Firstlightnetwork®

Asset Management Plan Update

31 March 2026

MESSAGE FROM OUR CEO

Welcome to the Firstlight Network 2026 Asset Management Plan (AMP) Update.

In October 2025, an agreement was reached for Powerco Ltd. to acquire Firstlight Network. While this sale / transition process is ongoing, it remains business as usual as we continue to operate and maintain the network for the benefit of our customers and communities.

Our commitment remains unchanged and our aim is to provide safe, reliable, and affordable electricity to the communities of Gisborne, Wairoa, and the East Coast. We continue to invest in and manage the network to balance service performance with affordability for our customers.

Operating a geographically large and predominantly rural network presents ongoing challenges. Recent years have reinforced the impact that severe weather, vegetation risk and an ageing asset base can have on network performance. Addressing these challenges requires targeted investment to maintain and replace assets, strengthen network resilience and reduce the risk of future outages.

This AMP Update outlines our view on the level and timing of investment required to strengthen network resilience. Our focus remains on directing investment where it delivers the greatest benefit, while managing costs over the long term.

During this period of transition, our priority remains ensuring the network continues to be well maintained, resilient and capable of supporting the communities and businesses across our region that rely on it every day.

Thank you for your continued support.

Paul Goodeve

CEO, Firstlight Network, part of Clarus

EXECUTIVE SUMMARY

This is the Firstlight Network asset management plan update (AMP Update) for 2026. This AMP Update builds on our previous AMP disclosures and provides expenditure forecasts for the coming 10-year period. It discusses completed works and reliability performance for the regulatory year ending 31 March 2026.

We are publishing an AMP Update as we sought and received an exemption from publishing a full AMP. Recognising this, our AMP Update has been expanded to provide information and updates on several areas typically covered by a full AMP. This includes our ongoing initiatives to improve the reliability and resilience of our network.

Changing ownership

In October 2025, an agreement was reached for Powerco Ltd. to acquire Firstlight Network. At the time of drafting this AMP Update, this process was still ongoing. Nevertheless, it remains business as usual as we continue to operate and maintain the network for the benefit of our customers and communities.

The proposed sale to Powerco is expected to conclude in 2026. Following completion, a phased integration process is anticipated. Powerco operates a large and diverse network serving more than 360,000 connections, which will complement the strengths of our network while maintaining a strong local presence.

During this period of transition, our priority remains ensuring the network continues to be well maintained, resilient and capable of supporting the communities and businesses across our region that rely on it every day.

A safe and resilient network

Firstlight Network's electricity network spans the Gisborne, Wairoa, and the East Coast districts and connects the national electricity grid to our customers' homes and workplaces. The network provides residential and business customers a safe, secure, and reliable electricity distribution service. Firstlight Network is part of the wider Clarus Group.

Safety remains our foremost organisational priority, and we challenge ourselves to put safety and well-being at the heart of everything we do. We continue to take an uncompromising approach to safety and will act when we believe there are safety risks to the public, our staff, or service providers.

Network resilience is a key priority for us, as the changing climate brings with it more frequent and more powerful storms and floods. Climate modelling and our own experiences suggest that extreme weather events will continue to increase in both frequency and intensity over the coming decades. Weather events have the potential to adversely impact the performance and safety of electricity assets. As a result, climate change poses ongoing risks to our network and its performance. The impact of severe weather events will be compounded by deteriorating condition of ageing assets. We are continuing to focus on addressing these risks and progressing a range of reliability performance initiatives (as set out in Chapter 5).

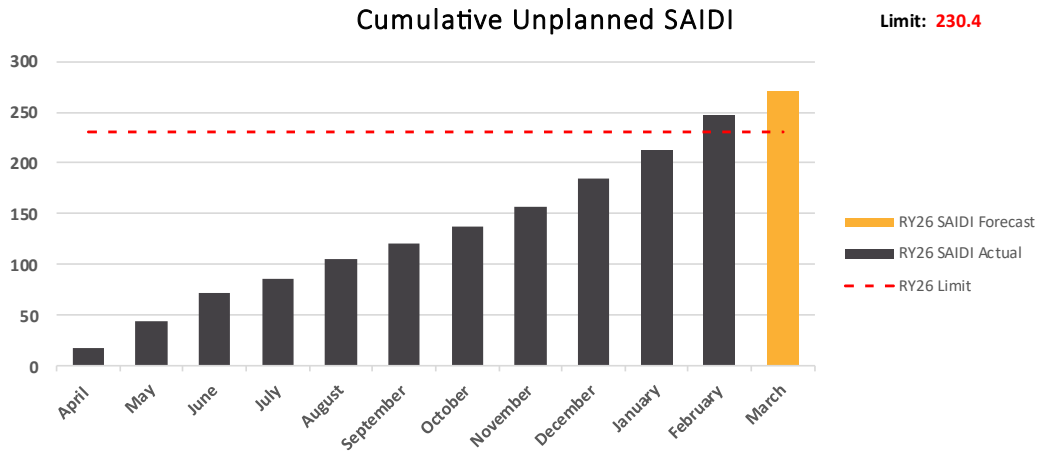
Reliability Performance

Delivering appropriate levels of service reliability is a priority for us. The levels of service our customers receive are influenced by a range of factors, including asset condition, weather, nearby vegetation, third-party activities, our capacity to respond to incidents, and network security.

The levels of reliability we can deliver today reflect historical trade-offs between cost and delivered levels of service. Improving service performance is often a long-term undertaking and has cost implications. We recognise that this trade-off needs to be based on our customer's preferences, while ensuring our network is safe.

As the 2026 regulatory year has progressed a range of factors (discussed in Section 3.4) have contributed to unplanned SAIDI ending the year above our annual regulatory limit (as depicted below). The largest contributor to this exceedance was equipment failure, which reinforces the importance of targeted renewal investment and our delivery of the strategic reliability management plan.

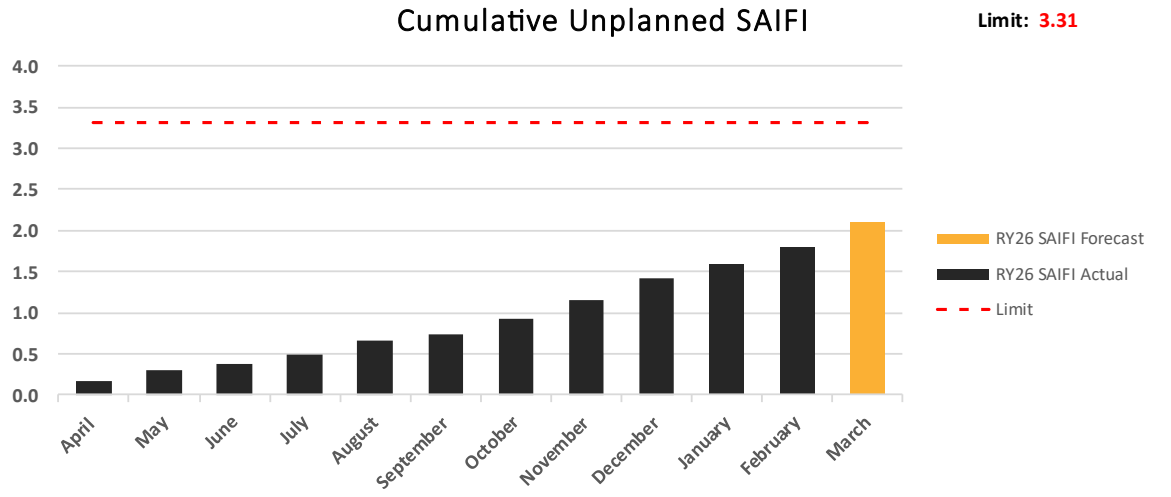
RY26 Cumulative unplanned SAIDI



We continue to progress our reliability focussed programs (see section 3.3) including overhead renewals works, automation, and improvements to vegetation management. Our performance in RY26 has seen a material reduction in non-normalised (raw) SAIDI, which more closely reflects the experience of customers.

In contrast and based on projections for the remainder of the regulatory year, our unplanned SAIFI will remain within the regulatory limit. As set out in Section 5.1.3, our SAIFI performance in RY26 has materially improved compared with recent years.

RY26 Cumulative unplanned SAIFI



Chapter 5 sets out a series of ongoing and planned improvement initiatives that we expect will improve reliability performance over the coming years.

Improving our Asset Management Capability

We believe strong asset management drives efficient delivery, and we're continuing to improve our asset management capability.

To support and guide these efforts we have undertaken a detailed review of our asset management capability as part of an updated AMMAT review. This robust review of current capability was undertaken by external specialists and resulted in a score of 2.5 (out of 4). This is a reduction compared with our 2023 score of 2.8. Our latest score reflects a more rigorous assessment rather than a deterioration in actual capability since 2023. The more rigorous assessment is consistent with our view of good practice asset management and the need for EDBs to continuously improve, given the challenges and opportunities discussed in other sections.

Recognising opportunities to improve our asset management and the need to address the network reliability challenges we, and the wider distribution sector face, we have progressed several asset management improvement initiatives during RY26, including:

- implementation of a strategic reliability management plan (SRMP)
- improvements to expenditure forecasting including the use of repex modelling
- implemented a formal asset class hierarchy to classify assets and related lifecycle management activities and data
- development of asset class strategies
- reinspecting poles against an improved inspection standard
- undertaking a comprehensive review of our AMMAT and RMMAT scoring
- implementing an improved approach to managing contractors and put in place new master services agreements.

These improvements will support improved reliability outcomes and are being directed towards aspects of capability that can deliver the most benefits. Chapters 4 and 5 set out further examples of the capability improvements we are progressing.

2026 AMP Expenditure Forecasts

As a lifeline utility, it is critical that we invest prudently to ensure our assets are safe, reliable, and resilient in the longer term. Our renewal investments and operations and maintenance activities help to maintain the condition and performance of our assets and to prevent increases in risk. Our expected total capital expenditure (capex) and operating expenditure (opex) profiles over the AMP period are discussed below.

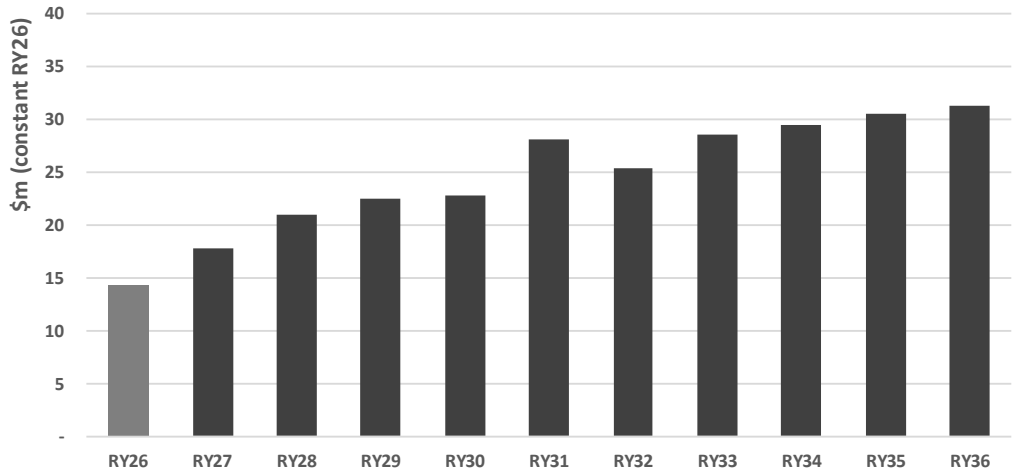
Capital expenditure

Firstlight Network believes that timely asset renewal and upgrade of our assets is an important foundation for delivering a safe, reliable, and resilient network. The capex forecasts in this AMP include targeted investments to support these outcomes.

During DPP4, most of our Capex relates to the renewal of our overhead assets, dealing with geohazards, and refurbishing ageing assets. We have prioritised expenditure based on the degree to which it improves safety and reliability risk on the network. Other renewal programmes are relatively stable over the period.

The 10-year profile (see figure below) varies over time due to the presence of larger 'lumpy' investments and projects during the period. The timing of these works reflects the latest prudent timing for addressing the related needs.

Forecast Capex during the AMP Period (constant RY26)



Our planned capex from RY26 through RY30 has been prioritised to focus on asset renewal and investments to improve reliability. This will see a continuation of higher investment compared with historical levels. This demonstrates our commitment to maintaining required levels of capex to address assets impacting our reliability performance. During the remainder of the AMP period and into DPP5, we expect to lift investment and will set out details of these investments in future AMP documents.

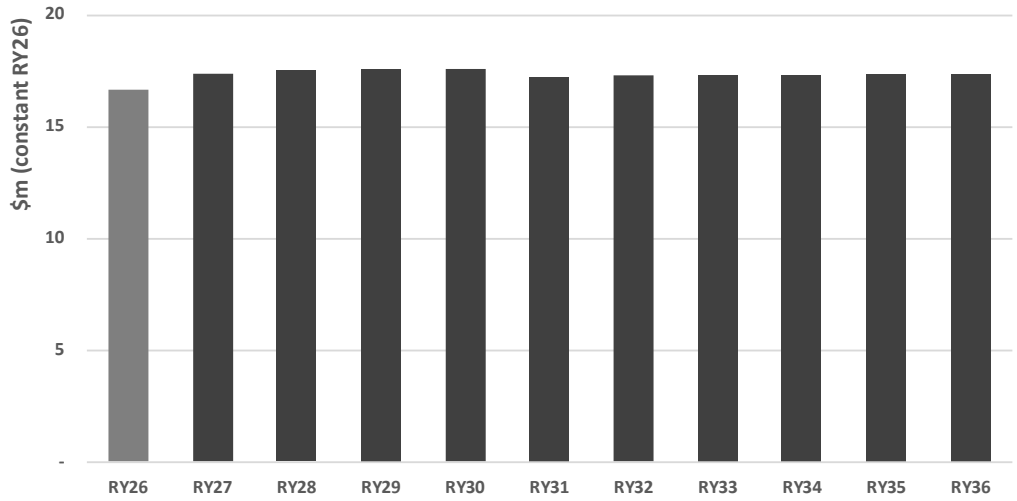
Several growth-related projects have been excluded from this AMP Update due to available funding and a degree of uncertainty surrounding the timing and/or scope of the projects. The need for these investments will continue to be monitored and reassessed as new information becomes available and may become candidates for regulatory reopeners.

We remain committed to making the necessary levels of investment to ensure a safe, reliable, and resilient distribution service for the communities we serve. Our expenditure in the coming years will be prioritised to support these outcomes.

Operating Expenditure

Our planned Opex during the AMP period is set out below.

Forecast Opex during the AMP Period (constant RY26)



Our planned Opex forecast is relatively stable from RY27 onwards through the AMP period and has been aligned to our DPP allowance in the initial years of the period. The amounts reflect the underlying levels of operations and maintenance, support costs, and people costs to manage our network. As we progress our renewal programs, we expect that reactive maintenance activity (e.g. repairs) will reduce over time. We have increased Opex on vegetation management activities to manage reliability performance.

Conclusion

We have developed Capex and Opex forecasts aimed at stabilising and gradually improving network resilience and reliability. Our expenditure priorities reflect recent network performance on our network and the increasing risks associated with escalating impacts of climate change and our ageing assets. The forecasts have been developed to support our improvement initiatives.

Our key expenditure driver continues to be providing a safe network that meets the needs of Gisborne, Wairoa, and East Coast communities, now and in the future.

1. INTRODUCTION

This is the Firstlight Network asset management plan update (AMP Update) for 2026. This section outlines its purpose, scope and structure and provides an overview of the overall business. This AMP Update builds on our previous AMP disclosures and provides expenditure forecasts for the coming 10-year period. In addition, it discusses completed works and reliability performance for the regulatory year ending 31 March 2026.

We are publishing an AMP Update for regulatory year 2026 as we sought and received an exemption from publishing a full AMP.[1] Recognising this, our AMP Update has been expanded to provide information and updates on several areas typically covered by a full AMP.

1.1. Purpose of the AMP Update

This AMP Update provides an update on our approach to managing our electricity network. This includes:

- outlining our ongoing commitment to minimising safety risks on our network
- notifying stakeholders about the proposed sale of our network to Powerco
- providing visibility of our investment plans to stakeholders including our planned capex and opex over the coming 10 years
- setting out our reliability performance and explaining how we plan to improve this over time
- updating stakeholders on improvements to our asset management practices.

This document is one part of our ongoing engagement with our customers, and we hope that it will help stakeholders to better understand our approach to managing our electricity network assets.

1.2. Period covered by the AMP Update

This AMP Update covers the 10-year period from 1 April 2026 to 31 March 2036 and relates to the electricity distribution services supplied by Firstlight Network. The AMP Update meets the requirements of the Electricity Distribution Information Disclosure Determination 2012. Appendix B sets out how the AMP Update meets these requirements.

The AMP Update was approved by our Board on 27 March 2026.

[1] Confirmed by a letter from Commerce Commission dated 5 February 2026.

1.3. Structure of the AMP Update

As discussed above, the content of our 2026 AMP Update has been expanded beyond our previous AMP Update published in 2025. It is structured as follows.

Table 1.1: Document Structure

CHAPTER		DESCRIPTION
1	**Introduction**	This chapter
2	**Overview of Firstlight Network**	Provides an overview of our business
3	**Year in Review**	Discusses our work program and reliability performance for the regulatory year ending 31 March 2026
4	**Asset Management Capability**	Provides an update on our approach to asset management
5	**Reliability and Resilience**	Our ongoing program to develop and implement reliability improvement initiatives
6	**Expenditure Forecasts**	How our investment plans have changed since our 2025 AMP Update
APPENDICES		**DESCRIPTION**
A	**Disclosure schedules**	AMP information disclosure schedules
B	**Disclosure Requirements**	Sets out how the AMP Update meets Information Disclosure requirements
C	**Director's Certificate**	A copy of the AMP's director certification

2. Overview of Firstlight Network

This section introduces the Firstlight Network business and provides an overview of the organisation. It introduces our approach to asset management and describes how we engage with stakeholders.

2.1. Our Business

Firstlight Network Limited (Firstlight) owns and maintains the electricity distribution assets that supply Gisborne, Wairoa and the East Coast providing electricity to approximately 26,200 customers over an area of approximately 12,000km^2. These regions are geographically isolated with challenging topography and limited access. The network area is predominantly rural with two urban centres.

> **Clarus**
>
> Firstlight Network is part of the wider **Clarus Group**. Clarus is one of New Zealand's largest energy groups with businesses that touch many aspects of the energy supply chain including Rockgas, Firstgas, Firstlight Network, First Renewables and Flexgas.

2.2. Asset Management Strategy

Our objectives as a business directly influence our approach to asset management through our overarching strategy to provide safe, reliable and cost-effective services to our customers. We believe that effectively delivering this strategy will ensure our business remains sustainable and lead to improving outcomes for the communities of Gisborne, Wairoa and the East Coast.

2.2.1. Network objectives

Throughout this AMP Update, we describe how we will achieve the following important objectives for our customers and wider stakeholders.

- **Safety commitment**: the safety of our customers, staff, service providers and the general public is paramount.
- **Effective engagement**: by consulting with our stakeholders, particularly on our planned investments, and how we manage our network to deliver for customers. We need to provide clear descriptions of our key strategies and objectives.
- **Performance accountability**: provide visibility to stakeholders on how we are performing and provide information on the performance of our network.
- **Investment planning**: provide visibility of forecast investment programmes and upcoming medium-term construction works, with a clear rationale as to why planned investments are the best way to meet customer needs.
- **Improving capability**: to ensure our asset management approach supports the delivery of our wider objectives.
- **Regulatory compliance**: ensure we meet our Information Disclosure obligations.

2.3. Stakeholder Engagement

This section provides an overview of Firstlight Network's engagement with stakeholders and how that engagement shapes our decision making. We engage with regulators, retailers, stakeholders, and customers to ensure that we can meet the needs of our customers.

We recognise the importance of engaging with businesses and customers who rely on the safe and reliable delivery of electricity to support their businesses and households. Our focus is to engage with our stakeholders on the following topics:

- understanding our customers' views and preferences for their energy supply and the transition to new solutions (e.g. EVs and PV)
- connection policies and pricing methodologies
- investment and asset maintenance strategies and key operational decisions
- regulatory and government policy processes

Delivering for our communities needs to be underpinned by meaningful, effective engagement with our customers and other stakeholders. We do so through a range of channels, actively consulting with them on what matters most to them and their experience in dealing with us.

- customer satisfaction surveys are run annually to test how well we are responding to their needs
- we actively engage with forestry owners to improve our shared understanding of how vegetation impacts our assets and how this risk can be managed
- our online safety centre provides information and advice on safety related issues
- outage communications through social media and our website for planned outages[2]
- iwi engagement
- our online 'home energy hub' provides information and advice on electricity bills
- stakeholders affected by major projects are consulted and their views are taken on board during the project planning phase

We recognise that affordability is a key concern, particularly for vulnerable customers. We continue to engage with customers to balance cost and service quality. As part of our annual customer surveys, it was a key finding that keeping the power on and getting it back on quickly is the most important part of our service, while keeping line charges low is increasing in importance. We will continue to use stakeholder engagement and incorporate these views to help inform future pricing and investment plans.

We continue to increase our efforts to work more closely and collaboratively with stakeholders, as part of this we welcome your feedback on this AMP.

2.3.1. Managing diverging interests

In the operation of any large organisation with numerous stakeholders and diverse interests, situations will inevitably arise where not all interests can be accommodated, or

[2] https://firstlightnetwork.co.nz/tell-me-about/outages

where conflicting interests exist. For example, different customers may place greater or lesser emphasis on price or service quality (including reliability).

From our perspective, situations of conflicting interests are best managed by:

- clearly identifying and analysing stakeholder conflicts (existing or potential)
- seeking solutions that are consistent with the principles found in industry codes and in relevant legislation or regulation
- communicating effectively with stakeholders so that all parties know where they stand

In all instances of conflicting interests, we will strive to engage with stakeholders in a transparent manner to explain our decisions.

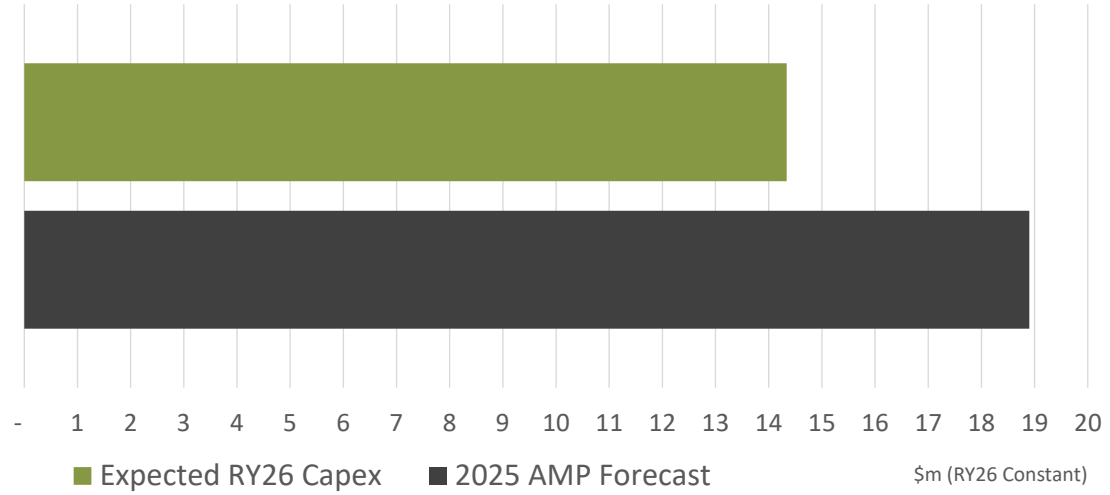
3. Year in Review

This section provides an overview of Firstlight Network's investments, main initiatives, and reliability performance over the past year ending 31 March 2026.

3.1. Capital Expenditure Summary

Firstlight Network remains focused on building and maintaining a safe and reliable electricity distribution network for customers across Gisborne, Wairoa and the East Coast. This focus is reflected in the work programme that was undertaken over the last 12 months.

