Firstlightnetwork

Information Disclosure

Assessment Period

1 April 2024 - 31 March 2025

1. Introduction

Firstlight Network (Firstlight) is the electricity lines company for Tairāwhiti and Wairoa. We own and maintain the poles, wires, transformers and underground cabling used by electricity retailers to supply customers with electricity.

We also own the region's high-voltage electricity transmission network (the steel poles and towers that connect our region to the national grid).

We're a team of people who, with our contractors, are responsible for keeping the lights on for 26,000 customers across 12,000 square kilometers of Tairāwhiti and Wairoa.

On 1 April 2023, Firstgas Group (now Clarus) took over ownership of Eastland Network Limited from Eastland Group. Firstlight Network is part of Clarus and is owned by Igneo Infrastructure Partners.

Clarus is one of New Zealand's largest energy groups, with brands that touch many parts of the energy supply chain – from energy transmission and distribution to retail supply and storage.

2. Date prepared

The Information Disclosures were prepared on 13 August 2025.



EDB Information Disclosure Requirements Information Templates

31 August 2025

31 March 2025

Schedules 1–10 excluding 5f–5h

Company Name Firstlight Network Limited

Disclosure Date

Disclosure Year (year ended)

Templates for Schedules 1–10 excluding 5f–5h Prepared 27 November 2024

Firstlight Network Limited 31 March 2025

SCHEDULE 1: ANALYTICAL RATIOS

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

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

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1(i): Expenditure metrics

8		Expenditure per GWh energy delivered to ICPs (\$/GWh)	Expenditure per average no. of ICPs (\$/ICP)	Expenditure per MW maximum coincident system demand (\$/MW)	Expenditure per km circuit length (\$/km)	Expenditure per MVA of capacity from EDB-owned distribution transformers (\$/MVA)
9	Operational expenditure	52,946	583	231,262	3,820	64,349
10	Network	28,342	312	123,795	2,045	34,446
11	Non-network	24,604	271	107,467	1,775	29,903
12						
13	Expenditure on assets	69,561	766	303,835	5,019	84,543
14	Network	66,841	736	291,956	4,822	81,237
15	Non-network	2,720	30	11,879	196	3,305
16						
17	1(ii): Revenue metrics					

1(ii): Revenue metrics

Revenue per GWh energy delivered to ICPs (\$/GWh)	Revenue per average no. of ICPs (\$/ICP)
114,422	1,260
114,422	1,260
-	-

1(iii): Service intensity measures

Total consumer line charge revenue

Standard consumer line charge revenue

Non-standard consumer line charge revenue

Demand density	17	Maximum coincident system demand per km of circuit length (for supply) (kW/km)
Volume density	72	Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)
Connection point density	7	Average number of ICPs per km of circuit length (for supply) (ICPs/km)
Energy intensity	11,010	Total energy delivered to ICPs per average number of ICPs (kWh/ICP)

1(iv): Composition of regulatory income

	(\$000)	% of revenue
Operational expenditure	15,176	45.80%
Pass-through and recoverable costs excluding financial incentives and wash-ups	5,140	15.51%
Total depreciation	8,493	25.63%
Total revaluations	5,612	16.93%
Regulatory tax allowance	826	2.49%
Regulatory profit/(loss) including financial incentives and wash-ups	9,115	27.51%
Total regulatory income	33,137	

1(v): Reliability

Interruption rate Interruptions per 100 circuit km



Company Name Firstlight Network Limited
For Year Ended 31 March 2025

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii). EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

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sch ref				
7 8	2(i): Return on Investment	CY-2	CY-1	Current Year CY
9	ROI – comparable to a post tax WACC	%	%	%
10	Reflecting all revenue earned	7.97%	4.61%	3.62%
11	Excluding revenue earned from financial incentives	7.97%	4.78%	3.81%
12	Excluding revenue earned from financial incentives and wash-ups	8.01%	4.81%	3.35%
13 14	Mid naint actions of nort tou WACC	4.88%	6.05%	6.18%
15	Mid-point estimate of post tax WACC 25th percentile estimate	4.88%	5.37%	5.50%
16	75th percentile estimate	5.56%	6.73%	6.86%
17				
18				
19	ROI – comparable to a vanilla WACC			
20	Reflecting all revenue earned	8.27%	5.31%	4.34%
21	Excluding revenue earned from financial incentives	8.27%	5.48%	4.53%
22 23	Excluding revenue earned from financial incentives and wash-ups	8.31%	5.51%	4.07%
24	WACC rate used to set regulatory price path	4.57%	4.57%	4.57%
25				
26	Mid-point estimate of vanilla WACC	5.39%	6.75%	6.90%
27	25th percentile estimate	4.71%	6.07%	6.22%
28 29	75th percentile estimate	6.07%	7.43%	7.58%
30 31	2(ii): Information Supporting the ROI	222.507	(\$000)	
32 33	Total opening RAB value plus Opening deferred tax	222,587 (18,624)		
34	Opening RIV	(18,024)	203,963	
35		<u> </u>	200,000	
36 37	Line charge revenue		32,797	
38	Expenses cash outflow	20,316		
39	add Assets commissioned	19,047		
40 41	less Asset disposals add Tax payments	332		
42	less Other regulated income	341		
43	Mid-year net cash outflows		39,133	
44				
45	Term credit spread differential allowance		-	
46				
47 48	Total closing RAB value less Adjustment resulting from asset allocation	238,531		
49	less Adjustment resulting from asset allocation Less Lost and found assets adjustment			
50	plus Closing deferred tax	(19,117)		
51	Closing RIV		219,414	
52		_		
53	ROI – comparable to a vanilla WACC			4.34%
54 55	Leverage (%)			42%
56	Cost of debt assumption (%)			6.12%
57	Corporate tax rate (%)			28%
58			_	
59	ROI – comparable to a post tax WACC			3.62%
60				



Company Name	Firstlight Network Limited
For Year Ended	31 March 2025

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

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ch ref							
61	2(iii): Information Supporting th	e Monthly ROI					
62 63	Opening RIV						N/A
64	Opening mv						N/A
65							
66		Line charge	Expenses cash	Assets	Asset	Other regulated	Monthly net cash outflows
67	April	revenue	outflow	commissioned	disposals	income	_
68	May						-
69	June						-
70	July						-
71	August						-
72	September						-
73	October						-
74 75	November December						-
76	January						_
77	February						-
78	March						-
79	Total	-	-	-	-	-	-
80							
81	Tax payments						N/A
82							
83	Term credit spread differential allo	owance					N/A
84	Clasing RIV						NI/A
85 86	Closing RIV						N/A
87							
88	Monthly ROI – comparable to a vanill	la WACC					N/A
89							
90	Monthly ROI – comparable to a post t	tax WACC					N/A
91							
92	2(iv): Year-End ROI Rates for Co	mparison Purposes					
93	v 155. II II						2.040/
94 95	Year-end ROI – comparable to a vanil	ia WACC					3.91%
96	Year-end ROI – comparable to a post	tay WACC					3.19%
97	real end not comparable to a post	tux wacc					5.1370
98	* these year-end ROI values are compo	arable to the ROI reported in	pre 2012 disclosures by	EDBs and do not rep	present the Commiss	ion's current view on	ROI.
99		•		·			
100	2(v): Financial Incentives and W	ash-Ups					
101							_
102	IRIS incentive adjustment					(367)	
103	Purchased assets – avoided transm	-					
104	Innovation and non-traditional solu Quality incentive adjustment	itions recovered amount				(172)	
105 106	Other CPP financial incentives					(172)	
107	Financial incentives						(540)
108							(5.13)
109	Impact of financial incentives on ROI						-0.19%
110							
111	Input methodology claw-back					_	
112	CPP application recoverable costs					-	
113	CPP Urgent project allowance					-	Not Required before DY2026
114	Reopener event allowance Wash-up draw down amount					-	Not Required before DY2026 Not Required before DY2026
116	Catastrophic event allowance					1,381	Not Required after DY2025
117	Capex wash-up adjustment					(83)	
118	Transmission asset wash-up adjusti	ment				-	Not Required after DY2025
119	2013–15 NPV wash-up allowance					-	Not Required after DY2025
120	Reconsideration event allowance					-	Not Required after DY2025
121	Other CPP wash-ups					_	
122	Wash-up costs						1,298
123							



Company Name Firstlight Network Limited

For Year Ended 31 March 2025

tive to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii). EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

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sch ref 124

Impact of wash-up costs on ROI

0.45%



Company Name Firstlight Network Limited
For Year Ended 31 March 2025

SCHEDULE 3: REPORT ON REGULATORY PROFIT

This schedule requires information on the calculation of regulatory profit for the EDB for the disclosure year. All EDBs must complete all sections and provide explanatory comment on their regulatory profit in Schedule 14 (Mandatory Explanatory Notes).

This	informatio	n is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance	e report required by	section 2.8.
sch rej	:			
7	3(i): R	egulatory Profit		(\$000)
8	-(.,	Income		
9		Line charge revenue		32,797
10	plus	Gains / (losses) on asset disposals		(79)
11	plus	Other regulated income (other than gains / (losses) on asset disposals)		420
12				
13		Total regulatory income		33,137
14		Expenses		
15	less	Operational expenditure		15,176
16				
17	less	Pass-through and recoverable costs excluding financial incentives and wash-ups		5,140
18				
19		Operating surplus / (deficit)		12,821
20		Water de constitue		0.402
21	less	Total depreciation		8,493
22	plus	Total revaluations		E 612
24	plus	Total revaluations		5,612
25		Regulatory profit / (loss) before tax		9,940
26			·	- 77
27	less	Term credit spread differential allowance		_
28				
29	less	Regulatory tax allowance		826
30				
31		Regulatory profit/(loss) including financial incentives and wash-ups		9,115
32				_
33	3(ii): I	ass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups	(\$0	000)
34	- 、 ,	Pass through costs		
35		Electricity lines service charge payable to Transpower		Not Required before D
36		Transpower new investment contract charges		Not Required before D
37		System operator services		Not Required before D\
38		Rates	283	
39		Commerce Act levies	135	
40		Industry levies	106	
41		CPP or DPP specified pass-through costs		
42		Recoverable costs excluding financial incentives and wash-ups		
43		Independent engineer costs		Not Required before D
44		FENZ levies		Not Required before D\
45		Electricity lines service charge payable to Transpower		Not Required after DY2
46		Transpower new investment contract charges		Not Required after DY2
47		System operator services Distributed generation allowages	 	Not Required after DY2
48 49		Distributed generation allowance Extended reserves allowance	———	Not Required after DY2
50		Other CPP recoverable costs excluding financial incentives and wash-ups		
51		Pass-through and recoverable costs excluding financial incentives and wash-ups		5,140
52			'	
53	3(iv):	Merger and Acquisition Expenditure		
	,.			
54				(\$000)
55		Merger and acquisition expenditure		
56			nonvised divide	in annual and a south
57		Provide commentary on the benefits of merger and acquisition expenditure to the electricity distribution business, including section 2.7, in Schedule 14 (Mandatory Explanatory Notes)	requirea disclosures	in accordance with
J.		Section 2.7, in schedule 24 (mandatory Explanatory Notes)		
58	3(v): 0	Other Disclosures		
59				(\$000)
60		Self-insurance allowance		



SCHEDULE 3a: REPORT ON INCREMENTAL ROLLING INCENTIVE SCHEME

This schedule requires information on the calculation of IRIS incentive amounts. All non-exempt EDBs must complete this section.

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

Please note; only the white cells should be filled in (i.e. F7 - J7, F10 - J12, F15 - J17). Forecast values should be filled in for all years, actual values should be filled in for all years where known.

Section	Row Context	: Category1	Category2	RY1	RY2	RY3	RY4	RY5	Total over / (under) spend
3a: Incremental Rolling Incentive Scheme	7	Current Year	Current Year	CY-2	CY-1	CY	CY+1	CY+2	
Section	Row Context	: Category1	Category2	RY1 (\$000)	RY2 (\$000)	RY3 (\$000)	RY4 (\$000)	RY5 (\$000)	Total over / (under) spend
3a: Incremental Rolling Incentive Scheme	10	Opex incentive amounts	Forecast opex						
3a: Incremental Rolling Incentive Scheme	11	Opex incentive amounts	Actual opex						
3a: Incremental Rolling Incentive Scheme	12 +	Opex incentive amounts	Plus lease payments						
3a: Incremental Rolling Incentive Scheme	13	Opex incentive amounts	Actual opex for IRIS	-	-	-	-	-	
3a: Incremental Rolling Incentive Scheme	14	Opex incentive amounts	Expenditure variance to opex allowance	-	-	-	-	-	-
3a: Incremental Rolling Incentive Scheme	15	Capex incentive amounts	Forecast aggregate value of commissioned assets						
3a: Incremental Rolling Incentive Scheme	16	Capex incentive amounts	Actual commissioned assets						
3a: Incremental Rolling Incentive Scheme	17 -	Capex incentive amounts	Less right-of-use assets						
3a: Incremental Rolling Incentive Scheme	18	Capex incentive amounts	Actual commissioned assets for IRIS	-	-	-	-	-	
3a: Incremental Rolling Incentive Scheme	19	Capex incentive amounts	Expenditure variance to commissioned assets allowance	-	-	-	-	-	-

		c	ompany Name	Firstlig	ght Network Li	mited
		,	For Year Ended	3	31 March 2025	
:	SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)					
	This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in ScheDBB must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure inform required by section 2.8.		tion 1.4 of this ID det	ermination), and	so is subject to the	e assurance report
sch r						
SCIII						
7		RAB	RAB	RAB	RAB	RAB
9		CY-4	CY-3 (\$000)	CY-2	CY-1	CY (¢ooo)
10		(\$000) 166,070	172,870	(\$000) 188,035	(\$000) 209,446	(\$000) 222,587
11		200/010	2.2/2.0	200,000	20071.10	
12	less Total depreciation	6,483	6,504	7,106	7,840	8,493
13						
14	· ·	2,518	11,955	12,500	8,417	5,612
15 16		10,983	9,630	16,078	12,573	19,047
17		10,303	3,030	10,070	12,373	13,047
18	less Asset disposals	-	88	24	40	221
19						
20 21		-	(21)	(38)	-	-
22		(219)	193		30	0
23		(223)	133		50	
24		172,870	188,035	209,446	222,587	238,531
25						
26	4(ii): Unallocated Regulatory Asset Base					
27			Unallocated R		RAE	
27 28			Unallocated R (\$000)	(\$000)	(\$000)	(\$000)
27 28 29	7 3 7 Total opening RAB value					
27 28	7 Total opening RAB value less			(\$000) 222,688		(\$000) 222,587
27 28 29 30	Total opening RAB value less Total depreciation			(\$000)		(\$000)
27 28 29 30 31 32 33	Total opening RAB value less Total depreciation plus Total revaluations			(\$000) 222,688		(\$000) 222,587
27 28 29 30 31 32 33 34	Total opening RAB value less Total depreciation plus Total revaluations plus		(\$000)	(\$000) 222,688 8,506	(\$000) [[(\$000) 222,587 8,493
27 28 29 30 31 32 33 34 35	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Not Required after DY2025	F		(\$000) 222,688 8,506		(\$000) 222,587 8,493
27 28 29 30 31 32 33 34	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Not Required after DY2025 Assets commissioned out of WUC Not Required before DY2026		(\$000)	(\$000) 222,688 8,506	(\$000) [[(\$000) 222,587 8,493
27 28 29 30 31 32 33 34 35 36	Total opening RAB value less Total depreciation plus Total revaluations plus Substance of the commissioned (other than below) Assets commissioned out of WUC Not Required after DY2025 Assets acquired (other than below) Nor Required before DY2026 Assets acquired (other than below) Nor Required before DY2026		(\$000)	(\$000) 222,688 8,506	(\$000) [[(\$000) 222,587 8,493
27 28 29 30 31 32 33 34 35 36 37 38	Total opening RAB value Jess Total depreciation plus Total revaluations July Sassets commissioned (other than below) Assets acquired (other than below) Not Required after DY2025 Assets acquired (other than below) Not Required before DY2026 Assets acquired form a regulated supplier Assets acquired from a related parry		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
27 28 29 30 31 32 33 34 35 36 37 38 39	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Not Required after DY2025 Assets commissioned out of WUC Nor Required before DY2026 Assets acquired (other than below) Not Required before DY2026 Assets acquired (other than below) Not Required before DY2026 Assets acquired from a regulated supplier Asset sacquired from a regulated supplier Assets acquired from a regulated supplier	E	(\$000)	(\$000) 222,688 8,506	(\$000)	(\$000) 222,587 8,493
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411	Total opening RAB value Jess Total depreciation plus Total revaluations plus Assets commissioned (other than below) Not Required after DY2025 Assets acquired (other than below) Not Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a regulated party Assets acquired from a related party Assets acquired from a related party Assets commissioned		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411 422	Total opening RAB value less Total depreciation plus Total revaluations plus Total revaluations plus Assets commissioned (other than below) Not Required after DY2025 Assets acquired (other than below) Not Required before DY2026 Assets acquired (other than below) Not Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a related party Assets commissioned less Asset disposals (other than below)		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Not Required after DY2025 Assets commissioned out of WUC Not Required before DY2026 Assets acquired ofter than below) Not Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a related party Assets commissioned less Asset disposals (other than below) Asset disposals to a regulated supplier		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411 422 433 444 445	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Nor Required after DY2025 Assets acquired out of WUC Not Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a related party Asset scommissioned less Asset disposals (other than below) Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a related party		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411 422 433 444 455 466	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Assets acquired other than below) Not Required after DY2025 Assets commissioned out of WUC Assets acquired other than below) Not Required before DY2026 Assets acquired from a regulated supplier Asset acquired from a related party Assets commissioned less Asset disposals (other than below) Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a related party Asset disposals		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411 422 433 444 455 466 477	Total opening RAB value Jess Total depreciation plus Total revaluations plus Assets commissioned (other than below) Assets acquired (other than below) Not Required after DY2025 Assets acquired (other than below) Not Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a regulated supplier Assets commissioned Less Asset disposals (other than below) Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a related party Asset disposals		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411 422 433 444 455 466 477 488 499	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Assets acquired (other than below) Not Required after DY2025 Assets acquired (other than below) Not Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a related party Assets commissioned less Asset disposals (other than below) Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a related party Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a related party Asset disposals plus Lost and found assets adjustment plus Adjustment resulting from asset allocation		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612
277 288 299 300 311 322 333 344 355 366 377 388 399 400 411 422 433 444 455 466 477 488	Total opening RAB value less Total depreciation plus Total revaluations plus Assets commissioned (other than below) Assets acquired out of WUC Assets acquired (other than below) Nor Required before DY2026 Assets acquired from a regulated supplier Assets acquired from a related party Asset disposals (other than below) Asset disposals (other than below) Asset disposals to a regulated supplier Asset disposals to a regulated supplier Asset disposals to a related party A		(\$000)	(\$000) 222,688 8,506 5,614	(\$000)	(\$000) 222,587 8,493 5,612



Firstlight Network Limited Company Name 31 March 2025 For Year Ended SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD) This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. 4(iii): Calculation of Revaluation Rate and Revaluation of Assets 1,299 CPI₄⁻⁴ 1,267 58 Revaluation rate (%) 2.53% Unallocated RAB * (\$000) 62 Total opening RAB value 222,688 222,587 63 less Opening value of fully depreciated, disposed and lost assets Total opening RAB value subject to revaluation 222,188 66 Total revaluations 5,612 4(iv): Roll Forward of Works Under Construction Unallocated works under construction Works under construction—preceding disclosure year Not Required after DY2025 plus Capital expenditure Not Required after DY2025 19,780 Not Required after DY2025 less Assets commissioned 19,047 19.047 Not Required after DY2025 plus Adjustment resulting from asset allocation Not Required after DY2025 2,626 Works under construction - current disclosure year 2,626 Unallocated works under construction Allocated works under construction Works under construction—preceding disclosure year Not Required before DY2026 plus WUC capital expenditure Not Required before DY2026 WUC acquired from a regulated supplier Not Required before DY2026 WUC acquired from a related party Not Required before DY2026 WUC capital expenditure - other Not Required before DY2026 Total WUC capital expenditure Not Required before DY2026 less WUC capital contributions Not Required before DY2026 83 less WUC other revenue Not Required before DY2026 less Assets commissioned out of WUC Not Required before DY2026 plus Adjustment resulting from asset allocation Not Required before DY2026 86 Works under construction - current disclosure year Not Required before DY2026 Highest rate of capitalised finance applied 88



									Company Name	First	light Network I	.imited
									For Year Ended		31 March 202	5
S	CHEDULE	4: REPORT ON VALUE OF THE F	REGULATORY	ASSET BAS	E (ROLLED F	ORWARD)						
		quires information on the calculation of the Regulati			•	•	OI calculation in Sch	edule 2.				
E	OBs must provid	de explanatory comment on the value of their RAB i							section 1.4 of this ID	determination), a	nd so is subject to th	ne assurance report
re	quired by secti	on 2.8.										
sch re	f											
90	4(v): Re	gulatory Depreciation										
91									Unallocate		R/	
92 93		Depreciation - standard						1	(\$000) 6,898	(\$000)	(\$000) 6,898	(\$000)
94		Depreciation - standard life assets							1.607	1	1.594	
95		Depreciation - modified life assets								1	-,00	
96		Depreciation - alternative depreciation in accorda	nce with CPP							1		
97	1	Fotal depreciation								8,506		8,493
98												
99	4(vi)∙ Di	isclosure of Changes to Depreciation	Profiles							/¢nnn	unless otherwise s	nacified)
33	4(01). 01	isclosure of changes to Depreciation	Tromes							(5000		pecifical
										Depreciation	Closing RAB value under 'non-	Closing RAB value
										charge for the	standard'	under 'standard'
100		Asset or assets with changes to depreciation*				Rea	son for non-standar	d depreciation (text	entry)	period (RAB)	depreciation	depreciation
101												
102												
103 104												
105												
106												
107												
108												
109		* include additional rows if needed										
110	4(vii)∙ D	isclosure by Asset Category										
111	4(VII). D	isclosure by Asset Category					(\$000 unless other	erwise specified)				
							.,	Distribution				
				Subtransmission		Distribution and	Distribution and	substations and	Distribution	Other network	Non-network	
112			lines	cables	Zone substations	LV lines	LV cables	transformers	switchgear	assets	assets	Total
113 114	less	Total opening RAB value Total depreciation	23,595 845	1,619 43	32,189 1,270	84,515 2,608	31,620 981	21,265 850	10,748 516	6,900 672	10,137 709	222,587 8,493
114	plus	Total revaluations	596	43	813	2,608	798	536	271	174	249	5,612
116	plus	Assets commissioned	3,521	-	1.955	6.821	1.187	1.753	1,494	1.627	689	19.047
117	less	Asset disposals	-	-	-	-	-	-	-	-	221	221
118	plus	Lost and found assets adjustment										-
119	plus	Adjustment resulting from asset allocation										_
120	plus	Asset category transfers										-
121	1	Fotal closing RAB value	26,867	1,617	33,688	90,861	32,624	22,705	11,997	8,029	10,145	238,531
122 123		Asset Life										
123	,	Weighted average remaining asset life	39.1	35.4	31.2	39.2	37.5	28.9	24.0	12.3	12.4	(years)
125		Weighted average expected total asset life	55.1	52.7	43.5	53.7	56.8	42.9	36.6	19.9	19.0	(years)



Firstlight Network Limited 31 March 2025

SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).

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

sch ref	;		
7	5a(i): R	egulatory Tax Allowance	(\$000)
8		Regulatory profit / (loss) before tax	9,940
9			
10	plus	Income not included in regulatory profit / (loss) before tax but taxable	*
11		Expenditure or loss in regulatory profit / (loss) before tax but not deductible	10 *
12		Amortisation of initial differences in asset values	1,901
13		Amortisation of revaluations	1,798
14		otal	3,709
15		Tabel and backing	5.612
16 17	less	Total revaluations	5,612
18		Income included in regulatory profit / (loss) before tax but not taxable Discretionary discounts and customer rebates	
19		Expenditure or loss deductible but not in regulatory profit / (loss) before tax	*
20		Notional deductible interest	5,089
21		otal	10,701
22			
23	1	tegulatory taxable income	2,948
24			
25	less	Utilised tax losses	
26 27		Regulatory net taxable income	2,948
28		Corporate tax rate (%)	28%
29		Regulatory tax allowance	826
30			
31	* Work	ngs to be provided in Schedule 14	
32	5a(ii): D	isclosure of Permanent Differences	
33		In Schedule 14, Box 5, provide descriptions and workings of items recorded in the asterisked categories in Sched	lule 5a(i).
34	5a(iii): /	Amortisation of Initial Difference in Asset Values	(\$000)
35			
36		Opening unamortised initial differences in asset values	34,172
37	less	Amortisation of initial differences in asset values	1,901
38	plus	Adjustment for unamortised initial differences in assets acquired	
39	less	Adjustment for unamortised initial differences in assets disposed	20.0
40 41		Closing unamortised initial differences in asset values	32,272
42		Opening weighted average remaining useful life of relevant assets (years)	18
43			



		Company Name	Firstlight Network Limited
		For Year Ended	31 March 2025
SC	HEDULE	5a: REPORT ON REGULATORY TAX ALLOWANCE	
prof	fit). EDBs mus	uires information on the calculation of the regulatory tax allowance. This information is used to calculate reg it provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory s part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject	Explanatory Notes).
ch rej			
44	5a(iv):	Amortisation of Revaluations	(\$000)
45 46 47		Opening sum of RAB values without revaluations	177,839
48		Adjusted depreciation	6,695
49		Total depreciation	8,493
50 51		Amortisation of revaluations	1,798
52	5a(v): R	Reconciliation of Tax Losses	(\$000)
53 54		Opening tax losses	
55	plus	Current period tax losses	
56	less	Utilised tax losses	
57		Closing tax losses	_
58	5a(vi):	Calculation of Deferred Tax Balance	(\$000)
59 60		Opening deferred tax	(18,624)
60 61		Opening deferred tax	(10,024)
62	plus	Tax effect of adjusted depreciation	1,874
63	pius	Tak Crick of adjusted depreciation	2,07.
64	less	Tax effect of tax depreciation	1,849
65			<u> </u>
66	plus	Tax effect of other temporary differences*	4
67			
68	less	Tax effect of amortisation of initial differences in asset values	532
69			
70	plus	Deferred tax balance relating to assets acquired in the disclosure year	
71			
72	less	Deferred tax balance relating to assets disposed in the disclosure year	(10)
73	,	Defendance to the United States of the Control of t	(0)
74	plus	Deferred tax cost allocation adjustment	(0)
75 76		Closing deferred tax	(19,117
. •			(15,117
77			
78	5a(vii):	Disclosure of Temporary Differences	
		In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Sc	chedule 5a(vi) (Tax effect of other temporary
79		differences).	
80	= /		
81	5a(viii):	: Regulatory Tax Asset Base Roll-Forward	

82

83

84

85

86

87

88

89

Opening sum of regulatory tax asset values

Lost and found assets adjustment

plus Other adjustments to the RAB tax value

Closing sum of regulatory tax asset values

Regulatory tax asset value of assets commissioned

Regulatory tax asset value of asset disposals

Adjustment resulting from asset allocation

less Tax depreciation

plus

less

plus



(\$000)

81,381

69,123

6,603

19,047

			_		
This schedule provides information on the valuation of related party transactions, in accordance with clause 2.3.6 of this ID determination. This information is part of audited disclosure information (as defined in clause 1.4 of this ID determination), and so is subject to the assurance report required by clause 2.8. Total regulatory income 5,665 55(1): Summary—Related Party Transactions Total regulatory income 5,665 Market value of asset disposals 12. 4,666 13. 5,665 Market value of asset disposals 13. 14. 5,665 Market value of asset disposals 13. 14. 6,667 Market value of particular disposals 13. 14. 6,667 Market value of capital contributions 13. 14. 6,667 Market value of capital contributi			Company Name	-	ed
			For Year Ended	31 March 2025	
Specimen					
	I his information	is part of audited disclosure information (as o	letined in clause 1.4 of this ID determination	on), and so is subject to the assurance report req	uired by clause 2.8.
Total regulatory income	sch ref				
Total regulatory income					
			tions	(\$000)	
Market value of asset disposals		Total regulatory income			5,464
		Market value of accet disposals			
		iviarket value of asset disposals			
		Service interruptions and emergencies		2.846	1
	13				1
Network opex	14		Inspection		
Business support 2,493	15	Asset replacement and renewal (opex)		55	
System operations and network support	16				8,124
Non-network solutions provided by a related party or third party	17	The state of the s			
	18				-
21 Consumer connection 125 22 System growth 278 23 Asset replacement and renewal (capex) 17,582 24 Asset relocations			ated party or third party		42.000
System growth 278 Asset replacement and renewal (capex) 17,582 Asset replacement and renewal (capex) 17,582 Asset replacement and renewal (capex) 17,582 Asset replacement and renewal (capex) 279 Cululity of supply 884 Cululity of supply 884 Espenditure on non-network assets 770 Espenditure on non-network assets 770 Cost of financing 19,489 Cost of financing 19,489 Cost of financing 19,489 Cost of financing 19,489 Copical Expenditure on september 19,489 Copical Expenditure 19,				105	13,088
Asset replacement and renewal (capex) Asset replacement and renewal (capex) Asset relocations Cuality of supply Baset Coulary of supply Expenditure on non-network assets Expenditure on non-network assets Cost of financing Value of capital contributions Value of capital contributions Value of capital expenditure Cost of financing Cost of financing Value of vested assets Cotal Expenditure Cost of provided Other related party transactions Sb(iiii): Total Opex and Capex Related Party Transactions Sb(iiii): Total Opex and Capex Related Party Transactions First Gas Limited Business support Caps Services NZ Midco Limited Gas Services NZ Midco Limited Vegetation management Gas Services NZ Midco Limited Routine and corrective maintenance and inspection Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited System operations and nemergencies Gas Services NZ Midco Limited System operations and nemergencies Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Service					1
Asset relocations					1
Quality of supply B44				17,302	†
Legislative and regulatory 253 77	25			844	†
Expenditure on non-network assets Expenditure on assets Cost of financing Value of capital contributions Value of vested assets Capital Expenditure Total expenditure Other related party transactions Sb(iii): Total Opex and Capex Related Party Transactions Total value of related party transactions Sb(iii): Total Opex and Capex Related Party Transactions Total value of transactions Name of related party provided Eirst Gas Limited Directors Business support Directors Business support Gas Services NZ Midco Limited Vegetation management Gas Services NZ Midco Limited Vegetation management Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Consumer connection 175 Gas Services NZ Midco Limited System growth Gas Services NZ Midco Limited System growth Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other relabellity, safety and environment Total value of related party transactions 32,578	26				1
Expenditure on assets Cost of financing Value of capital contributions Value of vested assets Capital Expenditure Total expenditure Other related party transactions Total Opex and Capex Related Party Transactions Total Opex and Capex Related Party Transactions Nature of opex or capex service Total Opex and Capex Related Party Transactions Nature of opex or capex service Signature Nature of opex or capex service Total value of transactions Name of related party provided Directors Business support Directors Business support Officer of Gas Services NZ Midco Limited Vegetation management Capex C	27	Other reliability, safety and environment		77	
Cost of financing Value of capital contributions Value of vested assets Capital Expenditure 19,489 Total expenditure 10,489 Total value of transactions 10,500 Total value of transactions (5000) First Gas Limited Business support Pirst Gas Limited Business support Pirst Gas Limited Services NZ Midco Limited Service interruptions and emergencies Pirst Gas Services NZ Midco Limited Postice interruptions and emergencies Pirst Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System gorerations and network support Pirst Gas Services NZ Midco Limited Post Expenditure experience and renewal (capex) Pirst Gas Services NZ Midco Limited Post Expenditure explacement and renewal (capex) Pirst Gas Services NZ Midco Limited Post Expenditure explacement and renewal (capex) Pirst Gas Services NZ Midco Limited Post Gas Services NZ Midco Limited Post Expenditure explacement and renewal (capex) Pirst Gas Services NZ Midco Limited Post Expenditure explacement and renewal (capex) Pirst Gas Services NZ Midco Limited Post Expenditure explacement and renewal (capex) Pirst Gas Services NZ Midco Limited Post Pirst Gas Services NZ Midco	28	Expenditure on non-network assets			331
Value of capital contributions Value of vested assets Capital Expenditure Total expenditure 32,578 Total expenditure Other related party transactions Sb(iii): Total Opex and Capex Related Party Transactions Total value of transactions Name of related party provided Name of related party provided Signature of opex or capex service provided (5000) First Gas Limited Business support Directors Business support Gas Services NZ Midco Limited Vegetation management Gas Services NZ Midco Limited Routine and corrective maintenance and inspection Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System gorwth Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited Consumer connection 126 Gas Services NZ Midco Limited Consumer connection 127 Gas Services NZ Midco Limited Consumer connection 128 Gas Services NZ Midco Limited Consumer connection 129 Gas Services NZ Midco Limited Consumer connection 120 Consumer connection 121 Consumer connection 125 Gas Services NZ Midco Limited Consumer connection 126 Gas Services NZ Midco Limited Consumer connection 1	29	Expenditure on assets			19,489
Total expenditure 19,489 10 10 19,489 10 10 19,489 10 10 19,489 10 10 10	30				
Total expenditure Total expenditure Other related party transactions Sb(iii): Total Opex and Capex Related Party Transactions Nature of opex or capex service Nature of opex or capex service First Gas Limited Directors Business support Directors Business support Gas Services NZ Midco Limited Service interruptions and emergencies Gas Services NZ Midco Limited Vegetation management Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Quality of supply Bata Gas Services NZ Midco Limited Quality of supply Gas Services NZ Midco Limited Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	31				
Total value of transactions Sb(iii): Total Opex and Capex Related Party Transactions Name of related party provided First Gas Limited Business support Directors Business support Gas Services NZ Midco Limited Gas Services NZ Midco Limited Routine and corrective maintenance and inspection Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited Asset replacement and renewal (opex) Gas Services NZ Midco Limited System operations and network support Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Asset replacement and renewal (capex) Gas Services NZ Midco Limited Gas Services NZ Midco Limited Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply B44 Gas Services NZ Midco Limited Quality of supply Gas Services NZ Midco Limited Gas Services NZ Midco Limited Quality of supply Gas Services NZ Midco Limited Gas Services NZ Midco Limited Egislative and regulatory Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions					
5b(iii): Total Opex and Capex Related Party Transactions Name of related party provided (5000) First Gas Limited Business support 2,454 Directors Business support 339 Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Noster and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578					
5b(iii): Total Opex and Capex Related Party Transactions Nature of opex or capex service transactions Name of related party provided (5000) First Gas Limited Business support 2,454 Directors Business support 39 Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Departs and proper support 177 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578		i otal expenditure			32,578
Sb(iii): Total Opex and Capex Related Party Transactions Nature of opex or capex service transactions Name of related party provided (5000) First Gas Limited Business support 2,454 Directors Business support 39 Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 2,2472 Gas Services NZ Midco Limited System growth 22,888 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ Midco Limited Quality of supply 925 Gas Services NZ M		Other related party transactions			
Nature of opex or capex service transactions Name of related party provided (\$500) First Gas Limited Business support 2,454 Directors Business support 39 Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 278 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	30	Other related party transactions			
Nature of opex or capex service transactions (5000) First Gas Limited Business support 2,454 Directors Business support 3 Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 27,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	37 5b(iii): T	otal Opex and Capex Related Pa	arty Transactions		
Nature of opex or capex service transactions (5000) First Gas Limited Business support 2,454 Directors Business support 3 Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 27,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578					
Name of related party provided (\$000)					Total value of
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Directors Business support Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 3,106 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Gas Services NZ Midco Limited Cuality of supply Gas Services NZ Midco Limited Gas Services NZ Midco Limited Cuality of supply Gas Services NZ Midco Limited Cuality of supply System growth Cas Services NZ Midco Limited Cuality of supply System growth Cas Services NZ Midco Limited Cuality of supply System growth Cas Services NZ Midco Limited Cuality of supply System growth Cas Services NZ Midco Limited Cas Ser	38				
Gas Services NZ Midco Limited Service interruptions and emergencies 2,846 Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 278 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 777 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578					
Gas Services NZ Midco Limited Vegetation management 2,117 Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 278 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 777 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578				nios.	
Gas Services NZ Midco Limited Routine and corrective maintenance and inspection 3,106 Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Consumer				cies	
Gas Services NZ Midco Limited Asset replacement and renewal (opex) 55 Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Cother reliability, safety and environment 77 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578				e and inspection	
Gas Services NZ Midco Limited System operations and network support 2,472 Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 777 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	44				
Gas Services NZ Midco Limited Consumer connection 125 Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 777 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	45			-	
Gas Services NZ Midco Limited System growth 278 Gas Services NZ Midco Limited Asset replacement and renewal (capex) 17,582 Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 777 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	46				
Gas Services NZ Midco Limited Quality of supply 844 Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 77 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	47				
Gas Services NZ Midco Limited Legislative and regulatory 253 Gas Services NZ Midco Limited Other reliability, safety and environment 77 Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	48	Gas Services NZ Midco Limited	Asset replacement and renewal (ca	pex)	17,582
52 Gas Services NZ Midco Limited Other reliability, safety and environment 77 53 Gas Services NZ Midco Limited Expenditure on non-network assets 331 54 Total value of related party transactions 32,578	50				
Gas Services NZ Midco Limited Expenditure on non-network assets 331 Total value of related party transactions 32,578	51				
Total value of related party transactions 32,578	52				
	54	* include additional rows if needed	3		32,578



Thi:	s schedule is s information	E 5c: REPORT ON TERM CREDIT SPREAD DIFFERE only to be completed if, as at the date of the most recently published financial sets part of audited disclosure information (as defined in section 1.4 of this ID de	statements, the wei	ighted average origin				Company Name For Year Ended alifying debt) is grea	31 Marc	
sch re 7 8 9		Qualifying Debt (may be Commission only)								
10		Issuing party	Issue date	Pricing date	Original tenor (in years)	Coupon rate (%)	Book value at issue date (NZD)	Book value at date of financial statements (NZD)	Term Credit Spread Difference	Debt issue cost readjustment
11		J								
12										
13										
14										
15										
16		* include additional rows if needed						-	-	-
17 18 19	5c(ii): /	Attribution of Term Credit Spread Differential								
20	G	ross term credit spread differential			_					
21										
22		Total book value of interest bearing debt								
23		Leverage		42%						
24		Average opening and closing RAB values								
25	A	ttribution Rate (%)			-					
26										
27	Te	erm credit spread differential allowance			-					



Company Name Firstlight Network Limited
For Year Ended 31 March 2025

SCHEDULE 5d: REPORT ON COST ALLOCATIONS

This schedule provides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassifications. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

Ini	information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assu	irance report required by	section 2.8.			
sch rej						
7	5d(i): Operating Cost Allocations					
8			Value allocat Electricity	ed (\$000s) Non-electricity		
		Arm's length	distribution	distribution		OVABAA allocation
9		deduction	services	services	Total	increase (\$000s)
10	Service interruptions and emergencies					
11	Directly attributable		2,846			
12	Not directly attributable				_	
13	Total attributable to regulated service		2,846			
14	Vegetation management					
15	Directly attributable		2,117			
16	Not directly attributable				_	
17	Total attributable to regulated service		2,117			
18	Routine and corrective maintenance and inspection					
19	Directly attributable		3,106			
20	Not directly attributable				-	
21	Total attributable to regulated service		3,106			
22	Asset replacement and renewal					
23	Directly attributable		55			
24	Not directly attributable				-	
25	Total attributable to regulated service		55			
26	Non-network solutions provided by a related party or third party					
27	Directly attributable		388			
28	Not directly attributable				-	
29	Total attributable to regulated service		388			
30	System operations and network support					
31	Directly attributable		1,975			
32	Not directly attributable				-	
33	Total attributable to regulated service		1,975			
34	Business support					
35	Directly attributable		4,689			
36	Not directly attributable				-	
37	Total attributable to regulated service		4,689			
38	Outputing and discally attails about		45			
39	Operating costs directly attributable		15,176			
40	Operating costs not directly attributable Operational expenditure	_	- 15 176	-	-	_
41	Operational expenditure		15,176			
42						



Company Name Firstlight Network Limits For Year Ended 31 March 2025 E 5d: REPORT ON COST ALLOCATIONS ovides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassification in a spart of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. Other Cost Allocations ass through and recoverable costs Directly attributable Not directly attributable Total attributable to regulated service ecoverable costs Directly attributable Total attributable to regulated service princetly attributable Total attributable (A,615)
E 5d: REPORT ON COST ALLOCATIONS ovides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassification in part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. Other Cost Allocations ass through and recoverable costs Directly attributable Not directly attributable Total attributable to regulated service ecoverable costs Directly attributable Directly attributable Total attributable to regulated service accoverable costs Directly attributable Total attributable 4,615
ovides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassification and included disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. Other Cost Allocations ass through and recoverable costs Directly attributable Not directly attributable Total attributable to regulated service Ecoverable costs Directly attributable Total attributable T
ovides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassification and included disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. Other Cost Allocations ass through and recoverable costs Directly attributable Not directly attributable Total attributable to regulated service Ecoverable costs Directly attributable Total attributable T
Other Cost Allocations as through and recoverable costs Directly attributable Total attributable Total attributable Total attributable Directly attributable Directly attributable Total attributable Directly attributable Total attributable Directly attributable Total attributable Directly attributable Total attributable Total attributable Directly attributable Total attributable Total attributable Directly attributable Total attributable
ass through and recoverable costs ass through costs Directly attributable 525 Not directly attributable 525 Total attributable to regulated service 525 Directly attributable 54,615
ass through and recoverable costs ass through costs Directly attributable 525 Not directly attributable 525 Total attributable to regulated service 525 Directly attributable 54,615
ass through and recoverable costs ass through costs Directly attributable 525 Not directly attributable 525 Total attributable to regulated service 525 Directly attributable 54,615
ass through and recoverable costs ass through costs Directly attributable 525 Not directly attributable 525 Total attributable to regulated service 525 Directly attributable 54,615
ass through costs Directly attributable Not directly attributable Total attributable to regulated service Ecoverable costs Directly attributable 1
Directly attributable 525 Not directly attributable 525 Total attributable to regulated service 525 ecoverable costs Directly attributable 525
Not directly attributable Total attributable to regulated service ecoverable costs Directly attributable 4,615
Total attributable to regulated service
Directly attributable 4,615
Directly attributable 4,615
Not directly attributable
Total attributable to regulated service 4,615
Changes in Cost Allocations* †
(5000)
Change in cost allocation 1 CY-1 Current Year (CY)
Cost category Original allocation
Original allocator or line items New allocation
New allocator or line items Difference
Rationale for change
(fore)
(\$000) Change in cost allocation 2 CY-1 Current Year (CY)
Cost category Original allocation
Original allocator or line items New allocation
New allocator or line items Difference
Rationale for change
(\$000)
Change in cost allocation 3 CY-1 Current Year (CY)
Cost category Original allocation New algorithm
Original allocator or line items New allocation
Original allocator or line items New allocation
Original allocator or line items New allocation Difference Difference Difference
Original allocator or line items New allocation
Original allocator or line items New allocation Difference Difference Difference
Original allocator or line items New allocation Difference Difference Difference



		Company Name For Year Ended		ht Network Lim 1 March 2025	ited
S	CHEDULE 5e: REPORT ON ASSET ALLOC				
Th EI	is schedule requires information on the allocation of asset val DBs must provide explanatory comment on their cost allocation	ues. This information supports the calculation of the RAB value in Schedule in Schedule 14 (Mandatory Explanatory Notes), including on the impact of D determination), and so is subject to the assurance report required by sec	any changes in asset allo	ocations. This inform	nation is part of
sch re	f				
7	5e(i): Regulated Service Asset Values				
8			Value allocated (\$000s)		
			Electricity distribution		
9			services		
10 11	Subtransmission lines Directly attributable		26,867	1	
12	Not directly attributable		20,007		
13	Total attributable to regulated service		26,867		
14	Subtransmission cables		4.047		
15 16	Directly attributable Not directly attributable		1,617		
17	Total attributable to regulated service		1,617		
18	Zone substations				
19	Directly attributable		33,688		
20 21	Not directly attributable Total attributable to regulated service		33,688		
22	Distribution and LV lines			·	
23	Directly attributable		90,861		
24 25	Not directly attributable Total attributable to regulated service		90,861		
26	Distribution and LV cables		50,001	,	
27	Directly attributable		32,624		
28	Not directly attributable				
29	Total attributable to regulated service		32,624		
30 31	Distribution substations and transformers Directly attributable		22,705	İ	
32	Not directly attributable		,		
33	Total attributable to regulated service		22,705	ı	
34	Distribution switchgear		44.007		
35 36	Directly attributable Not directly attributable		11,997		
37	Total attributable to regulated service		11,997		
38	Other network assets				
39 40	Directly attributable Not directly attributable		8,029		
41	Total attributable to regulated service		8,029		
42	Non-network assets				
43	Directly attributable		10,145		
44 45	Not directly attributable Total attributable to regulated service		10,145		
46					
47 48	Regulated service asset value directly attributable	hio.	238,531		
49	Regulated service asset value not directly attributa Total closing RAB value	DIE .	238,531		
50					
51	5e(ii): Changes in Asset Allocations* †				
52	Je(ii). Changes in Asset Anocations			(\$C	100)
53	Change in asset value allocation 1			CY-1	Current Year (CY)
54	Asset category		Original allocation		
55 56	Original allocator or line items New allocator or line items		New allocation Difference	-	-
57					
58	Rationale for change				
59 60					
61				(\$0	00)
62	Change in asset value allocation 2		Onininal allegation	CY-1	Current Year (CY)
63 64	Asset category Original allocator or line items		Original allocation New allocation		
65	New allocator or line items		Difference	-	-
66					
67 68	Rationale for change				
69					
70	Change in accept value allowables 2			(\$0 CV-1	
71 72	Change in asset value allocation 3 Asset category		Original allocation	CY-1	Current Year (CY)
73	Original allocator or line items		New allocation		
74	New allocator or line items		Difference	_	-
75 76	Rationale for change				
77					
78	# a change in asset allocation and he are let 15	allocator or component change that k	mayamant i=!!	or motric is a star	anao in allt
79 80	 a change in asset allocation must be completed for each include additional rows if needed 	allocator or component change that has occurred in the disclosure year. A	movement in an allocati	or metric is not a ch	unge in allocator o
00	, needed				



Firstlight Network Limited 31 March 2025

SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting acruals basis and must exclude finance costs.

EDBs must provide explanatory comment on their expenditure on assets must be provided on an accounting acruals basis and must exclude finance costs.

EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates).

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

f 			
6a(i):	Expenditure on Assets	(\$000)	(\$000)
	Consumer connection System growth		12 27
	Asset replacement and renewal		17,58
	Asset relocations		-
	Reliability, safety and environment:		
	Quality of supply	844	
	Legislative and regulatory	253	-
	Other reliability, safety and environment Total reliability, safety and environment	77	1,17
	Expenditure on network assets		19,15
	Expenditure on non-network assets		77
	·		
	Expenditure on assets		19,93
plus	Cost of financing		
less	Value of capital contributions		15
plus	Value of vested assets		
	Capital expenditure		19,78
6a(ii)	: Subcomponents of Expenditure on Assets (where known)		(\$000)
,	Energy efficiency and demand side management, reduction of energy losses		
	Overhead to underground conversion		
	Research and development		
6a(iii): Consumer Connection		
	Consumer types defined by EDB*	(\$000)	(\$000)
	Residential	37	-
	Commercial Industrial	88	-
	industrial		
	* include additional rows if needed		
	Consumer connection expenditure		12
less	Capital contributions funding consumer connection expenditure		1
	Consumer connection less capital contributions		12
6a(iv	: System Growth and Asset Replacement and Renewal		Asset Replacement ar
,	, i	System Growth	Renewal
		(\$000)	(\$000)
	Subtransmission	154	3,37
	Zone substations	23	1,48
	Distribution and LV lines Distribution and LV cables		6,84
	Distribution substations and transformers	74	1,73
	Distribution switchgear	_	2,06
	Other network assets	28	1,69
	System growth and asset replacement and renewal expenditure	278	17,58
less	Capital contributions funding system growth and asset replacement and renewal	158	
	System growth and asset replacement and renewal less capital contributions	120	17,58
	Accet Palacations		
Eal.	: Asset Relocations	(4000)	(\$000)
6a(v)	Project or programme*		
6a(v)	Project or programme*	(\$000)	(3000)
6a(v)	Project or programme*	(\$000)	(3000)
6a(v)	Project or programme*	(\$000)	(3000)
6a(v)	Project or programme*	(\$000)	(5000)
6a(v)		(\$000)	(3000)
6a(v)	* include additional rows if needed	(5000)	(3000)
6a(v)	* include additional rows if needed All other projects or programmes - asset relocations	(5000)	(3000)
	* include additional rows if needed All other projects or programmes - asset relocations Asset relocations expenditure	(5000)	(3000)
6a(v)	* include additional rows if needed All other projects or programmes - asset relocations	(5000)	(5000)



Firstlight Network Limited 31 March 2025

SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but

		hat are vested assets. Information on expenditure on assets must be provided or e explanatory comment on their expenditure on assets in Schedule 14 (Explanato		
This	information is	s part of audited disclosure information (as defined in section 1.4 of this ID deter	mination), and so is subject to the assurance report required by	y section 2.8.
sch ref 69				
	C=(::).	Overlites of Committee		
70	6a(VI): (Quality of Supply	44	(4)
71 72		Project or programme* Project -11kV Field Recloser Automation Additions	(\$000) 409	(\$000)
73		New Generators	278	
74		Fault Indicators	156	
75				
76				
77		* include additional rows if needed		ı
78 79		All other projects programmes - quality of supply Quality of supply expenditure		844
80	less	Capital contributions funding quality of supply		044
81		Quality of supply less capital contributions		844
			•	
82	6a(vii):	Legislative and Regulatory	(6000)	(\$000)
83 84		Project or programme* Replace Vehicle RTs	(\$000)	(\$000)
85		Project - SCADA Switching & Outage Management System	64	
86		Project - AUFLS/ Protection Relay install	175	
87		A Park Flood Prevention/Resilience	3	
88				
89		* include additional rows if needed All other projects or programmes - legislative and regulatory		1
90 91		Legislative and regulatory expenditure		253
92	less	Capital contributions funding legislative and regulatory		
93	1	Legislative and regulatory less capital contributions		253
	- / ····			
94	6a(viii):	Other Reliability, Safety and Environment	(******	(¢000)
95 96		Project or programme* Zone Substation Tolaga Bay, Puha Install Sepa Units	(\$000)	(\$000)
97		Replace Galv Meter Box (Asbestos)	3	
98		Tilt Sensors	45	
99				
100				
101		* include additional rows if needed		ı
102 103		All other projects or programmes - other reliability, safety and environment Other reliability, safety and environment expenditure		77
104	less	Capital contributions funding other reliability, safety and environment		
105		Other reliability, safety and environment less capital contributions		77
106				
107	Galiy): I	Non-Network Assets		
107 108		outine expenditure		
109		Project or programme*	(\$000)	(\$000)
110		General building Capex	32	
111		Vehicle Replacement	181	
112		Test Instrument & Safety Equipment	28	
113		General asset replacement	23	
114 115		IT Capex Projects IS Hardware	195	
116		Bridge Installation	301	
117		* include additional rows if needed		
118		All other projects or programmes - routine expenditure		
119		Routine expenditure		779
120	At	typical expenditure		
121		Project or programme*	(\$000)	(\$000)
122		[Description of material project or programme]		
123		[Description of material project or programme]		
124		[Description of material project or programme]		
125		[Description of material project or programme] [Description of material project or programme]		
126 127		* include additional rows if needed		
128		All other projects or programmes - atypical expenditure		
129		Atypical expenditure		-
130				
131	ı	Expenditure on non-network assets		779



Firstlight Network Limited
31 March 2025

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

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

sch ref

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

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

6b(i): Operational Expenditure Required for DY2025 only (\$000) (\$000) 8 2,846 Service interruptions and emergencies 9 2,117 Vegetation management 10 Routine and corrective maintenance and inspection 3,106 55 11 Asset replacement and renewal 12 8,124 Network opex 13 388 Non-network solutions provided by a related party or third party Required for DY2025 only 14 System operations and network support 1,975 15 4,689 **Business support** 16 7,052 Non-network opex 17 18 **Operational expenditure** 15,176 (\$000) 6b(i): Operational Expenditure Not Required before DY2026 (\$000) 19 20 Service interruptions and emergencies: 21 Vegetation-related 22 Other 23 Total service interruptions and emergencies 24 Vegetation management: 25 Assessment and notification costs 26 Felling or trimming vegetation - in-zone 27 Felling or trimming vegetation - out-of-zone 28 Other 29 **Total vegetation management** 30 31 Routine and corrective maintenance and inspection: 32 Asset replacement and renewal 33 **Network opex** 34 Non-network solutions provided by a related party or third party 35 System operations and network support 36 **Business support** 37 Non-network opex



	Company Name Firstlight Network Limited
	For Year Ended 31 March 2025
S	CHEDULE 6b: REPORT ON OPERATIONAL EXPENDITURE FOR THE DISCLOSURE YEAR
Th	is schedule requires a breakdown of operational expenditure incurred in the disclosure year.
EC	Bs must provide explanatory comment on their operational expenditure in Schedule 14 (Explanatory notes to templates). This includes explanatory comment on any atypical
	erational expenditure and assets replaced or renewed as part of asset replacement and renewal operational expenditure, and additional information on insurance.
Th	is information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.
sch r	of
38	<i>J</i>
39	Operational expenditure –
40	6b(ii): Subcomponents of Operational Expenditure (where known)
41	Energy efficiency and demand side management, reduction of energy losses
42	Direct billing*
43	Research and development
44	Insurance 414
45	* Direct billing expenditure by suppliers that directly bill the majority of their consumers



Firstlight Network Limited
31 March 2025

SCHEDULE 7: COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE

This schedule compares actual revenue and expenditure to the previous forecasts that were made for the disclosure year. Accordingly, this schedule requires the forecast revenue and expenditure information from previous disclosures to be inserted.