Figure 3.1: Total expected Capex in RY26 versus forecast Capex in the 2025 AMP Update



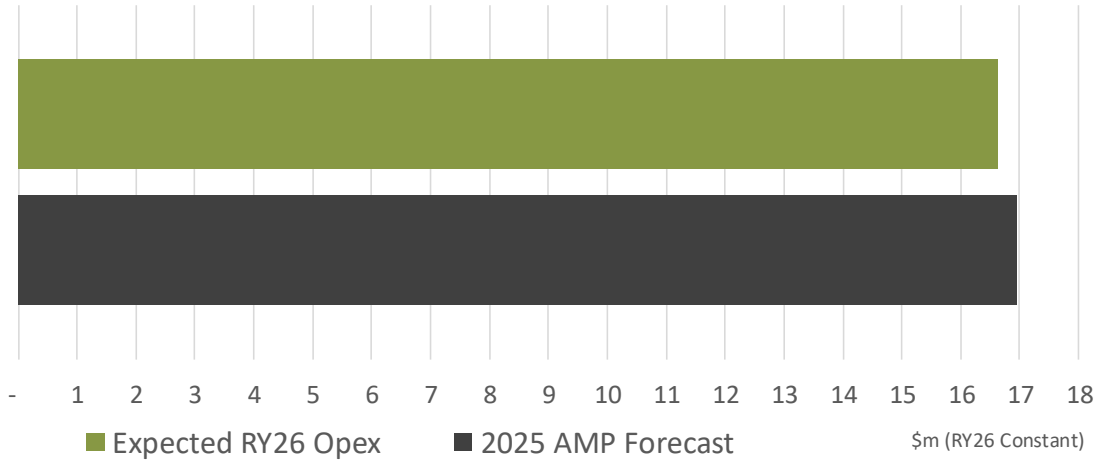
Our expected Capex during RY26 will be below our AMP 25 forecast due to variances across several categories. Supply chain issues impacted deliverability of an additional generator at Raupunga (RSE) with this work now scheduled for RY27. The capacitor bank (growth capex) planned at the Gisborne substation, was impacted by scoping delays and has been deferred to start RY28. Tower renewal works were deferred due to site access issues due to damaged tracks and related structures.

The eventual total will vary depending on completed works during March. We successfully maintained our pole replacement and rural automation programs during RY26. These have been prioritised to help improve our reliability performance.

3.2. Operating Expenditure Summary

Firstlight Network remains focused on effectively operating and maintaining its assets to provide a safe and reliable electricity distribution network for our customers across Gisborne, Wairoa and the East Coast. This focus is reflected in the activities undertaken over the last 12 months.

Figure 3.2: Total expected Opex in RY26 versus forecast Opex in the 2025 AMP Update



Our forecast Opex for RY26 is expected to be slightly below our AMP 25 forecast. This reflects variance across several categories. Expenditure in routine and corrective maintenance and vegetation management are both higher than forecast, reflecting additional activity in these areas. This has been offset by a small underspend in service interruptions spend due to fewer outages (consistent with lower SAIFI in RY26). We have also seen a slight reduction in non-network opex during the year. The final RY26 total may vary based on activity in March 2026 but is not expected to materially vary from the current forecast.

3.3. Significant Activities undertaken in RY26

In this section we set out a summary of key investments and related activities in RY26.

3.3.1. Network automation program

RY26 saw additional automation installed on our network, enhancing network performance and customer outcomes by reducing the number of customers impacted during a fault, swiftly identifying fault locations, and reducing the extent of network isolation during repairs.

Key advantages of automation include maintaining connectivity to more customers during faults through sectionalisers and auto-reclosers in strategic locations on the network and partitioning the system during faults. Installation of load fault indicators lowers response time to identify fault location in rural and remote areas.

Table 3.1: Completed installations in RY26

SECTIONALISERS		
G2050 Tauwhareparae Rd	G2345 Tauwhareparae Rd	E1066 Kanakanaia
J129 Waikura Valley	J4558 Lottin Point	E867 Armstrong Rd
J1048 Waiomatatini	F1072 Kanakanaia	E289 Waimata valley
W971 Iwitea	H55 Te Puia	

OVERHEAD LOAD FAULT INDICATORS		
Raupunga – Putere	Frasertown – Cricklewood	Frasertown – Ardkeen
Haisman – Ormond	Frasertown – Lake Rd	

Further work on our network automation program, including additional installation of sectionalisers and load fault indicators is planned for RY27.

We are tracking reliability improvements from automation, measured as SAIDI prevented in RY26 and shown in Table 3.1.

Table 3.2: Estimated SAIDI prevention (April 2025 to February 2026)

AUTOMATION BENEFITS	
Network SAIDI prevention	27.4
Load fault indication SAIDI prevention	6.2

3.3.2. Oil switch replacement programme

Urban distribution oil switches are approaching end of life and have become a driver of poor reliability as they can no longer be operated under fault conditions and this increases the size of the required isolation to complete repairs. We continue to make progress on this replacement program, focusing on replacements that will reduce the size of an isolation during unplanned outages.

Key advantages of replacement with modern switches include an ability to operate safely under load and a reduced number of customers impacted during faults.

Table 3.3: Completed oil switch replacements in RY26

OIL SWITCH LOCATIONS		
B6246 – Potae St	A555 – Iranui Rd	B1420 – Abbott St
W1448 – Tuai	W285 – Apatu Rd	W856 Marine Parade
A79 – Douglas St	B705 – Lytton Rd	B993 – Solander St
W1449 – Tuai		

3.3.3. Pole replacement and inspection programme

Our pole replacement programme continued throughout RY26 and focuses on replacing ageing wood poles nearing end-of-life. As poles degrade, asset reliability reduces and the risk of equipment failure. Pole renewals not only enhance network safety for both the public and our workforce but also support improved reliability by replacing old pole attachments such as crossarms and insulators, which can cause outages. We expect to replace over 700 sub-transmission, distribution, and low voltage poles during RY26.

Progress in RY26 on inspections has been significant. All previously identified H1 poles have been reinspected under a new inspection standard, and we have inspected wooden poles over 50 years old that did not have up-to-date inspection results. Our

understanding of fleet condition has improved and is informing our maintenance and renewal programmes.

Given the characteristics of our network, which features overhead lines situated in rural and remote regions, a key challenge associated with assets in these regions is the weight of poles, as aerial installation is required. While wooden poles offer ease of handling, their service life is typically shorter than that of concrete poles. Composite poles provide an alternative solution as they are lighter and deliver comparable service life to concrete poles, though at higher cost. We have installed an appropriate composite pole, as part of a pilot project, to assess their suitability relative to wooden poles.

3.3.4. Asset class strategies

In RY26 we introduced an asset class hierarchy and redeveloped our previous fleet strategies into combined asset class strategies for lifecycle management of assets (inspection, maintenance and renewal) with improved forecasting through repex (for larger fleet populations) and through candidate mapping (for smaller fleets).

Table 3.4: Asset class hierarchy

ASSET CLASS	ASSET FLEET	EXPLANATORY NOTES
Support structure	Poles	Structures supporting conductor operating at sub-transmission, distribution or low voltage.
	Crossarm	Supporting insulators to conductor, include associated pole top hardware
	Steel Structure	Steel tower supporting conductor operating at sub-transmission voltages, includes foundation
Overhead conductor	Sub-transmission conductor	All sub-transmission conductor configurations
	Distribution conductor	All distribution conductors, includes SWER
	Low voltage conductor	All LV conductor, includes streetlight circuits
Underground cable	Sub-transmission cable	All sub-transmission cable, includes associated ducts and joints
	Distribution cable	All distribution cable, includes associated ducts and joints
	Low voltage cable	All low voltage and streetlight cable, includes ducts and joints
Zone Substation	Power transformer	All power transformer at zone substation sites
	Indoor Switchgear	Includes GM circuit breaker (break load), GM switch (interrupt load), disconnector (manual isolation)
	Outdoor Switchgear	Includes OH circuit breaker (break load), OH switch (interrupt load)
	Ancillary equipment	CT & VT and control systems. Includes earthing
	Buildings and grounds	Buildings in switchyards, secure yards including security fence, civils
Distribution switchgear	Ground mounted switchgear	GM RMU & GM switch operating at distribution voltage supporting circuit redundancy and reliability
	Pole mounted switchgear	Automated switch, sectionaliser, recloser, automated ABS
	Overhead switch	Manual switch operating at distribution voltage, includes fuse, link, ABS, ABS Quadrant
	Low voltage enclosure	Enclosure operating at low voltage, includes disconnection box, link box, galvanised box, fuses and fuse rack

ASSET CLASS	ASSET FLEET	EXPLANATORY NOTES
Distribution transformer	Ground mounted transformer	GM transformer typically in range 50kW to 1,500kW, includes kiosk
	Overhead transformer	Transformers typically in range of 1kW to 100kW, includes communication transformers
	Voltage Regulator	GM Regulator maintaining stable voltage on long circuit
Other Network Assets	Protection relay	Circuit monitoring and protection
	Batteries and DC supplies	Site power supply operating at LVDC (12v, 24v and 110v)
	Generators	Fixed and portable generators
	Metering and load control	Measure and record consumption
	Network Communication	Communication includes wireless and physical assets (radio, cable and fibre)
	SCADA	SCADA monitoring, managing and controlling process equipment and assets in real time
	RTU	Remote terminal unit installed at remote sites reporting to SCADA through communications

3.3.5. Vegetation management

We continue to improve our vegetation management practices, particularly our three-year cyclical feeder cutting programme. Leveraging our vegetation inspection application has enabled us to target feeders for clearance, based on growth patterns and reliability risks, helping to reduce both SAIDI and SAIFI figures by preventing outages caused by in-zone vegetation. This has been assisted through improvements in vegetation management practices and enhanced engagement with landowners. Additionally, aerial spraying has been completed over 10 km of overhead lines at remote locations.

The field application supports real-time data capture while facilitating quick identification of critical work through a traffic light system. Our focus is on reducing unplanned outages, optimising inspection and patrol activities, and tracking emergent risks, with work undertaken outside routine patrol and clearing packages as needed.

We are actively collaborating with forestry owners, issuing electrical hazard management plans in accordance with the WorkSafe code of practice for forestry. These aim to address vegetation risks posed by out-of-zone trees within commercial forests.

Table 3.5: Overview of RY26 vegetation management activity

RY26 VEGETATION STATISTICS (APRIL 2025 TO FEBRUARY 2026)	
Kilometres patrolled	1,283
Number of inspections	1,126
Trees felled or trimmed	20,304
1st cut notices issued	257
2nd cut notices issued	101

RY26 VEGETATION STATISTICS (APRIL 2025 TO FEBRUARY 2026)	
Out of zone fall hazard sites	43
Out of zone felled	195
Electrical hazard management plans issued	22

3.3.6. Climate change risk assessment

Analysis of reliability performance over RY23–RY25 indicates a marked increase in both the frequency and severity of weather-related outages, with extreme weather events amplifying vegetation risk, access constraints, and restoration times, particularly on long rural feeders.

As part of the SRMP framework, we have undertaken a climate change risk assessment to better understand how changing weather patterns may impact network assets, operations, and reliability performance over time.

The climate change risk assessment evaluates our exposure to key climate hazards, including extreme heat, high winds, heavy rainfall, sea-level rise, and fire-weather. These hazards were assessed under two climate scenarios and across two future timeframes (2041–2060 and 2081–2100), providing insight into both medium and long-term climate-related risks.

The assessment identifies climate-related risks at a regional level across a range of asset types, with a particular focus on critical infrastructure. It aligns with recognised standards, including AS 5334 and ISO 14091, and supports preparedness for potential climate-related financial disclosures.

During RY27 we will complete the review of the risk assessment actions and add relevant initiatives to the strategic reliability management plan.

3.4. Reliability Performance

This section discusses our reliability performance during RY26. Consistent with the DPP framework, the main reliability measures we monitor are as follows:

- unplanned SAIDI
- unplanned SAIFI
- planned SAIDI
- planned SAIFI

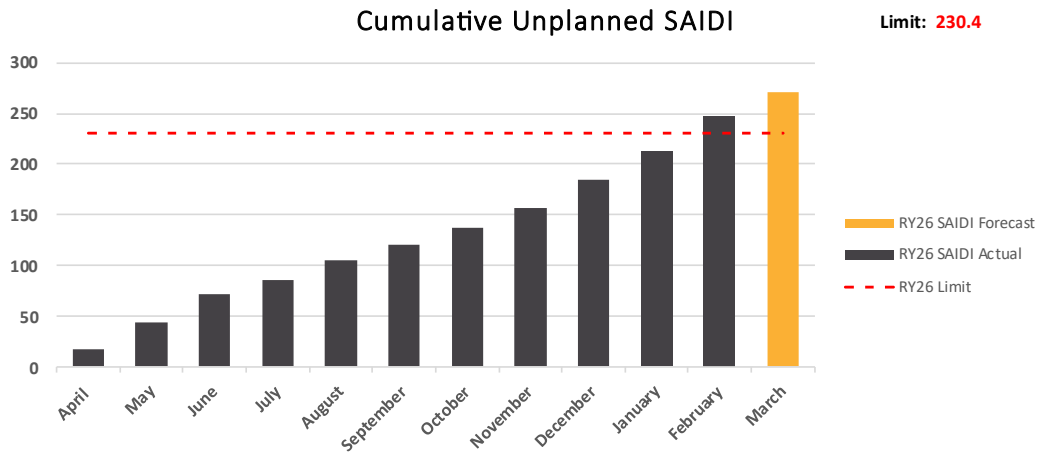
While the final performance figures for the RY26 were not available at the time of publishing this AMP Update, we have set out expected outcomes for the year. As a result, the included statistics and analysis are subject to refinement and may change.

3.4.1. Unplanned SAIDI

We have exceeded our annual regulatory limit (as depicted below) for unplanned SAIDI in RY26, underscoring the ongoing challenges in maintaining reliability on our network. The largest contributor to this exceedance was equipment failure, which highlights the

importance of targeted replacements and our delivery of the strategic reliability management plan.

Figure 3.3: Cumulative unplanned SAIDI



The main drivers for unplanned SAIDI during RY26 were equipment failure (34%), vegetation (16%), and adverse weather (15%). Chapter 5 of this AMP Update sets out our strategic reliability management plan which includes a series of ongoing and planned improvement initiatives that we expect to improve reliability performance over the coming years.

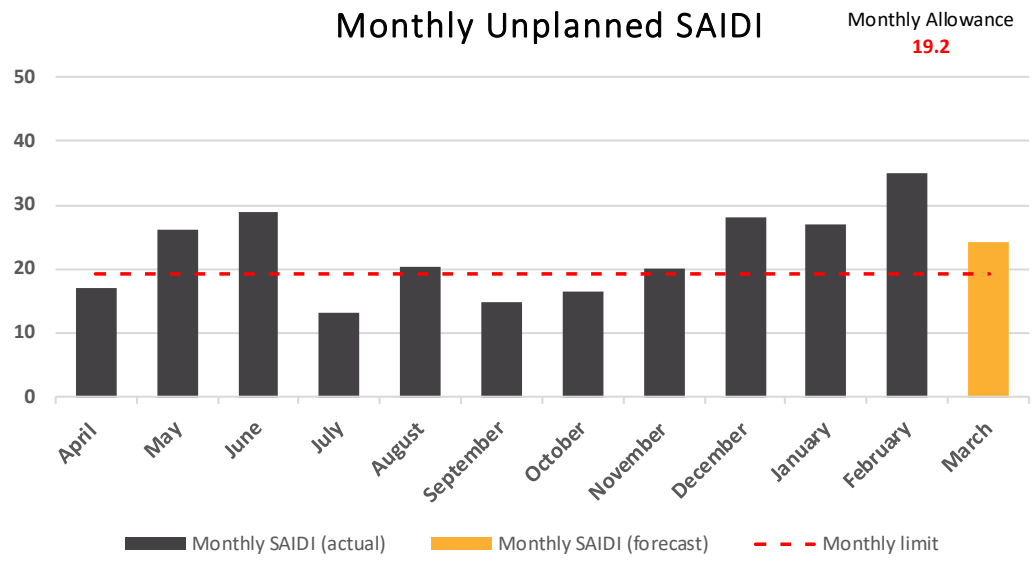
Reliability and resilience improvement initiatives

Our reliability performance in RY26, and in recent years, provides further impetus to advance our reliability improvement initiatives. These initiatives are crucial to ensure we can comply with regulatory limits and deliver an appropriate level of service to our customers. By proactively progressing these initiatives, we aim to reduce unplanned outages and the likelihood of exceeding our regulatory limits.

Monthly SAIDI performance

As is typical practice, we monitor our monthly performance against a representative monthly 'allowance' (derived from our DPP limits). We discuss this monthly performance in Section 3.4.3.

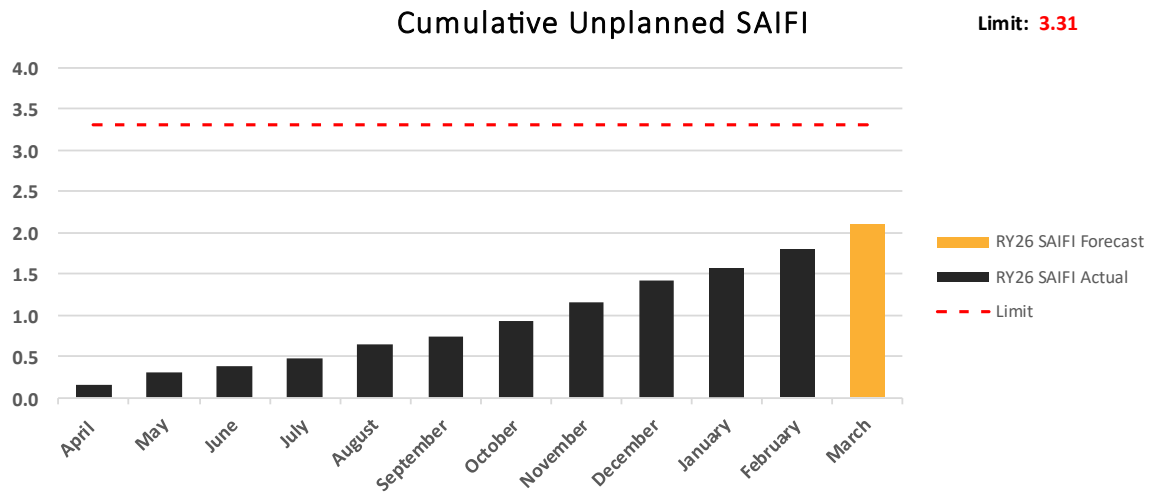
Figure 3.4: Monthly unplanned SAIDI



3.4.2. Unplanned SAIFI

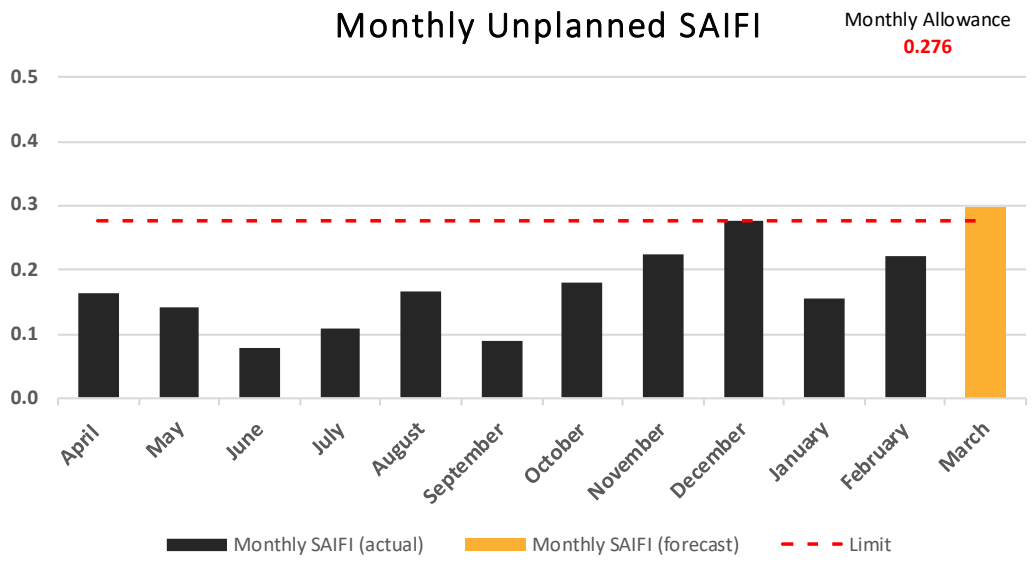
Based on our projections for the remainder of the regulatory period unplanned SAIFI is expected to remain below our regulatory limit. This reflects fewer outages on the network during RY26.

Figure 3.5: Cumulative unplanned SAIFI



Unplanned SAIFI has mainly been driven by equipment failure (32%), unknown causes (21%) and third-party interference (20%), while we have seen a marked reduction in vegetation related SAIFI. Further details on the drivers for SAIFI are included in Section 3.4.3.

Figure 3.6: Monthly unplanned SAIFI



To estimate March performance, we used historical monthly performance. Noting the overall reduction in SAIFI in RY26 compared with previous years we expect this estimate to exceed actual performance. However, to ensure consistency with previous estimates we have retained this approach.

3.4.3. Drivers of unplanned outages in RY26

The main drivers of unplanned interruptions leading to unplanned SAIDI and SAIFI in RY26 are set out below.

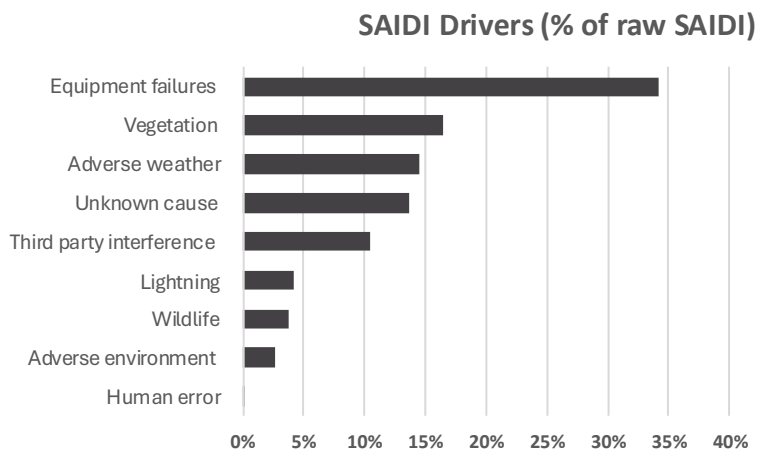
Table 3.6: Unplanned outages with material SAIDI impacts during RY26

MONTH	OUTAGES	NORMALISED SAIDI	MAIN OUTAGE CONTRIBUTORS
April	43	17.0	– Trees through lines at elevated rural sites – Ring main switch failure
May	41	26.1	– Intermittent fault (unknown origin) – Wildlife and third-party damage
June	63	28.9	– Equipment failures exacerbated by wind and flooding – Third party damage (car hit pole)
July	36	13.1	– Adverse environment (flooding) – Rural overhead transformer failure
August	49	20.4	– Strong winds causing conductor clashing – Urban cable fault
September	51	14.9	– Strong wind gusts downed a conductor – Bird contacted conductor and burnt pole
October	107	16.5	– Strong wind gusts – Conductor failure

MONTH	OUTAGES	NORMALISED SAIDI	MAIN OUTAGE CONTRIBUTORS
November	72	20.0	– Slips – Third party damage (car hit pole, truck damaged conductor)
December	111	28.1	– Fault at a circuit breaker – Third party damage (FENZ request to isolate due fire near lines)
January	109	26.9	– Flooding exacerbated by road closures – Lightning (rural overhead transformers destroyed)
February	68	35.0	– Third party damage (car hit pole) – Automated switch failure and lines down incident

As depicted in the following chart, the key drivers for unplanned SAIDI during RY26 (up to the end of February 2026) were equipment failure (34%), vegetation (16%), and adverse weather (15%). We discuss the main drivers in more detail below.

Figure 3.7: Contribution to unplanned SAIDI (April 2025 to February 2026)

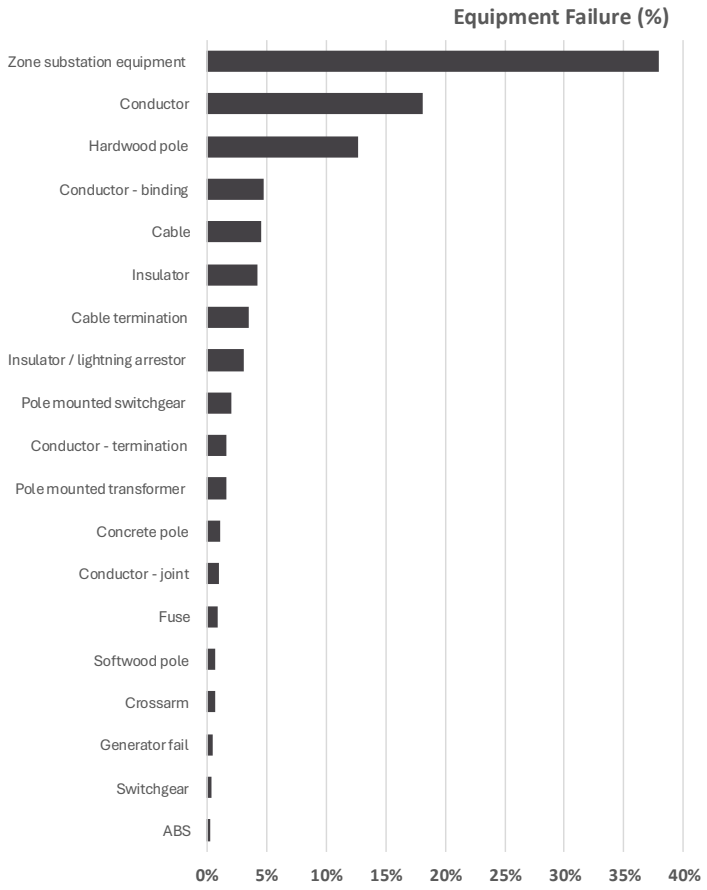


Equipment Failure

At the time of drafting, equipment failure was the largest contributor to interruptions during RY26. Detailed analysis of equipment faults to determine patterns and potential mitigations for these faults is completed annually at the beginning of the regulatory year. Based on these issues, several strategies and initiatives are reflected within our strategic reliability management plan. These are set out in Chapter 5.