EDBs must provide explanatory comment on the variance between actual and target revenue and forecast expenditure in Schedule 14 (Mandatory Explanatory Notes). This information is part of the audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. For the purpose of this audit, target revenue and forecast expenditures only need to be verified back to previous disclosures.

sch ref

7	7(i): Revenue	Target (\$000) 1	Actual (\$000)	% variance
8	Line charge revenue	32,784	32,797	0%
9	7(ii): Expenditure on Assets	Forecast (\$000) ²	Actual (\$000)	% variance
10	Consumer connection	1,830	125	(93%)
11	System growth	2,466	278	(89%)
12	Asset replacement and renewal	15,426	17,582	14%
13	Asset relocations	75	-	(100%)
14	Reliability, safety and environment:		·	
15	Quality of supply	1,203	844	(30%)
16	Legislative and regulatory	97	253	161%
17	Other reliability, safety and environment	102	77	(24%)
18	Total reliability, safety and environment	1,402	1,174	(16%)
19	Expenditure on network assets	21,199	19,159	(10%)
20	Expenditure on non-network assets	660	779	18%
21	Expenditure on assets	21,859	19,938	(9%)
22	7(iii): Operational Expenditure			
23	Service interruptions and emergencies	3,338	2,846	(15%)
24	Vegetation management	1,812	2,117	17%
25	Routine and corrective maintenance and inspection	3,474	3,106	(11%)
26	Asset replacement and renewal	674	55	(92%)
27	Network opex	9,298	8,124	(13%)
28	Non-network solutions provided by a related party or third party		388	-
29	System operations and network support	3,293	1,975	(40%)
30	Business support	5,246	4,689	(11%)
31	Non-network opex	8,539	7,052	(17%)
32	Operational expenditure	17,837	15,176	(15%)
33	7(iv): Subcomponents of Expenditure on Assets (where know	n)		
34	Energy efficiency and demand side management, reduction of energy losses		-	_
35	Overhead to underground conversion		4	_
36	Research and development		-	-
37				
38	7(v): Subcomponents of Operational Expenditure (where kno	own)		
39	Energy efficiency and demand side management, reduction of energy losses		-	_
40	Direct billing		_	_
41	Research and development		-	_
42	Insurance		414	_
12				

1 From the nominal dollar target revenue for the disclosure year disclosed under clause 2.4.3(3) of this determination



Firstlight Network Limited
31 March 2025

SCHEDULE 7: COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE

This schedule compares actual revenue and expenditure to the previous forecasts that were made for the disclosure year. Accordingly, this schedule requires the forecast revenue and expenditure information from previous disclosures to be inserted.

EDBs must provide explanatory comment on the variance between actual and target revenue and forecast expenditure in Schedule 14 (Mandatory Explanatory Notes). This information is part of the audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. For the purpose of this audit, target revenue and forecast expenditures only need to be verified back to previous disclosures.

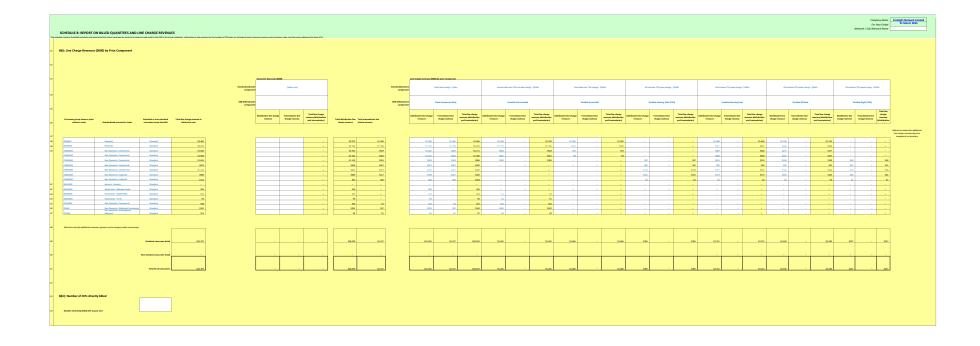
sch ref

45

2 From the CY+1 nominal dollar expenditure forecasts disclosed in accordance with clause 2.6.6 for the forecast period starting at the beginning of the disclosure year (the second to last disclosure of Schedules 11a and 11b)







Company Name For Year Ended ALL Network / Sub-network Name

Firstlight Network Limited 31 March 2025

SCHEDULE 9a: ASSET REGISTER

This schedule requires a summary of the quantity of assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

	9a: Ass	et Register						5.1
8	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
9	All	Overhead Line	Concrete poles / steel structure	No.	18,530	18,843	313	2
10	All	Overhead Line	Wood poles	No.	16,542	16,246	(296)	2
11	All	Overhead Line	Other pole types	No.	_	_	-	N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	336	336	-	2
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	302	302	-	2
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	2	2	_	2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	_	_	-	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	_	_	-	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	_	_	-	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	_	_	-	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	_	_	-	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	_	_	-	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	_	_	-	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	_	_	-	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	19	19	-	2
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	11	10	(1)	2
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	_	_	- '	N/A
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	47	47	-	2
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	_	_	-	N/A
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	2	2	-	2
29	HV	Zone substation switchgear	33kV RMU	No.	_	_	_	N/A
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	_	_	_	N/A
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	1	1	_	2
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	108	108	_	2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	13	13	_	2
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	35	34	(1)	2
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	2,370	2,374	4	2
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km		_	_	N/A
37	HV	Distribution Line	SWER conductor	km	1	1	_	2
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	48	49	1	2
39	HV	Distribution Cable	Distribution UG PILC	km	108	108	(0)	2
40	HV	Distribution Cable	Distribution Submarine Cable	km	_	_	_	2
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	44	45	1	2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	15	15	_	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	4,473	4,467	(6)	2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	76	73	(3)	2
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	280	278	(2)	2
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	3,092	3,192	100	2
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	583	586	3	2
48	HV	Distribution Transformer	Voltage regulators	No.	10	10	-	2
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	_	_	_	N/A
50	LV	LV Line	LV OH Conductor	km	515	516	0	2
51	LV	LV Cable	LV UG Cable	km	295	296	1	2
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	13	13	-	2
53	LV	Connections	OH/UG consumer service connections	No.	26,804	26,734	(70)	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	240	248	8	2
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	1,236	1,241	5	2
56	All	Capacitor Banks	Capacitors including controls	No	1	1	-	3
57	All	Load Control	Centralised plant	Lot	8	6	(2)	2
58	All	Load Control	Relays	No	16,157	17,401	1,244	1
59	All	Civils	Cable Tunnels	km	_	_	_	N/A

Company Name Firstlight Network Limited
For Year Ended 31 March 2025
Network / Sub-network Name GIS

SCHEDULE 9a: ASSET REGISTER

This schedule requires a summary of the quantity of assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

sch rej	9a: Ass	et Register						8-1
8	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
9	All	Overhead Line	Concrete poles / steel structure	No.	14,717	14,992	275	2
10	All	Overhead Line	Wood poles	No.	13,012	12,743	(269)	2
11	All	Overhead Line	Other pole types	No.	_	_		N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	269	269	-	2
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	178	178	_	2
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	1	1	_	2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	_	_	_	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	_	_	-	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	_	_	-	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	_	_	-	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	_	_	_	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	_	_	_	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	_	_	_	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	_	_	_	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	17	13	(4)	2
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	5	5	-	2
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	_	_	_	N/A
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	43	43	_	2
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	_	_	_	N/A
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	_	_	_	N/A
29	HV	Zone substation switchgear	33kV RMU	No.	_	_	_	N/A
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	_	_	_	N/A
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	_	_	_	N/A
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	82	82	_	2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	12	12	_	2
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	21	19	(2)	2
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	1,692	1,695	2	2
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	-		_	N/A
37	HV	Distribution Line	SWER conductor	km	_	_	_	N/A
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	41	43	3	2
39	HV	Distribution Cable	Distribution UG PILC	km	91	91	0	2
40	HV	Distribution Cable	Distribution Submarine Cable	km		_	_	2
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	29	28	(1)	2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	13	13	_	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	3,364	3,351	(13)	2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	60	57	(3)	2
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	240	238	(2)	2
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	2,297	2,302	5	2
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	477	479	2	2
48	HV	Distribution Transformer	Voltage regulators	No.	8	.,3	_	2
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	_	_	_	N/A
50	LV	LV Line	LV OH Conductor	km	383	383	0	2
51	LV	LV Cable	LV UG Cable	km	239	240	1	2
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	13	13	_	2
53	LV	Connections	OH/UG consumer service connections	No.	21,819	21,758	(61)	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	198	206	8	2
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	1,074	1,078	4	2
56	All	Capacitor Banks	Capacitors including controls	No	1,074	1,070	_	3
57	All	Load Control	Centralised plant	Lot	5	3	(2)	2
58	All	Load Control	Relays	No	17,221	17,279	58	1
59	All	Civils	Cable Tunnels	km			_	N/A
33	All	C.1.13	Cable (affile)	KIII		_	_	14/75

Company Name
For Year Ended
Network / Sub-network Name

Firstlight Network Limited
31 March 2025
WRA

SCHEDULE 9a: ASSET REGISTER

This schedule requires a summary of the quantity of assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

sch re		et Register						5.1
8	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
9	All	Overhead Line	Concrete poles / steel structure	No.	3,813	3,851	38	2
10	All	Overhead Line	Wood poles	No.	3,530	3,503	(27)	2
11	All	Overhead Line	Other pole types	No.	_	_		N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	67	67	-	2
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	124	124	-	2
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	0	0	_	2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	_	_	-	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	_	_	-	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	_	_	-	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	_	_	-	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	_	_	-	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	_	_	-	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	_	_	-	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	_	_	-	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	_	6	6	2
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	_	5	5	2
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	_	_	-	2
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	4	4	-	2
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	_	_	-	2
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	2	2	-	2
29	HV	Zone substation switchgear	33kV RMU	No.	_	_	_	2
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	_	_	-	2
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	1	1	-	2
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	26	26	-	2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	1	1	-	2
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	14	15	1	2
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	678	679	2	2
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	_	_	-	N/A
37	HV	Distribution Line	SWER conductor	km	1	1	-	2
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	5	6	0	2
39	HV	Distribution Cable	Distribution UG PILC	km	16	17	0	2
40	HV	Distribution Cable	Distribution Submarine Cable	km	_	_	-	N/A
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	15	16	1	2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	2	2	-	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	1,109	1,109	-	2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	16	16	-	2
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	40	40	-	2
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	795	890	95	2
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	106	107	1	2
48	HV	Distribution Transformer	Voltage regulators	No.	2	2	-	2
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	_	_	-	N/A
50	LV	LV Line	LV OH Conductor	km	132	132.44	0	2
51	LV	LV Cable	LV UG Cable	km	54	55.78	1	2
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	_	_	-	2
53	LV	Connections	OH/UG consumer service connections	No.	4,985	4,976	(9)	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	42	42	-	2
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	162	163	1	2
56	All	Capacitor Banks	Capacitors including controls	No	_	_	-	N/A
57	All	Load Control	Centralised plant	Lot	3	3	-	2
58	All	Load Control	Relays	No	123	122	(1)	N/A
59	All	Civils	Cable Tunnels	km	_	_	-	N/A

Company Name	
For Year Ended	31 March 2025
Network / Sub-network Name	ALL

																				Ne	etwork / Su	ıb-networ	k Name						ALI					
	ULE 9b: ASSET AGE PROF																																	
schedu	le requires a summary of the age profile	e (based on year of installation) of the assets that make up the network	, by asset catego	ory and asset clas	ss. All units relati	ing to cable	and line asse	ets, that are e	pressed in km,	, refer to ci	sircuit lengths.																							
ol																																		
ap: A	sset Age Profile																																	
	Disclosure Year (year ended)								Number of ass	sets at disc	closure year er	nd by insta	lation date																			Item	s at	
																															N	o. with end		with
				1940	1950 196																											age ye		fault
Voltage			Units pre-19	940 -1949	-1959 -196					2002		2004						2010 20:								019 2020		2022	2023			known (quan		ates
All	Overhead Line	Concrete poles / steel structure	No	134		253 1,		7 2,825					389 147	248 169	221 187	384 284	396 265		418 43 209 18		387 146	383 195	257 190	219 101	363 161	481 32 139 29				462	10		843 -	-
All	Overhead Line Overhead Line	Wood poles Other pole types	No	134	1,559 3,1	115 1,	407 1,33	9 2,832	442 815	242	2 127	182	147	169	187	284	265	239	209 18	2 202	146	195	190	101	161	139 29	2 163	240	244	287	10	- 16,	,246 -	-
HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km -		72 1	115	71 3				3 11		- 5		- 0	- 0	_				-				-		_	-	- 0			_	336	-
HV	Subtransmission Line	Subtransmission OH 110kV+ conductor		0 17				0 -	0 -	+ -	3 11		-		-	-	-			-		- 0	1	-	0	0 -	+ -	+ -	-	-			302 -	÷
iv iv	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km -	0 1/	0.4	39 .	111 3	-			-	-				-	-				_		- 1	-	- 0		-	+-	-	-	-		302	-
HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km -											_												-	-	-	_				_	÷
HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km -			- 1	- -		- 1	1 -		_	-	- 1	- 1	-	-		- -	1 -		- 1	- 1	-	-		1 -			- 1	- 1	-		-
HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km -			- 1		-		-	-	-	-	-	-	-	-	-		-	-	- 1	-	-	-		-	-	-	-	-	-		-
HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km -	-				-		-	-	-	-	-	-	-	-			-	-	-	-	-	-		-	-	-	-	-	-		-
HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km -			- -		- 1		-	-	-	-	-	-	-	-			-	-	-	-	-	-		-	-	-	-	-	-		-
īV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km -							_	-	_	-	-	-	-	-			-				-	-			-	_		-	-		-
īV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km -	-		- 1		-		-	-	-	-	-	-	-	-			-	-	-	-	-	-		-	-	-	-	-	-		-
V	Subtransmission Cable	Subtransmission submarine cable	km -					-		-	-	_	_	-	-	-	-			-	-	-	-	_	-		-	-	_	_	_	-		_
V	Zone substation Buildings	Zone substations up to 66kV	No	-		-	1	5 3	- 2	-	1	-	-	1	1	1	-	2	1 -	-	-	-	-	-	-	1 -	-	-	-	-	-	-	19 -	-
V	Zone substation Buildings	Zone substations 110kV+	No	-			-	6 2		-	-	-	-	-	-	-	-	1	1 -	-	-	-	-	-	-		-	-	-	-	-	-	10 -	-
V	Zone substation switchgear	50/66/110kV CB (Indoor)	No	-		- -	- -	-	- -	-	-	-	-	-	-	-	-		- -	-	-	-	-	-	-		-	-	-	-	-	-		-
V	Zone substation switchgear	50/66/110kV CB (Outdoor)	No		1 -	- -	-	4 1	5 2	4	2 -	3	5	4	6	2	-	2	2	2 -	-	-	3	-	-	3 -	-	-	-	-	-	-	47 -	-
V	Zone substation switchgear	33kV Switch (Ground Mounted)	No			- -	- -			-	+ -	-	-	-	-	-	-	- -	- -	-	-	-	-	-	-		-	-	-	-	-	-		-
V	Zone substation switchgear	33kV Switch (Pole Mounted)	No			- -		-	- 2	-	-	-	-	-	-	-	-			+ -	-	-	-	-	-		+ -	-	-	-	-	-	2 -	-
IV	Zone substation switchgear	33kV RMU	No	-		- -		-		-	-	-	-	-	-	-	-			-	-	-	-	-	-		+ -	-	-	-	-	-		-
V	Zone substation switchgear	22/33kV CB (Indoor)	No	-			-	-		-	-	-	- 1	-	-	-	-			-	-	-	-	-	-		+-	-	-	-	-	-	1	-
īV	Zone substation switchgear	22/33kV CB (Outdoor)	No				17 2			1	9 10	-	1	-	-		-			1 -	-	-	-	-			+ -	-	-	-	-			-
iv iv	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No	-		_	. 2	5	9 -	1 -	9 10	-	-	- /	-	4	-			4	-	8	-	-	1	5 -	+ -	+-	3	-	-	-	108 -	-
iv	Zone substation switchgear Zone Substation Transformer	3.3/6.6/11/22kV CB (pole mounted) Zone Substation Transformers	No		1	2	1 -	. 1 1			1 -	1	-	1	- 6	-	-			+ -	-	-	-	-				+-	-	-	-	_	34	-
iv	Distribution Line	Zone Substation Fransformers Distribution OH Open Wire Conductor		62 81	501 8	262	347 19	5 166	11 7		, 1	1		- 2	1	- 2		-	, -			- 7			-	-	2 11	13	15	- 1	- 0		34	÷
iv	Distribution Line	Distribution OH Open Wire Conductor Distribution OH Aerial Cable Conductor	km -	02 81	301 8	502	547 19	3 166	/	11	4		- 8	- 6	- 9	- 4	-1	-	3 -	- 4			- 3	-	-		2 11	13	- 15	- 8	-	- 4	3/4	÷
iv	Distribution Line	SWER conductor	km -					1 -					-	-	_	-	-						-	_	_	-	_		-	_	-		1	Ť
iv	Distribution Cable	Distribution UG XLPE or PVC	km -		0	1	3	6 6	0 1	1	0 0		1	2	1	3	0	2	2	0 0	0	1	2	1	4	2	1 1	,	3	1	-		49	÷
īV	Distribution Cable	Distribution UG PILC	km -		1	8	12 2	8 23	3 5		4 2	1	2	3	3	1	2	1	1	0 0	0	- 6	1	4	0	0 -		T -	1	- 1	-		108	-
v	Distribution Cable	Distribution Submarine Cable	km -					-		-		- 1	- 1	- 1	- 1	- 1	- 1			-	-	-	- 1	-	- 1		-	-		_	-	-		
īV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionaliser	No	1	1	1	1	2 2	5 2		3 4	1	-	1	-	-	-		-	1 1	-	1	-	-	2	3	3 8	2	-	1	-	-	45 -	-
V	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No	-		-	2 -	11		-	-	-	-	1	-	-	-			-	-	-	-	-	-		-	1	_	-	-	-	15 -	-
V	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No	-	186 7	709	512 38	8 427	52 110	126	6 99	110	77	131	75	69	92	91	76 S	7 62	87	108	84	57	79	73 9	3 88	82	71	90	6	- 4,	,467	-
v	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No	-	-	5	4	6 7	3 19	13	3 2	-	-	11	-	1	-	1 .		-	-	-	-	-	-		1	-	-	-	-	-	73 -	Ξ
V	Distribution switchgear	3.3/6.6/11/22kV RMU	No		- 1	3	7 1	0 51	6 26	22	2 2	6	1	16	4	9	4	5	4	3 2	4	7	21	8	12	6	8 7	11	5	8	_	-	278 -	-
V	Distribution Transformer	Pole Mounted Transformer	No	-	73 5	542	421 31	7 310	26 90	-			109	58	58	51	55		41 5	3 62	62	56	40	48	61	47 7	8 49	73	60	72	2		192 -	_
/	Distribution Transformer	Ground Mounted Transformer	No		7	20	16 2	2 34	31 54	31	1 13	28	21	21	29	16	15	20	14 1	7 13	20	14	18	18	8	18 2	3 16	11	7	11	-	-	586 -	_
V	Distribution Transformer	Voltage regulators	No		-	3 .	-	3 -	- 1	-	-	1	-	-	-	-	-			2	-	-	-	-	-		-	-	-	-	-	-	10 -	-
/	Distribution Substations	Ground Mounted Substation Housing	No	-		- -		-		-	-	-	-	-	-	-	-			-	-	-	-	-	-		-	-	-	-	-	-		-
-	LV Line	LV OH Conductor	Killi	7 32	*** *	103	00 3	5 52	2 8	1 5	5 1	2	0	1	1	1	0	-	0	0 0	0	1	0	0	0	0	0 0	0	1	0	-		516 -	-
1	LV Cable	LV UG Cable	KIII	0 0	3	21	44 6	6 40	8 17	15	5 9	5	5	4	7	6	5	2	3	3 3	1	3	2	3	3	5	2 2	4	2	2	-		296 -	-
-	LV Street lighting	LV OH/UG Streetlight circuit	km -	-	1	1	0	4 4	0 1	-	0 -	0	-	0	0	-	-			-	-	-	-	-	-			-	-	-	-		13 -	-
	Connections	OH/UG consumer service connections		44 521	1,949 4,9	993 4,		2 3,037	292 317			317	271	348	359	286	213		218 15		158	185	145	156	170	175 16				42	-		734 -	-
II	Protection	Protection relays (electromechanical, solid state and numeric)	No	-		- -		0 11	10 24		2 22	49	5	10	9	1	-		2 -	23	4	-	25	7 36	12	4 1	9 6 6 25	12	29	29	-		248 -	-
II .	SCADA and communications	SCADA and communications equipment operating as a single sys	Lot -	-	-	1 .	- 2	6 114	61 58	41	1 103	49	63	26	21	24	20	19	35 2	3 39	155	126	23	36	44	15 3	6 25	12	29	17	-	- 1,	,241 -	-
11	Capacitor Banks	Capacitors including controls	No -	-		- -		1		+ -	-	-	-	-	-	-	-	- -		+ -	-	-	-	-	-		+ -	+-	-		-	-	6 -	-
dl	Load Control	Centralised plant	Lot -	-		-	3	2 -		+ -			-	-	-	-	1		89 10	- 62			-	70	-	45 2		+		-	-	-		-
All	Load Control	Relays	NO -			- 12,	291 2,54	8 4,703	536 1,029	1,160	0 1,021	477	836	635	942	114	88	50	89 10	62	- 66	86	50	29	51	45 2	35	138	104	91	-	- 17,	,401 -	-
All	Civils	Cable Tunnels	km		- 1 -			1 -	- 1 -				-	-	-	- 1	-	- -		1 -		-	-	- 1	- 1	- 1 -		1 -		-	- 1	-	-	_

Company Name	Firstlight Network Limited
For Year Ended	31 March 2025
Network / Sub-network Name	GIS

35 138 104

SCHEDULE 9b: ASSET AGE PROFILE

Load Control Civils

Disclosure Year (year ended) Number of assets at disclosure year end by installation date No. with end of No. with age year default Data accuracy unknown (quantity) dates (1-4) | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | 1-50 | Voltage Asset category
All Overhead Line
All Overhead Line
HV Subtransmission LI
HV Subtransmission CI
Asset class Concrete poles / steel structure 14,992 -Wood poles Overhead Line Subtransmission Line Subtransmission Line Other pole types Subtransmission OH up to 66kV conductor Subtransmission OH 110kV+ conductor 5 6 7 4 3 11 km 0 17 29 59 49 23 - - - -Subtransmission Cable Subtransmission UG up to 66kV (XLPE) Subtransmission Cable Subtransmission UG up to 66kV (Oil pressurised) Subtransmission Cable Subtransmission Cable Subtransmission UG up to 66kV (Gra pressurised)
Subtransmission UG up to 66kV (PILC)
Subtransmission UG 110kV+ (XLPE) Subtransmission Cable Subtransmission UG 110kV+ (Oil pressurised) Subtransmission Cable Subtransmission Cable Subtransmission Cable Subtransmission Cable Subtransmission UG 110kV+ (Uni pressurised)
Subtransmission UG 110kV+ (Gas Pressurised)
Subtransmission UG 110kV+ (PILC)
Subtransmission submarine cable HV
HV
HV
HV
HV
HV
HV
HV
HV
HV Zone substation Buildings Zone substations up to 66kV Zone substation Buildings Zone substation switchgear Zone substations 110kV+ 50/66/110kV CB (Indoor) 50/66/110kV CB (Outdoor) Zone substation switchgear Zone substation switchgear 33kV Switch (Ground Mounted) Zone substation switchgear 33kV Switch (Pole Mounted) 33kV RMU 22/33kV CB (Indoor) 22/33kV CB (Outdoor) Zone substation switchgear 3.3/6.6/11/22kV CB (ground mounted) Zone substation switchgear Zone Substation Transformer HV
HV
HV
HV
HV
HV
HV
HV
HV
HV 3.3/6.6/11/22kV CB (pole mounted) Distribution Line Distribution OH Open Wire Conductor km 0 6 297 683 302 133 161 11 4 Distribution Line Distribution OH Aerial Cable Conductor Distribution Line Distribution Cable SWER conductor
Distribution UG XLPE or PVC Distribution Cable Distribution Cable Distribution UG PILC 8 9 21 21 3 5 4 2 1 Distribution Submarine Cable Distribution switchgear Distribution switchgear Distribution switchgear 3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionaliser 3.3/6.6/11/22kV CB (Indoor) 3.3/6.6/11/22kV Switches and fuses (pole mounted) 183 455 448 247 312 40 94 92 63 71 61 108 81 83 65 51 51 81 88 71 41 59 63 Distribution switchgear 3.3/6.6/11/22kV Switch (ground mounted) - except RMU Distribution switchgear Distribution Transformer Distribution Transformer 3.3/6.6/11/22kV RMU Pole Mounted Transformer Ground Mounted Transformer No. - - - 3 3 3 5 47 6 20 21 1 6 No. - - 73 292 291 215 233 20 79 42 53 46 11 3 8 3 5 4 2 2 2 7 20 8 11 47 48 42 53 58 33 51 43 56 42 31 36 46 66 - 5 15 15 19 28 30 52 26 11 20 12 17 20 7 15 19 11 13 12 14 12 17 Distribution Transformer Voltage regulators Distribution Substations Ground Mounted Substation Housing LV OH Conductor LV UG Cable 49 33 LV Street lighting LV OH/UG Streetlight circuit Connections
Protection
SCADA and comm
Capacitor Banks
Load Control OH/UG consumer service connections No. 44 521 1.874 3.520 3.981 3.989 3.337 256 255 183 79 204 228 310 315 244 168 152 186 136 134 123 150 121 121 149 137 147 239 226 189 Protection relays (electromechanical, solid state and numeric)
SCADA and communications equipment operating as a single sys Capacitors including controls Centralised plant

- - - 2,282 2,548 4,680 536 1,024 1,156 1,007 461 815 620 930 108 88 50 88 103 61 66 88 50 28 51 44 20

Company Name	Firstlight Network Limited
For Year Ended	31 March 2025
Network / Sub-network Name	WRA

	LE 9b: ASSET AGE PROF																																			
		e (based on year of installation) of the assets that make up the network	c, by asset catego	ory and asset o	lass. All uni	its relating to o	cable and lin	e assets, ti	hat are expre	ssed in km, re	efer to circ	uit lengths.																								
9b: As	set Age Profile																																			
	Disclosure Year (year ended)								Nun	mber of assets	s at disclos	ure year en	d by install	lation date																						
																																	No. with	Items a	at f No.w	with
				1940	1950	1960	1970	1980	1990																								age	year		fault D
Voltage	Asset category	Asset class	Units pre-1	1940 -1949			-1979		1999 2000		2002	2003	2004	2005	2006	2007				11 201			2015	2016	2017	2018	2019				023 202		unknown	quantit	ty) date	tes
All	Overhead Line	Concrete poles / steel structure	No		57		275	838	178 144	373	204	84	80	69	54	30	57	51	13	10	7 2	V	4	5 33	110	188	188	107	157	174	***	58	1 -	3,85	51 -	-
All	Overhead Line	Wood poles	No.	- 79	477	329	312	242	548 254	245	56	42	58	53	71	60	19	92	11	20 :	6 4	2 16	1	7 8	39	79	29	85	18	52	48	58	8 -	3,50	03 -	-
All	Overhead Line	Other pole types	No		-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-
HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km -		-	-	34	32		0	-	-	-	-	-	-	-	-	-		_	-	-	-	-	-	-	-	-	-	0 -	_	-	6	57 -	-
HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km -	- 0	55	-	62	7	- 0	-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-	0	-	-	-		-	-	12	24 -	_
HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km -		-		-	-	0 -	0	-	-	-	-	-		-	-	-			-	-	-	-	-	-	-	-	-	0 -		-		0 -	-
HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km -		-		-	-		-	-	-	-	-	-		-	-	-		_	-	-	-	-	-	-	-	-	-			-	-	_	_
HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km -		-	-	-	-		-	-	-	-	-	-	-	-	-	-		_	_	+-	_	-	-	-	-	-	-		_	_	-	_	_
HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km km		_	-	-	-		-	-	_	_	-	-		-	-	-		_	_	-	_	_	-	-	-		-		_	_	_		-
iv iv	Subtransmission Cable Subtransmission Cable	Subtransmission UG 110kV+ (XLPE) Subtransmission UG 110kV+ (Oil pressurised)			+-	+=+					-				-		-	-	-		+-	1 .	+ -	_	+-	-	-	-		-		_	+ -	-	_	÷
HV	Subtransmission Cable Subtransmission Cable	Subtransmission UG 110kV+ (UII pressurised) Subtransmission UG 110kV+ (Gas Pressurised)	km -		+-	-		-	- 1-		-	-	-	-	-	-	-	-	-		+ -	+ -	+-	+		-	-	-	-	-			+-	_		-
HV	Subtransmission Cable Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressursed) Subtransmission UG 110kV+ (PILC)	km km		+ -						-				-		-	-		-	_	1	+ -							-		_	+ -		_	-
iv iv	Subtransmission Cable Subtransmission Cable	Subtransmission UG 11UKV+ (PILC) Subtransmission submarine cable	km km		1										-		-				1 -	1 -	1 -							-			1 -			-
iv iv	Zone substation Buildings	Zone substations up to 66kV	No.				-	2	1 -	1 2	-	-	-	-	-	-	-	-	- 1	1 -			1 -			- 1	1	- 1	-	_			_		6 -	÷
iv	Zone substation Buildings	Zone substations 110kV+			-		-	2	1 -	-	-	-	-	-	-	-	-	_	1	1 -	_	_	_		-	-	- 1	-	-	-		_			5 -	-
iv	Zone substation switchgear	50/66/110kV CB (Indoor)	No.		-		-	-		-	-	-	-	-	- 1	-	-	-	-		_	-	-	_	-	-	-	-	-	-		_	-	-	_	_
v	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.		1		-	- 1	- 2	-	-	-	-	- 1	- 1	- 1	-	_	-		_	_	-		-	-	- 1	-	-	-		_			4 -	_
v	Zone substation switchgear	33kV Switch (Ground Mounted)	No.		-	_	-	-		-	-	-	-	-	- 1	-	-	-	-		_	-	-	-	-	-	-	-	-	-		_	-	-	-	_
iv	Zone substation switchgear	33kV Switch (Pole Mounted)	No.		_	-	-	-		2	-	-	-	-	-	-	-	_	-		-	-	-	_	-	-	-	-	-	-		-	-		2 -	_
īV	Zone substation switchgear	33kV RMU	No.		-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-		_	-	-	-	_
HV	Zone substation switchgear	22/33kV CB (Indoor)	No.		-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	_	-	-	-	-	-	-	-		-	-	-	-	_
HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.		-	-	-	-		-	-	-	-	1	-	-	-	-	-			-	-	-	-	-	-	-	-	-		_	-		1 -	Ξ
HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No		-	-	-	10		-	-	-	-	-	3	-	-	-	-		-	-		8 -	-	-	5	-	-	-		-	-	2	26 -	-
HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.		_	_	-	-	1 -	-	- 1	- 1	- 1	-	-	-	-	- [-		-	-	-	_	-	- 1	- 1	- 1	-	-		_	-		1 -	- 1
٠V	Zone Substation Transformer	Zone Substation Transformers	No	- 1	. 6	2	-	2	- 2	-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	1	-	-	-	-	-	1 -	-	- 1	15 -	_
IV	Distribution Line	Distribution OH Open Wire Conductor		62 76	204	179	44	61	5 -	2	3	2	6	3	2	6	1	-	0	-	0	1 (-	1 1	1	0	3	0	7	2	4	0	0 -	67	79 -	_
IV	Distribution Line	Distribution OH Aerial Cable Conductor	km -		-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	_
٠V	Distribution Line	SWER conductor	km -		-	-	-	1		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-		1 -	-
IV	Distribution Cable	Distribution UG XLPE or PVC	km -		-	0	-	0	1 0	0	0	0	0	0	0	0	1	-	0	-	0	0 0	1	0 -	0	1	0	0	0	0	0	0 -	-		6 -	-
ev.	Distribution Cable	Distribution UG PILC	km -		-	0	3	7	2 0	0	0	0	0	0	2	2	0	-	-			0 -	-	0	0	0	-	-	-	-	0 -	-	-		17 -	_
IV	Distribution Cable	Distribution Submarine Cable	km -		-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	_	_
-IV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionaliser	No.		-	1	1	2		1	-	-	-	-	-	-	-	-	-	-	1	1 -	+ -	-	-	-	2	2	3	1	-	1 -	+ -	,	16 -	-
v	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.		+	-	1		111 12	-	-	-	-	-	-	-	-	-	-				+ -		-	-	-	-	-	1					2 -	-
iv iv	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.		3	254	162	141		16	34	35	39	16	23	24	- 11	11	8	11	6 1	_	21	0 13	16	20	10	18	23	22	16	14	3 -	1,10	J9 -	-
iv iv	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU		-	+-	-		4		5		1	-	-	ь				-			+ -	+-	+	-		-	-					+-		10 -	-
N N	Distribution switchgear	3.3/6.6/11/22kv RMU	No.		+-	250	120	102	83 6	6	- 1	20	- 24	- 20	5	10	1	1	-	-	1 -		-	. 1	-	1	- 15	- 12	16	10	2	1 -		89	- 0	-
v v	Distribution Transformer Distribution Transformer	Pole Mounted Transformer Ground Mounted Transformer	No.		1	250	150	102	83 6	11	- 11	30	24	38	11	10	9	- 4		2	4 1	-	1 1	9	12	15	15	12	16	19	2	7	1 .	89		-
v	Distribution Transformer		No.			- 5	-1	- 3	- 1	1	_ 5			- 9	-4	- 9	- 9	-	- 1	-	*		1	_ 1	-				-4	- 1	-	/ -	+ -	- 10	-	÷
v	Distribution Transformer Distribution Substations	Voltage regulators Ground Mounted Substation Housing	No.		+-	+ -		-			-		-	-	-		-	-	-		+ -	1	+ -	+ -				-				+ -	+ -			÷
Ž	LV Line	LV OH Conductor		7 30	41	30	9	9	2 1	0	- 0	0	- 1	0	0	- 0	-		- 0			-	1	1 0	0	- 0	- 0	- 0	- 0	- 0	0 -	_	1	13	32 -	-
v	LV Cable	LV UG Cable	km	0 0	1 1	4	11	17	7 1	0	0	1	1	1	1	2	- 1	0	0	0	0			0 0	- 0	0	2	0	0	0	0	1 -	1 -	- 13	56	_
v	LV Street lighting	LV OH/UG Streetlight circuit	km -		-	1 - 1	- 11	- "			-	- 1	- 1	- 1	- 1	- 1	- 1	-	_		_	-	1 -	-	-	-	- 1	-	-	-		1 -	1	-	~	_
v	Connections	OH/UG consumer service connections	No.		75	1.473	836	843	500 36	62	130	271	113	43	38	44	42	45	31	32	1 3	9 39	3	5 24	35	21	38	22	40	33	17	2 -	-	4,97	76 -	_
ul	Protection	Protection relays (electromechanical, solid state and numeric)	No.			-	-	10	- 2	7	-	1	-	2	-	1	-	-	-	1 -	-	-	T -	11		5	1	-	- "	1		-	-	427		_
All .	SCADA and communications	SCADA and communications equipment operating as a single sys	Lot -		-	-	-	2	15 6	25	9	19	3	30	5	1	8	3	2	3	3	1 2		9 3	5	2	4	-	-	-	1	2 -	-	16	53 -	_
All .	Capacitor Banks	Capacitors including controls	No -		-	-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	_	-	-	-	-	-	-	-		-	-	-	-	_
All	Load Control	Centralised plant	Lot -		-	-	-	2		-	-	-	-	-	-	-	-	1	-		-	-	-	-	-	-	-	-	-	-		-	-		3 -	_
All	Load Control	Relays	No		-	-	9	-	13 -	5	4	14	16	21	15	12	6	-	-	1	2	1 -		1 -	1		1		-	-				12	22 -	_
All	Civils	Cable Tunnels	km -														_													_						-

Company Name	Firstlight Network Limited
For Year Ended	31 March 2025
Network / Sub-network Name	ALL

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

This schedule requires a summary of the key characteristics of the overhead line and underground cable network. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

	icii	iguis.			
	sch re	of			
	9	9c: Overhead Lines and Underground Cables			
]	Je. Overhead Lines and Onderground Cables			
	10				
	11	Circuit I and blue and a single and beautiful and a single and a	Overhead (km)	Underground (km)	Total circuit length (km)
	12	Circuit length by operating voltage (at year end) > 66kV	302	(KIII)	
	13	50kV & 66kV	302	1	302
	- 1				303
	14	33kV	34	0	34
1	15	SWER (all SWER voltages)	1	_	1
1	16	22kV (other than SWER)		_	-
1	17	6.6kV to 11kV (inclusive—other than SWER)	2,368	156	2,525
	18	Low voltage (< 1kV)	514	294	808
	19	Total circuit length (for supply)	3,521	451	3,973
	20			ı	
1	21	Dedicated street lighting circuit length (km)	13		13
	22	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)			
	23			(% of total	
	24	Overhead circuit length by terrain (at year end)	Circuit length (km)	overhead length)	
	25	Urban	188	5%	1
			1,499	43%	
	26	Rural			
	27	Remote only	305	9%	
	28	Rugged only	1,174	33%	
	29	Remote and rugged	345	10%	
	30	Unallocated overhead lines	11	0%	
	31	Total overhead length	3,521	100%	
	32			(% of total circuit	
	33		Circuit length (km)	length)	
	34	Length of circuit within 10km of coastline or geothermal areas (where known)	1,781	45%]
	35	Length of cheat within 10km of coastine of geothermal areas (where known)	1,701	4370	l
				(% of total	
	36		Circuit length (km)	overhead length)	
	37	Overhead circuit requiring vegetation management	3,521	100%	Not required after DY2025
					•
			Takal manulu idan kifi ad	Total remaining at	
			Total newly identified throughout the disclosure	high risk at the disclosure year-	
	38		year	end	
ı	39	Number of overhead circuit sites at high risk from vegetation damage	yeur	l	Not required before DY2026
	40	Number of overhead circuit sites at high risk from vegetation damage			INOL TEQUITED DEJOTE DT2020
		Dunal day, and a comband sign it sites at high yiely from properation day, and disclosure year and			
	41	Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end			
		Number of overhead circuit	Number of overhead circuit		
		Category of overhead circuit site sites at high risk from	sites involving critical assets		
		vegetation damage at disclosure year-end	at disclosure year-end		
	42		T	1	
1	43	[Single tree] –	_		Not required before DY2026
1	44	[Single tree - Urban] –	-		Not required before DY2026
1	45	[Single tree - Rural]	-		Not required before DY2026
1	46	[Row of trees] –	-		Not required before DY2026
1	47	[Span between two poles (X metres)] –	-		Not required before DY2026
	48	[Other] –	_		Not required before DY2026
	49	Total number of sites –	-		Not required before DY2026
	50	* Insert new rows in table above Total line as necessary			

Company Name	Firstlight Network Limited
For Year Ended	31 March 2025
Network / Sub-network Name	GIS

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

This schedule requires a summary of the key characteristics of the overhead line and underground cable network. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref					
9	9c: Overhead Lines and Underground Cables				
	·				
10					
10				Underground	Total circuit length
11	Circuit length by operating voltage (at year end)		Overhead (km)	(km)	(km)
12	> 66kV		178	=	178
13	50kV & 66kV		269	1	271
14	33kV		-	_	-
15	SWER (all SWER voltages)		-	_	-
16	22kV (other than SWER)		-	_	_
17	6.6kV to 11kV (inclusive—other than SWER)		1,689	134	1,822
18	Low voltage (< 1kV)		382	239	620
19	Total circuit length (for supply)		2,518	374	2,891
20		'			
21	Dedicated street lighting circuit length (km)		13		13
22	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)				
23					·
				(% of total	
24	Overhead circuit length by terrain (at year end)		Circuit length (km)	overhead length)	ı
25	Urban		165	7%	
26	Rural		1,193	47%	
27	Remote only		253	10%	
28	Rugged only		749	30%	
29	Remote and rugged		147	6%	
30	Unallocated overhead lines		10	0%	
31	Total overhead length		2,518	100%	
32		'		10/ 11 11 11	
		·	Circuit longth (km)	(% of total circuit	
33	Longth of circuit within 10km of coastling or goothormal areas (where known)		Circuit length (km)	length)	
33 34	Length of circuit within 10km of coastline or geothermal areas (where known)		Circuit length (km)		'
33	Length of circuit within 10km of coastline or geothermal areas (where known)			length)	
33 34	Length of circuit within 10km of coastline or geothermal areas (where known)			length) 45%	l I
33 34 35	Length of circuit within 10km of coastline or geothermal areas (where known) Overhead circuit requiring vegetation management		1,309	length) 45% (% of total overhead length)	Not required after DY2025
33 34 35 36			1,309 Circuit length (km)	length) 45% (% of total overhead length) 100%	Not required ofter DY2025
33 34 35 36			1,309 Circuit length (km) 2,517	length) 45% (% of total overhead length) 100% Total remaining at	Not required after DY2025
33 34 35 36			Circuit length (km) 2,517 Total newly identified	length) 45% (% of total overhead length) 100% Total remaining at high risk at the	Not required after DY2025
33 34 35 36 37			Circuit length (km) 2,517 Total newly identified throughout the disclosure	length) 45% (% of total overhead length) 100% Total remaining at	Not required after DY2025
33 34 35 36 37	Overhead circuit requiring vegetation management		Circuit length (km) 2,517 Total newly identified	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	
33 34 35 36 37			Circuit length (km) 2,517 Total newly identified throughout the disclosure year	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	Not required after DY2025 Not required before DY2026
33 34 35 36 37 38 39 40	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage	v vear-end	Circuit length (km) 2,517 Total newly identified throughout the disclosure year	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	
33 34 35 36 37	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure	-	Circuit length (km) 2,517 Total newly identified throughout the disclosure year	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	
33 34 35 36 37 38 39 40	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit sites at high risk from vegetation damage at disclosure	erhead circuit	Circuit length (km) 2,517 Total newly identified throughout the disclosure year Number of overhead circuit	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	
33 34 35 36 37 38 39 40	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit sites at high risk from vegetation damage at disclosure Output of overhead circuit sites at high risk from vegetation damage at disclosure of overhead circuit sites at high risk from vegetation damage at disclosure	erhead circuit h risk from	Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	
33 34 35 36 37 38 39 40 41	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit sites at high risk from vegetation damage at disclosure Output of overhead circuit sites at high risk from vegetation damage at disclosure of overhead circuit sites at high risk from vegetation damage at disclosure	verhead circuit th risk from age at disclosure	Circuit length (km) 2,517 Total newly identified throughout the disclosure year Number of overhead circuit	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	
33 34 35 36 37 38 39 40 41	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit sites at high risk from vegetation damage at disclosure Output Category of overhead circuit site vegetation damage veg	verhead circuit th risk from age at disclosure	Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	Not required before DY2026
33 34 35 36 37 38 39 40 41	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage at high risk from vegetation damage at disclosure Number of overhead circuit site Sites at high risk from vegetation damage at disclosure Vumber of overhead circuit site	verhead circuit gh risk from age at disclosure end	Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure yearend	Not required before DY2026 Not required before DY2026
33 34 35 36 37 38 39 40 41	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage at high risk from vegetation damage at disclosure Number of overhead circuit site Sites at high risk from vegetation damage at disclosure Vumber of overhead circuit site Sites at high risk from vegetation damage at disclosure Sites at high risk from vegetation damage at disclosure Sites at high risk from vegetation damage at disclosure Sites at high risk from vegetation damage at disclosure Number of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit sites at high risk from vegetation damage at disclosure Sites at high risk from vegetation damage a	verhead circuit gh risk from age at disclosure end	Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure yearend	Not required before DY2026 Not required before DY2026 Not required before DY2026 Not required before DY2026
33 34 35 36 37 38 39 40 41 41	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage at disclosure Vumber of overhead circuit site Sites at high risk from vegetation damage at disclosure Output Description (Single tree) [Single tree - Urban] [Single tree - Rural]	erhead circuit th risk from age at disclosure end – –	1,309 Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure yearend	Not required before DY2026 Not required before DY2026 Not required before DY2026 Not required before DY2026 Not required before DY2026
33 34 35 36 37 38 39 40 41 41 42 43 44 45 46	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage (Single tree] [Single tree - Urban] [Single tree - Rural] [Row of trees]	rerhead circuit th risk from age at disclosure -end - -	1,309 Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure yearend	Not required before DY2026 Not required before DY2026
33 34 35 36 37 38 39 40 41 42 43 44 45 46 47	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation dama year [Single tree] [Single tree - Urban] [Single tree - Rural] [Row of trees] [Span between two poles (X metres)]	rerhead circuit th risk from age at disclosureend	1,309 Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end	Not required before DY2026
33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage vegetation damage vegetation damage at disclosure [Single tree] [Single tree] [Single tree - Urban] [Single tree - Rural] [Row of trees] [Span between two poles (X metres)]	rerhead circuit th risk from age at disclosureend	1,309 Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end -	Not required before DY2026
33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage vegetation damage vegetation damage at disclosure [Single tree] [Single tree] [Single tree - Urban] [Single tree - Rural] [Row of trees] [Span between two poles (X metres)] [Other] Total number of sites	rerhead circuit th risk from age at disclosureend	1,309 Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end -	Not required before DY2026
33 34 35 36 37 38 39 40 41 41 42 43 44 45 46 47 48	Overhead circuit requiring vegetation management Number of overhead circuit sites at high risk from vegetation damage Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure Number of overhead circuit site Category of overhead circuit site vegetation damage vegetation damage vegetation damage at disclosure [Single tree] [Single tree] [Single tree - Urban] [Single tree - Rural] [Row of trees] [Span between two poles (X metres)]	rerhead circuit th risk from age at disclosureend	1,309 Circuit length (km) 2,517 Total newly identified throughout the disclosure year - Number of overhead circuit sites involving critical assets at disclosure year-end	length) 45% (% of total overhead length) 100% Total remaining at high risk at the disclosure year- end -	Not required before DY2026

Company Name	Firstlight Network Limited
For Year Ended	31 March 2025
Network / Sub-network Name	WRA

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

This schedule requires a summary of the key characteristics of the overhead line and underground cable network. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

'	lengtns.				
sch ref					
9	9c: Overhead Lines and Underground Cables				
10					
			Underground	Total circuit length	
11	Circuit length by operating voltage (at year end)	Overhead (km)	(km)	(km)	
12	> 66kV	124	_	124	
13	50kV & 66kV	32	_	32	
14	33kV	34	0	34	
15	SWER (all SWER voltages)	1	_	1	
16	22kV (other than SWER)	_	_	-	
17	6.6kV to 11kV (inclusive—other than SWER)	680	23	702	
18	Low voltage (< 1kV)	132	56	188	
19	Total circuit length (for supply)	1,004	79	1,082	
20					
21	Dedicated street lighting circuit length (km)	_	_	-	
22	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)				
23			to t		
20	Construct discontinuous to Long the last section (above and all)	Cincola Investe (Invest	(% of total		
24	Overhead circuit length by terrain (at year end)	Circuit length (km)	overhead length)	1	
25	Urban	22	2%		
26	Rural	305	30%		
27	Remote only	425	5%		
28	Rugged only		42%		
29	Remote and rugged	198	20%		
30 31	Unallocated overhead lines	1,004	100%		
32	Total overhead length	1,004	100%		
32			(% of total circuit		
33		Circuit length (km)	length)		
34	Length of circuit within 10km of coastline or geothermal areas (where known)	471	44%		
35					
			(% of total		
36		Circuit length (km)	overhead length)	1	
37	Overhead circuit requiring vegetation management	1,004	100%	Not required after DY2025	
			Total remaining at		
		Total newly identified	high risk at the		
		throughout the disclosure	disclosure year-		
38		year	end	1	
39	Number of overhead circuit sites at high risk from vegetation damage	_	_	Not required before DY2026	
40					
41	Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end				
	Number of overhead circuit	Number of overhead circuit			
	Category of overhead circuit site sites at high risk from	sites involving critical assets			
	vegetation damage at disclosure	at disclosure year-end			
42	year-end	,	1		
43	[Single tree]	-		Not required before DY2026	
44	[Single tree - Urban]	_		Not required before DY2026	
45	[Single tree - Rural]	-		Not required before DY2026	
46	[Row of trees] –	-		Not required before DY2026	
47	[Span between two poles (X metres)] –	_		Not required before DY2026	
48	[Other] _	_		Not required before DY2026	
49	Total number of sites –	-		Not required before DY2026	
50	* Insert new rows in table above Total line as necessary				

	Company Nam	e Firstlight Ne	twork Limited
	For Year Ende	d 31 Mai	rch 2025
S	CHEDULE 9d: REPORT ON EMBEDDED NETWORKS		
Thi	is schedule requires information concerning embedded networks owned by an EDB that are embedded in another EDB's network or in anot	her embedded network.	
cob ro	,¢		
sch re		Average number of	
		ICPs in disclosure	Line charge revenue
8	Location *	year	(\$000)
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24 25			
25	* Extend embedded distribution networks table as necessary to disclose each embedded network owned by the EDB which is embedded	ed in another FDR's netw	ork or in another
26	embedded network	ca iii another EDD 3 netw	ork or in unother

	Company Name	Firstlight Network Limited
	For Year Ended	31 March 2025
	Network / Sub-network Name	ALL
SC	HEDULE 9e: REPORT ON NETWORK DEMAND	
	schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new	connections including
	ibuted generation, peak demand and electricity volumes conveyed).	
sch ref	On (i) Community Communities and Donney in in-	
8	9e(i): Consumer Connections and Decommissionings	
9	Number of ICPs connected during year by consumer type	
		Number of
10	Consumer types defined by EDB* Domestic/Residential	connections (ICPs)
11 12	Commercial	260
13	Large Commercial	5
14	Industrial	_
15	[EDB consumer type]	_
16	* include additional rows if needed	
17	Connections total	314
18		
19	Number of ICPs decommissioned during year by consumer type	
		Northwest
20	Consumer types defined by EDB*	Number of decommissionings
21	Domestic/Residential	32
22	Commercial	62
23	Large Commercial	1
24	Industrial	_
25	[EDB consumer type]	_
26	* include additional rows if needed	
27	Decommissionings total	95
28	Distributed consention	
29 30	Distributed generation Number of connections made in year	111 connections
31	Capacity of distributed generation installed in year	1 MVA
32	Capacity of distributed generation installed in year	1 11100
32		
33	9e(ii): System Demand	
34		
35		Demand at time
		of maximum
		coincident
36	Maximum coincident system demand	demand (MW)
37	GXP demand	65
38	plus Distributed generation output at HV and above	1
39	Maximum coincident system demand	66
40	less Net transfers to (from) other EDBs at HV and above	
41	Demand on system for supply to consumers' connection points	66
42	Electricity volumes carried	Energy (GWh)
42	Electricity volumes carried Electricity supplied from GXPs	295
44	less Electricity supplied from GXPs	0
45	plus Electricity exports to dars	23
46	less Net electricity supplied to (from) other EDBs	-
47	Electricity entering system for supply to consumers' connection points	318
48	less Total energy delivered to ICPs	287
49	Electricity losses (loss ratio)	31 9.8%
50		
51	Load factor	0.55
	Qa(iii): Transformer Canacity	
52	9e(iii): Transformer Capacity	(0.0)(0.)
53	Distribution to a few and a second of the se	(MVA)
54 55	Distribution transformer capacity (EDB owned) Distribution transformer capacity (Non-EDB owned)	236 56
56	Total distribution transformer capacity	291
57	. Stat distribution transformer tapacity	251
58		(MVA)
59	Zone substation transformer capacity (EDB owned)	337
60	Zone substation transformer capacity (Non-EDB owned)	-
61	Total zone substation transformer capacity	337

	Company Name	Firstlight Network Limited
	For Year Ended	31 March 2025
	Network / Sub-network Name	GIS
(SCHEDULE 9e: REPORT ON NETWORK DEMAND	
-	his schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new	connections including
	istributed generation, peak demand and electricity volumes conveyed).	connections including
	0	
sch r		
8	9e(i): Consumer Connections and Decommissionings	
9	Number of ICPs connected during year by consumer type	
		Number of
10	Consumer types defined by EDB*	connections (ICPs)
11	Domestic/Residential Domestic/Residential	213
12	Commercial	35
13	Large Commercial	3
14	Industrial	
15	[EDB consumer type]	
16	* include additional rows if needed	
17	Connections total	251
18		
19	Number of ICPs decommissioned during year by consumer type	
		Number of
20	Consumer types defined by EDB*	decommissionings
21	Domestic/Residential	28
22	Commercial	52
23	Large Commercial	1
24	Industrial	
25	[EDB consumer type]	
26	* include additional rows if needed	
27 28	Decommissionings total	81
29	Distributed generation	
30	Number of connections made in year	97 connections
31	Capacity of distributed generation installed in year	1 MVA
32	Capacity of distributed generation instance in year	1
33	9e(ii): System Demand	
34		
35		Demand at time
		of maximum
		coincident
36	Maximum coincident system demand	demand (MW)
37	GXP demand	54
38	plus Distributed generation output at HV and above	-
39	Maximum coincident system demand	54
40	less Net transfers to (from) other EDBs at HV and above	
41	Demand on system for supply to consumers' connection points	54
40	Electricity volumes corried	Energy (GM/h)
42	Electricity volumes carried	Energy (GWh)
43	Electricity supplied from GXPs	239
44	less Electricity exports to GXPs	
45 46	plus Electricity supplied from distributed generation less Net electricity supplied to (from) other EDBs	15
47	less Net electricity supplied to (from) other EDBs Electricity entering system for supply to consumers' connection points	254
48	less Total energy delivered to ICPs	229
49	Electricity losses (loss ratio)	25 9.9%
50	, , , , , , , , , , , , , , , , , , , ,	_5,570
51	Load factor	0.54
52	9e(iii): Transformer Capacity	
53		(MVA)
54	Distribution transformer capacity (EDB owned)	190
55	Distribution transformer capacity (Non-EDB owned)	46
56	Total distribution transformer capacity	236
57		
58		(MVA)
59	Zone substation transformer capacity (EDB owned)	284
60	Zone substation transformer capacity (Non-EDB owned)	