The following chart compares different types of equipment failures and their respective contributions to unplanned SAIDI.

Figure 3.8: Main causes of equipment failure SAIDI (April 2025 to February 2026)



Zone substation equipment was the largest contributor to equipment failures during RY26. This was mainly driven by a fault at our Kaiti substation.

Ageing equipment continues to be a key driver notably for pole-top equipment and associated conductor, which becomes increasingly prone to failure over time. Given the nature and scale of the overhead network interruptions continue on our overhead assets which are more vulnerable to weather and vegetation contact. The impact of defects in remote locations is significant due to challenges associated with access and repair.

The impact of equipment failures underscores the need for targeted asset management and renewal strategies, with a focus on higher-risk assets. Addressing ageing overhead assets requires effective inspections and a proactive approach to renewal, potentially with more resilient designs. This, together with our ongoing deployment of fault detection, sectionalisers, improved field response, and the use of generators, will help reduce the future impact of equipment faults.

As set out in Chapter 6, we plan to continue our reliability focussed renewal programs. By addressing assets with poor health scores, we expect to see a reduction in equipment failure outages over the medium to long-term.

Vegetation

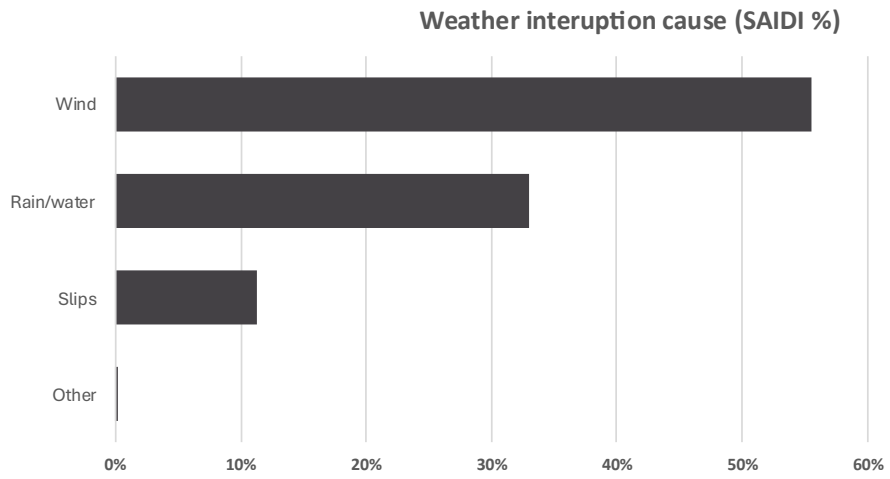
This includes both in-zone and out-of-zone vegetation that leads to contacts with our equipment. This will become increasingly challenging due to higher wind speeds and

more frequent storms. While we have seen a reduction in vegetation related SAIDI, approximately 63% of vegetation related SAIDI is due to out-of-zone trees, the majority of which are not actively managed by the tree owners (i.e. non-plantation 47%). It is likely that regulatory changes that address the management of out-of-zone trees would be required to effectively address these outages. As discussed in Section 3.3.5 we continue to improve our approach to vegetation management.

Adverse Weather

Adverse weather is a significant contributor to unplanned outages. The impacts of weather can emerge and persist months after an event ends.

Figure 3.9: Outages due to adverse weather and environment cause (April 2025 to February 2026)



The Gisborne, Wairoa and East Coast regions are increasingly being impacted by strong winds, with strong wind gusts often accompanied by episodes of heavy rain[3]. These are a key driver of unplanned interruptions on our network. High winds caused the majority of unplanned interruptions and can cause momentary trips as lines clash or momentary vegetation contact but then clear.

Weather events can lead to significant interruptions both through direct damage to assets and indirectly through impacts on fault restoration. Increasing rainfall leads to increased risk of slips impacting our assets. These conditions often result in damage to multiple assets leading to extended restoration times, especially in remote areas.

Our investment programmes during the DPP4 and DPP5 periods will include a focus on improving the ability of our network to withstand these events, and to increase operational capability to support our response.

Unknown causes

Unknown causes have been among the top five contributors to unplanned outages this year, primarily due to an event on our Matawai feeder where an intermittent fault resulted in an outage for which the cause could not be definitively determined.

[3] Based on analysis by Earth Sciences New Zealand for Firstlight network in November 2025.

Third-party interference

Third-party incidents like vehicle damage to poles or cable strikes is a consistent driver of unplanned outages. These events continue to be a significant contributor to unplanned SAIDI. Third party interference tends to have a higher relative contribution due to the time required to ensure public and worker safety before rectification work can commence.

3.4.4. Planned SAIDI and SAIFI

We expect to meet our limits for both planned SAIDI and SAIFI during RY26. When undertaking our work programmes, we aim to ensure that we limit the necessary length and number of planned outages.

4. ASSET MANAGEMENT CAPABILITY

Our people play a central role in our asset management approach, and they need to have appropriate capabilities to manage long-life electricity assets, safely and effectively. This means our organisation needs to help them to learn and adapt as the electricity sector evolves.

Effective capability needs to be supported by staff engagement, leadership, and collaboration between different teams and functions. To support these aspects, we are increasing our focus on developing a formal asset management competency to develop shared understandings around required capability.

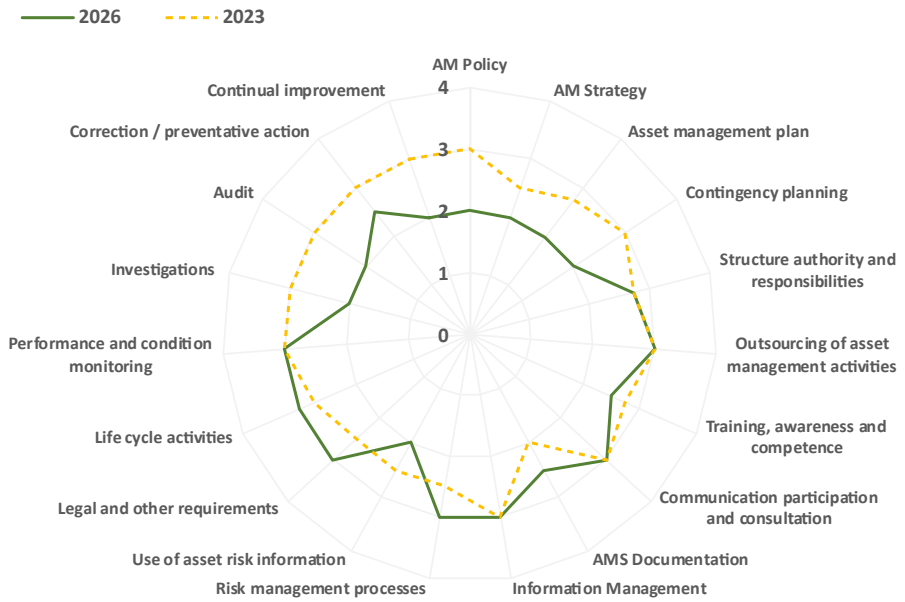
4.1. Capability reviews

This section covers the outcome of our 2026 asset management capability assessments and how this compares with assessment undertaken in 2023.

4.1.1. AMMAT

We have undertaken a detailed review of our asset management capability as part of an updated AMMAT[4] review. This robust review of current capability has been undertaken by external specialists. This assessment resulted in a score of 2.5 (out of 4). This is a reduction compared with our 2023 score of 2.8. Our more rigorous assessment reflects an evolving view of good practice and the need for EDBs to continuously improve, given the challenges and opportunities discussed in other sections.

Figure 4.1: 2026 AMMAT results compared with our 2023 result



[4] AMMAT refers to the asset management maturity assessment tool which is an information disclosure requirement that needs to be prepared and included in AMPs.

This scoring reflects a more robust, systematic assessment of our full asset management system. This forward-looking review assessed current capability against good practice asset management and required capabilities. Several areas have updated scoring:

- Documentation items (e.g. AM policy and strategy, AMP) show consistent reductions as the 2026 review applied a stricter interpretation of what is needed for a well-documented, integrated asset management system.
- Governance and assurance items (investigations, audit, and continual improvement) were scored lower, indicating that these processes need to be more formally implemented.
- Risk management processes and lifecycle activities all scored higher in 2026, consistent with the increased focus we have placed on risk-based decision-making through the SRMP (see Chapter 5).
- Contingency planning, investigations, and corrective/preventative action all show reduced scores and are priorities for improvement in RY27.

The stable scores in areas related to outsourcing and information management reflect some areas that have had ongoing and effective support from the wider Clarus group.

> **2026 AMMAT results**
>
> The 2026 AMMAT results, averaging 2.5, reflect reductions in scores across several categories compared with 2023. It is important to note that these scores reflect a more rigorous assessment in 2026 rather than a deterioration in actual capability since 2023.

Our aim is to be open and transparent about our capability. This more robust, systematic 2026 assessment by external specialists, applied against current good practice benchmarks, has led to a more appropriate outcome than prior assessments. These scores provide a clearer baseline from which to measure genuine improvement. We plan to put in place a series of initiatives to lift our maturity over the coming years.

Further details on our AMMAT findings are set out in Schedule 13 in Appendix A.

4.1.2. RMMAT

We have undertaken a detailed review of our resilience management capability as part of an updated RMMAT[5] review. This tool assists EDBs to enhance their resilience to extreme events that could jeopardise their capacity to deliver electricity to consumers.

A series of evaluation questions form the basis of the RMMAT. The purpose of the RMMAT is to allow EDBs to determine their level of resilience maturity and identify areas where improvements can be made. The expectation is that addressing these areas will bolster network resilience. RMMAT scores range from 0 (not aware) to 4 (excellent), as depicted below.

[5] RMMAT refers to the resilience management maturity assessment tool which aligns with the Electricity Engineers Association Industry Resilience Guide.

Figure 4.2: RMMAT maturity levels

Level 0 **Not aware**	Level 1 **Aware**	Level 2 **Developing**	Level 3 **Competent**	Level 4 **Excellent**
The organisation has not recognised the need for this requirement, and/or there is no evidence of a commitment to put it in place.	The organisation has identified the need for this requirement and there is evidence of an intent to progress it.	The organisation has identified the means of systematically and consistently achieving the requirement and can demonstrate that progress is being made with credible, and resourced plans in place.	The organisation can demonstrate that it systematically and consistently achieves relevant requirement. Only minor inconsistencies may exist.	The organisation can demonstrate that it consistently exceeds the requirement. It employs leading industry practices and mature continuous improvement culture to ensure a high standard of maturity and compliance is maintained.

To support ongoing improvement in our resilience in the face of events, we completed an updated RMMAT assessment. The 2026 assessment resulted in a score of 2.7 (out of 4) and is a reduction compared with our 2023 score of 2.9. Our RMMAT scores are compared with our initial RMMAT undertaken in 2023.

Figure 4.3: 2026 RMMAT results compared with our 2023 result

Similar to our revised AMMAT scores, the RMMAT review reflects a more robust, systematic assessment of our capability. This forward-looking review assessed current capability against good practice resilience practices and related approaches. A comparison between the 2026 and 2023 reviews is set out below:

- Majority of areas are broadly aligned between the two reviews, though with reduced overall scores reflecting the good practice standard applied by the external reviewer.

- While critical spares are held, there is no formally documented spares strategy. This gap has been identified through the SRMP and will be addressed with a formalised critical spares strategy aligned with good practice.
- A reduced contingency planning score reflects gaps that have been identified for improvement under the operational resilience workstream of the SRMP.
- Lifelines liaison has reduced reflecting that engagement with other lifeline utilities and civil defence groups will need ongoing focus and can be further improved (from a good starting position).
- Some areas show improvement, including network risk alignment, business continuity management, contingency switching plans, and recovery strategy and plans. This reflects the work undertaken through the SRMP to strengthen our risk identification and response frameworks.

Overall, these results provide a clearer and more credible baseline than the 2023 self-assessment. The improvements in risk-related areas demonstrate ongoing progress, while the areas of reduced scoring provide us a set of priorities for improvement. We are committed to improving our community, organisational, and network resilience.

4.2. Asset Management Capability Improvements

Since the publication of our 2023 AMP, we have been improving our asset management capability. These improvements have been driven by a commitment to adopting good industry practice and strengthening our processes. Previous AMP Updates have captured some of these improvements, this section consolidates the information.

The following table highlights key changes to our capability.

Table 4.1: Asset management capability improvements

IMPROVEMENTS AREA	KEY CHANGES
Strategic reliability management plan (SRMP)	– During RY26, we developed a new strategy to consolidate and prioritise all network reliability initiatives – This improvement framework is focused on a sustained return to compliance – Prioritisation framework to manage in-flight initiatives – Oversight provided by dedicated governance with a board subcommittee
Vegetation management	– During RY24 we appointed a new, dedicated field operations manager to manage the vegetation management team, contractors and processes – We updated our vegetation management strategy in RY25 – Introduced annual patrol of critical feeders and three yearly cyclical patrols – Increased engagement with forestry stakeholders to discuss risk of trees around our feeders, widening corridors and trimming of in zone trees – Created a new mobile vegetation application with a geographical desktop view for scheduling, reporting and tracking the status of vegetation work and notices – Created a vegetation management dashboard to track volume of trees cut, notices issued and reactive expenditure against planned expenditure – Implemented risk based aerial spraying programme for hard to access areas – Introduced monthly strategic reviews and reporting – Increased expenditure to clear vegetation on our network

IMPROVEMENTS AREA	KEY CHANGES
Asset class hierarchy	– During RY26 we implemented a formal asset class hierarchy to classify assets and related lifecycle management activities and data – Created new asset class strategy documents to implement the asset class hierarchy – Restructured our forecast modelling to align with our asset classes
Capital forecasting	– Capital forecasting approaches were reviewed and progressively refined each time we prepared an AMP and related forecasts – AMP 24 and AMP 25 shifted to volumetric based forecasts to determine 10 year renewal forecasts with associated quantities – In RY26 we further refined our approach and implemented replacement expenditure (repex) forecasting for AMP26 – New repex models were created for poles, crossarm, overhead conductor, cable, switchgear and low voltage enclosures – We reviewed approach to the lifecycle management of generators and refined our refurbishment approach
Pole management	– During RY25 we reviewed and improved our internal inspection standard to utilise industry guidelines and implemented a defect scale (D0-D5) – We updated our approach to asset health modelling and utilised repex to estimate probabilistic asset condition across our pole fleet – We developed new mobile and geographical desktop application to capture condition information of poles and their subassemblies – We retrained our field inspectors to ensure consistent application of the improved inspection standard and mobile application – During RY26 we reinspected all H1 poles and graded assets and their subassemblies against the new defect scale to support improved replacement prioritisation – We utilised repex to forecast pole and crossarm renewals over next 10 years for AMP26
Outage analysis	– During RY25 we created business intelligence reports for reliability analysis, trends, dashboards and reporting – The reports capture SAIDI and SAIFI outage data from 2020 onwards – The new reports and dashboards are available to everyone in the business and are used to update our executive management and Board
Contractor management	– We have been refining our approach to managing contractors and integrating with Clarus – RY26 saw us sign a milestone master services agreements with our long standing electrical contractor to provide certainty of future work, enable investment in future workforce capability and capacity, and to improve response to outages or potentially disruptive weather systems
Risk management	– During RY24 Clarus risk management framework was aligned to ISO 31000 and we began to align with these new processes – We implemented an asset risk register process to capture all risks to our assets, track interim controls, and to manage minor technical change – Implemented our assurance processes and completed initial audits and pre audits for public safety standards
Scoping and engineering reviews	– During RY24 we implemented the Clarus options analysis process, which improved our approach to reviewing options for renewing or installing new assets – These changes facilitated the reprioritisation of projects such as the automation project for the installation of load fault indicators and sectionalisers

IMPROVEMENTS AREA	KEY CHANGES
Emergency management	– In RY24 we begun the process of implementing the coordinated incident management system (CIMS) to align with the Clarus emergency response system and to coordinate with local councils – New emergency management documents, processes and exercises were created – Some of our roles were provided specialist training to operate under the CIMS processes – Set up regular test exercises to maintain readiness and embed lessons learnt

4.3. Asset Management Transition

In October 2025, an agreement was reached for Powerco Ltd. to acquire Firstlight Network. At the time of drafting this AMP Update, this process was still ongoing. Nevertheless, it remains business as usual as we continue to operate and maintain the network for the benefit of our customers and communities.

Our commitment remains unchanged and our aim is to provide safe, reliable, and affordable electricity to the communities of Gisborne, Wairoa, and the East Coast. We continue to invest in and manage the network to balance service performance with affordability for our customers.

The proposed sale to Powerco is expected to conclude in mid-2026. Following completion, a phased integration process is anticipated.

5. Reliability and Resilience

5.1. Strategic Reliability Management Plan

5.1.1. Improving the reliability of our network

This strategic reliability management plan (SRMP) provides a framework for improving reliability and resilience across our network. It informs our asset management plans, and supports our pathway towards long-term sustainable performance, consistent with the principles of good asset management and continuous improvement.

We are improving our approach to reliability analysis, renewal forecasting and replacement of aging assets such as wooden poles. While we continue to make these improvements, work must continue renewing aging and deteriorating assets. Over the next ten years, we plan to replace more than 5,500 poles, prioritising replacement of wooden poles with concrete poles in suitable locations to enhance network resilience and deliver long-term benefits.

While our asset renewal efforts are substantial, we recognise that asset replacement alone is a lengthy process and must be complemented by broader intervention strategies, including changes to network operation, vegetation management, operational response, improving our asset management system and data management.

To provide an immediate impact on reliability while the longer term renewal of assets is completed, we are replacing oil filled switches and installing automation to reduce the number of customers affected by an outage and to identify the fault location quicker, improving our response and restoration time. At the same time, we are looking further ahead identifying future risks and opportunities to reinforce network load and security on critical assets such as the 110kV network.

The aim of this SRMP is to improve reliability by preventing and limiting the impact of interruptions on our network (unplanned outages).

5.1.2. SRMP purpose

To guide our efforts to return to compliance we have developed the SRMP and an SRMP delivery plan. The plan brings together initiatives that will enhance our systems, processes, and operational practices to deliver better reliability outcomes.

The SRMP has been designed to support the network's return to compliance with the quality standards as set under the DPP. We are subject to price-quality standards under the DPP set by the Commerce Commission. These include limits for unplanned SAIDI and SAIFI.

As the delivery plan progresses, we will continue to monitor performance against the DPP4 reliability targets and assess outcomes through ongoing customer engagement. This continuous evaluation will help determine whether additional measures, such as a customised price-quality path application or a quality standard variation, is supported by our customers.

5.1.3. The reason why

Firstlight Network delivers electricity distribution services to approximately 26,200 customers across Gisborne, Wairoa, and the East Coast. This is a geographically isolated and predominantly rural service area with challenging terrain and limited access, where reliable electricity supply is critical for households, businesses, and community resilience.

Recent reliability performance has breached unplanned SAIDI limits in RY23, RY24, and RY26, with RY25 exceeding both unplanned SAIDI and unplanned SAIFI limits.

Normalised SAIDI and SAIFI DPP3 and DPP4 limits compared against historical performance are shown in the graphs below. Note the RY26 amounts include estimates for March 2026.

Figure 5.1: Annual normalised SAIDI versus applicable limits

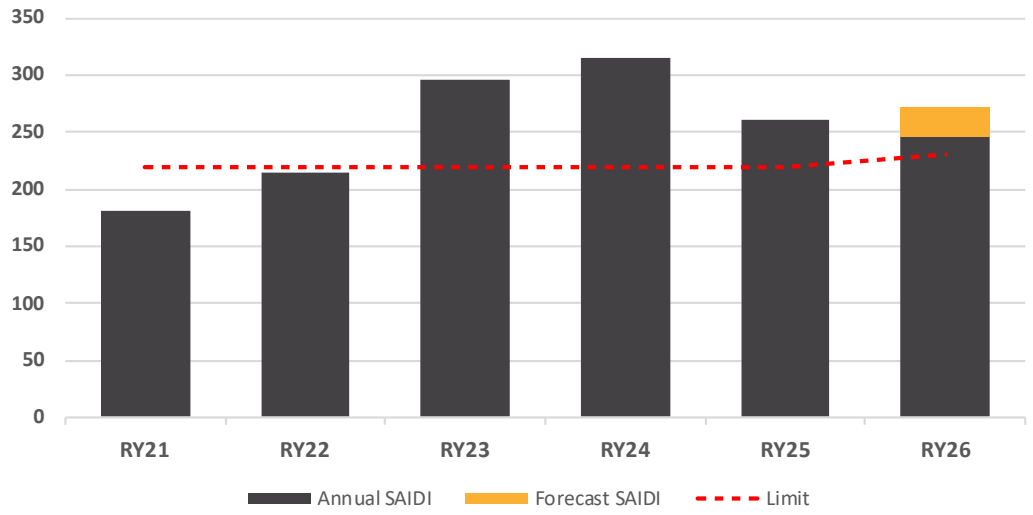
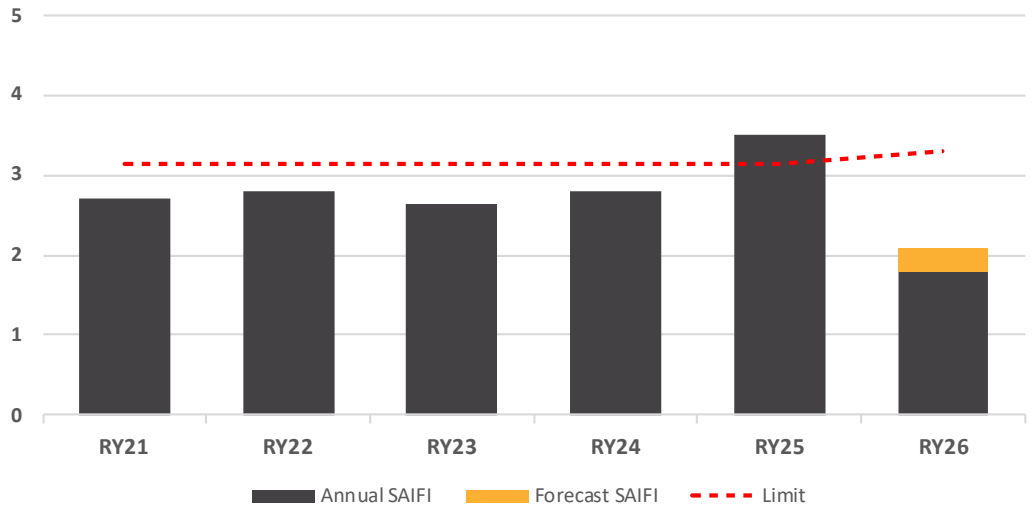


Figure 5.2: Annual normalised SAIFI versus applicable limits



The outage-driver results for RY23–RY25 and RY26 (see Section 3.4.3) help to explain why reliability performance has breached quality limits in multiple consecutive years.

Although each year shows a slightly different profile, the pattern is clear: a small number of dominant causes consistently drive most of our raw SAIDI and SAIFI.

In RY25 we identified that approximately 75% of unplanned SAIDI occurred on the rural parts of our network with a corresponding 80% of capex being spent on network reliability in rural areas. Our long, rural overhead lines continue to feature among poor performing feeders for vegetation and equipment failure reflecting higher wind gusts impacting these assets with steep terrain and long travel times impacting response times.

Understanding these drivers is essential because they highlight where reliability risk is concentrated, and therefore where improvements must be prioritised. The insights of raw SAIDI/SAIFI from these charts shaped the scope of the SRMP and its five strategic workstreams.

Figure 5.3: SAIDI and SAIFI drivers for RY23

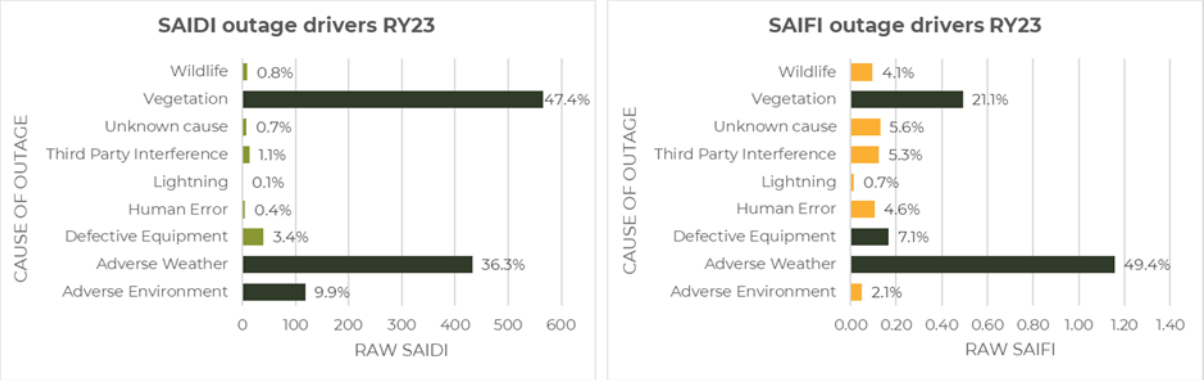


Figure 5.4: SAIDI and SAIFI drivers for RY24

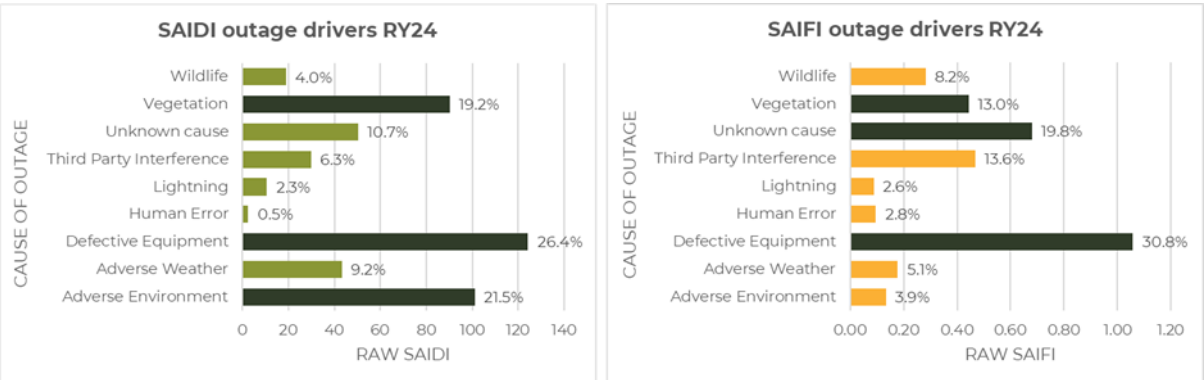
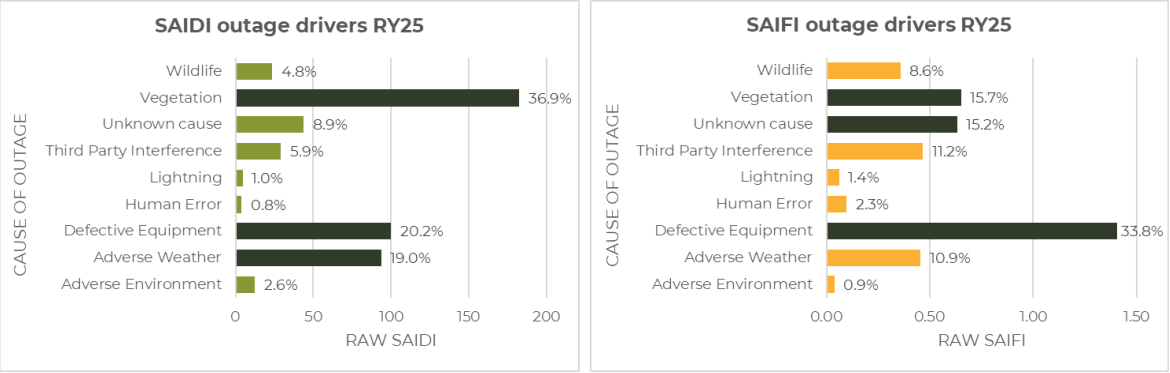


Figure 5.5: SAIDI and SAIFI drivers for RY25



Customer feedback consistently identifies 'keeping the power on and restoring it quickly' as the most valued aspect of our service, with survey results showing that 99% of residential customers consider reliable supply extremely or very important, and 97% place the same level of importance on rapid restoration during outages. Customer comments reinforce this expectation, emphasising uninterrupted supply and fast response during emergencies.

Affordability is also a critical priority, with 96% of residential customers rating 'keeping electricity costs as low as possible' as extremely or very important. Many customers link affordability with community resilience, noting that maintaining reasonable charges supports households and businesses in managing the impacts of unplanned events.

These insights highlight a clear expectation: customers want strong reliability performance that is delivered prudently and cost-effectively. This reinforces the need to balance resilience, operational capability, and affordability when planning and delivering reliability improvements.

Our SRMP is designed as an interconnected process where each action strengthens the next: understanding outages, preventing them where possible, and responding effectively when they occur to continuously improve network resilience and reliability.

We are committed to delivering a safe, reliable, and resilient electricity service. Our focus is on delivering measurable improvements in reliability performance (SAIDI/SAIFI) to return and maintain the network to compliance with regulatory obligations and to meet customer reliability expectations.

5.1.4. Scope

The SRMP covers all network assets and operational activities that influence reliability performance and customer impacts under the DPP4 quality standards.

Through targeted initiatives across the following five key strategic areas, we are strengthening how we manage, maintain, and invest in our assets ensuring the right intervention, at the right time, for the right asset.

- customer engagement
- asset management framework
- vegetation management
- operational resilience and emergency response

- asset data and systems improvement

5.1.5. Customer benefits

Delivering customer benefits under the SRMP framework means balancing reliability, power quality, and cost of service. Understanding customer expectations and willingness to pay helps prioritise network improvements that deliver meaningful value and maintain affordability. The 'customer perception survey', included as one of the SRMP workstream initiatives, supports this by ensuring that customer feedback continues to inform investment priorities and guide ongoing engagement.

Customer insights and willingness-to-pay information play a pivotal role in shaping these trade-offs. While reliability and quick restoration are near-universal expectations, survey results show that affordability remains a strong and persistent concern, particularly among residential customers. This creates a natural tension: customers value resilience and reliability but are cautious about significant price increases.

Willingness-to-pay findings also highlight important differences across customer groups. Businesses show greater flexibility, with around 61% willing to pay more for fewer power cuts and 68% for improved disaster preparedness, whereas residential customers are more cost-sensitive (45% and 58% respectively). These differences indicate that while reliability and resilience are non-negotiable for most customers, the appetite for higher costs varies by segment.

Both residential and business customers strongly support investment in resilience, with over 90% considering it very important, but acceptance of any price impact depends on transparent communication about long-term benefits. Customers want assurance that additional costs will translate into tangible improvements such as fewer outages, faster restoration, and better preparedness for major events. Resilience and affordability are often seen as interconnected, particularly among residential customers who associate cost control with community wellbeing.

Taken together, these insights from the 'customer perception survey' reinforce the need for a balanced approach that strengthens reliability and power quality while managing affordability through prudent, phased investment. They also emphasise the importance of clear communication about how improvements are prioritised, funded, and monitored.

By improving the reliability of our network and engaging with customers on their preferences, we expect to achieve the following benefits for our customers:

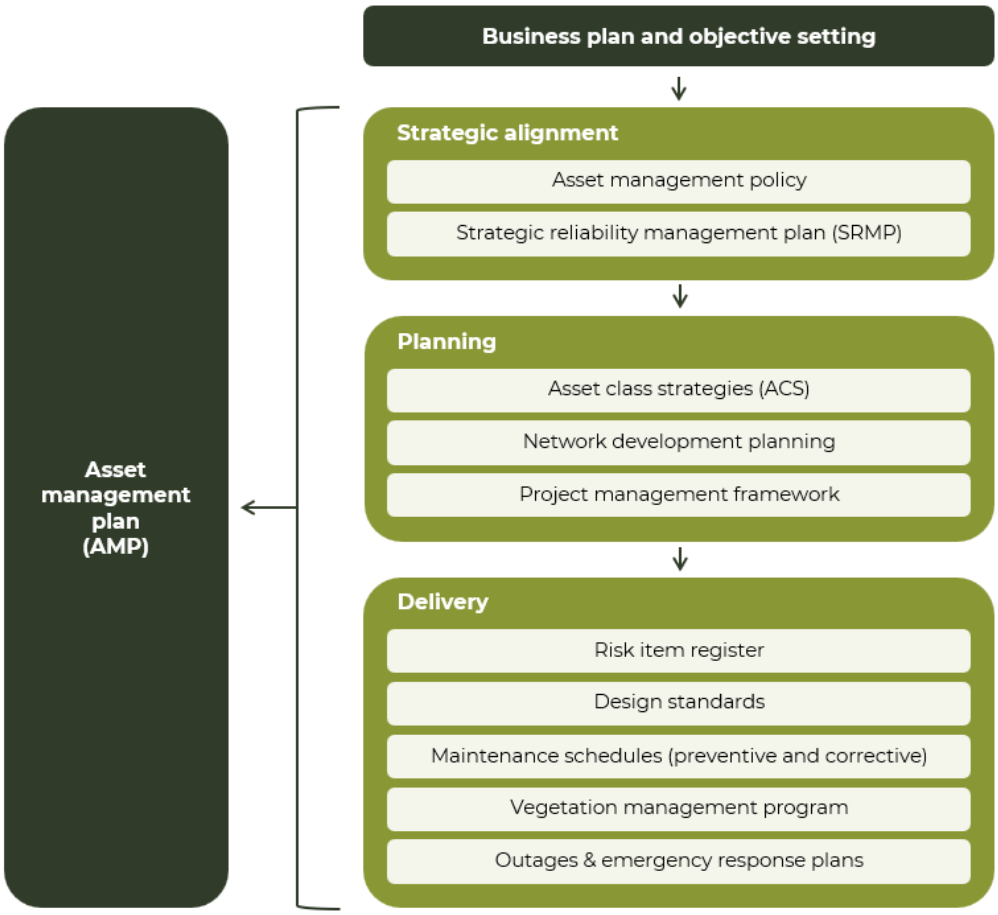
- fewer and shorter power outages (resulting in SAIDI/SAIFI reduction)
- greater resilience to severe weather and network faults
- increased transparency in investment and maintenance decisions
- improved long-term performance of our assets and service
- delivering a stronger, more reliable electricity service for our communities
- network improvements that reflect customer expectations and willingness to pay, ensuring value and affordability

Progress on these initiatives and the resulting benefits will be communicated to customers through updates in our AMPs.

5.1.6. Connection to the wider framework

The SRMP sits within our broader asset management system (as depicted in Figure 5.6), directly supporting the objectives and strategies outlined in our AMPs and ensuring alignment with the ISO 55001 principles. It provides a key link between strategic intent, operational delivery, and achieving regulatory compliance under the DPP and any possible future customised price-quality path developments.

Figure 5.6: Asset management system



5.2. Governance and reporting

We have established an SRMP Oversight Committee and governance structure with defined escalation processes, supported by frequent reporting and regular communication of progress to stakeholders and the community through the annual AMP.

This section explains the governance model to ensure transparency, accountability, and effective oversight of the SRMP across all organisational levels. It provides a clear line of sight from operational delivery to Board oversight and embeds continuous improvement in alignment with ISO 55001, the DPP quality standards and good asset management practice.

The SRMP governance model builds on existing meetings, aligning them under a single reporting and accountability framework.

5.2.1. Governance structure

The SRMP governance structure defines clear reporting and escalation pathways to ensure reliability performance, risks, and improvement actions are reviewed, prioritised, and implemented efficiently.

It integrates the current meeting structure (asset management committee, SRMP meetings, SAIDI/SAIFI reviews, and workstream coordination) into a formal governance model that provides clear visibility from operational delivery through to Board oversight.

Table 5.1: Governance responsibilities

Governance level	Responsibilities
SRMP Board Subcommittee	Provide oversight to ensure Firstlight Network's ability to return to compliance. They monitor SRMP delivery and confirm that improvement plans are delivering the expected reliability benefits.
Executive	Reporting to the Board, the COO holds ownership and accountability for the SRMP programme delivery. The executive ensures that budgets, resources, and strategic direction are aligned to deliver programme objectives and regulatory outcomes.
Asset Management Committee	Responsible for ensuring that SRMP priorities are effectively managed and resourced. It oversees delivery progress, monitors performance, and ensures that the SRMP programme manager provides timely and accurate reporting to support decision-making.
SRMP programme manager	Oversees the day-to-day coordination, delivery, and adherence to schedules. This role ensures implementation aligns with governance processes, prepares reports for the asset management committee and executive, and escalates risks and issues when required.
Workstream leads	Delivers assigned reliability initiatives within scope, time, and budget. Owns the workstream plan, KPIs, and benefits tracking; coordinates internal teams and contractors; ensures health and safety, quality, and data capture (RCA, outage insights); reports to the SRMP Programme Manager and escalates risks, variances, and dependencies.

5.2.2. Governance performance and review cycle

The SRMP governance framework will be reviewed annually to ensure it continues to support and align with the AMP and the DPP quality standards, and internal improvement programmes.

Findings from asset management committee and executive reviews, along with Board oversight, will inform continuous improvement of governance processes, reporting cadence, and programme delivery.

In addition, every six months the SRMP Programme Manager will complete an effectiveness review of this SRMP and report the findings, insights and recommended actions directly to the asset management committee.

5.3. Strategic approach to reliability

Our strategic approach to reliability brings together customer expectations, regulatory requirements, asset management strategy, and the operational disciplines needed to

sustainably improve SAIDI, SAIFI, and customer average interruption duration index (CAIDI). Building on the asset management strategy and the themes identified in the 2024–25 unplanned interruptions report, the SRMP provides the operational framework that connects long-term strategic intent with short-term reliability improvement actions.

This approach recognises that reliability outcomes are shaped by multiple factors: asset condition, environmental exposure, vegetation risk, network configuration, operational response capability, and data quality. Accordingly, the SRMP integrates these drivers into a coordinated set of principles, objectives, and workstreams that strengthen our ability to manage current challenges and future uncertainties, including climate change, ageing assets, and increasing customer expectations.

5.3.1. Reliability objectives

SRMP reliability objectives align with the asset management strategy, the AMP, and the improvement priorities identified through the unplanned interruptions report[6] review. Together, these objectives establish a clear and consistent direction for improving network performance:

- **customer and regulatory outcomes:**
  - maintain overall network reliability at levels that meet customer expectations and improve on historical performance
  - deliver the cost-quality trade-offs that reflect customer and community preferences
  - meet regulatory standards on power quality
- **asset management system outcomes:**
  - embed an AMS aligned with ISO 55001
  - apply risk-based and health-based decision-making to target investments where they deliver the greatest reliability impact
  - improve data quality, condition information, and forecasting capability
  - develop SAIDI and SAIFI forecasting ability for DPP5
- **network performance outcomes:**
  - improve resilience to adverse weather events
  - reduce vegetation-related outages
  - increase fault location speed and network automation capability to reduce outage duration and customer impact
  - ensure network planning supports future energy transformation, electrification, and demand growth, without compromising reliability

These objectives set the foundation for the workstreams, and initiatives, described in section 5.5, SRMP workstreams.

[6] Report available here.

5.3.2. Strategic principles for reliability improvement

To translate strategic objectives into practical action, this SRMP provides a holistic framework structured around four principles that guide how we identify, manage, and improve reliability risks:

- **understand:** through improved outage data capture, asset health forecasting, root cause analysis, and customer engagement insights.
- **prevent:** unplanned outages by targeting vegetation risks, replacing and upgrading ageing assets, and embedding proactive maintenance plans.
- **respond:** to unplanned outages by reinstating customers quickly and safely through strengthened operational resilience, investment in real-time fault location tools, and enhanced emergency preparedness.
- **improve:** processes used to manage network reliability, strengthening the asset management system, network design, and planning practices to build long-term resilience and continuously enhance overall network reliability.

These principles are delivered through five key workstream areas:

- customer engagement
- asset management framework
- vegetation management
- operational resilience and emergency response
- asset data and systems improvement

Each workstream has SRMP initiatives focusing on our response capability and improving the network's resilience and reliability. Initiatives focus on faster fault location, reducing customer impact, targeted asset renewal, proactive vegetation risk reduction, robust asset data governance, and transparent, customer-focused engagement. These are underpinned by inspection programmes, preventive and corrective maintenance, technology adoption (e.g., LIDAR, drones, predictive modelling, business intelligence dashboards), and improved contractor performance management.

Through disciplined execution of these initiatives, we aim to stabilise and progressively improve reliability, meeting service commitments while preparing for future climate and demand challenges.

This SRMP has been developed to align with the principles of ISO 55001, which will be used to build the foundation for our asset management system. The SRMP reflects the ISO 55001 framework by ensuring:

- **alignment with organisational objectives:** reliability targets are linked to service delivery outcomes and customer expectations.
- **value and risk-based decision-making:** investments and maintenance actions are prioritised based on asset criticality, condition, and reliability impact.
- **leadership and accountability:** governance roles and escalation pathways are clearly defined, supporting transparency and continual improvement.
- **coordinated activities:** staff understand their role and responsibilities within the asset management system.

- **lifecycle and information management:** the SRMP integrates with asset data, planning, and performance monitoring processes across the asset lifecycle,
- **continuous improvement:** outcomes from the SRMP feed directly into the AMP review cycle and the wider ISO 55001 initiative.

In this way, the SRMP supports reliability outcomes across the asset management system, embedding ISO 55001 principles in day-to-day reliability management.

5.3.3. Expected improvement in reliability performance

At this stage, we are not projecting a specific numerical improvement in SAIDI, SAIFI, or CAIDI. The SRMP focuses on building the foundational capability required to enable robust reliability forecasting and performance modelling in the future.

The SRMP is designed to deliver measurable improvements in reliability over time, considering the variability in weather between years.

As the SRMP actions mature and the supporting initiatives are embedded (e.g., vegetation risk reduction, improved asset lifecycle management, increased automation, enhanced operational resilience, and climate-related mitigation), the cumulative effect of these improvements is expected to contribute to more stable and resilient reliability performance. The ability to forecast SAIDI, SAIFI, and CAIDI impacts will be an outcome of this strengthened asset management system.

5.4. Reliability performance, analytics and monitoring

5.4.1. Reliability trends and insights (RY23–RY25)

Over the RY23–RY25 period, our reliability performance has been heavily influenced by the combined effect of extreme weather, vegetation exposure on long rural feeders, and age-related equipment failures. Details on RY26 performance are set out in Section 3.4.3.

Across those three regulatory years:

- **weather and vegetation have become persistent SAIDI drivers:**
  - in RY23, vegetation, adverse weather and adverse environment together contributed roughly a third of unplanned SAIDI, alongside outage management issues and unknown causes.
  - in RY24, adverse weather and adverse environment were again the largest contributors to unplanned SAIDI, with out-of-zone tree contacts emerging as a key mechanism.
  - in RY25, vegetation became the single largest contributor to SAIDI and the second largest to SAIFI, with a step-change in both fault count and customer impact.
- **defective equipment has shifted from a secondary driver to a primary risk:**
  - in RY24, defective equipment contributed over 26% of unplanned SAIDI.
  - by RY25, defective equipment was the largest contributor to SAIFI and the second largest to SAIDI.

- **extreme weather conditions are an ongoing reliability risk:**
  - RY23 unplanned interruptions report noted a marked increase in the number and severity of extreme weather events, with 44 days classified as "extreme" – significantly higher than prior years – and rainfall around 50% above the long-term average, largely due to Cyclones Hale and Gabrielle.
  - a similar pattern repeats in RY24, where 44 extreme-weather days were again recorded, and adverse weather and environment were the largest SAIDI contributors.
  - in RY25, multiple high-wind events drove both vegetation and adverse-weather faults.
  - rural, long feeders remain over-represented: across RY23–RY25, the same long rural feeders regularly feature among the worst performers for both vegetation and defective-equipment causes, reflecting their exposure to steep terrain, forestry, and long travel times.

Performance across RY23 to RY25 indicates that:

- weather-driven vegetation risk is escalating
- ageing overhead structures and substation equipment are driving higher fault counts
- operational constraints amplify the consequences of remote faults
- cause coding and data quality influence how risks are seen and managed

Even with improved automation and some localised improvements, we remain exposed to future non-compliance unless these emerging issues are addressed.

This SRMP has been deliberately structured so that each strategic workstream addresses a material part of this risk profile:

- **customer engagement**
  - use price–quality engagement and targeted communications to explain weather/vegetation and ageing-asset risks, and to test customer preferences for resilience investments (e.g. more tree work, back-up supplies, remote communities support) versus price.
  - improve communication about high-risk feeders and planned reliability initiatives to manage expectations, build trust, and strengthen landowner cooperation for vegetation access and mitigation programmes.
- **asset management framework**
  - embed the insights from the defective-equipment and reliability reviews, and unplanned interruptions reporting into asset class strategies and long-term planning documents.
  - develop approaches to prioritise high-impact feeders for targeted renewal, protection upgrades, and network security improvements based on criticality, asset health index trends, and failure patterns.
- **vegetation management**
  - develop a structured risk-assessment approach to identify, map and prioritise high-risk out-of-zone vegetation and forestry corridors, particularly those exposed to wind, storm events and tree-fall hazards.

- apply feeder-level vegetation SAIDI/SAIFI analysis (e.g., top 10 feeders) to guide inspection cycles, clearance programmes, and engagement with forestry owners and councils.

– **operational resilience and emergency response**
  - incorporate lessons from past weather events to refine storm-response procedures, resourcing models, and back-up supply options in the field and control room.
  - strengthen contingency plans for long rural feeders, where terrain, distance, and access limitations significantly extend outage duration.

– **asset data and systems improvement**
  - enhance outage analytics so that trends like age-related failures and forestry exposure are visible at feeder and asset-type level.
  - integrate reliability trends, feeder rankings and condition data into planning tools to support optimised investment decisions and tracking of SRMP outcomes.

By explicitly tying multi-year performance to the SRMP workstreams, the approach is not only reacting to past breaches, but is addressing the underlying, emerging risks that could drive future non-compliance if left unmanaged.

Together, these insights form the evidence base for the workstream initiatives, ensuring that each action directly targets the most material drivers of SAIDI and SAIFI.

5.4.2. Turning data into actions

Reliable decision-making depends on the ability to turn data into clear insights and actionable steps. This section outlines how our reliability information is analysed, reported, and translated into operational and strategic actions.

Reliability analytics framework overview

The reliability analytics framework illustrates how reliability information flows through our analytics process.

Figure 5.7: Conceptual overview of reliability analytics framework

This framework connects operational data with strategic insights through four key steps.

- **data collection and validation:** gathering and validating outage and operational data from the network. Outage data captured through the fault switching forms, validated for accuracy and completeness.
- **analysis and forecasting:** converting data into trends, forecasts, and risk scenarios. Trend, variance, and scenario modelling of SAIDI/SAIFI results to identify performance drivers and risks.
- **performance reporting:** communicating progress through dashboards and KPI reviews using the RAG status method for clarity. Dashboards and KPI summaries reviewed by operational teams, asset management committee, and executive.
- **action and continuous improvement:** translating insights into initiatives and tracking them through the SRMP continuous improvement cycle.

Together, these steps form a closed feedback loop between operations, governance, and strategy; ensuring that relevant data contributes to measurable reliability improvement.

Applying the analytics framework

Our reliability analysis approach is a combination of current business as usual practices and new capability that will be strengthened through the SRMP.

The reliability analytics process uses outage information, environmental factors, and network configuration data to understand what drives performance and how reliability can be improved.

Listed below are the existing practices and processes that already support ongoing visibility of reliability performance:

- **monthly major-event review meetings:** cross-functional discussions led by network control to understand drivers of high-impact outages.
- **business intelligence reliability report:** trend report based on five years of SAIDI/SAIFI actuals, used to identify high-impact feeders, outage causes, and seasonal patterns.
- **reliability review memo:** led by the engineering team this memo summarises key outage trends, main drivers of unreliability, and recommended actions for performance improvement.
- **defective equipment memo:** focused on the analysis of equipment-related outages to identify recurring asset issues, failure patterns, and priority areas for corrective or preventive and recommended improvement actions, led by the engineering team.

The SRMP builds on current practices and will strengthen our planning capabilities to support long-term reliability by enhancing and/or enabling:

- **forecasting:** projecting SAIDI, SAIFI, and CAIDI performance using historical patterns, asset failure behaviour, programme delivery assumptions, and weather drivers.
- **trend and variance analysis:** expanding the existing business intelligence reporting to include feeder-level trends, variance drivers, and emerging issues linked to SRMP workstreams.
- **scenario outlooks:** modelling best, base, and worst-case performance scenarios to inform network planning and risk management and modelling benign, average, and extreme-weather impacts.
- **visual insights:** developing summary dashboards and heatmaps that highlight high-impact areas and performance progress over time.
- **integration with governance:** further embedding reliability analysis into asset management committee and executive reporting so operational, planning, and investment decisions are consistently evidence-based.