	Company Name	Firstlight Network Limited
	For Year Ended	31 March 2025
	Network / Sub-network Name	WRA
SCI	HEDULE 9e: REPORT ON NETWORK DEMAND	
	schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new	connections including
	buted generation, peak demand and electricity volumes conveyed).	connections including
ch ref		
8	9e(i): Consumer Connections and Decommissionings	
9	Number of ICPs connected during year by consumer type	
		Number of
10	Consumer types defined by EDB*	connections (ICPs)
11	Domestic/Residential	47
12	Commercial	14
13	Large Commercial	2
14	Industrial	-
15	[EDB consumer type]	
16 17	* include additional rows if needed Connections total	63
18	Connections total	03
19	Number of ICPs decommissioned during year by consumer type	
19	Number of ters decommissioned during year by consumer type	
		Number of
20	Consumer types defined by EDB*	decommissionings
21	Domestic/Residential Domestic/Residential	4
22	Commercial	10
23	Large Commercial	
24	Industrial	
25	[EDB consumer type]	
26	* include additional rows if needed	14
27 28	Decommissionings total	14
29	Distributed generation	
30	Number of connections made in year	14 connections
31	Capacity of distributed generation installed in year	0.14 MVA
32	capacity of distributed generation installed in year	0.14
32		
33	9e(ii): System Demand	
34		
35		Demand at time
		of maximum
		coincident
36	Maximum coincident system demand	demand (MW)
37	GXP demand	9
38	plus Distributed generation output at HV and above	4
39	Maximum coincident system demand	13
40	less Net transfers to (from) other EDBs at HV and above	
41	Demand on system for supply to consumers' connection points	13
42	Electricity volumes carried	Energy (GWh)
43	Electricity supplied from GXPs	56
44	less Electricity exports to GXPs	-
45	plus Electricity supplied from distributed generation	7
46	less Net electricity supplied to (from) other EDBs	_
47	Electricity entering system for supply to consumers' connection points	63
48	less Total energy delivered to ICPs	58
49	Electricity losses (loss ratio)	5 8.0%
50		
51	Load factor	0.57
	O-fill). Toron forman Committee	
52	9e(iii): Transformer Capacity	
53		(MVA)
54	Distribution transformer capacity (EDB owned)	46
55	Distribution transformer capacity (Non-EDB owned)	10
56	Total distribution transformer capacity	56
57		
58		(MVA)
59	Zone substation transformer capacity (EDB owned)	54
60	Zone substation transformer capacity (Non-EDB owned)	-
61	Total zone substation transformer capacity	54

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

8	10(i): Interruptions	
		Number of
9	Interruptions by class	interruptions
10	Class A (planned interruptions by Transpower)	-
11	Class B (planned interruptions on the network)	439
12	Class C (unplanned interruptions on the network)	734
13	Class D (unplanned interruptions by Transpower)	
14	Class E (unplanned interruptions of EDB owned generation)	-
15	Class F (unplanned interruptions of generation owned by others)	
16	Class G (unplanned interruptions caused by another disclosing entity)	-
17	Class H (planned interruptions caused by another disclosing entity)	-
18 19	Class I (interruptions caused by parties not included above)	4.472
20	Total	1,173
21	Interruption restoration	≤3Hrs >3hrs
22	Class C interruptions restored within	392 34
3	class c interruptions restored within	332 34
24	SAIFI and SAIDI by class	SAIFI SAIDI
5	Class A (planned interruptions by Transpower)	
26	Class B (planned interruptions on the network)	1.0779 180.901
27	Class C (unplanned interruptions on the network)	5.0282 493.638
28	Class D (unplanned interruptions by Transpower)	
29	Class E (unplanned interruptions of EDB owned generation)	
30	Class F (unplanned interruptions of generation owned by others)	
31	Class G (unplanned interruptions caused by another disclosing entity)	
32	Class H (planned interruptions caused by another disclosing entity)	
33	Class I (interruptions caused by parties not included above)	
34	Total	6.11 674.
35		
36	Transitional SAIFI and SAIDI (previous method)	SAIFI SAIDI
37	Class B (planned interruptions on the network)	1.0286 180.901
38	Class C (unplanned interruptions on the network)	4.1628 493.638
		4.1628 493.638



Company Name For Year Ended Network / Sub-network Name Firstlight Network Limited 31 March 2025 ALL

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so it without to the secure provided by receiving 1.9 of the second section 1.9 of the second section 1.4 of this ID determination.

	liability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of autermination), and so is subject to the assurance report required by section 2.8.	udited disclosure information	(as defined in sect	OH 1.4 OF CHIS ID
41 42	10(ii): Class C Interruptions and Duration by Cause			
43	Cause	SAIFI	SAIDI	
44	Lightning	0.0621	4.7435	
45	Vegetation	0.8400	182.2097	
46	Adverse weather	0.7772	93.8449	
47	Adverse environment	0.0761	12.6300	
48	Third party interference	0.4754	28.9449	
49	Wildlife	0.3649	23.6403	
50	Human error	0.1047	3.9267	
51	Defective equipment	1.6632	99.7692	
52 53	Other cause Unknown	0.6645	43.9296	
54	Olkilowii	0.0043	43.3230	
55	Breakdown of third party interference	SAIFI	SAIDI	
56	Dig-in	0.0553	2.2351	
57	Overhead contact	0.2101	7.3867	
58	Vandalism	0.0002	0.1277	
59	Vehicle damage	0.1766	11.1946	
60	Other	0.0331	8.0008	
61				
62	Breakdown of vegetation interruptions (vegetation cause)	SAIFI	SAIDI	
63 64	In-zone Out-of-zone			Not required before DY2026
65	Out-or-zone			Not required before DY2026
66	10(iii): Class B Interruptions and Duration by Main Equipment Involved			
67				
68	Main equipment involved	SAIFI	SAIDI	
68 69	Subtransmission lines	0.2527	3.6969	
68 69 70	Subtransmission lines Subtransmission cables	0.2527	3.6969 -	
68 69 70 71	Subtransmission lines Subtransmission cables Subtransmission other	0.2527 - -	3.6969 - -	
68 69 70 71 72	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV)	0.2527 - - - 0.7481	3.6969 - - - 159.2901	
68 69 70 71	Subtransmission lines Subtransmission cables Subtransmission other	0.2527 - -	3.6969 - -	
68 69 70 71 72 73	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV)	0.2527 - - - 0.7481	3.6969 - - - 159.2901	
68 69 70 71 72 73 74	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV)	0.2527 - - - 0.7481	3.6969 - - - 159.2901	
68 69 70 71 72 73 74 75 76	Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved	0.2527 - - 0.7481 0.0771	3.6969 - - 159.2901 17.9149 -	
68 69 70 71 72 73 74 75 76 77 78 79	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables	0.2527 	3.6969 - - 159.2901 17.9149 - SAIDI 77.8080	
68 69 70 71 72 73 74 75 76 77 78 79 80	Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other	0.2527 	3.6969 - - 159.2901 17.9149 - SAIDI 77.8080	
68 69 70 71 72 73 74 75 76 77 78 79 80 81	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV)	0.2527 	3.6969 	
68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	Subtransmission clables Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV)	0.2527 	3.6969 	
68 69 70 71 72 73 74 75 76 77 78 79 80 81	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV)	0.2527 	3.6969 	
68 69 70 71 72 73 74 75 76 77 78 79 80 81 82	Subtransmission clables Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV)	0.2527 	3.6969 	Fault rate (faults
68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84	Subtransmission clables Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved	0.2527	3.6969	per 100km)
68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86	Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission lines	0.2527	3.6969	
68 69 70 71 72 73 74 75 76 77 78 80 81 82 83 84 85 86 87	Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission lines Subtransmission lines Subtransmission other (excluding LV)	0.2527	3.6969	per 100km)
68 69 70 71 72 73 74 75 76 77 78 80 81 82 83 84 85 86 87 88	Subtransmission clables Subtransmission cables Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission cables Subtransmission cables Subtransmission other	0.2527	3.6969 159.2901 17.9149 SAIDI 77.8080 391.8037 24.0272 Circuit length (km) 638 2	per 100km) 5.17
68 69 70 71 72 73 74 75 76 77 78 80 81 82 83 84 85 86 87 88 89	Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution lines (excluding LV)	0.2527	3.6969	per 100km) 5.17 - 28.55
68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90	Subtransmission clables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission clables Subtransmission clables Subtransmission cher Distribution lines (excluding LV) Distribution cables (excluding LV)	0.2527	3.6969 159.2901 17.9149 SAIDI 77.8080 391.8037 24.0272 Circuit length (km) 638 2	per 100km) 5.17
68 69 70 71 72 73 74 75 76 77 78 80 81 82 83 84 85 86 87 88 89	Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution lines (excluding LV)	0.2527	3.6969	per 100km) 5.17 - 28.55



Firstlight Network Limited 31 March 2025 Company Name For Year Ended Network / Sub-network Name GIS

h ref	10(i): Interruptions		
Ĭ	20(1): 111:011 april0113	Number of	
9	Interruptions by class	interruptions	
10	Class A (planned interruptions by Transpower)		
11	Class B (planned interruptions on the network)	337	
12	Class C (unplanned interruptions on the network)	549	
13	Class D (unplanned interruptions by Transpower)		
14	Class E (unplanned interruptions of EDB owned generation)		
15	Class F (unplanned interruptions of generation owned by others)		
16	Class G (unplanned interruptions caused by another disclosing entity)		
17	Class H (planned interruptions caused by another disclosing entity)		
18	Class I (interruptions caused by parties not included above)		
19	Total	886	
20			
21	Interruption restoration	≤3Hrs >	3hrs
22	Class C interruptions restored within	299	250
23			
24	SAIFI and SAIDI by class	SAIFI S	AIDI
25	Class A (planned interruptions by Transpower)	_	-
26	Class B (planned interruptions on the network)	1.0233	82.9695
27	Class C (unplanned interruptions on the network)	3.9866	342.6894
28	Class D (unplanned interruptions by Transpower)	-	-
29	Class E (unplanned interruptions of EDB owned generation)	-	-
30	Class F (unplanned interruptions of generation owned by others)	-	-
31	Class G (unplanned interruptions caused by another disclosing entity)	_	-
32	Class H (planned interruptions caused by another disclosing entity)	-	-
33	Class I (interruptions caused by parties not included above)	-	-
34	Total	5.01	425.7
35			
36	Transitional SAIFI and SAIDI (previous method)	SAIFI S.	AIDI
37	· · · · · · · · · · · · · · · · · · ·		
- 1	Class B (planned interruptions on the network)	0.9967	82.9695
38 39	Class C (unplanned interruptions on the network)	3.5656	342.6894
	Where EDBs do not currently record their SAIFI and SAIDI values using the 'multi-count' appro	ach, they shall continue to record their SAIFI and SA	AIDI values on the
40	same basis that they employed as at 31 March 2023 as 'Transitional SAIFI' and 'Transitional Substitutional Salfi' and 'Transitional Salfi' and 'Transitional Salfi' and 'Transitional Salfi' as using the 'multi-count approach'. This is a transitional reporting requirement that shall be		



Company Name Firstlight Network Limited
For Year Ended 31 March 2025
Network / Sub-network Name GIS

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

deterr	mination), and so is subject to the assurance report required by section 2.8.			
1	10(ii): Class C Interruptions and Duration by Cause			
12	25(1), 3133 C 11131 Sprint and 24141611 27 Casac			
13	Cause	SAIFI	SAIDI	
14	Lightning	0.0175	4.1196	
5	Vegetation	0.8135	150.0233	
6	Adverse weather	0.0696	19.5508	
7	Adverse environment	0.0190	4.1745	
3	Third party interference	0.5301	21.0628	
	Wildlife	0.4108	23.8272	
	Human error	0.0753	1.3703	
	Defective equipment	1.3563	75.9890	
	Other cause	-	-	
	Unknown	0.6945	42.5719	
1				
	Breakdown of third party interference	SAIFI	SAIDI	
	Dig-in	0.0679	2.7422	
	Overhead contact	0.2459	4.3530	
	Vandalism	0.0003	0.1566	
1	Vehicle damage	0.2134	13.3031	
1	Other	0.0026	0.5078	
	Breakdown of vegetation interruptions (vegetation cause)	SAIFI	SAIDI	
	In-zone			Not required before DY
	Out-of-zone			Not required before DY
5	10(iii): Class B Interruptions and Duration by Main Equipment Involved	CAIFI	CAIDI	
	Main equipment involved	SAIFI	SAIDI	
	Main equipment involved Subtransmission lines	0.3408	2.5981	
	Main equipment involved Subtransmission lines Subtransmission cables		2.5981 -	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other	0.3408 - -	2.5981 - -	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV)	0.3408 - - 0.6171	2.5981 - - 74.1698	
5	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV)	0.3408 - -	2.5981 - -	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV)	0.3408 - - 0.6171 0.0654	2.5981 - - 74.1698 6.2015	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV)	0.3408 - - 0.6171 0.0654	2.5981 - - 74.1698 6.2015	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved	0.3408 	2.5981 - - 74.1698 6.2015 -	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved	0.3408 	2.5981 - - 74.1698 6.2015 - SAIDI	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines	0.3408 	2.5981 - - 74.1698 6.2015 -	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables	0.3408	2.5981 	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other	0.3408	2.5981 	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV)	0.3408	2.5981 	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV)	0.3408	2.5981 	
	Main equipment involved Subtransmission lines Subtransmission other Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV)	0.3408	2.5981 	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV)	0.3408	2.5981 	Fault rate
	Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution eables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved	0.3408	2.5981	
	Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission lines	0.3408	2.5981 	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission lines (excluding LV) Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) Subtransmission cables Main equipment involved Subtransmission lines Subtransmission lines Subtransmission cables	0.3408	2.5981	
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission lines Subtransmission lines Subtransmission lines Subtransmission lines Subtransmission lines Subtransmission lines Subtransmission tebles Subtransmission other	0.3408	2.5981	Fault rate per 100
	Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) Subtransmission other Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV)	0.3408	2.5981	per 100
	Main equipment involved Subtransmission lines Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution lines (excluding LV) Distribution other (excluding LV) 10(v): Fault Rate Main equipment involved Subtransmission cables Subtransmission cables Subtransmission lines Subtransmission cables Subtransmission cables Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV)	0.3408	2.5981	
	Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) 10(iv): Class C Interruptions and Duration by Main Equipment Involved Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV) Distribution cables (excluding LV) Distribution cables (excluding LV) Distribution other (excluding LV) Distribution other (excluding LV) Subtransmission other Main equipment involved Subtransmission lines Subtransmission other Distribution lines (excluding LV)	0.3408	2.5981	per 100



Company Name Firstlight Network / Sub-network Name Firstlight Network / Sub-network Name Firstlight Network / Sub-network Name

Firstlight Network Limited
31 March 2025
WRA

	CHEDULE 10: REPORT ON NETWORK RELIABILITY			
	s schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI			
	ability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI in ermination), and so is subject to the assurance report required by section 2.8.	formation is part of audited disclosure information ((as defined in sect	ION 1.4 OF THIS ID
uci	crimination, and so is subject to the assurance report required by section 2.6.			
ch ref				
8	10(i): Interruptions			
		Number of		
9	Interruptions by class	interruptions		
10	Class A (planned interruptions by Transpower)			
11	Class B (planned interruptions on the network)	102		
12	Class C (unplanned interruptions on the network)	185		
13	Class D (unplanned interruptions by Transpower)			
14	Class E (unplanned interruptions of EDB owned generation)	-		
15	Class F (unplanned interruptions of generation owned by others)			
16	Class G (unplanned interruptions caused by another disclosing entity)	-		
17	Class H (planned interruptions caused by another disclosing entity)			
18 19	Class I (interruptions caused by parties not included above) Total	287		
20	Total	287		
21	Interruption restoration	≤3Hrs	>3hrs	
22	Class C interruptions restored within	93	92	
23	class c interruptions restored within	33	32	
	SAIFI and SAIDI by class	SAIFI	SAIDI	
24	Class A (planned interruptions by Transpower)	- JAIFI	JAIDI	
26	Class B (planned interruptions on the network)	1.3185	165.6586	
27	Class C (unplanned interruptions on the network)	9.6192	1,158.9639	
28	Class D (unplanned interruptions by Transpower)	5.0192	1,138.3033	
29	Class E (unplanned interruptions of EDB owned generation)			
30	Class F (unplanned interruptions of generation owned by others)	_	_	
31	Class G (unplanned interruptions caused by another disclosing entity)	_	_	
32	Class H (planned interruptions caused by another disclosing entity)	_	_	
33	Class I (interruptions caused by parties not included above)	_	_	
34	Total	10.9377	1,324.6225	
35				
36	Transitional SAIFI and SAIDI (previous method)	SAIFI	SAIDI	
37	Class B (planned interruptions on the network)	1.1686	165.6586	
38	Class C (unplanned interruptions on the network)	6.7953	1,158.9639	
39				



Company Name For Year Ended Network / Sub-network Name Firstlight Network Limited
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SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

de	termination), and so is subject to the assurance report required by section 2.8.			
41 42	10(ii): Class C Interruptions and Duration by Cause			
43	Cause	SAIFI	SAIDI	
44	Lightning	0.2589	7.4936	
45	Vegetation	0.9570	324.0748	
46	Adverse weather	3.8960	421.3034	
47	Adverse environment	0.3281	49.8980	
48	Third party interference	0.2344	63.6863	
49	Wildlife	0.1628	22.8167	
50	Human error	0.2342	15.1944	
51	Defective equipment	3.0158	204.5831	
52	Other cause	-	_	
53	Unknown	0.5320	49.9138	
54 55	Ducal Indonesia of their department of the superference	SAIFI	SAIDI	
56	Breakdown of third party interference	SAIFI	SAIDI	
57	Dig-in Overhead contact	0.0523	20.7581	
58	Vandalism	0.0323	20.7381	
59	Vehicle damage	0.0145	1.9012	
60	Other	0.1676	41.0270	
61		3,25,0		
62	Breakdown of vegetation interruptions (vegetation cause)	SAIFI	SAIDI	
63	In-zone			Not required before DY2026
64	Out-of-zone			Not required before DY2026
65				
66 67	10(iii): Class B Interruptions and Duration by Main Equipment Involved	CAISI	CAIDI	
68	Main equipment involved	SAIFI	SAIDI	
69 70	Subtransmission lines	0.1875	7.5328	
71	Subtransmission cables Subtransmission other	-	_	
72	Distribution lines (excluding LV)	1.0023	137.6126	
73	Distribution cables (excluding LV)	0.1287	20.5133	
74	Distribution other (excluding LV)	-	-	
75 76	10(iv): Class C Interruptions and Duration by Main Equipment Involved			
77	Main equipment involved	SAIFI	SAIDI	
78	Subtransmission lines	2.8692	101.0997	
79	Subtransmission cables	-	_	
80	Subtransmission other	-		
81 82	Distribution lines (excluding LV)	6.2687	1,018.4510	
83	Distribution cables (excluding LV) Distribution other (excluding LV)	0.4813	39.4132 -	
84	10(v): Fault Rate		Circuit length	Fault rate (faults
85	Main equipment involved	Number of Faults	(km)	per 100km)
86	Subtransmission lines	8	190	4.20
87	Subtransmission cables	-	0	_
88	Subtransmission other	-		
89	Distribution lines (excluding LV)	174	680	25.59
90	Distribution cables (excluding LV)	3	22	13.43
91	Distribution other (excluding LV)	-		
92 93	Total	185		



Company Name
For Year Ended
Network / Sub-network Name Firstlight Network Limited 31 March 2025 SCHEDULE 10: REPORT ON NETWORK RELIABILITY SCHEDOLE 20. REPORT ON THE I WOMEN RELIGIOIST. This schedule requires a summary of the key measures of network reliability (interruptions, SAID), SAIFI and fault rately for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAID information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. 10(vi): Worst-performing feeders (unplanned) SAIDI 7 Mata 0304 8 Rototahi 0403 27 Unknown cause SAIFI Number of Unplanned Interruptions Unplanned Interruptions Unplanned Interruptions

31 Defective Equipment Vegetation % of Feeder Overhead (optional) Circuit Length of Feeder Number of ICPs Feeder name 1 Mahia 3301 0.7421 0.2618 2 Waimata 0903 3 Elgin 0703 4 Crawford 1504 100% 97% 39% 5 Raupunga 3101 6 Rototahi 0403 34 Adverse Environment 7 Borough One 3204 0.161 6 Adverse Weather 819 8 Brickworks 3201 0.1542 9 Adverse Weather 616 63% 2 Defective Equipment Customer Impact Unplanned Most Common Cause of Unplanned Interruptions

26 Defective Equipment 100% 1 Ruakituri 2003 4104.7840 3 Inland 0301 4 Mahia 3301 5 Tiki Tiki 0206 938 316 421 113 216 2174.6171

Company Name
For Year Ended
Network / Sub-network Name This schedule requires a summary of the key measures of network reliability (interruptions, SAID), SAIP and fault rate) for the disclosure year. EDIs must provide explanatory comment on their network reliability for the disclosure year in Schedule 4 (Epplanatory notes to templates). The SAIPI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. SCHEDULE 10: REPORT ON NETWORK RELIABILITY 10(vi): Worst-performing feeders (unplanned) SAIDI SAIFI Most Common Cause of Unplanned Interruptions Vegetation Number of Unplanned Interruptions % of Feeder Overhe (optional) Circuit Length of Feeder Number of ICPs 1 Waimata 0903 2 Elgin 0703 3 Crawford 1504 4 Rototahi 0403 Defective Equipment **Customer Impact** Most Common Cause of Unplanned Interruptions 38 Vegetation 13 Vegetation (optional) 1 Tiniroto 1003 2 Inland 0301 3 Tiki Tiki 0206 4 Makarika 0204 efective Equipment 1987.9381 5 Rototahi 0403



SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires as unmary of the key measures of retwork retriability (interruptions, SAID), SAIP and fault rate for the disclosure year. EDBs must provide explanatory comment on their network retailability for the disclosure year in Schedule 14

(Explanatory notes to templates). The SAIP and SAID information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

***Exh ref

***India 301 | SAID | SA



EDB Information Disclosure Requirements Information Templates Schedule 10a

Company Name
Disclosure Date
Disclosure Year (year ended)

Firstlight Network Limited

31 August 2025

31 March 2025

Template for Schedule 10a Prepared 16 February 2024.

Table of Contents Schedule Schedule name 10a REPORT ON INTERRUPTIONS

	SCHEDULE 10s: REPORT ON INTERRUPTIONS										Company Name Far Tear Ended	Firstfielt Metanis Limited El March 2005
	This schedule regions new interruption data for the disclosure year SADI and SATI SERIES - Store interruption data	is to be recorded using	he malii souni approach ili	here multiple best	ies are affected, the interception record	lis in benjalit inte m	altiple interspitans, ie, or	e interruption re	mord per lessie.	This information	en in part of audited disclo	per defender per defend to notice 1.0 of this Children interioris, and so is subject to the assurance require required by section 3.6.
	bianglia	Submetered	Provider (s) affectived by	Start date	Dark Since End date End	-	Number	od 10h 10 anied	Pinterruption	Planned or unplanned interruption		
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28 29	1555 Teachquare M Science Mi 1557 7075 Water Seed	Galaxies Galaxies	Teachergene 5001 Malerite 5001	5/05/0024 5/05/0024	0811-00 1/06/0024 18-110 0811-00 8/06/0024 18-110	0 032	0.000 00	65		Named Orginal	Flancel Unknown source	Total Villa San Carlo San
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33	1983 177 Springer Seel N/A7 Springer Seel	Galaxies Galaxies	Marine 2011 Marine 2011	118430H	1405-00 1204-0014 16-114 1405-00 1204-0014 16-01	0 000	0.00012 24 0.00038 56	196	12	Stational Stational	Vegetation Vegetation	TORREST CONTROL CONTRO
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43 23	2000 Tricks fined 2001 688 Mehrs Corp. Seed 5004 Test Salesbellers	Galacter Matrix Matrix	Training 2003 Matrix 2003 Tout Sale	2454/3024 2454/3024 2454/3024	2002-00 2004-2014 14:000 12:21:00 27:04:2014 12:410 00:00 27:04:2014 12:400	0 043 0 144 0 023	0.00326 85 0.00968 252 0.00006 1	190	(80 (7)	September September September	Stration Trial Purplement Debute Springer	Dank Ben (and how of shall and howed down. A sergial formight has 2755 Co-included 1965 conductor 1995 underlose major from earth. Former and Millerford in wells in an Wilderford Ben of surgial or which the Ben the Ben of shall be significant entries. A service of the Service Ben of Servi
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Company Name Firstlight Network Limited

For Year Ended 31 March 2025

Schedule 14 Mandatory Explanatory Notes

(Guidance Note: This Microsoft Word version of Schedules 14, 14a and 15 is from the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024. Clause references in this template are to that determination)

- 1. This schedule requires EDBs to provide explanatory notes to information provided in accordance with clauses 2.3.1, 2.4.21, 2.4.22, and subclauses 2.5.1(1)(f), and 2.5.2(1)(e).
- 2. This schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.1. Information provided in boxes 1 to 11 of this schedule is part of the audited disclosure information, and so is subject to the assurance requirements specified in section 2.8.
- 3. Schedule 15 (Voluntary Explanatory Notes to Schedules) provides for EDBs to give additional explanation of disclosed information should they elect to do so.

Return on Investment (Schedule 2)

4. In the box below, comment on return on investment as disclosed in Schedule 2. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 1: Explanatory comment on return on investment

In RY2025, the vanilla ROI was 4.34%. This is below the ROI of 5.31% reported for RY2024. This decrease in ROI is primarily due to an increase in assets commissioned compared with RY2024. Reclassified items are noted in box 10 below and have no impact on ROI. Commerce Commission published their final decision to reopen Firstlight's DPP3 price path and determine a catastrophic event allowance of \$1.381 million, which Firstlight will be able to recover from its consumers.

Regulatory Profit (Schedule 3)

- 5. In the box below, comment on regulatory profit for the disclosure year as disclosed in Schedule 3. This comment must include
 - a description of material items included in other regulated income (other than gains / (losses) on asset disposals), as disclosed in 3(i) of Schedule 3
 - 5.2 information on reclassified items in accordance with subclause 2.7.1(2).