Ongoing reliability oversight

As the SRMP continues to mature, we will progressively build the analytical capability required for consistent, transparent, and actionable reliability monitoring. These capabilities will be developed in parallel with the advancement of key workstream initiatives, with implementation occurring in stages as supporting systems, data governance practices, and field-capture processes are strengthened.

The core components of this monitoring framework will include:

- **monthly reliability dashboard:** rolling 12-month view of SAIDI and SAIFI trends, integrating validated outage data and forecasting tools.
- **feeder-level analysis:** identification of feeders contributing disproportionately to reliability performance, supported by visual mapping.
- **outage cause analysis:** categorisation of interruptions by vegetation, equipment failure, weather, or third-party interference to inform targeted responses.
- **climate normalisation:** adjusting historical performance to distinguish operational from weather-driven impacts, improving comparability across reporting periods.

- **quarterly reliability summary:** consolidate overview report for asset management committee and Executive review, providing updates on trends, risks, and initiative performance.
- **SRMP initiative performance KPIs:** each initiative within the SRMP includes defined KPIs that provide a measurable link between workstream activities and expected reliability outcomes.
- **early-warning processes:** identification of emerging trends, feeder deterioration, or abnormal outage patterns that require escalation or targeted intervention.
- **risk monitoring and regulatory thresholds:** ongoing tracking of performance against DPP quality limits, high-risk feeder trends, and indicators that signal potential future non-compliance.

Initiatives supporting reliability

We recognise that maintaining accurate and reliable performance data requires continual improvement of both systems and processes. Several initiatives are currently underway, or scheduled over the next regulatory years, to enhance how reliability information is collected, validated, and reported.

In a nutshell, these initiatives focus on improving data governance, field data capture, system integration, and deepening root cause analysis capabilities. Together, they will strengthen our ability to measure performance consistently and make evidence-based decisions that drive sustained reliability improvements across the network.

As a result, the reliability indicators will more accurately reflect the true performance of the network, providing a sound basis for operational planning, investment decisions, and continuous reliability improvement.

5.5. SRMP workstreams

We have developed five workstreams to achieve measurable improvements in SAIDI and SAIFI, strengthen network resilience, and ensure we meet our service level commitments to customers and under the DPP.

These workstream are discussed below.

- customer engagement
- asset management framework
- vegetation management
- operational resilience and emergency response
- asset data and systems improvement.

By focusing on these five strategic areas, we can address the root causes of reliability issues, enhance operational effectiveness, and deliver tangible improvements in customer experience and network performance.

5.5.1. Customer engagement

Building trust and maintaining open communication with customers and stakeholders is a key focus. Effective engagement helps to ensure that reliability improvement initiatives, investment priorities, and service expectations are clearly understood and

aligned. This workstream supports our customer-centric approach, ensuring that reliability outcomes reflect both customer preferences, technical performance goals and community values.

Objectives and expected outcomes

The objective of this workstream is to strengthen our relationship with customers and stakeholders through consistent, meaningful engagement that informs reliability-related decisions. Engagement activities aim to capture customer expectations, educate stakeholders about reliability performance and investment priorities, and integrate this feedback into planning and decision-making processes.

The expected outcomes include improved transparency and trust, better alignment between network investments and customer priorities, and stronger support for potential regulatory proposals such as a customised price-quality path or quality standard variation. These outcomes will help ensure that reliability improvements deliver measurable value that is recognised by the community.

Key initiatives

Recent and upcoming initiatives under this workstream include a series of structured engagement activities to capture meaningful insights from customers and stakeholders and are presented in the table below.

Table 5.2: Customer engagement key initiatives

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Customer perception survey	Insights on customer expectations and perceptions of service quality. This will help ensure approach to reliability and AMP investment plans are aligned with customer preferences and community needs.	In Progress
Direct engagement with major users	Focusing on larger customers this engagement will seek further insights on expectations and service perception. This will help ensure approach to reliability and AMP investment plans are aligned with the needs of larger users.	In Progress
AMP feedback	Proactively seek feedback from stakeholders and customers on our published AMP investment plans.	Planned
Price-quality engagement	Undertake engagement with customers on their preferences and willingness to pay for improved reliability. These will be an important input to decisions on a potential customised price-quality path or quality standard variation.	In Progress

Expected contribution to SAIDI and SAIFI

While stakeholder and customer engagement does not directly alter outage frequency or duration, it plays a critical enabling role in improving both SAIDI and SAIFI outcomes over time. Insights gained through engagement inform prioritisation of reliability investments, guide the design of targeted maintenance and renewal programmes, and ensure that future decisions balance technical performance with customer expectations, including cost.

5.5.2. Asset management framework

A robust asset management framework is fundamental to achieving consistent and sustainable reliability performance. By strengthening the systems, processes, and governance that support asset-related decisions, we can ensure that appropriate reliability outcomes are achieved through evidence-based investment, proactive risk management, and through long-term asset reliability.

This workstream focuses on improving the maturity of our asset management system, aligning it with ISO 55001 principles and industry good practice. Enhancing capability in risk assessment, criticality analysis, and decision-making processes will enable us to prioritise investments effectively, optimise maintenance and renewal programmes, and ensure that reliability improvements are achieved efficiently and prudently.

Objectives and expected outcomes

The objectives of this workstream are to improve the maturity and effectiveness of our asset management framework, embed structured risk-based decision-making, and strengthen the alignment of planning processes with reliability outcomes. This includes refining the asset management system, developing supporting documentation such as a strategic asset management plan, asset class strategies and enhancing staff competency in asset management practices.

Expected outcomes include:

- greater consistency and transparency in asset-related decisions
- improved forecasting, renewal programs and risk management capabilities
- enhanced alignment between investment decisions and network reliability targets
- progress toward certification and alignment with ISO 55001 asset management standards

Key initiatives

The following initiatives outline the key activities planned under this workstream to strengthen the asset management framework and deliver improved reliability performance.

Table 5.3: Asset management framework key initiatives

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Independent AMMAT assessment	Undertake comprehensive independent maturity assessment to inform asset management improvement initiatives for inclusion in this 2026 AMP Update.	Complete
Asset management system improvements	Refine asset management processes and expand documentation to address AMMAT improvement plans and align with good practice.	Planned
Asset health index assessments	Update asset health index forecasting models to support improved renewal forecasts and disclosures for this 2026 AMP Update.	Complete

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Investment decision-making	Improve decision-making through improved analysis, including cost-benefit analysis, Repex modelling, and the use of non-network solutions. Develop capability to forecast reliability outcomes.	Planned
Review and feedback processes	Establishing effective feedback and review mechanisms to provide assurance that reliability targets and related improvement initiatives are being achieved.	In Progress
Criticality framework	Refine and expand criticality methodology and supporting framework, models and documentation.	In Progress
Risk management	Expand network asset risk methodology and related documentation.	Planned
Maintenance review	Review maintenance standards, utilising industry guides to inform practices.	Planned
Engineering standards	Review engineering design standards, reflecting outcomes of relevant risk assessments.	Planned
Asset management competency	Develop asset management capability through effective development of our staff, ensuring appropriate competency levels and breadth of skills.	In Progress
Renewal strategies	Update strategies for poles, crossarm, steel structures, and conductor renewal.	In Progress
ISO 55001	Alignment of asset management system with ISO 55001.	Planned

Expected contribution to SAIDI and SAIFI

Although upgrades to the asset management framework may not directly affect outage duration or frequency, they establish the platform for decisions and practices that lead to reliability improvement by refining asset risk and criticality, strengthening forecasting methods, and ensuring maintenance and renewal programmes are well-targeted, this workstream enables investment to be directed where it will have the greatest impact.

In the medium to long term, these measures are expected to contribute to reductions in both SAIDI and SAIFI through better visibility of asset condition, prioritisation of critical assets, and more effective delivery of field interventions.

5.5.3. Vegetation management

Vegetation management is critical to network reliability, as vegetation-related faults continue to be one of the main causes of unplanned outages. Trees growing too close to power lines can lead to faults, fires, or safety risks, particularly during storms or high winds.

This workstream area focuses on refining vegetation management practices to comply with evolving legislative requirements, strengthen coordination with landowners and councils, and make better use of technology such as LiDAR and predictive modelling. These improvements will support compliance with tree regulations and enable more

targeted and efficient vegetation control, reducing the likelihood and impact of vegetation-related interruptions.

Objectives and expected outcomes

The objectives of this workstream are to develop a proactive, data-informed vegetation management approach that supports compliance, safety, and network reliability. This includes aligning the vegetation management strategy with upcoming legislative changes, adopting modern tools for vegetation monitoring, and establishing a consistent inspection and clearance cycle.

Expected outcomes include:

- reduced frequency of vegetation-related unplanned outages
- enhanced ability to forecast and plan vegetation work through data analytics
- stronger partnerships with landowners, local councils, and the forestry sector
- compliance with forthcoming tree regulations, minimising future risks and liabilities

Key initiatives

The proposed initiatives, summarised below, represent the core actions designed to reduce vegetation-related outages, enhance safety, and prepare for compliance with new tree regulations.

Table 5.4: Vegetation management key initiatives

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Revise vegetation management strategy	Updating vegetation management strategy to reflect expected changes in tree regulations and updated contracting arrangements.	In Progress
Tree regulations preparations	Preparations for complying with expected changes to the tree regulations including approach to clear-to-sky and tree-fall-hazard requirements. Forecast cost scenarios for different regulatory scopes.	Planned
LiDAR and vegetation modelling	Evaluate feasibility of LiDAR and predictive modelling for vegetation growth forecasting and to inform inspection scheduling and clearance plan.	Planned
Engagement	Engage with MBIE, forestry sector, and councils to coordinate risk mitigation and cooperation.	In Progress
Cyclical management	Transition current vegetation management programme to a 3-year rolling cycle by feeder.	Complete
Out-of-zone risk management	Develop risk assessment methodology for tree regulations. Identify and map high-risk forestry corridors.	In Progress

Expected contribution to SAIDI and SAIFI

This workstream is expected to have a direct and measurable impact on both SAIDI and SAIFI by addressing one of the leading causes of unplanned outages. The adoption of a three-year rolling vegetation management cycle, combined with improved risk assessment and LiDAR-based forecasting, will reduce fault frequency and duration

through earlier detection, proactive trimming and tree removal, and prioritised response.

Engagement with stakeholders and alignment with new tree regulations will further support long-term reductions in vegetation-related interruptions and enhance network resilience during adverse weather events.

5.5.4. Operational resilience and emergency response

Operational resilience relates to our capacity to maintain service continuity and recover quickly from unplanned events. Severe weather, equipment failure, and other disruptions can significantly impact reliability performance if not managed through structured planning and preparedness.

This workstream focuses on contingency planning, real-time operational capability, and systematic learning from events to improve responsiveness.

Objectives and expected outcomes

The objective is to increase capability to anticipate, absorb, and recover from disruptions effectively. We aim to integrate fault analysis, automation, and emergency response processes to support restoration and informed operational decisions.

The expected outcomes include an improved outage management process, better coordination between field and control room operations, and insights into the root causes of incidents.

Through the adoption of climate change adaptation plans and improved contingency procedures, we will be better prepared for future incidents, supporting our reliability improvement targets.

Key initiatives

The initiatives below represent the primary activities under this workstream.

Table 5.5: Operational resilience and emergency response key initiatives

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Resilience strategy	Develop a resilience strategy to capture learnings from the SRMP and to improve the ability of the network to withstand future events.	Planned
Automation	Install further line fault indicators, increase network automation (sectionalisers, reclosers) and replace oil filled isolation switches.	In Progress
Outage response capability	Outage response prioritisation with scalable resource capability in the field and control room.	Planned
Outage response process	Optimise response process to eliminate potential response or restoration delays.	Planned
Root cause analysis	Develop root cause analysis framework and equipment failure investigation process.	In Progress

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Climate change	Undertake an assessment of the risks posed by climate change.	Complete
Adaptation strategy	Develop an adaptation strategy to address the recommendations of the climate change risk assessment.	Planned
Critical spares	Formalise and document critical spares strategy and approach to inventory management.	Planned
Field service procurement	Implementation of master services agreement (MSA) with service providers, including KPIs related to response times, outage performance, critical spares and inventory management.	Complete
Contingency planning	Emergency management training, implementation of CIMS structure and setting up a dedicated emergency management room.	Complete

Expected contribution to SAIDI and SAIFI

It's expected for this workstream to have a direct and noticeable influence on future reliability performance by improving our ability to respond to outages through improved detection, isolation, and restoration approaches.

Expanded network automation and improved coordination between field teams and the control room will help shorten restoration intervals, while a systematic approach to fault analysis and contingency planning will help develop approaches to prevent repeat failures.

Collectively, these measures will support sustained reductions in both SAIDI and SAIFI, leading to fewer customer interruptions and faster recovery during unplanned events.

5.5.5. Asset data and systems improvement

Managing network performance depends on the accuracy, completeness, and accessibility of asset information. Inconsistent or outdated data can lead to suboptimal investment decisions, inefficient maintenance, and gaps in regulatory reporting.

This workstream focuses on strengthening the governance, integrity, and integration of asset data to provide a solid foundation for operational planning, reliability analysis, and long-term asset management.

By ensuring data is traceable, standardised, and connected across systems, we will be able to make timely and better-informed decisions that directly support appropriate reliability outcomes.

Objectives and expected outcomes

This workstream aims to support the creation of a dependable foundation for asset-related information. By putting in place clear governance, defined ownership, and consistent data standards, we can ensure asset information is accurate, traceable, and aligned across our systems.

A key focus of the workstream is to connect field, operational, and asset data to develop actionable insights that guide investment planning and reliability management. In

parallel, the introduction of analytical and reporting tools will allow teams to monitor performance trends and make better informed, evidence-based decisions.

Expected outcomes:

- consistent and traceable asset information across systems and teams
- improved data accuracy, reducing duplication and errors in reporting
- stronger integration between asset, operational, and field data systems
- reliable analytical tools to support evidence-based decision-making
- enhanced transparency and confidence in reliability performance reporting
- improved ability to forecast and monitor the effectiveness of reliability initiatives

Key initiatives

The initiatives in this workstream outline the main steps being undertaken to improve the reliability, consistency, and use of asset data. These actions will improve how data is captured, validated, governed, and used across systems and teams.

Table 5.6: Asset data and systems improvements key initiatives

INITIATIVE	MAIN ACTION / ACTIVITIES DESCRIPTION	STATUS
Data governance framework	Establish data governance framework document. Improve governance of asset data. Document clear roles and responsibilities.	In Progress
Master data	Documented asset register data standard (data dictionary). Align asset registers with asset class hierarchy and regulatory reporting.	In Progress
Data quality	Develop quality data assurance program and exception dashboards. Undertake sample audits (data validation) and rectification.	Planned
Field data	Define and develop field data capture standards and processes.	In Progress
Integration	Increase integration between asset and field data systems.	Planned
Reporting and Analytics	Build dashboards for reliability and asset data quality. Develop analytical capability to inform planning.	Complete

Expected contribution to SAIDI and SAIFI

Although this workstream does not directly reduce outage duration or frequency, it plays a critical role in enabling more effective decision-making. High-quality, integrated asset data will allow us to identify patterns in outage causes, prioritise renewal and maintenance activities, and evaluate the impact of reliability initiatives with greater accuracy.

Over time, this will support more precise forecasting and targeted interventions, that are expected to lead to measurable and sustained reductions in both SAIDI and SAIFI.

5.6. Continuous improvement

Continuous improvement focuses on structured learning, evidence-based review, and targeted adjustments to strengthen reliability performance over time. This approach ensures that lessons learned from each SRMP cycle, operational insights, and field-based observations translate into practical improvements that enhance network performance and regulatory compliance.

5.6.1. Post-implementation review

To strengthen continuous improvement and ensure that the SRMP remains effective over time, we will conduct a structured post-implementation review within the first three months of each regulatory year, upon completion of an external audit of the reliability data and a reliability review, including analysis of equipment failure. Minor reviews will be completed after the completion of key initiatives.

The post implementation review will assess:

- whether initiatives delivered the expected reliability outcomes (SAIDI/SAIFI improvements or risk reduction)
- any gaps between planned and actual delivery performance
- the effectiveness of controls, response processes, and data capture
- lessons learned that should be incorporated into future SRMP updates or operational practices
- inform future asset management plans of additional initiatives

The SRMP programme manager will document these findings and present them to the asset management committee for consideration.

Approved recommendations will feed directly into the next SRMP review cycle and the AMP planning process, ensuring that each version of the plan is progressively strengthened by evidence and learning.

This post-implementation review process will close the SRMP improvement loop and support sustained reliability performance and long-term compliance.

5.6.2. Effectiveness review of reliability improvements

We will also carry out periodic effectiveness reviews to evaluate whether corrective actions and reliability initiatives are achieving their intended results. These reviews will examine:

- the impact of improvement actions on outage performance and risk reduction
- whether implemented controls remain suitable and effective
- any new or emerging issues requiring refinement or additional intervention

Outcomes from these reviews will be reported by the SRMP programme manager to the asset management committee and executive, enabling informed governance decisions on adjustments, resourcing, or escalation where needed.

This process will ensure that improvements are not only implemented but validated and strengthened over time.

5.6.3. SRMP continuous improvement approach

The SRMP establishes a structured and repeatable approach to improving network reliability by combining clear governance, targeted workstreams, and evidence-based decision-making.

This approach strengthens how we capture, analyse, and act on reliability insights, linking operational learning, outage trends, and post-event reviews with forward planning and investment decisions.

Through disciplined delivery of the five strategic workstreams, supported by post implementation and effectiveness reviews, we will progressively build the capability needed to reduce outage impacts, strengthen resilience, and support a sustainable return to compliance.

This approach will ensure that reliability improvements are aligned with long-term network performance objectives, and directly support us in meeting regulatory compliance obligations.

6. EXPENDITURE FORECASTS

This chapter summarises our expenditure forecasts for the AMP period. The information presented here provides high-level commentary and context for our forecasts, including work volumes and related assumptions.

These reflect our current view on required expenditure, based on our asset management strategies, and using available information. We expect these forecasts, particularly later in the period, to be refined as we further enhance our modelling approaches and improve our underlying asset management capability.

Note the portfolios and fleets referred to below reflect our internal categorisation and may vary from those included in Schedules 11a and 11b in Appendix A.

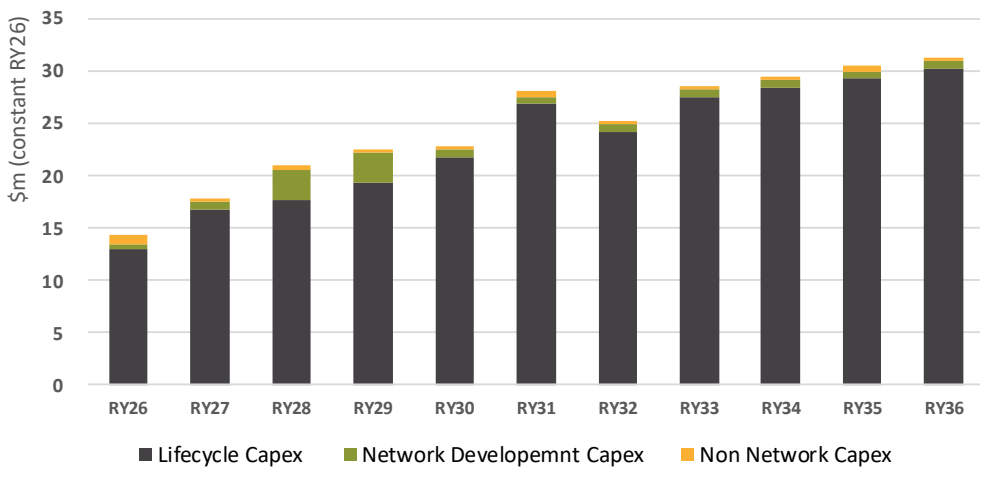
6.1. Overview of Total Capex

We use a lifecycle-based approach to manage our assets. We reflect these stages in the categories we use to explain our investments in network assets. In addition, we use the term 'non-network capex' to describe investment in assets that support our electricity distribution service. Overall capex includes the following categories:

- **asset lifecycle**: includes asset renewal and investments focused on safety and reliability outcomes (RSE).
- **customer connections**: the cost of connecting new customers to our network.
- **growth and security**: relates to capital investments that increase the capacity, functionality, or size of our network.
- **non-network capex**: our investment in those assets that support and enable our asset management activities.

Consistent with our DPP allowances, and as part of our 'business-as-usual' internal planning and governance processes we have developed updated expenditure plans for RY26 and beyond. The chart below summarises our capex forecasts over the period.

Figure 6.1: Forecast total capex during the AMP period (constant RY26)



Lifecycle capex for our network assets represents the majority of our 10-year programme. This ramps up over the planning period as we address our ageing asset base. We will support this important work through additional targeted inspections to ensure we address higher-risk assets, particularly overhead assets. This demonstrates our ongoing commitment to maintain required levels of capex to address assets impacting our reliability performance.

Our capex forecast has been refined to account for a range of factors including our ageing assets and recent reliability performance. A key consideration in our plans is the need to improve network reliability and strengthen network resilience. We will continue our reliability focused investments such as feeder automation. During the remainder of the AMP period, we expect to further lift investment during the DPP5 period (RY31-35).

Network development capex includes growth and security investments and capex to support consumer connections. During the AMP period we will continue to make relatively small investments to undertake minor works that support organic growth on the network. In addition, we currently have a number of existing constraints on the network that may need to be addressed during the AMP period, though these have not been included in our forecasts.

We plan to make minor non-network capex investments over the period to maintain ICT capability, cybersecurity and to manage our buildings and vehicle fleets.

6.2. Asset Renewal

Our asset renewal category includes expenditure to replace and refurbish our existing assets. This is our largest capex category, and we expect this to ramp up over the planning period as we address our ageing assets.

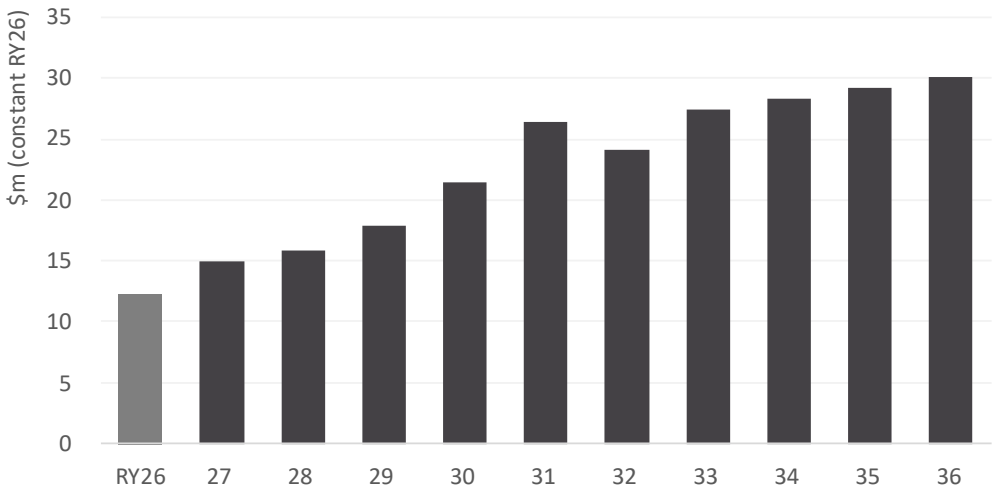
We will continue our approach to replacing our assets as they reach their expected end-of-life. Our principal strategy is to mitigate the failure risks posed by ageing or poor-condition assets on our network. This typically involves refurbishment of poor condition assets or replacement of H1 and H2 assets before end-of-life failure. Our approach is supported by new asset inspection standards and increased inspection volumes.

Our lifecycle management forecasts use a range of models to inform plans for individual asset fleets and the overall portfolio. Volumetric fleet renewal requirements are primarily determined using good practice replacement expenditure (repex) models, adapted to our available asset data quality and availability. Our short-term programme is supported by preventive maintenance inspections to identify areas requiring asset renewal.

> **Forecasting asset renewal needs**
>
> We have refined our approaches to forecasting asset health and have better aligned our expenditure forecasting methodology with typical industry good practice. An example is adopting a repex-based methodology for assessing asset health and forecasting overall future asset replacement needs.
>
> Asset class strategies have been developed for major asset types to identify the issues, asset management strategies, and investment drivers to maintain assets over their full lifecycle.

Our planned renewal capex during the AMP period is set out below.

Figure 6.2: Total forecast renewal capex during the AMP period (constant RY26)



Our renewals capex forecast has been developed to address several investment drivers including our ageing assets, recent reliability performance, and overall deliverability. Our renewal programmes focus on proactive volumetric works to address key risks. In addition, we will need to undertake reactive renewals to address urgent replacement needs.