Box 2: Explanatory comment on regulatory profit

Our regulated profit including financial incentives and wash-ups for the year is \$9.1m which is a 14% decrease compared to regulated profit in FY24 of \$10.5m. The \$1.4m decrease is attributable to a \$2.81m decrease in revaluation, and \$653k increase in depreciation.

Material items included in other regulated income were compensation receipts for damages to network infrastructure, electricity sales income from gensets and new connections fees.

Reclassified items are noted in box 10 below and have no impact on regulated profit.

Merger and acquisition expenses (3(iv) of Schedule 3)

- 6. If the EDB incurred merger and acquisitions expenditure during the disclosure year, provide the following information in the box below-
 - 6.1 information on reclassified items in accordance with subclause 2.7.1(2).
 - 6.2 any other commentary on the benefits of the merger and acquisition expenditure to the EDB.

Box 3: Explanatory comment on merger and acquisition expenditure

There were no merger or acquisition expenditure during the year.

Value of the Regulatory Asset Base (Schedule 4)

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

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

The RAB has increased from \$222.6m to \$238.5m, an increase of 7%. Assets commissioned in RY25 of \$19m was 51% higher than RY24 of \$12.6m largely attributable to increased asset replacement and renewal expenditure correlating into much higher value of assets commissioned in RY25 with sub transmission and distribution pole replacements a major driver.

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

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



- 8.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible:
- 8.3 Income included in regulatory profit / (loss) before tax but not taxable;
- 8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax.

Box 5: Regulatory tax allowance: permanent differences

There was an immaterial permanent difference for entertainment expenses.

Regulatory tax allowance: disclosure of temporary differences (5a(vi) of Schedule 5a)

9. In the box below, provide descriptions and workings of material items recorded in the asterisked category 'Tax effect of other temporary differences' in 5a(vi) of Schedule 5a.

Box 6: Tax effect of other temporary differences (current disclosure year)

The amounts are immaterial.

Cost allocation (Schedule 5d)

10. In the box below, comment on cost allocation as disclosed in Schedule 5d. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 7: Cost allocation

Reclassified items are noted in box 10 below. No cost allocation has been applied.

Asset allocation (Schedule 5e)

11. In the box below, comment on asset allocation as disclosed in Schedule 5e. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 8: Commentary on asset allocation

No asset allocation has been applied. Refer to box 9 for items reclassified.



Capital Expenditure for the Disclosure Year (Schedule 6a)

- 12. In the box below, comment on expenditure on assets for the disclosure year, as disclosed in Schedule 6a. This comment must include-
 - 12.1 a description of the materiality threshold applied to identify material projects and programmes described in Schedule 6a;
 - 12.2 information on reclassified items in accordance with subclause 2.7.1.

Box 9: Explanation of capital expenditure for the disclosure year

Capital expenditure is focused on asset replacement and renewal to maintain the network by replacing aging assets and contributed \$17.6m of total expenditure of \$19.8m or 88%. This is a significant increase on replacement and renewal expenditure of \$12.4m in RY24. Increased expenditure on quality of supply totalling \$844k in RY25 included expenditure on generators, field recloser automation and placement of fault indicators on the network.

Major expenditure items for categories in asset replacement and renewal were:

- 11kV Pole Replacements Planned/Unplanned
- 50kV Pole/Component Replacement
- Zone Substation Component Replacement/Refurbishment
- Switchgear Replacement plan Planned/Unplanned
- GENSET Refurbishment
- 110kV Tower/Component Replacement + Tracks

There is no materiality threshold applied to the schedule

There are costs relating to installation of a bridge on landowner property to allow access to Sub-transmission towers that have been reclassified from asset replacement and renewal – sub transmission to non-network assets. The total value of the costs reclassified in the RY25 \$301k and \$86k in RY24.

Operational Expenditure for the Disclosure Year (Schedule 6b)

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



of the expenditure the purpose of the expenditure, and the operational expenditure categories the expenditure relates to.

Box 10: Explanation of operational expenditure for the disclosure year

Operational expenditure is broken down to Network opex relating to network maintenance (\$8.1m) and non-network opex supporting the business operations (\$7.1m).

Network opex consists of four standard categories: Asset replacement and renewal, service interruptions and emergencies, vegetation management and routine and corrective maintenance and inspection.

Asset replacement and renewal expenditure of \$55k was 92% below target. This is primarily a result of the reclassification of the avoided cost of distribution charges paid to Eastland Generation Limited now classified as non-network solutions in RY25. This provides network security in the form of distributed generation from Waihi Hydro and avoids electricity distribution capital expenditure due to the provision of alternate security services.

Service interruptions and emergencies expenditure was 15% or \$492k below target for RY25. The region again incurred adverse weather conditions over the course of the year but not to the extent of the severity of previous years, most notably in RY23. Genset maintenance and servicing costs have been reclassified as routine and corrective maintenance costs in RY25.

Non-network opex expenditure of \$7.1m was comprised of \$1.98m on system operations and network support (SONS), \$388k on Non-network solutions provided by related party or third party and business support costs of \$4.7m.

Variance between forecast and actual expenditure (Schedule 7)

14. In the box below, comment on variance in actual to forecast expenditure for the disclosure year, as reported in Schedule 7. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).



Box 11: Explanatory comment on variance in actual to forecast expenditure CAPITAL EXPENDITURE

Customer Connections variance (-\$1,705k)

Firstlight Network has historically adopted a customer connections policy whereby all expenses related to customer-initiated requirements have been covered in full by the customer. A review of the capital contributions policy where customers contribute less than 100% upfront resulted in an increase in forecast capex for customer connections. This policy is still planned to go ahead but yet to be adopted.

System Growth variances (-\$2,188k)

The underspend in growth was a result of the delay in preparing the project scope for the capacitor banks, being implemented to allow the main Tuai to Gisborne sub transmission line to be operated at a higher rate.

Asset Replacement and Renewal variances +\$2,156k

Asset replacement and renewal expenditure was 14% over budget. Increased investment in sub transmission and distribution overhead renewals, zone sub renewal expenditure, switchgear replacement plan and continuation of remediation work on critical sub transmission assets were the main drivers to the overspend. Increased costs in the supply chain also had an impact on overall expenditure.

Reliability, Safety and Environment (-\$228k)

Generator project has been deferred, currently still in project scoping phase.

Asset Relocations (-\$75k)

Small provision is made annually for any asset relocations. No relocations in RY25.

Non- network Assets +\$119k

This overspend is driven by a reclassification of bridge installation costs of \$301k to allow access to transmission towers. These were reclassified from asset replacement and renewal — sub transmission. The overspend was partially offset by delay in Wairoa Depot rebuild originally scheduled for RY25.

OPERATIONAL EXPENDITURE

Asset Replacement & Renewal (-\$619k)

Asset Replacement and Renewal underspent by \$619k. As noted previously, the avoided cost of distribution charges paid to Eastland Generation Ltd have now been classified as non-network solution expenditure and this is the major driver in the underspend. There has also been a reclassification of some work categories previously identified as AR&R but deemed more appropriately classified as routine and corrective maintenance in RY25.

Routine & Corrective Maintenance & Inspection (-\$368k)

Total expenditure of \$3.1m was \$368k under budget of \$3.5m a variance of 11%. This is considerably higher than RY24 spend of \$2.2m and trending above historical levels. Additional headcount and major maintenance work carried out at Wairoa and Tuai subs were contributing factors to the increase compared to historic levels.

Service Interruption & Emergencies (-\$492k)

Service interruption expenditure of \$2.8m was 15% under budget. This compared to \$3m in RY23 and \$2.9m in RY24. Genset maintenance and servicing costs have been reclassified as routine and corrective maintenance costs in RY25.

Vegetation Management +\$305k

Increased focus has been put on vegetation management activities to manage the increasing impact of vegetation on the reliability performance of the network and this is reflected in increased spend to budget.

System Operations & Network Support Costs (-\$1318k)

A large step change was factored into SONS forecasts in the 2024 AMP. This, coupled with a higher than budgeted personnel recovery (time writing that results in a credit to SONS) are the key drivers in the underspend. Major SONS costs are payroll, management fee that is split between SONS and business support, network consultancy costs and vehicle expenses.

Business Support Costs (-\$557k)

Business support costs of \$4.7m was 11% under budget. Spend was in line with RY23 and RY24 also at \$4.7m respectively. Major components of business support costs are management fee, payroll, insurance, consultancy fees, software/licence fees and legal expenses. Base year business support AMP calculations included some one-off expenses in RY23 prior to acquisition by Clarus Group in March 23 and were included in AMP forecast modelling and was the driver to underspend.



Information relating to revenues and quantities for the disclosure year

- 15. In the box below provide-
 - 15.1 a comparison of the target revenue disclosed before the start of the disclosure year, in accordance with clause 2.4.1 and subclause 2.4.3(3) to total billed line charge revenue for the disclosure year, as disclosed in Schedule 8; and
 - 15.2 explanatory comment on reasons for any material differences between target revenue and total billed line charge revenue.

Box 12: Explanatory comment relating to revenue for the disclosure year There is no material difference between target and actual revenue.

Network Reliability for the Disclosure Year (Schedule 10)

16. In the box below, comment on network reliability for the disclosure year, as disclosed in Schedule 10.

Box 13: Commentary on network reliability for the disclosure year

In RY25, there was a significant increase in planned outages, rising by 41% from 313 in RY24 to 439. This increase was reflected in a corresponding rise in planned SAIDI, which went up from 122 to 181.

Unplanned SAIFI saw a sharp increase of 31%, rising from 3.826 to 5.028. One of the key contributors to this was Sub-transmission line outages almost doubled in RY25, increasing by 94% from 17 to 33. Zone substations also had a significant impact, particularly on SAIFI, due to the high number of customers affected during outages.

Vegetation-related interruptions saw a sharp increase, with SAIDI more than doubling rising 103% from 90 to 182. Notably, 91% of this impact was caused by out-of-zone vegetation. In contrast, in-zone vegetation-related SAIDI fell by 47% compared to the previous year, indicating that the vegetation management strategy within regulated areas is delivering positive results.

Weather-related interruptions showed a dramatic reduction, with SAIDI due to adverse environment falling by 88% - from 101 to just 13.

Interruptions due to equipment failure increased, contributing to a 33% rise in SAIFI. However, despite more interruptions, the SAIDI associated with equipment failure dropped by 20%, from 124 in RY24 to 100 in RY25. This suggests shorter durations of impact of the outages potentially due to faster response for restoration due to increased automation. Pole and pole-top hardware were identified as major contributors to equipment-related interruptions.

Mahia 3301 was the worst performing feeder as it contributed to the highest SAIDI and SAIFI.

The most common cause on a feeder is determined by the highest number of interruptions attributed to that cause. In cases where two causes have the same number of interruptions, we have selected the cause that contributed the highest metric (SAIDI/SAIFI).

In response to these trends, a targeted pole management program is now underway. The introduction of a new inspection app has improved forecasting, resulting in a higher forecasted rate of pole replacements going forward.

The data stated in this year's Schedule 10 is consistent with how Firstlight has been treating SAIDI and SAIFI in the past and as in the past SAIDI and SAIFI calculations for Information Disclosures does not uses normalising customer minutes leading to different reported SAIDI and SAIFI to those in Annual Compliance Statement.

The information provided in Schedule 10 has been derived from the records kept by the control room. These processes follow Firstlight Outage Data Recording Procedures contained in our Quality Standards Manuals and are typical of industry control room procedures. There are inherent limitations in the ability to collect and

record the network reliability information to be disclosed in Schedule 10(i) to 10(vi) and schedule 10a. Consequently, there is no independent evidence available to support the accuracy and completeness of recorded faults, and Firstlight has limited control over the accuracy and completeness of installation control point (ICP) data included in the SAIDI and SAIFI calculations.	

Insurance cover

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

Box 14: Explanation of insurance cover

Network assets such as the substation buildings, zone sub transformers and switchgear, SCADA, other communications equipment excluding fibre-optic cables are insured but lines, poles and cables are not. These assets are insured for replacement cost to a maximum of \$79m.

Firstlight Network Limited has no self-insurance cover.

Amendments to previously disclosed information

- 18. In the box below, provide information about amendments to previously disclosed information disclosed in accordance with clause 2.12.1 in the last 7 years, including:
 - 18.1 a description of each error; and
 - 18.2 for each error, reference to the web address where the disclosure made in accordance with clause 2.12.1 is publicly disclosed.

Box 15: Disclosure of amendment to previously disclosed information

There were no amendments to the previously disclosed information.

Company Name Firstlight Network Limited

For Year Ended 31 March 2025

Schedule 14a Mandatory Explanatory Notes on Forecast Information

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024.)

- 1. This Schedule requires EDBs to provide explanatory notes to reports prepared in accordance with clause 2.6.6.
- 2. This Schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with 2.7.2. This information is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.

Commentary on difference between nominal and constant price capital expenditure forecasts (Schedule 11a)

3. In the box below, comment on the difference between nominal and constant price capital expenditure for the current disclosure year and 10 year planning period, as disclosed in Schedule 11a.

Box 1: Commentary on difference between nominal and constant price capital expenditure forecasts

Commentary on difference between nominal and constant price operational expenditure forecasts (Schedule 11b)

4. In the box below, comment on the difference between nominal and constant price operational expenditure for the current disclosure year and 10 year planning period, as disclosed in Schedule 11b.

Box 2: Commentary on difference between nominal and constant price operational expenditure forecasts

Company Name Firstlight Network Limited

For Year Ended 31 March 2025

Schedule 15 Voluntary Explanatory Notes

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024.)

- 1. This schedule enables EDBs to provide, should they wish to
 - additional explanatory comment to reports prepared in accordance with clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1, 2.5.2 and 2.6.6.
 - information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.
- 2. Information in this schedule is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.
- 3. Provide additional explanatory comment in the box below.

Box 1: Voluntary explanatory comment on disclosed information
Schedule 5b system operations and network support costs (SONS) are higher than the amount disclosed in schedule 6b in RY25. The primary reason for this is a catch up in personnel recoveries in RY25 that results in a credit to SONS that is not a related party transaction.

Firstlightnetwork

Appendix A Information Disclosure for Related Parties

Assessment Period

1 April 2024 - 31 March 2025

1. Introduction

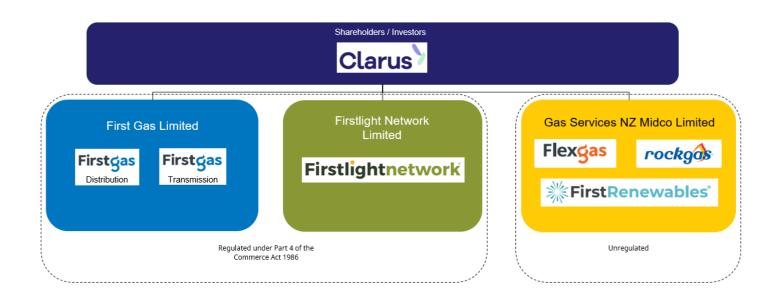
Firstlight Network (Firstlight) is the electricity lines company for Tairāwhiti and Wairoa. We own and maintain the poles, wires, transformers and underground cabling used by electricity retailers to supply customers with electricity.

We also own the region's high-voltage electricity transmission network (the steel poles and towers that connect our region to the national grid).

We're a team of people who, with our contractors, are responsible for keeping the lights on for 26,000 customers across 12,000 square kilometers of Tairāwhiti and Wairoa.

On 1 April 2023, Firstgas Group (now Clarus) took over ownership of Eastland Network Limited from Eastland Group. Firstlight Network is part of Clarus and is owned by Igneo Infrastructure Partners.

Clarus is one of New Zealand's largest energy groups, with brands that touch many parts of the energy supply chain – from energy transmission and distribution to retail supply and storage.





2. Information Disclosure requirements

This disclosure is made on behalf of Firstlight. Firstlight procures operations and maintenance (O&M) services from its related party, Gas Services New Zealand Midco Limited (GSNZ Midco). Firstlight also procures corporate support services from Firstgas. The extent of these and other purchases from companies within the Clarus group means that Firstlight procures more than 65% of its operating expenditure (Opex) and capital expenditure (Capex) from related parties.

Given this use of related parties, Firstlight is subject to the full disclosure requirements for related parties under the Electricity Distribution Information Disclosure Determination 2012 (ID Determination) issued by the Commerce Commission.

The related party information disclosed on the following pages has been prepared in accordance with sections 2.3.8, 2.3.10, 2.3.12 and 2.3.13 of the ID Determination. It:

- Provides a summary of related party relationships and transactions
- Provides a summary of the Clarus procurement policy and describes how this policy is applied in practice by Firstlight
- Describes policies and procedures that require consumers to purchase goods or services from related parties
- Provides representative examples of how the procurement policy has been applied for related party purchases and how arm's length terms were tested
- Provides a map of anticipated network expenditure and constraints

This disclosure was prepared on 13 August 2025 and where required, has been audited as part of the annual information disclosure process.

A copy of the full procurement policy and associated guidelines has been provided to the Commerce Commission as required under section 2.3.11 of the ID Determination.



3. Summary of Firstlight's related party relationships and transactions

Clause 2.3.8 of the ID Determination requires that:

"if an EDB has had related party transactions involving a procurement from a related party during that disclosure year, the EDB must publicly disclose a diagram or a description that shows the connection between the EDB and the related parties with which it has had related party transactions in the disclosure year, including for each of those related parties-

- (1) the relationship between the EDB and the related party
- (2) the principal activities of the related party
- (3) the total annual expenditure incurred by the EDB with the related party.

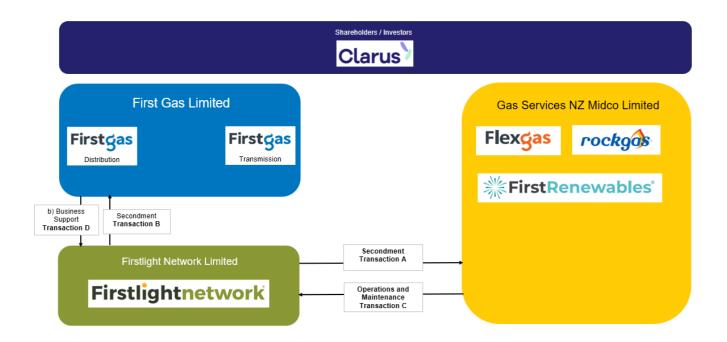
In RY2025, Firstlight:

- Seconded staff to GSNZ Midco to undertake operations and maintenance services across Clarus (Transaction A).
- Seconded staff to Firstgas to undertake business support services across Clarus (Transaction B).
- Procured operations and maintenance (O&M) services from its related party, Gas Services New Zealand (Midco) Limited (GSNZ Midco) (Transaction C).
- Procured corporate function services from Firstgas under the terms of the (CFSA) Corporate Function and Secondment Services Agreement (Transaction D).

In the RY2025 disclosure period, Firstlight seconded staff to GSNZ Midco and Firstgas. The supply of these unregulated services was valued using independent and objective measures.

These related party transactions are illustrated in Figure 2.





The following table describes the connection between Firstlight and its related parties with which it has had transactions with during the 2025 disclosure year. A breakdown of these transactions is also provided in schedule 5b of our Information Disclosure schedules.



Table 1: The nature and extent of related party transactions in disclosure year 2025

Related Party	Nature of relationship	Principle activities of the related party	RY2025 expenditure/revenue between Firstlight and its related party
GSNZ Midco (Transaction A)	Firstlight and GSNZ Midco have the same ultimate shareholders	Firstlight seconded staff to GSNZ Midco to provide operations and maintenance services	Unregulated income received of \$5.464 million is included in Schedule 5b for the provision of these services. This unregulated income is included in total regulatory income in Schedule 5b (and is not included in Schedule 2 or Schedule 3 as it is non-regulatory in nature)
Firstgas (Transaction B)	Firstgas and Firstlight have the same ultimate shareholders	Firstlight seconded staff to Firstgas to provide regulated gas transmission and gas distribution services	Unregulated income received of \$0.072 million (this amount is deducted from management fee)
GSNZ Midco (Transaction C)	Firstlight and GSNZ Midco have the same ultimate shareholders	Firstlight acquired operations and maintenance services from GSNZ Midco.	Network Capex \$19.159 million Non-Network Capex \$0.331 million Network Opex \$8.124 million System operations Opex and Network support Opex \$2.472 million
Firstgas (Transaction D)	Firstgas and Firstlight have the same ultimate shareholders	Firstgas provided corporate function services to Firstlight	\$2.493 million including \$0.039 million Directors Fees

Gas Services (Midco) New Zealand Limited

GSNZ Midco and Firstlight are part of the wider Clarus group of companies and have the same ultimate shareholders. GSNZ Midco owns Gas Services, a contracting company providing operations and maintenance services.

In the 2025 disclosure year, GSNZ Midco provided 98% of the Firstlight total Capex and 70% of all Operating Expenditure (Opex) under an Operations and Maintenance agreement (O&M agreement).

Services provided under the O&M agreement include:

- Management of the Firstlight business operations
- Asset management
- · Health, safety and environment management
- Land and planning management
- Design and engineering services
- Scheduling and completing field works
- · Incident and emergency response
- Provision of non-network assets such as plant and equipment (if required).



Operations and Maintenance (O&M) Agreement

Firstlight procures almost all of its network capital expenditure, most of its network Opex, and all its system operations and network support (SONS) expenditure from GSNZ Midco. These services are provided by Gas Services in accordance with the terms and conditions of the O&M agreement between Firstlight and GSNZ Midco.

While Firstlight owns the network and non-network assets and provides the electricity distribution services services across Tairāwhiti and Wairoa, under the O&M agreement, GSNZ Midco manages the operation of the assets, carries out an agreed Capital and Maintenance works programme, responds to incidents and emergencies, and provides system operations and network support services to Firstlight.

Costs incurred under the O&M agreement are directly attributable to Firstlight.

Corporate Function and Secondment Services Agreements (CFSA).

Firstlight contracts business support services from Firstgas under the Corporate Functions and Secondment Services Agreement (the CFSA), a shared services arrangement provides economies of scale and scope across Clarus.

Since Firstgas was the first regulated business owned by Clarus, this entity was chosen as the provider of corporate service across the group.

As with the O&M agreement, we have applied EBIT margins to the costs of goods sold (i.e., seconded staff and corporate functions) and used benchmarking to confirm that the value of the services supplied to Firstlight by Firstgas was not more than the terms of an arm's length transaction.

The CFSA requires Firstgas to carry out all corporate functions in a competent, diligent, and expeditious manner. While no specific service standards apply to corporate functions, as might be the case in a commercially negotiated agreement, the CFSA puts a process in place for Firstlight to review performance and communicate any concerns back to Firstgas.

Since the provision of business support is combined across Clarus, any issues affecting the performance of Firstgas under the CFSA will likely also affect other companies withing the group.



Summary of Clarus' procurement policy

Clause 2.3.10 of the ID Determination requires that:

"if an EDB has had related party transactions involving a procurement from a related party during that disclosure year, the EDB must publicly disclose:

- (1) a summary of its current policy in respect of the procurement of assets or goods or services from any related party; or
- (2) a summary of alternative documentation which is equivalent to a procurement policy in respect of the procurement of assets or goods or services from any related party.

Pursuant to clause 2.3.10(2), this section provides a summary of our procurement policy and guidelines.

Firstlight's electricity network spans Tairāwhiti and Wairoa districts. We require specialist personnel, contractors, and materials to operate and manage this extensive network in a safe and reliable manner.

To maximise our cost efficiency while managing our networks, Clarus has an overarching procurement policy that applies to all companies within the group. This policy requires we "source, engage and manage suppliers in a professional and transparent manner within a consistent framework to achieve best value for Clarus." This Policy provides guiding principles for all procurement by, or on behalf of Clarus.

In this section, we summarise the procurement principles that underpin the procurement policy and the procurement methods employed by Clarus. Procurement of goods and services from GSNZ Midco under the O&M agreement must abide by the Clarus procurement policy.





Procurement principles-

Anyone procuring goods and services for Firstlight must be familiar with and apply the following procurement principles:

Principle	Description
Be professional and ethical in the sourcing of goods and services	- Clarus has long standing relationships and dealings with many valued suppliers, this has been forged over time and you are to ensure your actions should do nothing to compromise the company's reputation.
	 Priority will be given to those suppliers that share the same or similar values to Clarus, especially relating to the ethical sourcing of materials and mitigation against illegal labour practices.
	– Be accountable, transparent and reasonable.
	Stay impartial – identify and manage conflicts of interest.Encourage e-business (Tenders via email)
Have an open and fair approach	- Create competition and encourage capable suppliers to respond ensuring they are aware of and understand their obligations within the Commerce Act 1986.
	– Treat all suppliers equally.
	 Ensure the best results for Clarus and the supplier are front of mind; value should be considered but not the dominating factor.
	– Be clear on how you will assess the supplier and what it is
	they will be measured on.
	- Provide constructive positive feedback with the
	unsuccessful suppliers for the encouragement towards
	continuous improvement.
Be consistent and timeous	 Identify what you need, what you want to achieve and how this will be delivered.
	- Choose the right process - proportional to size, complexity, value and risk.
	– Be realistic on the approach. Is it time valuable for the
	value or risk?
Achieve the best and just results	– Set up a team with the right mix of skills and experience.
	- Be innovative and open to change.
	- Understand the market and what is achievable.
	- Have clear and precise performance measures, monitor
	and manage ensuring the desired results are achieved.
	– Nurture the supplier relationship to make ongoing savings
	and improvements.



These principles all contribute to producing efficient and effective infrastructure for the long-term benefit of our business and our customers. While we seek competitive outcomes, we believe consumers equally value least-cost over the lifetime of the asset and Firstlight always places the health and safety of our employees and contractors above other criteria. For example, we may not select the lowest price quote or tender if the supplier cannot meet our safety and quality standards or if the life-cycle cost of the asset is higher than other options.

The competitive process

Whilst Clarus encourages competition amongst suppliers through our procurement process, to some extent this is governed by the value of the goods / services to be supplied and the availability of suppliers to meet our needs. This includes being suitably qualified to work on the electricity network.

Low-cost purchases will be supported, at a minimum, with quotations from several suppliers. High value works will be supported by an open competitive process such as a request for proposal or invitation to tender where possible.

The Policy recognises that in some instances sole sourcing may be the only procurement option available. "Sole sourcing" refers to where a competitive procurement process, such as a tender or quote requests, cannot be used or there would be no benefit from going through a competitive process. This will generally be because only one supplier, to the best of our knowledge and belief, can deliver the required good(s) and/or service(s). In the relatively specialised field of electricity distribution operations and maintenance, this is not an uncommon situation.



Other typical reasons for selecting sole sourcing include:

- Availability / workload within pool of approved suppliers: Particularly with professional services where we have already negotiated rates and have a pool of 3 5 suppliers. To ensure that work is allocated to avoid resource conflict, it may be acceptable to sole source smaller projects
- Exclusivity: Where Firstlight is already committed to an exclusive contract for the procurement of such goods or services for a set time period (for example the O&M Agreement with GSNZ Midco)
- OEM / warranty arrangement: Where sole source is required contractually.

The sole sourcing procurement option requires formal justification and approval in line with delegated authorities.