A key focus in the initial years of the period is addressing fleets that have poor asset health or impacting safety and reliability performance. Over the AMP period we expect to lift investment gradually in additional fleets. From the DPP5 period (RY31-35) onwards we plan to increase investments in our conductor fleets and further investments to improve network reliability and strengthen resilience.

Our renewal capex has been developed across our seven asset classes:

- support structures
- overhead conductors
- cables
- zone substations
- distribution switchgear
- distribution transformer
- other network assets

The following sections provide details on our planned renewals across these asset classes.

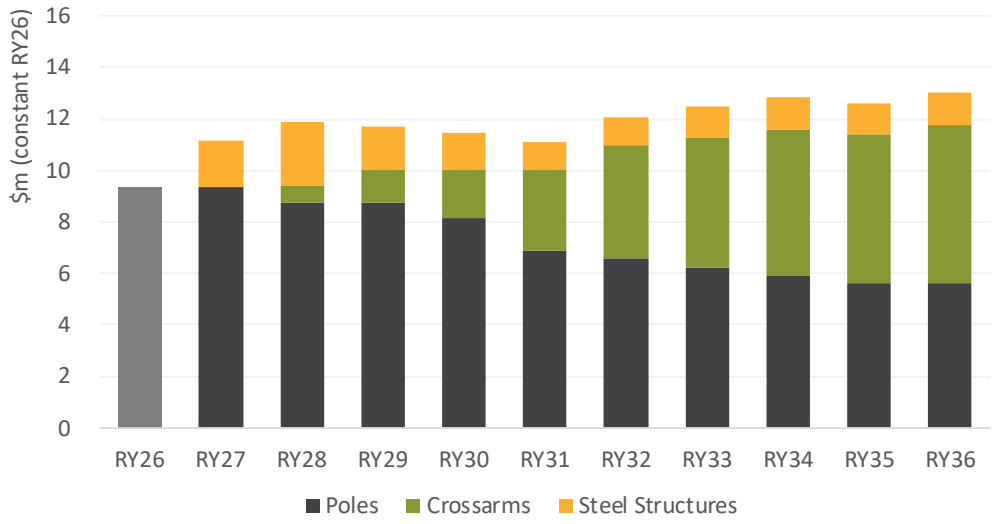
6.2.1. Support structures renewals

This section sets out planned investment in our support structures asset class including plans for the following three asset fleets:

- poles
- crossarms
- steel structures

Our planned renewal capex during the AMP period is set out below.

Figure 6.3: Forecast support structures renewal capex during the AMP period (constant RY26)



A significant portion of our renewal activities focuses on addressing high priority defects. in our overhead network, such as poor-condition poles. Assets that are impacting reliability performance including crossarms will become a larger focus over the period.

Pole replacements will be broadly maintained through DPP4 and will stabilise at lower volumes in DPP5 as we improve the overall health of this asset fleet. Additional investment is planned to proactively replace crossarms and associated equipment in DPP5.

Table 6.1: Planned work volumes during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Wooden poles	750	700	700	650	550	525	500	475	450	450
Crossarms		257	507	757	1,257	1,757	2,007	2,257	2,307	2,458

Our investments in steel structures relate to ongoing remediation of the fleet (e.g. foundation refurbishment) and resilience works focused on specific towers. We will start a tower painting program around the middle of the DPP5 period.

Table 6.2: Planned steel structure work volumes during the AMP period

ASSETS	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Foundations	13	15	15	15	15	15	13	13	13	13
Towers	36	35	35	33	33	35	35	35	35	35
Tower painting							2	2	2	2

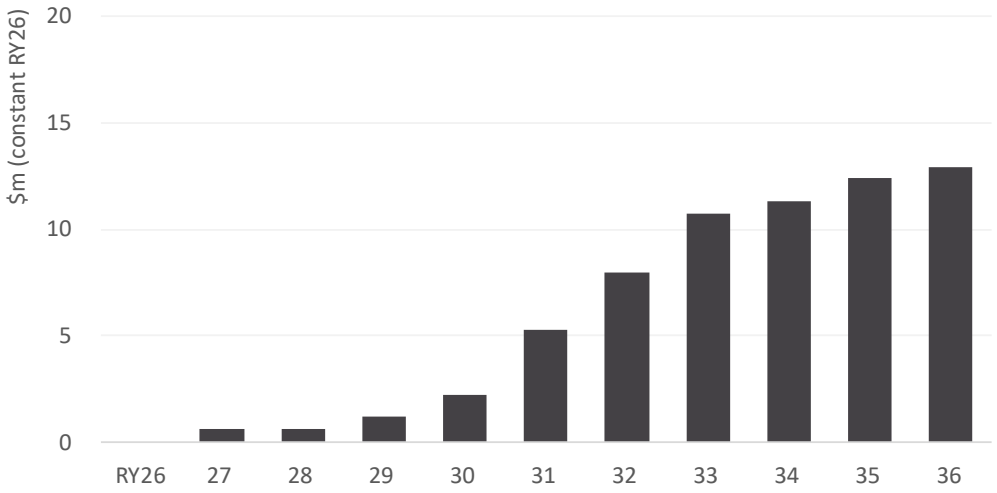
6.2.2. Overhead conductor renewal

This section sets out planned investment in our overhead conductor asset class including plans for following three asset fleets:

- subtransmission conductor
- distribution conductor
- low voltage conductor

Our planned renewal capex during the AMP period is set out below.

Figure 6.4: Forecast overhead conductor renewal capex during the AMP period (constant RY26)



Recognising the declining asset health and increasing impact of conductor assets on our reliability performance we will begin to roll-out a proactive renewals programme.

Table 6.3: Planned work volumes (km) during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Subtransmission					4	6	8	10	12	12
Distribution	4	4	8	16	24	36	48	48	52	56
Low voltage	1	1	1	1	8	12	17	17	17	17

The programme will be refined over time to allow further analysis and inspections data to be gathered. We then expect the programme to ramp up in DPP5, with a focus on our distribution conductor fleet.

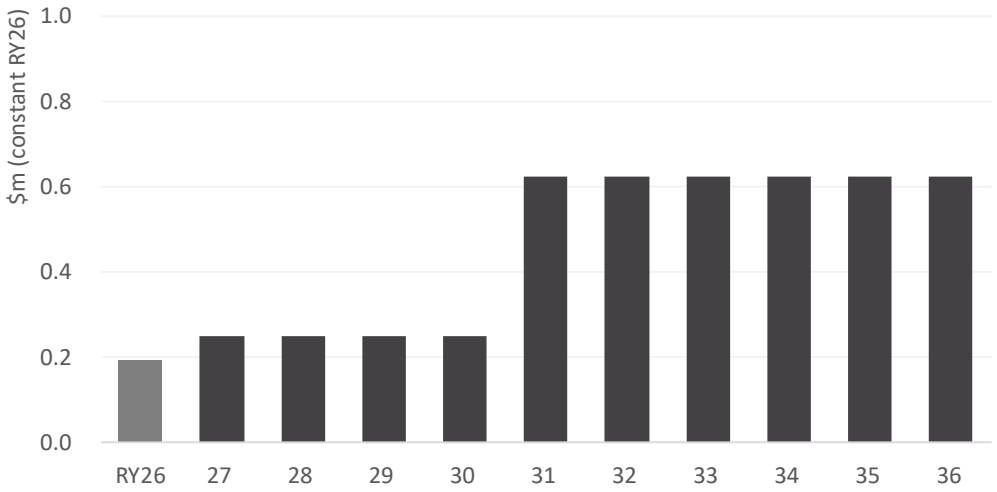
6.2.3. Underground cable renewal

This section sets out expected investment in our underground cable asset class, which includes the following three asset fleets:

- subtransmission cables
- distribution cables
- low voltage cables

Our planned renewal capex during the AMP period is set out below.

Figure 6.5: Forecast underground cable renewal capex during the AMP period (constant RY26)



During the remainder of the DPP4 period we will focus on reactive renewals of our cable asset class. During DPP5 we plan to begin a limited programme of proactive renewals.

Table 6.4: Planned work volumes (km) during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Distribution	0.5	0.5	0.5	0.5	1	1	1	1	1	1
Low voltage	1	1	1	1	3	3	3	3	3	3

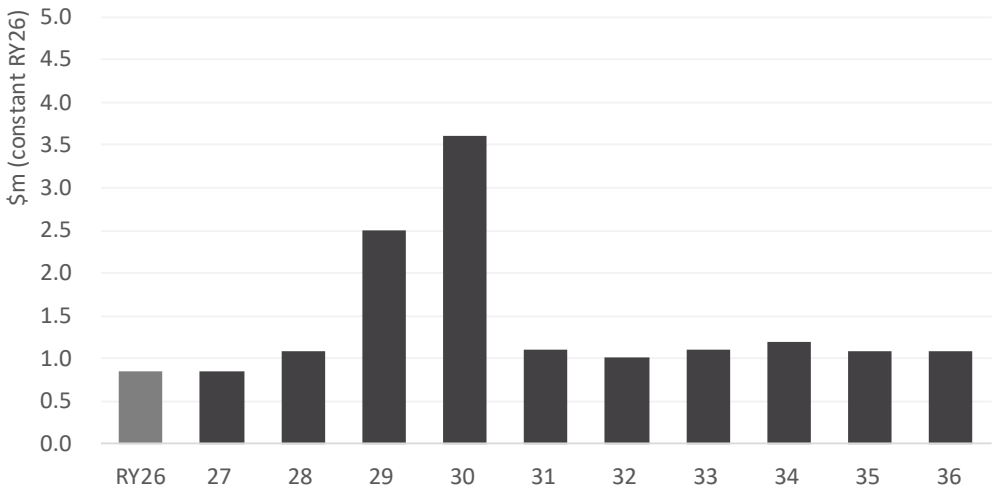
6.2.4. Zone Substations Renewals

This section sets out planned investment in our zone substations asset class including plans for following asset fleets:

- power transformer
- indoor switchgear
- outdoor switchgear
- ancillary equipment
- buildings and grounds

Our planned renewal capex during the AMP period is set out below.

Figure 6.6: Forecast zone substations renewal capex during the AMP period (constant RY26)



The uplift in investment in RY29 and RY30 relates to the replacement of aged, poor condition power transformer units at Wairoa zone substation. Power transformer refurbishments will continue through the period.

We will renew indoor and outdoor switchgear at zone substations to address type issues and poor condition units. In addition, ongoing stable investment in ancillary equipment and buildings and grounds will continue throughout the AMP period.

Table 6.5: Planned work volumes during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Power transformer refurbishment	1	2	1	1	1	1	1	1	1	1
Power transformer replacement			1	1						
Indoor switchgear	4	4	5	5	5	5	6	5	5	5
Outdoor switchgear	5	6	7	9	8	6	6	7	5	5

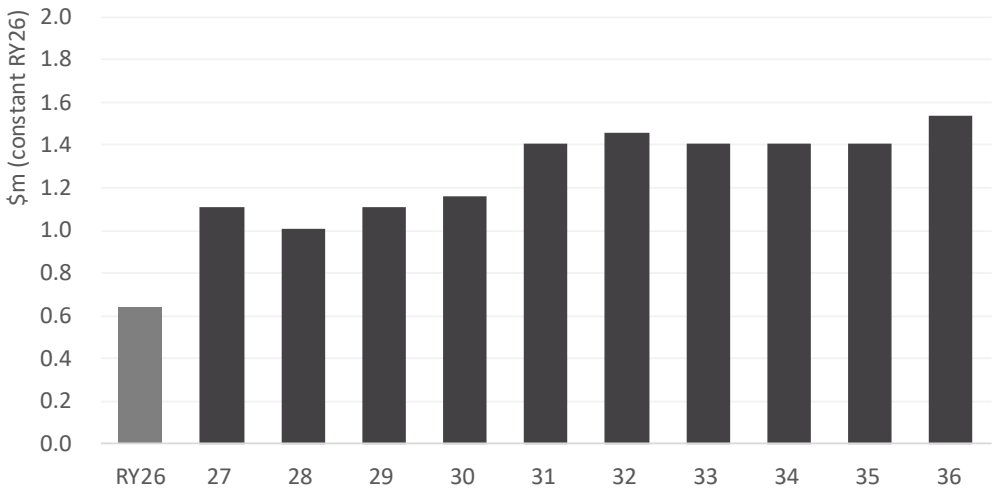
6.2.5. Distribution switchgear renewals

This section sets out planned investment in our distribution switchgear asset class including plans for following asset fleets:

- ground mounted switchgear
- pole mounted switchgear
- overhead switch
- low voltage enclosure

Our planned renewal capex during the AMP period is set out below.

Figure 6.7: Forecast distribution switchgear renewal capex during the AMP period (constant RY26)



The uplift in investment in from RY31 relates to the planned replacement of aging ground mount oil switches. Urban distribution oil switches are approaching end of life and have become a cause of reliability issues as they can no longer be operated under fault conditions. The replacement program will reduce the size of required isolation during unplanned outages.

The low voltage enclosures fleet will see steady replacement of aging assets over the AMP period. Inspections have identified an issue with metering cubicles but these are being managed under RSE programmes.

Table 6.6: Planned work volumes during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Ground mount switch	8	8	8	8	11	11	11	11	11	11
Overhead switchgear	1	1	1	1	1	2	1	1	1	3
Overhead switch[7]	25	25	25	25	25	25	25	25	25	25
Low voltage enclosure	33	16	33	41	50	50	50	50	50	50

6.2.6. Distribution transformer renewals

This section sets out planned investment in our distribution transformer asset class, which includes the following asset fleets:

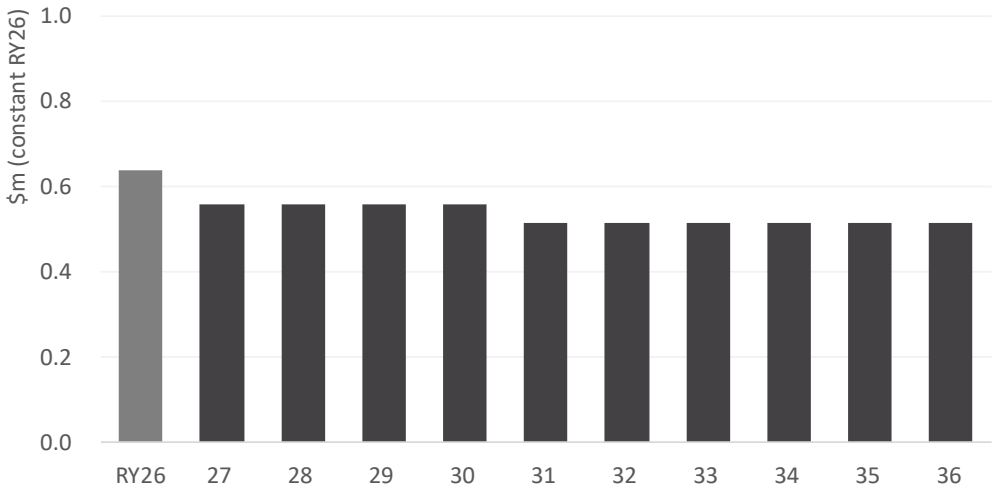
- ground mounted transformer
- overhead transformer

[7] Overhead switch comprises air-break switch (ABS) quadrant (older ABS variant) and reactive response.

- voltage regulator

Our planned renewal capex during the AMP period is set out below.

Figure 6.8: Forecast distribution transformer renewal capex during the AMP period (constant RY26)



Over the AMP period we expect to continue relatively steady renewal investment across our distribution transformer fleets. We expect work volumes for larger ground-mounted units to reduce over the period as we address higher priority units.

Table 6.7: Planned work volumes during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Ground mount transformer	4	4	4	4	3	3	3	3	3	3
Pole mount transformer	38	38	38	38	38	38	38	38	38	38

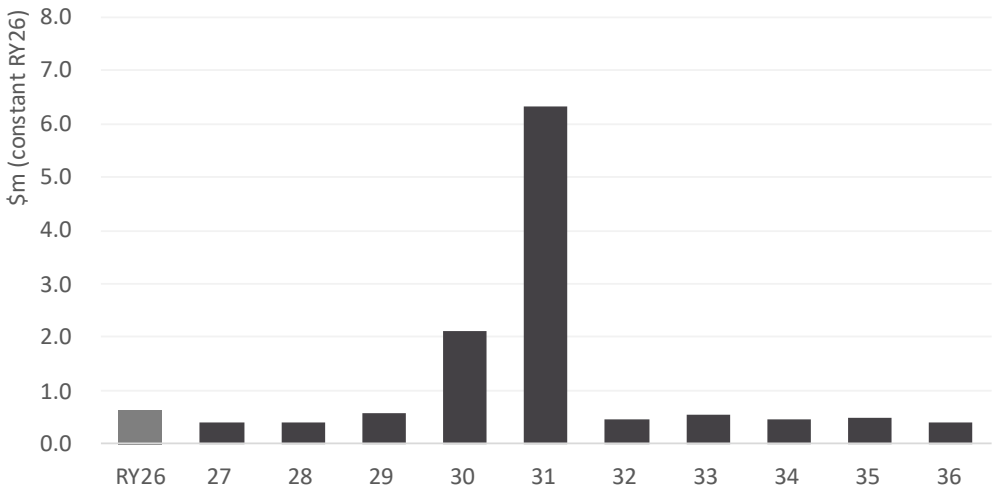
6.2.7. Other network assets renewals

This section sets out planned investment in our other network assets asset class which includes following asset fleets:

- protection
- batteries and DC systems
- generators
- metering
- communications and SCADA (RTU)

Our planned renewal capex during the AMP period is set out below.

Figure 6.9: Forecast other network assets renewal capex during the AMP period (constant RY26)



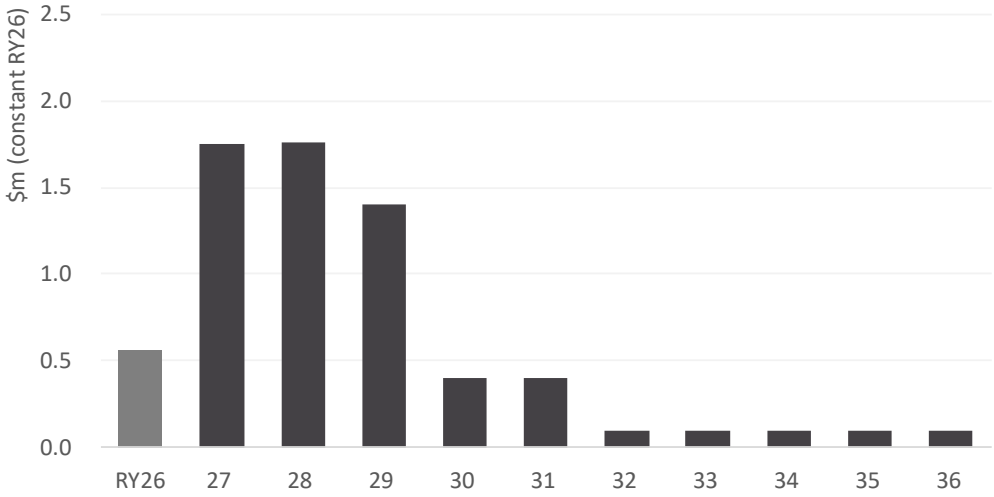
Ongoing investment in minor network assets will continue throughout the AMP period. The uplift in other-network investment in RY30 and RY31 relates to a planned renewal of our advanced distribution management system (ADMS). In addition, we will refurbish generator units later in the period based on their usage and condition.

6.3. RSE Capex

The information disclosure category for reliability, safety and environment (RSE) capex includes the following three types of investments:

- **quality of supply**: investments are targeted at managing reliability performance to meet customer expectations and ensure they receive an appropriate level of service quality
- **legislative and regulatory**: investments ensure we meet electrical safety, health and safety requirements, and other legal obligations
- **other reliability, safety and environment** (ORSE): investments to target specific safety improvements and environmental initiatives.

Figure 6.10: Forecast RSE capex during the AMP period (constant RY26)



Our planned RSE capex reflects targeted interventions in response to identified risks or compliance needs. Investment during the AMP period includes the installation of further automation (reclosers) on the network and installation of additional back-up generation at selected points on the network. Our RSE investments primarily aim to improve our reliability performance during the remainder of DPP4. We will reassess the need for further investment based on performance during this period.

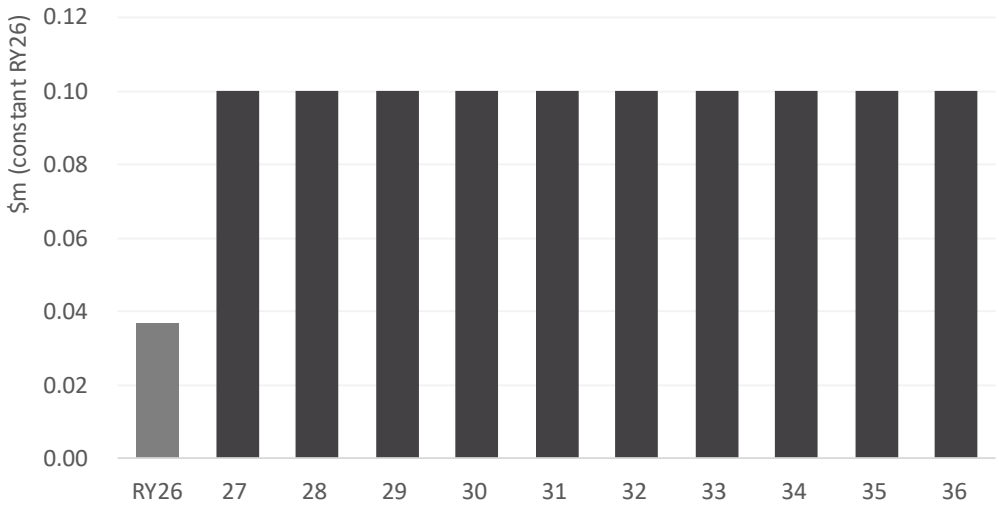
Table 6.8: Planned work volumes during the AMP period

PORTFOLIO	RY27	RY28	RY29	RY30	RY31	RY32	RY33	RY34	RY35	RY36
Load fault indicators	10	10	5	5	5					
Automation	8	6	4	4	4					
Generator installations	1	1	1							
Galvanised box replacements	7	7	7	7	7	7	7	7	7	7

6.4. Consumer Connections Capex

Customer connections capex includes expenditure Firstlight Network incurs when connecting new customers to its network. Our forecast for net capex (i.e. post contributions from connecting parties) over the 10-year period is relatively low.

Figure 6.11: Forecast consumer connections (net) Capex during the AMP period (constant RY26)



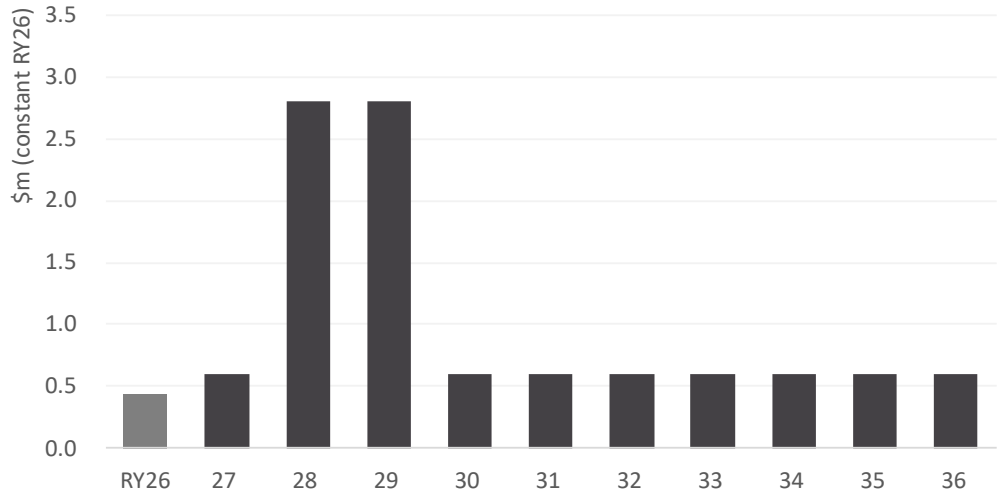
This reflects our current customer contribution policy, which leads to expenditure on new connections being largely covered by connecting customers and developers, with some exceptions. Given the ongoing deliberations and consultation on connections policy across the sector, we will reassess our approach and update future forecasts as required.

6.5. Growth and Security Capex

Investments to develop our network are primarily driven by load growth and the changing behaviours and needs of our customers. Required projects are closely linked to shorter-term economic activity, such as housing development and changes in consumer demand.

Our planned growth capex during the AMP period is set out below.

Figure 6.12: Forecast growth and security capex during the AMP period (constant RY26)



We will continue to make relatively small investments to undertake minor works that support organic growth on the network. In addition, we plan a voltage support project across RY28 and RY29.

In addition, we currently have a number of existing constraints on the network that may need to be addressed during the DPP4 AMP period. To address these, several growth projects are being assessed. These investments would help ensure we can manage and alleviate existing network constraints and prepare for expected future growth.