Monitoring and compliance

The Clarus procurement team is responsible for monitoring compliance with the procurement policy for Firstlight and reporting any breaches of this policy to the Executive. The procurement team will undertake reviews of Clarus' procurement activity especially around the compliance with the policy and the application of procurement processes. Reviews may include review of the procurement process undertaken by GSNZ Midco acting on the behalf of Firstlight under the O&M agreement.

Failure within Clarus to comply with the provisions of the procurement policy is a breach of an employee's Code of Conduct & Performance & Conduct Policy. Any instances of reported non-compliance will be investigated and may lead to disciplinary action.

Clarus has a whistle blower policy that provides an avenue for employees to raise concerns about misconduct or wrongdoing. Misconduct or wrongdoing includes failure to abide by the procurement policy and the whistle blower policy enables anyone to report identified breaches of the procurement policy.



Application of the procurement policy

Clause 2.3.12 of the ID Determination requires that:

"if an EDB has had related party transactions involving a procurement from a related party during that disclosure year, the EDB must publicly disclose-

- (1) a description of how the EDB applies its current policy for the procurement of assets or goods or services from a related party in practice;
- (2) a description of any policies or procedures of the EDB that require or have the effect of requiring a consumer to purchase assets or goods or services from a related party that are related to the supply of the electricity distribution services;
- (3) subject to subclause (5), at least one representative example transaction from the disclosure year of how the current policy for the procurement of assets or goods or services from a related party is applied in practice;
- (4) for each representative example transaction specified in accordance with subclause
- (5) separate representative example transactions where the EDB has applied the current policy for the procurement of assets or goods or services from a related party significantly differently between expenditure categories.

Pursuant to clause 2.3.12 (1), the following section describes how Firstlight has applied the Clarus procurement policy in respect of the procurement of goods or services from a related party.

In the 2025 disclosure period, Firstlight has procured goods and services from GSNZ Midco under the O&M agreement.

Firstlight has contracted GSNZ Midco as the sole provider of operations and maintenance services for the network. GSNZ Midco acts on behalf of Firstlight when project managing and purchasing required goods and services while carrying out its responsibilities under the O&M agreement.

The section considers the procurement of goods and services under the O&M contract.



Purchase of Opex and Capex services from our related party GSNZ Midco

The procurement policy puts emphasis on making decisions to achieve the best outcomes for Firstlight and its customers whilst keeping our staff, contractors, and assets free from harm. We manage long-life assets and require specialist personnel, contractors, and materials to operate and manage this extensive network in a safe and reliable manner.

Under the O&M agreement, Firstlight has contracted GSNZ Midco to manage the operational functions, maintain the network assets, implement and feed into the Asset Management Plan (AMP), and provide system operations and network support functions. From time to time, Firstlight may also procure non-network assets from GSNZ Midco. These assets are provided under the service agreement as they relate to the ongoing maintenance of the distribution network or management of the assets on the distribution network. GSNZ Midco acts on behalf of Firstlight when project managing and purchasing required goods and services in the course of carrying out its responsibilities under the O&M agreement.

As discussed above, our first step in ensuring we are achieving the best for our customers and businesses was to enter into an Operations and Maintenance (O&M) agreement.

The O&M agreement with GSNZ Midco provides a range of expertise and experience guiding and supporting our electricity distribution business. This expertise and experience is vital in maintaining and expanding the network and also in the planning process both annually and long-term.

Provisions within the O&M agreement align with Firstlight procurement principles to ensure on-going value of the agreement to our customers. These include:

- Planning to ensure O&M works plans align with Firstlight requirements efficiently and in a cost-effective manner. This may include benchmarking of costs to ensure the O&M agreement continues to meet efficiency targets and is compliant with the related party rules for regulated businesses
- Service level agreements including a range of key performance indicators that are linked to payments
- Provisions around meeting stringent safety standards.





To give an idea of how the O&M agreement works in practice, we consider the annual process:

- Planning
- Challenge and benchmarking process
- Execution of works including monitoring and reporting
- Completion of works

At the end of each year, Firstlight conducts an annual review of the process.

Planning

Planning is an important part of the procurement process. It determines the anticipated work plan for the year and highlights resource requirements, whether they be personnel or materials.

Each year, Firstlight management work with the Chief Operations Officer (COO) of GSNZ Midco to develop and update the long-term Asset Management Plan (AMP). The AMP provides the asset management framework for the Firstlight network and includes guidance on the expected annual works plan. The AMP is reviewed and approved by Clarus management and the Firstlight Board of Directors.

The AMP is part of the long-term planning for the network. It supports the Firstlight business plan and the operations and maintenance (O&M) plan. GSNZ Midco provides Firstlight with the long-term O&M plan to meet the network development and maintenance section of the business plan. The O&M plan includes indicative resourcing and costings and works plans. This must be agreed by both parties and the O&M agreement outlines the resolution process.

The COO of GSNZ Midco provides a budget to Firstlight to complete the annual works plan as required under the O&M agreement.



Challenge and benchmarking process

While GSNZ Midco is a related party of Firstlight, the O&M agreement is structured as if it was between two separate legal entities, with different ownership interests, and operating on an arm's length basis. Each party acknowledges that a key objective of Firstlight in appointing GSNZ Midco to deliver the O&M is to ensure value for money and continuous improvement in delivery and value.

In practice, this means that Firstlight may accept in full or challenge any part of the budget provided by GSNZ Midco. Firstlight may subject all or part of the annual budget to a benchmarking procedure undertaken by an independent expert.

The Benchmark will:

- Compare the O&M Services and Service Fee, including the component parts of the Service Fee, with the services, charges and margins being obtained under other similar service contracts in New Zealand and / or good international market services, charges and margins for third parties
- Assess, in light of this comparison, whether:
 - The scope of the O&M Services being provided is necessary to meet the Service Standards and
 - o The Service Fee, including the component parts of the Service Fee, is market competitive and otherwise meets the Information Disclosure Determination requirements.

Under the O&M agreement, we anticipate that prices charged by GSNZ Midco will not change significantly from year to year (unless there is strong evidence that input costs have permanently changed). This is consistent with a competitive market where companies with long-term contracts in place (such as the O&M agreement and CFSA) tend to set prices for longer terms. This gives service providers greater certainty to invest in staff and equipment required to fulfill — the contract terms over the duration of the contract. For FY2025 Firstlight engaged independent experts to:

- Confirm the margin charged by GSNZ Midco under the O&M agreement was within the range of providers of similar services
- Cross-checked that GSNZ Midco costs remain efficient and consistent with the input prices Firstlight would have paid in an arm's length transaction by completing benchmarking against others in the industry.

Whilst we do not anticipate GSNZ Midco would need to significantly change prices within the contract period, we recognise that the onus remains on Firstlight to ensure that costs from related party transactions remain consistent with input prices that we would have paid in an arm's length transaction. The Commission has noted that there is some risk that long-term contracts can become out of date with current market practices and prices and Firstlight has actively considered this risk through our benchmarking process this year.

For RY2025, our O&M agreement remains aligned with current market practices and prices. This was last tested in April 2023 when we engaged an independent expert to:

- Consider changes in market practices or pricing for similar services and how this may affect arm's length margins
- Conduct a sample of relevant margin data to ensure no substantive and permanent change has occurred in the market since margins were established under the O&M Agreement.

Firstlight continued to cross-check that our costs remain efficient and consistent with the input prices Firstlight would have paid in an arm's length transaction by completing benchmarking against others in the industry. This exercise is carried out annually

Execution of works including monitoring and reporting

Once the O&M budget has been agreed, GSNZ Midco undertakes responsibility to complete the works to the service level required. Significant large-scale projects are managed by the GSNZ Midco projects team. Projects of this nature often require additional resources and expertise. GSNZ Midco will source services and materials as required and in line with the Clarus procurement policy.

The COO of GSNZ Midco reports monthly to Firstlight on progress against the works plan and budget for services provided under the O&M agreement. From time-to-time works may be required by Firstlight that are outside of the budgeted plan. Any change to the annual work plan is negotiated between GSNZ Midco and Firstlight. Any additional remedial works GSNZ Midco recommend are either included in the current year's workplan, with agreement from Firstlight or included in the annual works budget for following years.

The costs GSNZ Midco incurs undertaking the responsibilities of the O&M agreement are charged to Firstlight monthly and include a commercial mark up to enable a reasonable commercial profit.



Completion of works

The completion of works is managed within GSNZ Midco. GSNZ Midco will process any project close out documentation and update maintenance records within Clarus information systems. If the project was a Capex project, Firstlight will capitalise the project once GSNZ Midco notifies that the assets have been commissioned.

Corporate Function and Secondment Services Agreement (CFSA)

Total corporate function costs across Clarus are allocated based on the expected time spent on each service for Firstgas, Firstlight and GSNZ Midco activities. To apportion the direct costs and staff time to service activities within Clarus, management determines the split of Firstlight business support between the regulated and unregulated business within the Group.



Policies that require consumers to purchase goods or services from Firstlight's related parties

Section 2.3.12 of the ID Determination requires that:

within 5 months after the end of each disclosure year, if an EDB has had related party transactions involving a procurement from a related party during that disclosure year, the EDB must publicly disclose-

(2) a description of any policies or procedures of the EDB that require or have the effect of requiring a consumer to purchase assets or goods or services from a related party that are related to the supply of the electricity distribution services;

To work on or near the Firstlight network, a contractor must be deemed competent and authorised to complete the work undertaken to meet operating standard requirements. This is very specialised work, and we require any work to be completed GSNZ Midco

Customers that contribute to the cost of new developments or upgrades on our network are therefore required to use GSNZ Midco to complete the works. Our capital contribution policy is available at https://www.firstlightnetwork.co.nz/tell-me-about/firstlight-network/regulatory-information/.



Representative examples of how the procurement policy is applied

Regulatory requirements

Section 2.3.12 of the ID Determination for the EDB specify that:

within 5 months after the end of each disclosure year, if an EDB has had related party transactions involving a procurement from a related party during that disclosure year, the EDB must publicly disclose-

- (3) subject to subclause (5), at least one representative example transaction from the disclosure year of how the current policy for the procurement of assets or goods or services from a related party is applied in practice;
- (4) for each representative example transaction specified in accordance with subclause (3), how and when the EDB last tested the arm's-length terms of those transactions; and
- (5) separate representative example transactions where the EDB has applied the current policy for the procurement of assets or goods or services from a related party significantly differently between expenditure categories.

Representative examples

Firstlight sources a range of services from GSNZ Midco to manage the network operations and complete the work plan each year. Firstlight's corporate functions including Information Services, Legal, Health and Safety, Finance and Commercial and Regulatory are sourced from Firstgas. The Clarus procurement policy for all expenditure is applied under the O&M agreement and CFSA agreement. This is summarised in the table below.



Table 2: Representative example transactions of costs in Schedule 5b

Expenditure category	Representative example	Procurement method	How and when were the arm's length terms last tested
All network Capex categories	Network Opex and Capex and system operations and	Direct procurement from a 'sole supplier' under the existing O&M	The arm's length terms were tested as part of a benchmarking process carried out annually including RY2025.
All network Opex categories	network support across the network. We provide example below of	agreement.	The benchmarking process is in line with the approach undertaken by an independent expert engaged in RY2023 to benchmark:
System	procurement undertaken by GSNZ Midco on our	aken by Midco on our under the	- The margins applied to the costs of O&M services provided by GSNZ Midco to Firstlight
operations and network support	behalf under the O&M agreement		- Total service costs against comparable businesses.
Non-network assets			The margin benchmarking compared services supplied by GSNZ Midco to companies providing similar services across New Zealand.
			Benchmarking against comparable businesses indicated that Firstlight costs are aligned with our peers and the wider market. This demonstrates that the cost of the underlying service is consistent with the input price that Firstlight would have paid in an arm's length transaction.
			Benchmarking was undertaken with the permission of GSNZ Midco. Benchmarking is allowed for under the O&M agreement.
Business Support Opex	Corporate Services and IT Services for Firstlight Network. Payable by	Direct procurement from a 'sole supplier' under the existing CFSA agreement.	The arm's length terms were tested as part of a benchmarking process carried out annually including RY2025. In RY2023, Firstlight engaged an
	Management Fee which is set prior to regulatory year. Monthly Management Fee issued providing breakdown of services. Inclusive in the Management Fee are Directors Fees We provide below a schedule of services undertaken under the CFSA agreement.		independent expert to benchmark: - The margins applied to the costs of Business Support services provided to Firstlight Benchmarking undertaken against comparable businesses indicated that Firstlight costs are aligned with our peers and the wider market. This demonstrates that the cost of the underlying service is consistent with the input price that Firstlight would have paid in an arm's length transaction.



Example of procurement undertaken by GSNZ Midco on our behalf

Firstlight procures a range of services from GSNZ Midco. These services may have different characteristics and involve different procurement choices within the policy to suit the work undertaken. The process will remain consistent with the project management and reporting requirements within GSNZ Midco, and with monthly reporting against the budget and works plan provided to the Clarus executive team.

The following example of a project undertaken by GSNZ Midco for Firstlight illustrating the procurement process.

Project name:	Lavenham Road Pole Replacement	
Project date	The scope was issued in April 2024 with works completed in July 2024	
Project or work order number:	5021876 / 5021877	
Project expenditure (estimated)	\$0.137 million	
Project cost type	Asset Replacement and Renewal Capex	
Project managed by:	GSNZ Midco acting on behalf of Firstlight under the O&M agreement.	
Subcontractors:	Electrinet managed the delivery of the project. Works were completed under the terms and rates specified in the master service agreement with Electrinet.	

Planning

Leading into RY2025, it was identified that there were poles earmarked for replacement, particularly Lavenham Road.

The AMP is approved by Firstlight's Chief Executive Officer and the Clarus Board of Directors. Once approved, work plans are finalised for the upcoming year.



Completion of works

The scope of works and plan included supply and upgrade of existing 15x 11kV poles, 4x stub poles, 3x 400V poles and 2x sets of 11kV fuses. Also included in the works was to carry out the 11kV maintenance in the area. The scope was reviewed by GSNZ Midco and Electrinet and the report reviewed by GSNZ Midco's project manager and engineers.

Once the project began, project costs were paid and tracked within the financial system after approval by the project manager. Project costs and progress were monitored by the GSNZ Midco project team and reported to the Chief Operating Officer for GSNZ Midco. Progress against projects and budgeted costs is reported to the Firstlight executive team monthly.

Market testing

Electrinet were selected as the supplier to carry out the works using the sole sourcing approach. Electrinet have specialist expertise in the Tairawhiti region and are the incumbent supplier of O&M services for Firstlight. Electrinet were the preferred supplier due to:-

- Their experience on working on our network and within our systems
- Their base in the Tairawhiti region

Outcomes:

The project was completed in time and within budget





Corporate Function Services undertaken as per the CFSA agreement

Area	Description		
Executive Management Team	Executive Management of Firstlight Network		
Finance	Ensuring Firstlight Network's financial management and results are correctly accounted for and reported. Services include accounts payable, accounts receivable, fixed assets, treasury, tax, and financial reporting. This includes maintaining the finance system and providing training to staff raising purchase orders or completing timesheets		
Legal	Provision of legal services and contract management to Firstlight Network		
Information Services	Information Services is split into two focus area, improvement and run.		
	Improvement is an integral part of the solutions team who works closely with the Continuous Improvement team to deliver business excellence, value, and optimization. Run covers the day to day support of the IT systems used by Firstlight Network. These include everything from the data center to Desktop, Business Systems, Office Systems, Telephony, Networks, and the Service Desk function.		
People and Performance	Provision of Human Resources, Recruitment, Payroll, Internal Communications, Staff Engagement and Culture, Learning and Developme		
Commercial and Regulation	Commercial and Regulatory support for Firstlight Network. Including:- - Completing and filing all regulatory disclosures on behalf of Firstlight - Regulatory and Policy advocacy in Firstlight interests - Office Management support for Firstlight - Marketing Support - External Communications		
Health and Safety, Environment and Quality	Provision of HSEQ and Risk Management services for Firstlight Network		
Procurement, Stores and Facilities	 This team manage the following functions:- Facilities: All tasks and activities associated with managing operated facilities Purchasing: Provide purchasing support, stock ordering, fleet management, supply contracts, associated credit applications, new vendor approvals, prequalification, and general purchasing activities Stores: Manage and maintain inventory to facilitate the day to day maintenance activities of the business. Inwards and outwards goods as well as managing project and emergency materials. 		
Operations Management Team	Provision of oversight and management of operations of the Electricity Distribution Business		
Maintenance Services	Support services for Firstlight Networks Operational Teams, such as Maximo management, and permit co-ordination.		





Map of anticipated network expenditure and constraints

Section 2.3.13 of the ID Determination requires that:

within 5 months after the end of each disclosure year, where an EDB has had related party transactions involving a procurement from a related party during that disclosure year, the EDB must publicly disclose a map of its electricity distribution service territory, which includes-

- (1) subject to clause 2.3.15, a brief explanatory description of the 10 largest forecast operational expenditure projects in the AMP planning period and the likely timing, value and location of the projects;
- (2) subject to clause 2.3.15, a brief explanatory description of the 10 largest forecast capital expenditure projects in the AMP planning period and the likely timing, value and location of the projects;
- (3) subject to clause 2.3.16, a brief explanatory description of possible future network or equipment constraints and their location, where the responses to the constraints would involve one of the 10 largest future operational expenditure projects in the AMP planning period; and
- (4) subject to clause 2.3.16, a brief explanatory description of possible future network or equipment constraints and their location, where the responses to the constraints would involve one of the 10 largest future capital expenditure projects in the AMP planning period.

Section 2.3.14 further specifies the map must:

- (1) identify whether the forecast or possible operational expenditure or capital expenditure is-
- (a) already subject to a contract and, if so, whether that contract is with a related party;
- (b) forecast to require the supply of assets or goods or services by a related party; or
- (c) currently not indicated for supply by a related party; and
- (2) be consistent with the AMP information specified in-
- (a) clause 11.8.3 of Attachment A on network or equipment constraints; and
- (b) clause 11.8.4 of Attachment A on the projected impact of demand management initiatives.



The largest Opex activities and Capex projects in the AMP planning period are provided below. Further information is available in the annual AMP or AMP update available on the Firstlight website.

Largest Opex activities

Figure 3 sets out the location of the largest ten activities in the AMP planning period (RY2025-RY2034), with greater detail in Table 3. All network Opex is forecast to be completed by our related party, Gas Services New Zealand Midco Limited (GSNZ Midco) under the Operations and Management (O&M) agreement between Firstlight and GSNZ Midco. GSNZ Midco manages a number of third-party contractors to deliver this network Opex. All activities are network related works, and none are a result of future network or equipment constraints.

Figure 3: Map showing largest Opex projects in the planning period (RY25-RY34)

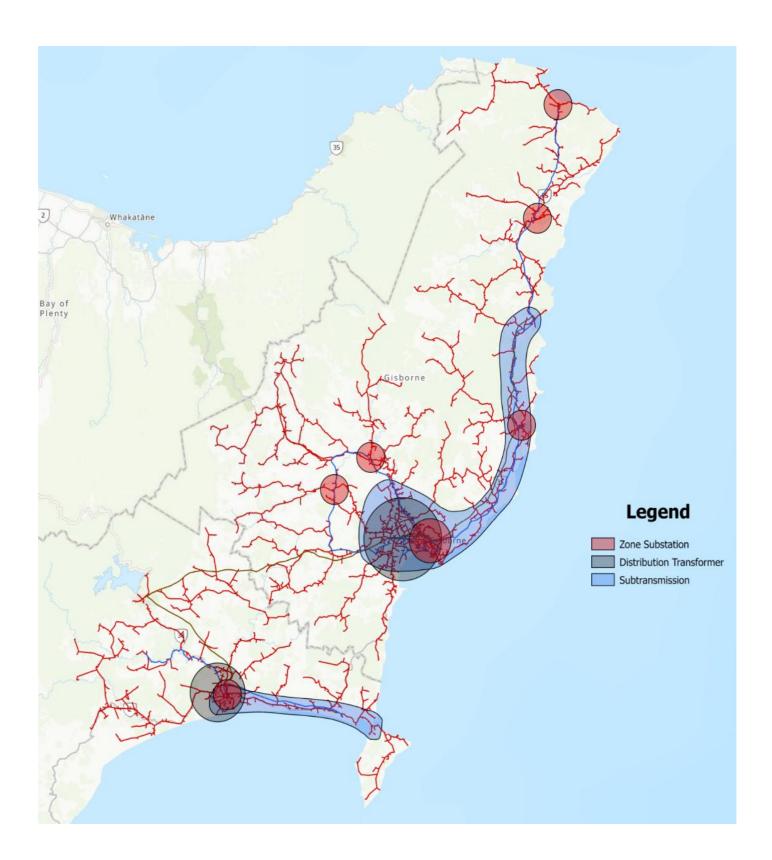


Table 3: 10 largest Opex projects in the planning period (RY25-RY34)

Planned Vegetation Management	Vegetation Management	Network Wide	\$10 million	RY25-RY34
Emergent risk Vegetation	Vegetation Management	Network Wide	\$3 million	RY25-RY34
Sub transmission Routine and corrective maintenance	Routine and Corrective Maintenance	Network Wide	\$6.6 million	RY25-RY34
Zone Substation Routine and corrective Maintenance	Routine and Corrective Maintenance	Network Wide	\$4 million	RY25-RY34
Distribution and LV lines Routine and Corrective Maintenance	Routine and Corrective Maintenance	Network Wide	\$3 million	RY25-RY34
Generator Routine and corrective maintenance	Routine and Corrective Maintenance	Network Wide	\$2.6 million	RY25-RY34
Distribution Transformer and substation maintenance	Routine and Corrective Maintenance	Network Wide	\$1.4 million	RY25-RY34
Distribution Switchgear Routine and Corrective maintenance	Routine and Corrective Maintenance	Network Wide	\$1.4 million	RY25-RY34
Comms and Scada Routine Maintenance and Inspections	Routine and Corrective Maintenance	Network Wide	\$0.8 million	RY25-RY34
Other Network Asset Corrective maintenance	Routine and Corrective Maintenance	Network Wide	\$0.1 million	RY25-RY34

Largest Capex activities

Figure 4 sets out the location of the largest ten activities in the AMP planning period (RY2025-RY2034), with greater detail in Table 4. All network Capex is forecast to be completed by our related party, Gas Services New Zealand Midco Limited (GSNZ Midco) under the Operations and Management (O&M) agreement between Firstlight and GSNZ Midco. GSNZ Midco manages a number of third-party contractors to deliver this network Opex. All activities are network related works, and none are a result of future network or equipment constraints.

Whakatāne Legend Zone Substation Growth Generator ADMS

Figure 4: Heatmap illustrating largest Capex projects in the planning period (RY25-RY34)

Table 4: 10 largest Capex projects in the planning period (RY25-RY34)

ADMS	System upgrade to existing Control	Network	\$6.9 million	RY27
Wairoa substation transformer replacement(s)	Replace existing single phase with new three phase units, upgrade capacity	Wairoa	\$6.5 million	RY31
Tuai - Gisborne capacity upgrade	Previous called Thermal Upgrade	Network	\$5.7 million	RY25
Generator renewals	ARR project	Gisborne	\$3.6 million	RY31-RY34
Wairoa and Kiwi substations	Wairoa re-configuration	Wairoa	\$1.2 million	RY28
Capacity increase hospital, Back Ormond Rd GDC developments	Capacity increase to meet new growth Lytton West	Gisborne	\$1 million	RY26
Raupanga generator	1 MVA generator (reliability)	Wairoa	\$1 million	RY26
Ruakituri generator	1 MVA generator (reliability)	Wairoa	\$1 million	RY27
Frasertown generator	1 MVA generator (reliability)	Wairoa	\$1 million	RY30
Zone substation switchgear replacements	Matawhero	Gisborne	\$1 million	RY27

Note-

^{1.} Only projects with budget and phasing are included in this table. Pole replacement, while a significant driver of CAPEX, not included in list as they are considered business as usual

^{2.} Wairoa reconfiguration works may become part of larger project, budget for separable items understood but phasing may alter within planning period



Clause 2.9.2

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-

- a) the information prepared for the purposes of clauses 2.3.1, 2.3.2, 2.3.8-2.3.12, 2.4.21, 2.4.22, 2.5.1(1)(a)-(f), 2.5.2, 2.5.2A, 2.6.1B and 2.7.1 of the Electricity Distribution Information Disclosure Determination 2024 in all material respects complies with that determination; and
- b) the historical information used in the preparation of Schedules 8, 9a, 9b, 9c, 9d, 9e, 10, 10a and 14 has been properly extracted from the Firstlight Network Limited's accounting and other records sourced from its financial and non-financial systems, and that sufficient appropriate records have been retained except in the case of recording of outage information contained in Schedule 10. While we believe that sufficient records are maintained, third party verification of the completeness of this data is difficult to achieve.
- c) In respect of information concerning assets, costs and revenues valued or disclosed in accordance with clause 2.3.6 of the Electricity Distribution Information Disclosure Determination 2024 and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012, we are satisfied that
 - i. the costs and values of assets or goods or services acquired from a related party comply, in all material respects, with clauses 2.3.6(1) and 2.3.6(3) of the Electricity Distribution Information Disclosure Determination 2024 and clauses 2.2.11(1)(g) and 2.2.11(5)(a)-2.2.11(5)(b) of the Electricity Distribution Services Input Methodologies Determination 2012; and
 - ii. the value of assets or goods or services sold or supplied to a related party comply, in all material respects, with clause 2.3.6(2) of the Electricity Distribution Information Disclosure Determination 2024.

Mah	Forgolie
Director: Mark Adrian Ratcliffe	Director: Fiona Ann Oliver
13 August 2025	13 August 2025
Date	Date
Date	Dato

^{*} Refers to the current Electricity Distribution Information Disclosure Determination 2024.



Independent Assurance Report

To the Directors of Firstlight Network Limited and the Commerce Commission

Assurance report on Related Party Transactions Pursuant to Electricity Distribution Information Disclosure (amendments relating to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31

Opinion

We have undertaken a reasonable assurance engagement in respect of the compliance of Firstlight Network Limited (the "Company") with the related party requirements, as set out in the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31, (the "Determination") for the disclosure year ended 31 March 2025 where we are required to report on:

- whether the Company's basis for valuation of related party transactions ('valuation of related party transactions'), has complied, in all material respects, with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012 (consolidated 23 April 2024) ("the IM Determination"); and
- whether the steps taken by the Company, as specified under the "Summary of steps and analysis undertaken by the Company to test compliance" are considered to be, in all material respects, reasonable in the circumstances.

In our opinion, in all material respects:

- the basis for valuation of related party transactions for the disclosure year ended 31 March 2025 complies with the Determination and the IM Determination; and
- the steps undertaken by the Company, as specified under the "Summary of steps and analysis undertaken by the Company to test compliance" are considered to be reasonable in the circumstances.

Basis for Opinion

We have 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 (NZ) 3100 (Revised) requires that we comply with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised) *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information*.

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

Our approach

Materiality

Our assurance engagement is designed to obtain reasonable assurance about the Company's qualitative and quantitative compliance, in all material respects, with the Determination and the IM Determination.

Quantitative materiality level was determined as 2% of total related party transactions. Qualitative factors were also considered when assessing the arm's length valuation rules on related party transactions.

The scope of our assurance engagement was influenced by our application of materiality.

Based on our professional judgement, we determined certain quantitative thresholds for materiality. These, together with qualitative considerations, helped us to determine the scope of our assurance engagement, the nature, timing and extent of our assurance procedures and to evaluate the effect of misstatements, both individually and in aggregate on the related party information as a whole.



Key assumptions we made in carrying out our procedures

In carrying out our procedures as the independent appraiser for the disclosure year ended 31 March 2025, we have relied on the Company's internal control environment relating to the identification of related party transactions and the valuation of related party transactions, that we obtained an understanding of during our audit of the First Sunrise Group financial statements for the period ended 30 September 2024. We did not identify any significant changes in the Company's internal control environment through our procedures performed for the regulatory year ended 31 March 2025.

How we assessed the Company's related party transactions

We obtained the Company's assessment of their compliance with the relevant related party valuation requirements in the Determination and IM Determination and performed the procedures set out below.

Steps and analysis undertaken in testing compliance

Step 1) Identifying related party relationships and transactions

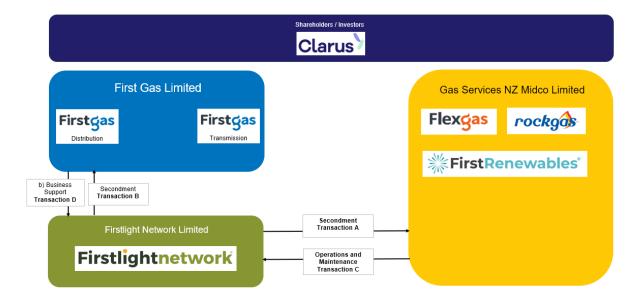
Summary of steps undertaken by the Company to demonstrate compliance

The Company identified all related party relationships and transaction flows in accordance with the Determination and disclosed these in Appendix A - Information disclosure for related parties, as prepared and published under the Determination. Due to a decrease in the level of expenditure on non-network assets, and in increase in the level of related party systems operations and network support expenditure, the proportion of both total capital expenditure and total operating expenditure accounted for by related party transactions has increased by more than 5% since the most recent independent report in disclosure year 2024.

In disclosure year 2025, the Company:

- Provided unregulated services involving seconded staff across the Clarus Group including to Gas Services New Zealand (Midco) Limited (GSNZ Midco) to undertake operations and maintenance services (Transaction A - \$5.46m) and to First Gas Limited (Firstgas) to assist in providing corporate function services across the group (Transaction B - \$0.07m).
- Procured operations and maintenance (O&M) services from its related party, GSNZ Midco under an Operation & Maintenance Services Agreement (Transaction C - \$30.09m).
- Procured corporate function services from Firstgas under the terms of the Corporate Function Services (CFSA) Agreement (Transaction D - \$2.49m including Directors Fees).

A summary of the related party relationships and transaction flows is shown below:





Our procedures undertaken

We have tested the completeness and accuracy of the related party relationships and transactions by:

- Agreeing the disclosures within Schedule 5(b) to the underlying financial records for the year ended 31 March 2025, investigating any material differences and determining whether any such differences are justified; and
- Applying our understanding of the business structure against the related party definition in IM
 Determination clause 1.1.4(2)(b) to assess management's identification of any "unregulated parts"
 of the entity.

We selected related party transaction flows A (secondment income), C (operations and maintenance expenditure) and D (corporate function services expenditure) on the basis of materiality and assessed the supporting information provided by the Company to demonstrate the independent and objective measure used for those transactions and services, to determine whether the related party transactions have been valued in accordance with the related party valuation requirements in the Determination and the IM Determination.

Step 2) Outlining the relationship with each related party and the intent behind the key related party contracts

Summary of steps undertaken by the Company to demonstrate compliance

Clarus is one of New Zealand's largest energy groups, with brands that touch many parts of the energy supply chain – from energy transmission and distribution to retail supply and storage. GSNZ Midco, Firstgas and Firstlight are part of the wider Clarus Group and have the same ultimate shareholders.

GSNZ Midco owns Gas Services, a contracting company providing operations and maintenance services. All such services are provided under an Operation & Maintenance Services Agreement (O&M Agreement).

Under the terms of the agreement, GSNZ Midco manages the operation of the assets, carries out an agreed Capital and Maintenance works programme, responds to incidents and emergencies, and provides system operations and network support services to Firstlight. In the 2025 disclosure year, GSNZ Midco provided 98% of the Firstlight total capital expenditure and 70% of all operating expenditure under the terms of the agreement.

Part of the policy intent of the new related party rules is to address concerns that related parties may be inefficient which may cause the Company to overcharge consumers. Firstlight notes that the intent of the O&M Agreement was to allow Firstlight to access a broader range of experience and capability for operating their electricity distribution business. The O&M Agreement specifies the outcomes that GSNZ Midco is expected to deliver and the consequences of failing to deliver. All work within the scope of the O&M Agreement is procured from GSNZ Midco, which then tenders out elements of the work as required to either GSNZ Midco or third parties.

In addition, Firstgas provides business support services to support the operations of Firstlight under a Corporate Functions Services Agreement (the CFSA). Firstgas provides the corporate function services to all entities across the Clarus Group. Firstgas is the employer of staff performing corporate functions that work across the Clarus Group to support services for accounting, employment terms and conditions, remuneration and benefits, and performance planning and management. The shared service model allows the group to benefit from economies of scale and obtain benefits from increased staff utilisation and experience across the group. The CFSA puts a process in place for Firstlight to review performance and communicate any concerns back to Firstgas. Firstgas is obligated to respond to Firstlight's concerns by identifying performance improvements and providing an implementation plan for Firstlight's comment.

Finally, Firstlight seconds staff to GSNZ Midco to undertake O&M services, and to Firstgas to assist with providing the corporate function services to the group, under a Secondment Services Agreement (SSA) with each entity. All agreements with related parties are designed to be similar to a commercially negotiated agreement between independent third parties.



Our procedures undertaken

The background information provided by Firstlight is in line with our understanding of the intent behind the group structure and agreements entered between Firstlight, GSNZ Midco and Firstgas.

- We obtained the final O&M Agreement, CSFA and SSA. The agreements were effective for the entire disclosure period and terms are consistent with the understanding obtained from management.
- We obtained and reviewed prior year external reports and advice received by the Clarus group supporting the efficiency of the shared service nature of the group including the group's external margin benchmarking report and internal cost benchmarking used to confirm that the margins applied to the services supplied under the O&M agreement and CFSA are appropriate.
- We note from our procedures performed that GSNZ carried out an agreed Capital and Maintenance works programme resulting in 98% of total expenditure on assets and 70% of the total operating expenditure being with GSNZ. In addition, Firstgas provided business support services that contributed a further 16% of total operating expenditure.

Step 3) Assessing compliance with the definition of an arm's length transaction (in accordance with ISA (NZ) 550)

From 1 April 2018, a principles-based approach to the valuation of related party transactions is being applied. All related party transactions must meet the arm's length valuation rule for ID disclosures, based on the following definition of arm's length transaction from the International Standard for Auditing (NZ) 550: "a transaction conducted on such terms and conditions as between a willing buyer and a willing seller who are unrelated and are acting independently of each other and pursuing their own best interests".

Summary of steps undertaken by the Company to demonstrate compliance

Regulated expenditure

To demonstrate compliance with the definition of arm's length, including the 'willing buyer and willing seller' criteria, the company relied upon independent third party benchmarking, performed in April 2023, of the margins applied to the costs of O&M services provided by GSNZ Midco to Firstlight. O&M margins were set in 2023 with the intention they would be applied in disclosure year 2024 and 2025. The margins applied to the services performed by Firstgas under the CFSA were benchmarked by an independent third party in August 2022 with the intention they would be consistently applied in disclosure year 2024 and 2025.

The purpose of the benchmarking was to test that the margins applied to related party transactions were consistent with margins observed in comparable arm's length transactions in competitive markets. The benchmarking obtained from independent experts:

- Confirmed the margin charged by GSNZ Midco under the O&M agreement was within the range of providers of similar services.
- Cross-checked that GSNZ Midco costs remain efficient and consistent with the input prices
 Firstlight would have paid in an arm's length transaction by completing benchmarking against
 others in the industry.
- Determined the margin range to apply to the business support cost service categories captured under the CFSA based on comparable businesses.



To ensure that the Company's costs are efficient and consistent with the input prices Firstlight would pay in an arm's length transaction, Firstlight completed benchmarking of capital expenditure and operating expenditure against others in the industry in the current year. Benchmarking performed included:

- Total capex per energy delivered (\$/GWh)
- Network capex per connection (\$/ICP)
- Network opex per energy delivered (\$/GWh)
- Network opex per connection (\$/ICP)
- Non-network opex per energy delivered (\$/GWh)
- Business support opex per ICP (\$/ICP)
- Business support opex as a proportion of RAB

Benchmarking against comparable businesses has demonstrated that the cost incurred within Firstlight's regulated business including related party expenditure, is comparable with others in the industry.

Unregulated revenue

The margin applied to unregulated services provided by Firstlight to GSNZ under the SSA, is consistent with the margin applied for similar services across the Clarus group and was determined based on independent advice received in 2020. The Group considers this margin to remain relevant to disclosure year 2025 due to the long-term nature of the contract.

Overall

Firstlight considers that the related party structure is a benefit to customers, as it allows the Company to provide reliable and specialised services at a cost that is no more than would be incurred from a third party. Additionally, by providing corporate functions at a centralised level across the Clarus Group at an arm's length rate, the shared services model allows corporate activity to be streamlined, reducing the Group's overall costs to serve and encourages efficiency. Lower costs to serve are in the longer-term interests of consumers.

Our procedures undertaken

We have considered the following in our assessment over the arm's length definition:

- We have considered the business and group structure and read the key terms and conditions
 within the O&M agreement and SSA with GSNZ Midco and the CFSA with Firstgas. No
 non-standard terms were identified in the arrangements.
- For the regulated expenditure, we obtained the margin and benchmarking reports prepared by management's experts in prior periods, and considered whether there had been any significant changes to the group, industry or environment since the reports were prepared that would indicate the margins are no longer materially in line with arm's length transactions. Based on the evidence provided, the margins applied are considered consistent with comparable entities indicating that the parties are acting consistent with the principle of willing buyer and willing seller who are unrelated and acting in their own best interests.
- For the unregulated revenue, we obtained the margin report prepared by management's experts in 2020, and considered whether the market may have moved since the independent advice was obtained. Based on materiality, we consider the margin applied to be reasonably inline with arm's length transactions.



Step 4) Obtaining independent and objective measures to support the arm's length principle

Summary of steps undertaken by the Company to demonstrate compliance

As outlined in step 3 above, in prior periods the company utilised an independent third party to perform benchmarking and comparable pricing, determining margins that have continued to be applied in 2025. The margins applied ensured the value of goods or services acquired from a related party are not greater than if it had been acquired under the terms of an arm's length transaction with an unrelated party, and the supply to a related party are not valued at an amount less than if it had been sold or supplied under the terms of an arm's-length transaction with an unrelated party.

A summary of benchmarking and comparable pricing exercise undertaken for each related party transaction flow is summarised below:

RPT Category	Description	Arm's-length valuation approach	Test for Independent and objective measures
Transaction A	Firstlight seconded staff to GSNZ Midco to provide operations and maintenance services.	Applying a margin to the cost of unregulated secondment services provided based on independent advice	For FY2025, Firstlight have: • Applied a margin to all direct labour costs incurred based on advice received from an
Transaction B	Firstlight seconded staff to Firstgas to provide corporate function services across the group.	received. Firstlight consider margin to remain comparable with	independent advisor in 2020. Firstlight considers this margin to remain relevant and comparable with services within the industry.
Transaction C	Firstlight acquired operations and maintenance services from GSNZ Midco.	Comparable pricing by applying a margin to the services provided (i.e., a cost-plus approach) results in prices charged that are substantially the same as the prices paid for similar services by peers.	 For FY2025, Firstlight have: Been charged an average EBIT margin across all O&M services provided. Confirmed margins applied are based on independent advice received in April 2023. Used benchmarking to confirm that costs are comparable with peers.
Transaction D	Firstgas provided corporate function services to Firstlight	Comparable pricing by applying a margin to the services provided (i.e., a cost-plus approach) results in prices charged that are substantially the same as the prices paid for similar services by peers.	 For FY2025, Firstlight have: Been charged an EBIT margin that is within the range of applicable margins, for each service received. Confirmed margins applied are based on independent advice received in August 2022 relevant to the Clarus Group. Used benchmarking to confirm that costs are comparable with peers.



Our procedures undertaken

Our procedures were tailored based on the identified related party transaction flows, including consideration of the materiality of each transaction flow, and aligned to the method management had applied to evidence that the related party transactions are at an arms' length value. We have addressed our procedures below:

- Obtained and understood the O&M agreement and SSA with GSNZ Midco, and the CFSA with Firstgas.
- Tested compliance with the procurement policy/process as disclosed in Appendix A to the Information Disclosure Schedules.
- Obtained the margin and benchmarking reports prepared by management's experts and external
 advice received in prior years supporting the Clarus Group structure and margins applied to
 related party transactions across the Group including the margin and benchmarking reports
 prepared by management's experts in April 2023 to incorporate Firstlight into the Clarus Group.
- Confirmed that the management's expert qualification and experience was adequate to perform the benchmarking and the experts were independent from Clarus Group.
- Considered the appropriateness of the comparable entities used within the benchmarking.
- Verified on a sample basis for O&M and overall for the SSA and CFSA, that the margins applied to each distinct service provided and/or received are in line with the independent expert margins obtained.
- Recalculated the margins determined by the independent expert based on external data.
- Benchmarked current and prior year costs against comparable businesses to confirm that costs incurred are consistent with others in the industry.

Director's Responsibilities

The Directors are responsible on behalf of the Company for:

- The identification of related-parties and related-party transactions during the disclosure year ended 31 March 2025;
- Compliance with the Determination and the valuation of related party transactions in accordance with the Determination and the IM Determination; and
- The identification of risks that may threaten compliance with the Determination and IM
 Determination, controls that would mitigate those risks, and monitoring the Company's ongoing
 compliance.

Our Independence and Quality Management

We have complied with the Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)* or other professional requirements, or requirements in law or regulation, that are at least as demanding, which include independence and other requirements founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We apply 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 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.

We are independent of the Company. Our firm carries out other assurance services for the Company in the areas of regulatory compliance engagements. The provision of these other services has not impaired our independence.



Assurance Practitioner's responsibilities

Our responsibility is to prepare an independent appraiser report in accordance with clause 2.8.4 of the Determination. In preparing the report we are required to express an opinion on whether, for the disclosure year ended 31 March 2025, the basis for valuation of related party transactions complies, in all material respects, with the with clause 2.3.6 of the Determination, and clauses 2.2.11(1)(g) and 2.2.11(5) of the IM Determination, and whether the steps taken by the Company to test whether it complies, are considered to be, in all material respects, reasonable in the circumstances.

Our engagement has been conducted in accordance with SAE 3100 (Revised) which require that we plan and perform our procedures to obtain reasonable assurance about whether the Company has complied, in all material respects, with the Determination and the IM Determination.

An assurance engagement to report on the Company's compliance with clause 2.3.6 of the Determination, and clauses 2.2.11(1)(g) and 2.2.11(5) of the IM Determination, involves performing procedures to obtain evidence about the compliance activity and controls implemented. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance.

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 may occur and not be detected. A reasonable assurance engagement for the disclosure year ended 31 March 2025 does not provide assurance on whether compliance with clause 2.3.6 of the Determination, and clauses 2.2.11(1)(g) and 2.2.11(5) of the IM Determination will continue in the future.

Use of Report

This report has been prepared for the Directors and the Commerce Commission in accordance with clause 2.8.4 of the Determination and is provided solely to assist you in establishing that compliance requirements have been met.

Our report should not be used for any other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility for any reliance on this report to anyone other than the Directors of the Company, as a body, and the Commerce Commission or for any purpose other than that for which it was prepared.

The engagement partner on the assurance engagement resulting in this independent assurance report is Elizabeth Adriana (Adri) Smit.

PricewaterhouseCoopers 15 August 2025

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Christchurch, New Zealand



Independent Assurance Report

To the Directors of Firstlight Network Limited and the Commerce Commission

Assurance report pursuant to the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31

We have undertaken a reasonable assurance engagement in respect of the compliance of Firstlight Network Limited (the "Company") with the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31, (the "Determination") for the disclosure year ended 31 March 2025 where we are required to opine on:

- whether the Company has complied, in all material respects, with the Determination, in preparing the
 information disclosed under schedules 1 to 4 (excluding 3a), 5a to 5h, 6a and 6b, 7, 10 and 10a
 (limited to SAIDI and SAIFI information), the related party transactions disclosed in Appendix A, and
 the explanatory notes disclosed in boxes 1 to 11 in Schedule 14 (the 'Disclosure Information'); and
- whether the Company's basis for valuation of related party transactions ('valuation of related party transactions'), has complied, in all material respects, with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012 (consolidated 23 April 2024) ("the IM Determination").

Qualified Opinion

In our opinion, except for the possible effect of the matter described in the Basis for Qualified Opinion section of our report, in all material respects:

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

Basis for Qualified Opinion

As described in Box 13 of Schedule 14, there are inherent limitations in the ability of the Company to collect and record the network reliability information specifically the installation control points ("ICPs") affected by an interruption and the duration of the interruption used in calculating the amounts required to be disclosed in Schedule 10(i) to 10(vi) and 10a. Consequently, there is no independent evidence available to support the accuracy and completeness of the ICPs affected and duration of an interruption. Controls over the accuracy and completeness of ICPs and interruption data included in the SAIDI and SAIFI outage statistics are limited throughout the year.

There are no practical audit procedures that we could adopt to independently confirm the accuracy and completeness of the ICPs data used to record the number of ICPs affected and duration of the interruption for the purposes of inclusion in the amounts relating to SAIDI and SAIFI outage statistics set out in Schedule 10(i) to 10(vi) and 10a.

Because of the potential effect of the limitations described above, we are unable to form an opinion as to the accuracy and completeness of the data that forms the basis of the compilation of Schedule 10(i) to 10(vi) and 10a. In this respect alone we have not obtained all the recorded evidence and explanations that we have required.



We have 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 (NZ) 3100 (Revised) requires that we comply with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised) *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information*.

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

Our assurance approach

Overview

Our assurance engagement is designed to obtain reasonable assurance about the Company's compliance, in all material respects, with the Determination and IM Determination.

Quantitative materiality levels are determined for testing purposes within individual schedules included in the Disclosure Information based on the nature of the information set out in the schedules. These thresholds are determined based on our assessment of errors that could have a material impact on key measures within the Disclosure Information:

- Financial information any impact resulting in +/-100 basis points of the Return of Investment ('ROI')
- Performance based schedules 5% of non-financial measures
- Related party transactions 2% of total related party transactions.

When assessing overall material compliance with the Determination, qualitative factors are considered such as the combined impact on ROI and other key measures as well as assessing the arm's length valuation rules on related party transactions, which may impact on users assessment on whether the purpose of Part 4 of the Commerce Act 1986 has been met.

We have determined that there are two key assurance matters:

- Regulatory Asset Base
- Related Party Transactions.

Materiality

The scope of our assurance engagement was influenced by our application of materiality.

Based on our professional judgement, we determined certain quantitative thresholds for materiality. These, together with qualitative considerations, helped us to determine the scope of our assurance engagement, the nature, timing and extent of our assurance procedures and to evaluate the effect of misstatements, both individually and in aggregate on the Disclosure Information as a whole.

Scope

Our procedures included analytical procedures, evaluating the appropriateness of assumptions used and whether they have been consistently applied, agreement of the Disclosure Information to, or reconciling with, source systems and underlying records, an assessment of the significant judgements made by the Company in the preparation of the Disclosure Information and valuing the related party transactions, and evaluation of the overall adequacy of the presentation of supporting information and explanations.

These procedures have been undertaken to form an opinion as to whether the Company has complied, in all material respects, with the Determination in the preparation of the Disclosure Information for the year ended 31 March 2025, and whether the basis for valuation of related party transactions complies, in all material respects, with the Determination and the IM Determination.



Key Assurance Matters

Key assurance matters are those matters that, in our professional judgement, were of most significance in carrying out the assurance engagement during the current disclosure year. These matters were addressed in the context of our assurance engagement as a whole, and in forming our opinion. We do not provide a separate opinion on these matters. In addition to the matter described in the Basis of Qualified Opinion section of our report, we have determined the matters described below to be Key Assurance Matters.

Key Assurance Matter

Regulatory Asset Base

The Regulatory Asset Base (RAB), as set out in Schedule 4, reflects the value of the Firstlight Network Limited electricity distribution assets. These are valued using an indexed historic cost methodology prescribed by the Determination. It is a measure which is used widely and is key to measuring the Firstlight Network Limited's return on investment and therefore important when monitoring financial performance or setting electricity distribution prices.

The RAB inputs, as set out in the IM Determination, are similar to those used in the measurement of fixed assets in the financial statements, however, there are a number of different requirements and complexities which require careful consideration.

Due to the importance of the RAB within the regulatory regime, the incentives to overstate the RAB value, and complexities within the regulations, we have considered it to be a key area of focus.

How our procedures addressed the key assurance matter

We have obtained an understanding of the compliance requirements relevant to the RAB as set out in the Determination and the IM Determination.

Our procedures over the regulatory asset base included the following:

Assets commissioned

- We inspected the assets commissioned during the period, as per the regulatory fixed asset register, to identify any specific cost or asset type exclusions, as set out in the Determination, which are required to be removed from the RAB;
- We reconciled the assets commissioned, as per the regulatory fixed asset register, to the asset additions disclosed in the underlying financial records and investigated any material reconciling items; and
- We tested a sample of assets commissioned during the disclosure period for appropriate asset category classification.

Depreciation

- For assets with no standard asset lives we assessed the reasonableness of the lives used by reference to the accounting depreciation rates used in preparing the underlying financial records;
- We compared the standard asset lives by asset category to those set out in the IM Determination;
- We reperformed the regulatory depreciation calculation for a samples of assets; and
- For a sample of assets, we compared the system formula utilised to calculate regulatory depreciation expense with IM Determination clause 2.2.5.

Revaluation

 We recalculated the revaluation rate set out in the IM Determination using the relevant Consumer Price Index indices taken from the Statistics New Zealand website: and



Key Assurance Matter	How our procedures addressed the key assurance matter

Related party transactions

Disclosures over related party transactions including related party relationships, procurement policies/processes, application of these policies/processes and examples of market testing of transaction terms as required under the Determination and the IM Determination are set out in Appendix A.

The Determination and the IM Determination require the Company to value its transactions with related parties, disclosed in Schedule 5b, in accordance with the principles-based approach to the arm's length valuation rule. This rule states that the value of goods or services acquired from a related party cannot be greater than if it had been acquired under the terms of an arm's length transaction with an unrelated party, nor may it exceed the actual cost to the related party. A sale or supply to a related party cannot be valued at an amount less than if it had been sold or supplied under the terms of an arm's-length transaction with an unrelated party.

Arm's-length valuation, as defined in the IM Determination, is the value at which a transaction, with the same terms and conditions, would be entered into between a willing seller and a willing buyer who are unrelated and who are acting independently of each other and pursuing their own best interests.

Firstlight Network Limited is required to use an objective and independent measure to demonstrate compliance with the arm's-length principle. In the absence of an active market for similar transactions, assigning an objective arm's length value to a related party transaction is difficult and requires significant judgement.

 We tested the mathematical accuracy of the revaluation calculation performed by management.

We have obtained an understanding of the compliance requirements relevant to related party transactions as set out in the Determination and the IM Determination. We have ensured Schedule 5(b) and Appendix A includes all required disclosures including current procurement policies, descriptions of how they are applied in practice, representative example transactions and when and how market testing was last performed.

Our procedures over the related party transactions included the following:

Completeness and accuracy of related party relationships and transactions

We have tested the completeness and accuracy of the related party relationships and transactions by:

- Agreeing the disclosures within Schedule 5(b) to the underlying financial records for the year ended 31 March 2025, investigating any material differences and determining whether any such differences are justified; and
- Applying our understanding of the business structure against the related party definition in IM Determination clause 1.1.4(2)(b) to assess management's identification of any "unregulated parts" of the entity.

Practical application of procurement policies

 Testing a sample of operating expenditure and capital expenditure transactions disclosed in Schedule 5(b) by inspecting supporting documentation to determine compliance with the disclosed procurement policy and practices.

Arm's length valuation rule

We obtained Firstlight Network Limited's assessment of available independent and objective measures used in supporting the arm's length valuation principal and performed the following procedures:

- Reperformed the calculations and agreed key inputs and assumptions to supporting documentation; and
- Where benchmarking or other market information was used as independent and objective measures, we assessed whether the related party transaction values fell within a reasonable range.



Key Assurance Matter	How our procedures addressed the key assurance matter
We have identified related party transactions at arm's-length as a key assurance matter due to the judgement involved.	Qualitative factors were considered in determining the appropriate acceptable range.

Directors' Responsibilities

The Directors are responsible on behalf of the Company for compliance with the Determination and the valuation of related party transactions in accordance with the Determination, for the identification of risks that may threaten such compliance, controls that would mitigate those risks, and monitoring the Company's ongoing compliance.

Our Independence and Quality Management

We have complied with the Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)* or other professional requirements, or requirements in law or regulation, that are at least as demanding, which include independence and other requirements founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We apply 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 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.

We are independent of the Company. Our firm carries out other assurance services for the Company in the areas of regulatory compliance engagements. The provision of these other services has not impaired our independence.

Assurance Practitioner's responsibilities

Our responsibility is to express an opinion on whether the Company has complied, in all material respects, with the Determination in the preparation of the Disclosure Information for the disclosure year ended 31 March 2025 and on whether the basis for valuation of related party transactions complies, in all material respects, with the Determination and the IM Determination.

Our engagement has been conducted in accordance with ISAE (NZ) 3000 (Revised) and SAE 3100 (Revised) which require that we plan and perform our procedures to obtain reasonable assurance about whether the Company has complied in all material respects with the Determination in the preparation of the Disclosure Information for the disclosure year ended 31 March 2025, and whether the basis for valuation of related party transactions complies, in all material respects, with the Determination and the IM Determination.

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



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 may occur and not be detected. A reasonable assurance engagement for the disclosure year ended 31 March 2025 does not provide assurance on whether compliance with the Determination and the IM Determination will continue in the future.

Use of Report

This report has been prepared for the Directors and the Commerce Commission in accordance with clause 2.8.1(1) of the Determination and is provided solely to assist you in establishing that compliance requirements have been met.

Our report should not be used for any other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility for any reliance on this report to anyone other than the Directors of the Company, as a body, and the Commerce Commission, or for any purpose other than that for which it was prepared.

The engagement partner on the assurance engagement resulting in this independent auditor's report is Elizabeth Adriana (Adri) Smit.

PricewaterhouseCoopers 15 August 2025

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Christchurch, New Zealand