The table below sets out several existing network constraints, some of these may require a reopener to proceed. While recognising that the mechanism and eligibility for reopeners is evolving, we will consider applying for growth projects, if required.

Table 6.9: Growth and security constraints

NEED	DESCRIPTION
Hospital substation	Addressing feeder security, local overloading issues and load increase at Gisborne Hospital. Design options are being considered though there is uncertainty surrounding the timing and scope
Thermal upgrade	Increasing ground clearance to increase carrying capacity of overhead lines. There is a need to review scope and phasing.
Wairoa Substation	Addresses regional load growth and feeder security. Solution scope to be reviewed due to complexity.
Mahia	Need to mitigate voltage constraints impacting Mahia peninsula.
Matawai line support	Addresses feeder security to rural townships

As discussed above, we have prioritised expenditure based on the degree to which it manages safety and reliability risk on the network. As a result, several projects have been excluded from this AMP Update forecasts due to uncertainty surrounding the timing and/or scope of these projects. The need for these investments will continue to be monitored and reassessed as new information becomes available and may become candidates for regulatory reopeners.

As investment needs evolve during the AMP period, we will investigate whether a reprioritisation of our plan can be achieved ahead of seeking a reopener of our allowance. Seeking to ensure affordability for customers by continuing to challenge projects or programmes where the driver for investment has changed/reduced.

6.6. Asset Relocations Capex

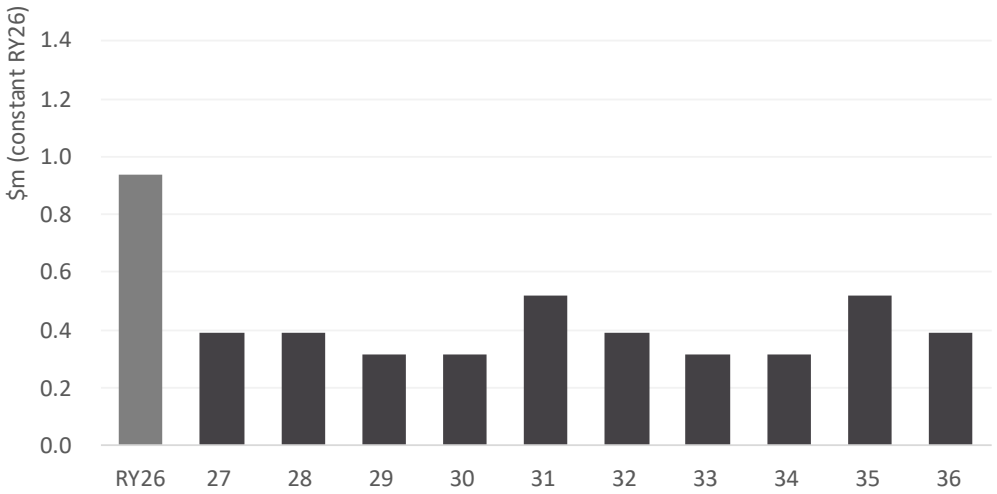
Asset relocations spend includes the portion of the cost that Firstlight Network covers to relocate assets following customer requests. By its nature, asset relocations expenditure is difficult to predict with certainty. Our forecast over the 10-year period is relatively low. Further details on this forecast are set out in Schedule 11a in Appendix A.

6.7. Non-network Capex

We manage a range of assets that support our network business. These include information and communications technology (ICT) assets, vehicles, corporate buildings and depots.

Our planned non-network capex during the AMP period is set out below.

Figure 6.13: Forecast non-network capex during the AMP period (constant RY26)



We plan to make minor non-network capex investments over the period to maintain ICT capability, including cybersecurity, and to manage our buildings and vehicle fleets. One-off expenditure items in RY26 led to an uplift versus expected expenditure during the AMP period. These investments included office rebuild works in Wairoa and an operational technology project.

6.8. Operating Expenditure

This section summarises our planned opex during the AMP period. Our opex forecast includes forecast expenditure across six portfolios:

- routine, corrective maintenance and inspections (RCI)
- service interruptions and emergencies
- vegetation management
- system operations and network support
- business support

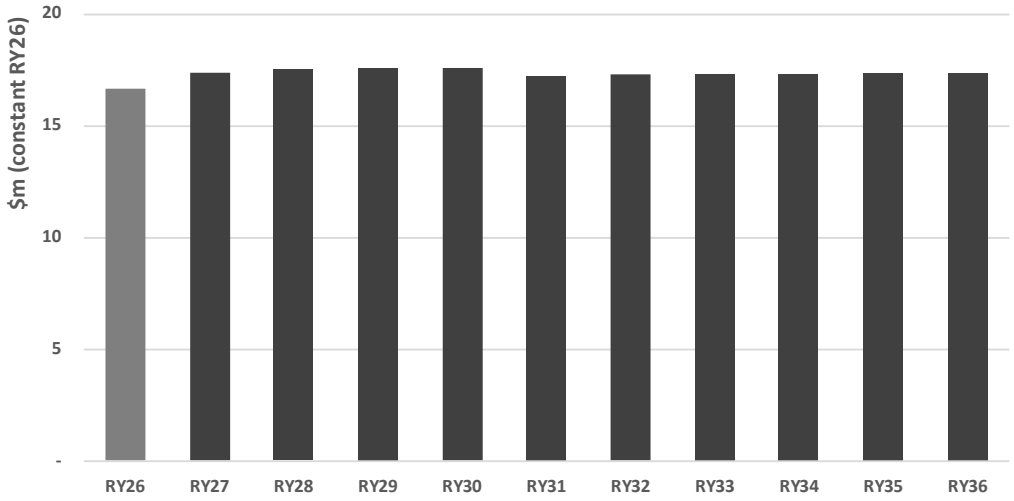
Our forecast categories (above) align with the information disclosure categories set out in Schedule 11b (see Appendix A).

We use a base-step-trend (BST) approach to forecast opex. For our 2026 AMP forecasts, we have used the latest available, confirmed actuals from RY25 as the base year, adjusted to 2026 dollars. This approach best reflects our prevailing operational environment, evolving business structure, and baseline activities.

Significant changes in expenditure, where they are known or anticipated, were incorporated as step changes. These encompassed network or operational changes, alterations to external drivers, and other material drivers expected to impact opex. Additionally, a trend component was integrated to account for the anticipated variations in outputs throughout the forecast period, for example forecast increase in ICPs.

Our planned opex during the AMP period is set out below.

Figure 6.14: Forecast total opex during the AMP Period (constant RY26)



Over the 10-year AMP period we plan to spend approximately $174 million opex on activities related to delivering safe and reliable service to our customers. This includes corporate activities that support our asset management activities. When compared with 2025 AMP, our total forecast opex has increased slightly over their respective periods.[8]

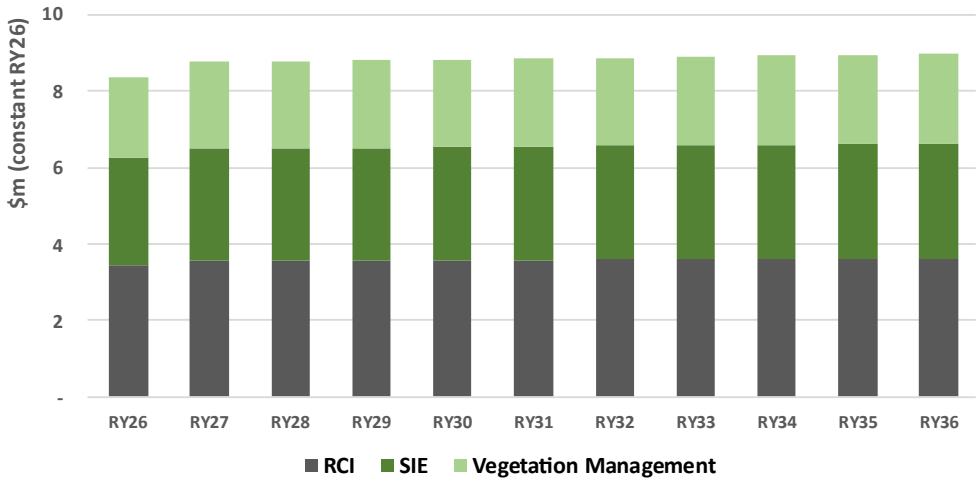
6.8.1. Network Opex

We carry out a range of maintenance activities to ensure our network assets provide the required capability in a safe and reliable manner throughout their useful life. It includes vegetation management and the following two main maintenance categories.

[8] Relates to the overlapping period (nine years) between the respective AMP 25 and AMP 26 periods.

Our planned network opex during the AMP period is set out below.

Figure 6.15: Forecast network opex during the AMP period (constant RY26)



Over the 10-year AMP period we plan to spend approximately $36 million on routine, corrective maintenance, and inspections (RCI). It is scheduled work, including servicing to maintain asset integrity, and inspections to compile condition information for subsequent analysis and renewals planning. It includes corrective maintenance to address minor (non-emergency) defects. RCI is our most regular asset intervention.

Over the AMP period we expect to spend approximately $30 million on service interruptions and emergencies (SIE) maintenance. It is reactive work without advanced scheduling and is especially frequent during and after large events such as major storms. It focuses on safely restoring supply to customers. We need to ensure that there are sufficient resources on standby to respond to network faults. SIE is difficult to forecast with certainty as it is based on fault numbers, which are influenced by external drivers such as weather and third-party incidents. The stable forecast reflects our expectation that outage numbers will reduce as we uplift renewal work, though this will be offset by increased efforts to reduce duration of outages.

Over the 10-year AMP period we plan to spend approximately $23 million on vegetation management. We undertake vegetation management to keep trees clear of our assets, particularly overhead lines. This is necessary to minimise vegetation-related outages and meet our safety and statutory obligations. The main activities we carry out are inspections to determine the amount of work required, liaison with landowners when work is required, and subsequent follow-up tree trimming and removal.

Changes to the Tree Regulations

At the time of drafting this AMP, MBIE has signalled a number of proposed changes to rules governing EDB responsibilities around vegetation management. The key changes are:

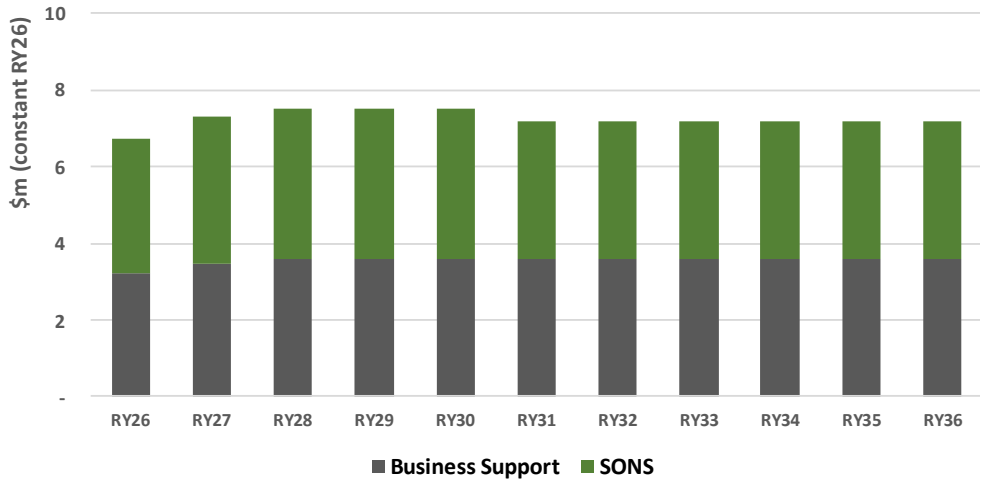
- extending the growth limit zone 'clear to sky' requirements to 11 kV and 400 V conductors that have spans of less than or equal to 150 meters in non-urban areas,
- introducing a requirement for EDBs to assess the treefall hazard in relation to a tree and consider the likelihood and impact of a tree falling on lines,
- introducing requirements for the removal of at-risk trees within a defined fall zone.

At this point, given that the requirements have not been finalised we have not included any related adjustments to our vegetation management forecasts.

6.8.2. Non-network Opex

Non-network opex includes two main expenditure categories as defined in information disclosure. Our planned non-network opex during the AMP period is set out below.

Figure 6.16: Forecast non-network opex during the AMP period (constant RY26)



Over the 10-year AMP period we plan to spend approximately $48 million on business support opex. This includes costs associated with supporting our asset management functions. These relate to corporate activities such as HR and finance, as well as ICT-related opex.

Over the 10-year AMP period we plan to spend approximately $37 million on system operations and network support (SONS) opex. This category includes indirect network opex where the primary driver is the management of the network. It includes expenditure relating to our engineering staff, control centres, and system operations.

Note the above SONS amount includes expenditure in the "non-network solutions provided by a related party or third party" disclosure category.

6.9. Forecasting Assumptions

Several inputs and assumptions underpinning our forecasts for the planning period. This section sets out examples of these inputs and assumptions and how they may impact our overall forecasts.

6.9.1. Approach to cost estimation

Good practice cost estimation uses a range of qualitative and quantitative methods to establish the most likely expenditure at project or programme level, depending on the nature of the work. The development of estimates can be complex, leading to a degree of uncertainty and estimation risk, especially for longer-term forecasts.

Investments are estimated using our cost estimation process which differs depending on the type of project. The two main estimate types are explained below.

- Volumetric unit rates are used for our large-volume, low-cost replacement programmes. These generally reflect average historical costs. We assume historical expenditure supports P50 unit rates, where a P50 cost is an estimate that has a 50% probability of not being exceeded.
- Our assumption is that historical works broadly reflect future volumetric work scopes and risks at an aggregate or portfolio level. While we aim for delivery efficiencies, we expect these to be offset by increased safety-related costs (such as traffic management) and costs associated with accessing the road corridor and private land
- Specific estimates are used for low-volume and one-off projects, a desktop study of the project is used to determine an estimate and a breakdown of the scope, to which unit rates are applied. As the project moves into delivery, the scope and cost estimate become more accurate through further engineering investigation and detailed design. We have also recently included our non-network projects through a similar customised estimation process.

6.9.2. Potential forecasting uncertainties

Our AMP reflects our latest, best forecasts using currently available information and modelling. We expect to refine these spend profiles in later AMPs, particularly for the latter part of the period, as we respond to future circumstances and collect updated asset information.

The following examples illustrate key assumptions behind our forecasts for the planning period.

- We have developed our renewal forecasts using available asset information and applied assumptions. Both the data and assumptions contain known uncertainties, but we consider the overall expenditure forecast to be appropriate. We will continue refining our asset information and assumptions to improve forecast accuracy.
- Reliability performance requires improvement, but there may be limited willingness by consumers to fund substantial future investment. This creates uncertainty around the timing and priority of reliability-driven investment. We

may need to adjust our expenditure plans if customer priorities shift or if regulatory expectations change during the planning period.

- Inflationary pressures create ongoing uncertainty in our capex forecasts and future cost escalation could require reprioritisation of planned work. A larger work programme may help offset some cost pressures. However, if cost pressures exceed our assumptions, we may need to defer lower priority projects or seek alternative delivery approaches to remain within expenditure limits.
- We expect relatively low overall demand growth, but unforeseen developments could alter investment priorities. Existing network constraints may require expenditure regardless of demand trends.
- Potential large customer connections or developments that emerge during the planning period could require us to bring forward projects or amend our other programmes. This creates uncertainty in both the timing and quantum of growth-related capex across the period.
- Higher than anticipated development of grid-scale solar could alter demand patterns and potentially reduce some capacity constraints, while simultaneously creating new investment needs to support network management or voltage control.
- We don't expect DER uptake to materially affect network investment needs during the planning period. Our assumption is that small residential solar and storage installations will not significantly impact peak load growth or associated investment needs. However, DER adoption rates are uncertain and could exceed our expectations. This creates uncertainty in both the type and timing of our planned expenditure, and we may need to adjust our investment priorities as actual DER adoption patterns become clearer during the period.

Developing forecasts and investment strategies across a 10-year AMP period requires flexibility, for example through scenario planning to inform decisions. We will expand on these scenarios in future AMPs.

APPENDIX A. DISCLOSURE SCHEDULES

This appendix includes the following Information Disclosure schedules:

- Schedule 11a: report on forecast Capital Expenditure
- Schedule 11b: report on forecast Operational Expenditure
- Schedule 12a: report on asset condition
- Schedule 12b: report on forecast capacity
- Schedule 12c: report on forecast network demand
- Schedule 12d: report on forecast interruptions and duration
- Schedule 14a: commentary on differences between forecast Capex (schedule 11a) and Opex (schedule 11b) in nominal and constant prices

Firstlightnetwork

Schedule 11a: report on forecast Capital Expenditure

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**

SCHEDULE 11a: REPORT ON FORECAST CAPITAL EXPENDITURE

This schedule requires a breakdown of forecast expenditure on assets for the current disclosure year and a 10 year planning period. The forecasts should be consistent with the supporting information set out in the AMP. The forecast is to be expressed in both constant price and nominal dollar terms. Also required is a forecast of the value of commissioned assets (i.e., the value of RAB additions)

EDBs must provide explanatory comment on the difference between constant price and nominal dollar forecasts of expenditure on assets in Schedule 14a (Mandatory Explanatory Notes). EDBs must express the information in this schedule (11a) as a specific value rather than ranges. Any supporting information about these values may be disclosed in Schedule 15 (Voluntary Explanatory Notes).

This information is not part of audited disclosure information.

sch ref			*Current Year CY*	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*	*CY+6*	*CY+7*	*CY+8*	*CY+9*	*CY+10*
9	**11a(i): Expenditure on Assets Forecast**		**$000 (in nominal dollars)**										
10		Consumer connection	333	920	938	957	976	995	1,015	1,036	1,056	1,077	1,099
11		System growth	436	613	2,918	2,976	651	664	677	690	704	718	733
12		Asset replacement and renewal	12,363	15,303	16,519	19,007	23,193	29,214	27,162	31,568	33,224	34,903	36,740
13		Asset relocations	-	77	78	80	81	83	85	86	88	90	92
14		Reliability, safety and environment:											
15		Quality of supply	441	1,686	1,730	1,382	325	332	-	-	-	-	-
16		Legislative and regulatory	16	-	-	-	-	-	-	-	-	-	-
17		Other reliability, safety and environment	104	102	104	106	108	111	113	115	117	120	122
18		**Total reliability, safety and environment**	561	1,788	1,834	1,488	434	442	113	115	117	120	122
19		**Expenditure on network assets**	13,692	18,701	22,287	24,508	25,335	31,399	29,051	33,496	35,190	36,908	38,785
20		**Expenditure on non-network assets**	937	401	409	338	344	573	443	366	373	620	480
21		**Expenditure on assets**	14,630	19,102	22,697	24,846	25,679	31,971	29,494	33,861	35,563	37,528	39,264
22													
23	*plus*	Cost of financing	-	21	21	64	51	266	23	23	23	24	24
24	*less*	Value of capital contributions	296	817	834	850	867	885	902	921	939	958	977
25	*plus*	Value of vested assets											
26													
27		**Capital expenditure forecast**	14,334	18,306	21,884	24,059	24,863	31,353	28,614	32,964	34,647	36,594	38,312
28													
29		Assets commissioned	14,351	19,688	20,331	24,804	22,428	33,649	27,988	32,374	34,470	36,382	38,140

			Current Year CY	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*	*CY+6*	*CY+7*	*CY+8*	*CY+9*	*CY+10*
30													
31													
32			**$000 (in constant prices)**										
33		Consumer connection	333	900	900	900	900	900	900	900	900	900	900
34		System growth	436	600	2,800	2,800	600	600	600	600	600	600	600
35		Asset replacement and renewal	12,363	14,978	15,850	17,880	21,390	26,415	24,078	27,435	28,308	29,155	30,088
36		Asset relocations	-	75	75	75	75	75	75	75	75	75	75
37		Reliability, safety and environment:											
38		Quality of supply	441	1,650	1,660	1,300	300	300					
39		Legislative and regulatory	16	-	-	-	-	-					
40		Other reliability, safety and environment	104	100	100	100	100	100	100	100	100	100	100
41		**Total reliability, safety and environment**	561	1,750	1,760	1,400	400	400	100	100	100	100	100
42		**Expenditure on network assets**	13,692	18,303	21,385	23,055	23,365	28,390	25,753	29,110	29,983	30,830	31,763
43		Expenditure on non-network assets	937	393	393	318	318	518	393	318	318	518	393
44		**Expenditure on assets**	14,630	18,695	21,778	23,373	23,683	28,908	26,145	29,428	30,300	31,348	32,155
45													
46		**Subcomponents of expenditure on assets (where known)**											
48		Energy efficiency and demand side management, reduction of energy losses											
49		Overhead to underground conversion											
50		Research and development											
52													

		Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5	CY+6	CY+7	CY+8	CY+9	CY+10
Difference between nominal and constant price forecasts	**$000**											
Consumer connection		-	20	38	57	76	95	115	136	156	177	199
System growth		-	13	118	176	51	64	77	90	104	118	133
Asset replacement and renewal		-	326	669	1,127	1,803	2,799	3,084	4,133	4,916	5,748	6,652
Asset relocations		-	2	3	5	6	8	10	11	13	15	17
Reliability, safety and environment:												
Quality of supply		-	36	70	82	25	32	-	-	-	-	-
Legislative and regulatory		-	-	-	-	-	-	-	-	-	-	-
Other reliability, safety and environment		-	2	4	6	8	11	13	15	17	20	22
Total reliability, safety and environment		-	38	74	88	34	42	13	15	17	20	22
Expenditure on network assets		-	398	902	1,453	1,969	3,009	3,299	4,386	5,207	6,078	7,022
Expenditure on non-network assets		-	9	17	20	27	55	50	48	55	102	87
Expenditure on assets		-	407	919	1,473	1,996	3,063	3,349	4,433	5,262	6,180	7,109

Commentary on options and considerations made in the assessment of forecast expenditure

EDBs may provide explanatory comment on the options they have considered (including scenarios used) in assessing forecast expenditure on assets for the current disclosure year and a 10 year planning period in Schedule 15

	Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5
11a(ii): Consumer Connection						
*Consumer types defined by EDB**	**$000 (in constant prices)**					
General	333	900	900	900	900	900
Consumer connection expenditure	333	900	900	900	900	900
less Capital contributions funding consumer connection	296	800	800	800	800	800
Consumer connection less capital contributions	37	100	100	100	100	100
11a(iii): System Growth						
Subtransmission	-	-	-	-	-	-
Zone substations	-	-	2,200	2,200	-	-
Distribution and LV lines	277	150	150	150	150	150
Distribution and LV cables	-	240	240	240	240	240
Distribution substations and transformers	158	210	210	210	210	210
Distribution switchgear	-	-	-	-	-	-
Other network assets	-	-	-	-	-	-
System growth expenditure	436	600	2,800	2,800	600	600
less Capital contributions funding system growth						
System growth less capital contributions	436	600	2,800	2,800	600	600

*include additional rows if needed

		Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5
97							
98							
99	**11a(iv): Asset Replacement and Renewal**	**$000 (in constant prices)**					
100	Subtransmission	1,822	3,191	3,919	3,198	2,973	3,748
101	Zone substations	838	855	1,090	2,505	3,605	1,105
102	Distribution and LV lines	7,604	8,619	8,634	9,685	10,725	12,675
103	Distribution and LV cables	190	250	250	250	250	625
104	Distribution substations and transformers	638	560	560	560	560	515
105	Distribution switchgear	637	1,109	1,009	1,109	1,159	1,409
106	Other network assets	635	394	389	574	2,119	6,339
107	**Asset replacement and renewal expenditure**	12,363	14,978	15,850	17,880	21,390	26,415
108	*less* Capital contributions funding asset replacement and renewal						
109	**Asset replacement and renewal less capital contributions**	12,363	14,978	15,850	17,880	21,390	26,415
110							

		Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5
111							
112							
113	**11a(v): Asset Relocations**						
114	*Project or programme**	**$000 (in constant prices)**					
115	General	-	75	75	75	75	75
116							
117							
118							
119							
120	**include additional rows if needed*						
121	All other project or programmes - asset relocations						
122	**Asset relocations expenditure**	-	75	75	75	75	75
123	*less* Capital contributions funding asset relocations						
124	**Asset relocations less capital contributions**	-	75	75	75	75	75
125							

		Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5
126							
127							
128	**11a(vi): Quality of Supply**						
129	*Project or programme**	**$000 (in constant prices)**					
130	Generators	108	1,050	1,000	1,000	-	-
131	Rural Automation / Reclosers	126	400	300	200	200	200
132	Load Fault Indicators	207	200	200	100	100	100
133							
134							
135	**include additional rows if needed*						
136	All other projects or programmes - quality of supply			160			
137	**Quality of supply expenditure**	441	1,650	1,660	1,300	300	300
138	*less* Capital contributions funding quality of supply						
139	**Quality of supply less capital contributions**	441	1,650	1,660	1,300	300	300
140							

		Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5

11a(vii): Legislative and Regulatory

Project or programme*	$000 (in constant prices)					
*include additional rows if needed						
All other projects or programmes - legislative and regulatory	16					
Legislative and regulatory expenditure	16	-	-	-	-	-
less Capital contributions funding legislative and regulatory						
Legislative and regulatory less capital contributions	16	-	-	-	-	-

	Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5

11a(viii): Other Reliability, Safety and Environment

Project or programme*	$000 (in constant prices)					
*include additional rows if needed						
All other projects or programmes - other reliability, safety and environment	104	100	100	100	100	100
Other reliability, safety and environment expenditure	104	100	100	100	100	100
less Capital contributions funding other reliability, safety and environment						
Other reliability, safety and environment less capital contributions	104	100	100	100	100	100

	Current Year CY	CY+1	CY+2	CY+3	CY+4	CY+5

11a(ix): Non-Network Assets

Routine expenditure

Project or programme*	$000 (in constant prices)					
Buildings	308	22	22	22	22	22
Vehicles	118	143	143	143	143	143
ICT	433	197	197	122	122	322
Other Assets	78	31	31	31	31	31
*include additional rows if needed						
All other projects or programmes - routine expenditure						
Routine expenditure	937	393	393	318	318	518

Atypical expenditure

Project or programme*						
*include additional rows if needed						
All other projects or programmes - atypical expenditure						
Atypical expenditure	-	-	-	-	-	-
Expenditure on non-network assets	937	393	393	318	318	518

Schedule 11b: report on forecast Operational Expenditure

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**

SCHEDULE 11b: REPORT ON FORECAST OPERATIONAL EXPENDITURE

This schedule requires a breakdown of forecast operational expenditure for the disclosure year and a 10 year planning period. The forecasts should be consistent with the supporting information set out in the AMP. The forecast is to be expressed in both constant price and nominal dollar terms.

sch ref			*Current Year CY*	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*	*CY+6*	*CY+7*	*CY+8*	*CY+9*	*CY+10*
9	**Operational Expenditure Forecast**		**$000 (in nominal dollars)**										
10	Service interruptions and emergencies		2,837	2,998	3,066	3,135	3,205	3,278	3,352	3,427	3,504	3,583	3,664
11	Vegetation management		2,098	2,328	2,381	2,435	2,489	2,546	2,603	2,662	2,722	2,783	2,846
12	Routine and corrective maintenance and inspection		3,429	3,630	3,711	3,793	3,878	3,964	4,053	4,143	4,236	4,330	4,427
13	Asset replacement and renewal		48	-	-	-	-	-	-	-	-	-	-
14	**Network Opex**		8,412	8,956	9,157	9,363	9,573	9,788	10,007	10,232	10,462	10,697	10,937
15	System operations and network support		3,209	3,558	3,733	3,808	3,884	3,961	4,041	4,122	4,204	4,288	4,374
16	Business support		4,694	4,927	5,026	5,126	5,229	5,333	5,440	5,549	5,660	5,773	5,888
17	Non-network solutions provided by a related party or third party	*Not Required before DY2025*	325	340	355	370	385	-	-	-	-	-	-
18	**Non-network opex**		8,228	8,825	9,114	9,304	9,497	9,295	9,481	9,670	9,864	10,061	10,262
19	**Operational expenditure**		16,641	17,781	18,271	18,666	19,070	19,082	19,488	19,902	20,325	20,757	21,199

			Current Year CY	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*	*CY+6*	*CY+7*	*CY+8*	*CY+9*	*CY+10*
22			**$000 (in constant prices)**										
23	Service interruptions and emergencies		2,837	2,934	2,941	2,949	2,956	2,964	2,971	2,978	2,986	2,993	3,001
24	Vegetation management		2,098	2,279	2,285	2,290	2,296	2,302	2,307	2,313	2,319	2,325	2,331
25	Routine and corrective maintenance and inspection		3,429	3,552	3,560	3,568	3,576	3,584	3,593	3,601	3,609	3,617	3,625
26	Asset replacement and renewal		48	-	-	-	-	-	-	-	-	-	-
27	**Network Opex**		8,412	8,765	8,786	8,807	8,829	8,850	8,871	8,892	8,914	8,935	8,957
28	System operations and network support		3,209	3,482	3,582	3,582	3,582	3,582	3,582	3,582	3,582	3,582	3,582
29	Business support		4,694	4,822	4,822	4,822	4,822	4,822	4,822	4,822	4,822	4,822	4,822
30	Non-network solutions provided by a related party or third party	*Not Required before DY2025*	325	333	341	348	355	-	-	-	-	-	-
31	**Non-network opex**		8,228	8,637	8,745	8,752	8,759	8,404	8,404	8,404	8,404	8,404	8,404
32	**Operational expenditure**		16,641	17,402	17,531	17,559	17,588	17,254	17,275	17,296	17,318	17,339	17,361
33	**Subcomponents of operational expenditure (where known)**												
35	Energy efficiency and demand side management, reduction of energy losses												
36	Direct billing*												
37	Research and Development												
38	Insurance												
39													

41 ** Direct billing expenditure by suppliers that direct bill the majority of their consumers*

			Current Year CY	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*	*CY+6*	*CY+7*	*CY+8*	*CY+9*	*CY+10*
45	**Difference between nominal and real forecasts**		**$000**										
46	Service interruptions and emergencies		-	64	124	186	249	314	381	449	519	590	663
47	Vegetation management		-	50	96	144	194	244	296	348	403	458	515
48	Routine and corrective maintenance and inspection		-	77	150	225	301	380	460	542	627	713	801
49	Asset replacement and renewal		-	-	-	-	-	-	-	-	-	-	-
50	**Network Opex**		-	191	371	555	744	938	1,136	1,340	1,548	1,761	1,980
51	System operations and network support		-	76	151	226	302	380	459	540	622	706	792
52	Business support		-	105	203	304	406	511	618	726	837	951	1,066
53	Non-network solutions provided by a related party or third party	*Not Required before DY2025*	-	7	14	22	30	-	-	-	-	-	-
54	**Non-network opex**		-	188	369	552	738	891	1,076	1,266	1,460	1,657	1,858
55	**Operational expenditure**		-	378	740	1,107	1,482	1,828	2,213	2,606	3,008	3,418	3,838

57 **Commentary on options and considerations made in the assessment of forecast expenditure**

58 *EDBs may provide explanatory comment on the options they have considered (including scenarios used) in assessing forecast operational expenditure for the current disclosure year and a 10 year planning period in Schedule 15.*

Schedule 12a: report on asset condition

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**

SCHEDULE 12a: REPORT ON ASSET CONDITION

This schedule requires a breakdown of asset condition by asset class as at the start of the forecast year. The data accuracy assessment relates to the percentage values disclosed in the asset condition columns. Also required is a forecast of the percentage of units to be replaced in the next 5 years. All information should be consistent with the information provided in the AMP and the expenditure on assets forecast in Schedule 11a. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref						Asset condition at start of planning period (percentage of units by grade)							
	Voltage	Asset category	Asset class	Units	H1	H2	H3	H4	H5	Grade unknown	Data accuracy (1–4)	% of asset forecast to be replaced in next 5 years
10	All	Overhead Line	Concrete poles / steel structure	No.	0.1%	0.2%	1.0%	2.2%	96.5%		2	0.6%
11	All	Overhead Line	Wood poles	No.	7.6%	11.5%	21.2%	13.3%	46.3%		2	21.2%
12	All	Overhead Line	Other pole types	No.	-	-	-	-	-		N/A	-
13	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	11.4%	8.4%	40.9%	64.6%	80.9%		2	-
14	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	33.2%	0.3%	40.8%	25.5%	0.3%		2	-
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	-	-	-	4.2%	95.8%		2	-
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	-	-	-	-	-		N/A	-
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	-	-	-	-	-		N/A	-
18	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	-	-	-	-	-		N/A	-
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	-	-	-	-	-		N/A	-
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	-	-	-	-	-		N/A	-
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	-	-	-	-	-		N/A	-
22	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	-	-	-	-	-		N/A	-
23	HV	Subtransmission Cable	Subtransmission submarine cable	km	-	-	-	-	-		N/A	-
24	HV	Zone substation Buildings	Zone substations up to 66kV	No.	10.5%	15.8%	-	68.4%	5.3%		2	-
25	HV	Zone substation Buildings	Zone substations 110kV+	No.	-	60.0%	10.0%	20.0%	10.0%		2	-
26	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	-	-	-	-	-		N/A	-
27	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	-	-	-	100.0%	-		2	-
28	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	-	-	-	-	-		N/A	-
29	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	-	-	-	-	-		N/A	-
30	HV	Zone substation switchgear	33kV RMU	No.	-	-	-	-	-		N/A	-
31	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	-	-	-	-	-		2	-
32	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	9.6%	-	9.6%	38.5%	42.3%		2	20.2%
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	10.0%	10.0%	16.0%	39.0%	25.0%		2	13.1%
34	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	-	-	-	-	100%		2	-

					Asset condition at start of planning period (percentage of units by grade)							
	Voltage	Asset category	Asset class	Units	H1	H2	H3	H4	H5	Grade unknown	Data accuracy (1–4)	% of asset forecast to be replaced in next 5 years
39	HV	Zone Substation Transformer	Zone Substation Transformers	No.	19.4%	-	3.2%	35.5%	41.9%		2	6.3%
40	HV	Distribution Line	Distribution OH Open Wire Conductor	km	9.3%	15.3%	35.0%	17.6%	22.7%		2	1.5%
41	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	-	-	-	-	-		N/A	-
42	HV	Distribution Line	SWER conductor	km	-	-	-	100.0%	-		2	-
43	HV	Distribution Cable	Distribution UG XLPE or PVC	km	0.6%	1.3%	6.5%	10.8%	80.7%		2	2.1%
44	HV	Distribution Cable	Distribution UG PILC	km	0.2%	0.4%	1.7%	2.1%	95.5%		2	2.1%
45	HV	Distribution Cable	Distribution Submarine Cable	km	-	-	-	-	-		N/A	-
46	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	3.1%	5.6%	18.7%	22.2%	50.4%		2	5.5%
47	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	-	55.6%	22.2%	22.2%	-		2	-
48	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	28.9%	6.1%	8.4%	23.1%	33.5%		2	4.5%
49	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	4.6%	3.1%	9.2%	58.5%	24.6%		2	2.2%
50	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	2.1%	5.8%	13.0%	36.6%	42.5%		2	9.9%
51	HV	Distribution Transformer	Pole Mounted Transformer	No.	12.2%	11.6%	12.1%	20.5%	43.5%		2	6.1%
52	HV	Distribution Transformer	Ground Mounted Transformer	No.	0.4%	1.5%	4.6%	8.9%	84.7%		2	3.5%
53	HV	Distribution Transformer	Voltage regulators	No.	-	-	25.0%	37.5%	37.5%		2	-
54	HV	Distribution Substations	Ground Mounted Substation Housing	No.	-	-	-	-	-		N/A	-
55	LV	LV Line	LV OH Conductor	km	2.6%	5.4%	23.5%	34.7%	93.6%		2	1.0%
56	LV	LV Cable	LV UG Cable	km	0.5%	1.1%	6.4%	12.0%	80.1%		2	1.7%
57	LV	LV Streetlighting	LV OH/UG Streetlight circuit	km	-	0.0%	11.8%	47.2%	41.0%		2	-
58	LV	Connections	OH/UG consumer service connections	No.	4.1%	41.9%	32.4%	13.5%	8.1%		2	-
59	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	3.4%	26.4%	15.4%	19.5%	35.3%		2	16.6%
60	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	11.0%	34.1%	20.3%	19.5%	15.1%		2	28.0%
61	All	Capacitor Banks	Capacitors including controls	No.		100%					2	-
62	All	Load Control	Centralised plant	Lot		100%					2	-
63	All	Load Control	Relays	No.	6.5%	12.5%	76.3%	1.5%	3.3%		2	6.5%
64	All	Civils	Cable Tunnels	km	-	-	-	-	-		N/A	-

Schedule 12b: report on forecast capacity

Company Name **Firstlight Network**
AMP Planning Period **1 April 2026 – 31 March 2036**

SCHEDULE 12b: REPORT ON FORECAST CAPACITY

This schedule requires a breakdown of current and forecast capacity and constraints for each zone substation. The data provided should be consistent with the information provided in the AMP. Information provided in this table should relate to the operation of the network in its normal steady state configuration.

sch ref

12b(i): System Growth - Zone Substations

Existing Zone Substations	Current peak load (MVA)	Current peak load period	Installed operating capacity (MVA)	Current security of supply classification (type)	Current constraint type	Current available capacity (MVA)	Peak load period +5 yrs	Available capacity +5 yrs (MVA)	Security of supply classification +5 yrs (type)	Peak load period +10 yrs	Min. available capacity +10 yrs (MVA)	Max. available capacity +10 yrs (MVA)	Security of supply classification +10 yrs (type)	Forecast constraint type	Year of any forecast constraint	Constraint primary cause	Constraint solution type	Constraint solution progress	Temporary constraint solution remaining lifespan	Explanation
TeAraroa	0.8	Winter	1.3	N-1 switched	Security	1.7	Winter	1.7	N-1 switched	Winter	1.5	1.7	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	> 3 years	Security constraint supported by generation
Ruatoria	1.5	Winter	2.0	N-1 switched	Security	3.5	Winter	3.5	N-1 switched	Winter	3.1	3.5	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	> 3 years	Security constraint supported by generation & adjacent substations
Tokomaru Bay	1.0	Winter	1.2	N-1 switched	Security	1.5	Winter	1.5	N-1 switched	Winter	1.2	1.4	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	> 3 years	Security constraint supported by adjacent substations
Tolaga Bay	1.2	Winter	1.8	N-1 switched	Security	3.8	Winter	3.7	N-1 switched	Winter	3.5	3.7	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	> 3 years	Security constraint supported by generation & adjacent substations
Kaiti	7.8	Winter	8.0	N-1 switched	Security	4.7	Winter	4.3	N-1 switched	Winter	0.9	3.8	N-1 switched	Security	10+	Distribution back-up circuit capacity	Network upgrade	Planning stage	Not applicable	Security constraint supported by adjacent substations. Backup circuits near capacity. New substation in planning stage that will allow rebalancing of loads and restore security.
Port	7.7	Spring	8.0	N-1 switched	Security	4.8	Spring	4.4	N-1 switched	Spring	1.1	4.0	N-1 switched	Security	10+	Distribution back-up circuit capacity	Network upgrade	Planning stage	Not applicable	Security constraint supported by adjacent substations. Backup circuits near capacity. New substation in planning stage that will allow rebalancing of loads and restore security.
Gisborne	57.0	Winter	60.0	N-1	Security	3.0	Winter	0.1	N-1	Winter	50.5	57.0	N	Capacity	10+	Subtransmission circuit	Network upgrade	Implementation stage	> 3 years	TUAI to Gisborne 110kV Circuit Thermal upgrade work is being carried out & voltage support work is planned. Generation support available during peak load periods (N-1 switched)
Carnarvon	14.3	Winter	23.5	N-1 switched	Security	9.2	Winter	8.5	N-1	Winter	2.3	7.7	N-1	No constraint	None	Distribution back-up circuit capacity	Network upgrade	Planning stage	Not applicable	Security constraint supported by adjacent substations. Backup circuits near capacity. New substation in planning stage that will allow rebalancing of loads and restore security.
Parkinson	8.2	Winter	12.5	N-1	No constraint	5.5	Winter	5.2	N-1	Winter	2.2	4.8	N-1	No constraint	None	Not applicable	Not applicable	Not applicable	Not applicable	
Makaraka	7.5	Winter	7.0	N-1 switched	Security	5.3	Winter	4.5	N-1 switched	Winter	1.7	3.6	N-1 switched	Security	10+	Distribution back-up circuit capacity	Network upgrade	Planning stage	Not applicable	Security constraint supported by adjacent substations. Backup circuits near capacity. New substation in planning stage that will allow rebalancing of loads and restore security.
Patutahi	4.0	Winter	5.0	N-1 switched	Security	8.5	Winter	8.3	N-1 switched	Winter	6.5	8.0	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	Not applicable	Security constraint supported by adjacent substations
Pehiri	0.5	Autumn	1.3	N-1 switched	Security	2.0	Autumn	2.0	N-1 switched	Autumn	1.9	2.0	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	Not applicable	Security constraint supported by adjacent substations
Ngatapa	0.5	Winter	1.5	N-1 switched	Security	2.0	Winter	2.0	N-1 switched	Winter	1.9	2.0	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	Not applicable	Security constraint supported by adjacent substations
Puha	2.1	Winter	1.5	N-1 switched	Security	2.9	Winter	2.9	N-1 switched	Winter	2.9	2.9	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	> 3 years	Embedded hydro generation connection through distribution feeder. Security constraint supported by generation
JNL	2.1	Spring	5.0	N-1 switched	Security	10.7	Spring	10.7	N-1 switched	Spring	10.2	10.7	N-1 switched	Security	10+	Not applicable	Not applicable	Not applicable	Not applicable	Security constraint supported by adjacent substation
Matawhero	4.5	Autumn	12.8	N-1	No constraint	8.3	Autumn	7.8	N-1	Autumn	4.7	7.3	N-1	No constraint	None	Not applicable	Not applicable	Not applicable	Not applicable	
Tuai	0.7	Spring	5.0	N	Security	4.3	Spring	4.3	N	Spring	4.1	4.3	N	Security	10+	Distribution back-up circuit capacity	Undecided	No active planning	> 3 years	No distribution backup circuit. Portable generation used for extended outages.
Kiwi	4.5	Autumn	6.5	N	Security	2.0	Autumn	2.0	N	Autumn	2.0	2.0	N	No constraint	None	Not applicable	Not applicable	Not applicable	Not applicable	Waihi Hydro generation infeed
Wairoa	11.0	Autumn	12.5	N-1	Security	1.5	Autumn	1.2	N-1	Autumn	0.0	0.9	N-1	Capacity	10+	Zone substation transformer	Network upgrade	Planning stage	> 3 years	Constraint supported by generation. Investigation work has started on reconfiguration of the Wairoa network.
Blacks pad	1.4	Summer	1.5	N-1 switched	Capacity	0.1	Summer	0.0	N-1 switched	Summer	0.0	0.0	N-1 switched	Security	10+	Zone substation transformer	Network upgrade	Planning stage	> 3 years	Peak loads during holiday periods and supported by generation. Long term plan for a new substation in Mahia with interim plan to increase capacity of the Black's pad substation transfomer.
Tahaenui	0.8	Winter	1.0	N-1 switched	Security	0.7	Winter	0.7	N-1 switched	Winter	0.5	0.7	N-1 switched	Security	None	Not applicable	Not applicable	Not applicable	Not applicable	Security constraint supported by adjacent substations
Waihi	4.5	Winter	6.5	N	Security	2.0	Winter	2.0	N	Winter	2.0	2.0	N	No constraint	None	Not applicable	Not applicable	Not applicable	Not applicable	Waihi Hydro generation infeed

[1] *Extend table as necessary to disclose all capacity and constraint information by each zone substation*

Schedule 12c: report on forecast network demand

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**

SCHEDULE 12c: REPORT ON FORECAST NETWORK DEMAND

This schedule requires a forecast of new connections (by consumer type), peak demand and energy volumes for the disclosure year and a 5 year planning period. The forecasts should be consistent with the supporting information set out in the AMP as well as the assumptions used in developing the expenditure forecasts in Schedule 11a and Schedule 11b and the capacity and utilisation forecasts in Schedule 12b.

sch ref

12c(i): Consumer Connections

Number of ICPs connected during year by consumer type

Number of connections

	*Consumer types defined by EDB**	*Current Year CY*	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*
	Domestic/Residential	287	290	293	296	299	302
	Commercial	50	51	52	53	54	55
	Large Commercial	4	4	4	4	4	4
	Industrial	-	-	-	-	-	-
	Other	4	4	4	4	4	4
	Connections total	345	349	353	357	361	365

**include additional rows if needed*

Distributed generation

	Current Year CY	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*
Number of connections made in year	130	130	130	130	130	130
Capacity of distributed generation installed in year (MVA)	1	1	1	1	1	1

12c(ii) System Demand

		Current Year CY	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*
	Maximum coincident system demand (MW)						
	GXP demand	57	65	67	68	71	72
plus	Distributed generation output at HV and above	6	6	6	6	6	6
	Maximum coincident system demand	63	71	73	74	77	78
less	Net transfers to (from) other EDBs at HV and above	-	-	-	-	-	-
	Demand on system for supply to consumers' connection points	63	71	73	74	77	78
	Electricity volumes carried (GWh)						
	Electricity supplied from GXPs	299	301	304	307	310	313
less	Electricity exports to GXPs						
plus	Electricity supplied from distributed generation	21	21	22	23	24	25
less	Net electricity supplied to (from) other EDBs						
	Electricity entering system for supply to ICPs	320	323	327	330	334	338
less	Total energy delivered to ICPs	289	293	296	299	302	306
	Losses	31	30	31	31	32	33
	Load factor	58%	52%	51%	51%	50%	49%
	Loss ratio	9.6%	9.4%	9.4%	9.5%	9.6%	9.6%

Schedule 12d: report on forecast interruptions and duration

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**
Network / Sub-network Name	**Gisborne & Wairoa**

SCHEDULE 12d: REPORT FORECAST INTERRUPTIONS AND DURATION

This schedule requires a forecast of SAIFI and SAIDI for disclosure and a 5 year planning period. The forecasts should be consistent with the supporting information set out in the AMP as well as the assumed impact of planned and unplanned SAIFI and SAIDI on the expenditures forecast provided in Schedule 11a and Schedule 11b.

sch ref		*Current Year CY*	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*
8							
9							
10	**SAIDI**						
11	Class B (planned interruptions on the network)	241.4	241.4	241.4	241.4	241.4	241.4
12	Class C (unplanned interruptions on the network)	229.3	229.3	229.3	229.3	229.3	229.3
13	**SAIFI**						
14	Class B (planned interruptions on the network)	1.34	1.34	1.34	1.34	1.34	1.34
15	Class C (unplanned interruptions on the network)	3.29	3.29	3.29	3.29	3.29	3.29

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**
Network / Sub-network Name	**Gisborne**

SCHEDULE 12d: REPORT FORECAST INTERRUPTIONS AND DURATION

This schedule requires a forecast of SAIFI and SAIDI for disclosure and a 5 year planning period. The forecasts should be consistent with the supporting information set out in the AMP as well as the assumed impact of planned and unplanned SAIFI and SAIDI on the expenditures forecast provided in Schedule 11a and Schedule 11b.

sch ref		*Current Year CY*	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*
8							
9							
10	**SAIDI**						
11	Class B (planned interruptions on the network)	169.0	169.0	169.0	169.0	169.0	169.0
12	Class C (unplanned interruptions on the network)	172.0	172.0	172.0	172.0	172.0	172.0
13	**SAIFI**						
14	Class B (planned interruptions on the network)	0.94	0.94	0.94	0.94	0.94	0.94
15	Class C (unplanned interruptions on the network)	2.47	2.47	2.47	2.47	2.47	2.47

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**
Network / Sub-network Name	**Wairoa**

SCHEDULE 12d: REPORT FORECAST INTERRUPTIONS AND DURATION

This schedule requires a forecast of SAIFI and SAIDI for disclosure and a 5 year planning period. The forecasts should be consistent with the supporting information set out in the AMP as well as the assumed impact of planned and unplanned SAIFI and SAIDI on the expenditures forecast provided in Schedule 11a and Schedule 11b.

sch ref		*Current Year CY*	*CY+1*	*CY+2*	*CY+3*	*CY+4*	*CY+5*
10	**SAIDI**						
11	Class B (planned interruptions on the network)	72.4	72.4	72.4	72.4	72.4	72.4
12	Class C (unplanned interruptions on the network)	57.3	57.3	57.3	57.3	57.3	57.3
13	**SAIFI**						
14	Class B (planned interruptions on the network)	0.40	0.40	0.40	0.40	0.40	0.40
15	Class C (unplanned interruptions on the network)	0.82	0.82	0.82	0.82	0.82	0.82

Schedule 13: report on asset management maturity

Company Name	**Firstlight Network**
AMP Planning Period	**1 April 2026 – 31 March 2036**
Asset Management Standard Applied	**ISO 55001**

SCHEDULE 13: REPORT ON ASSET MANAGEMENT MATURITY

This schedule requires information on the EDB'S self-assessment of the maturity of its asset management practices .

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
3	Asset management policy	To what extent has an asset management policy been documented, authorised and communicated?	2	Asset Management Policy is documented and approved by CEO. The policy is relevant to Firstlight Network's business. The policy has limited circulation and is not actively communicated to employees or stakeholders.	Widely used AM practice standards require an organisation to document, authorise and communicate its asset management policy (eg, as required in PAS 55 para 4.2 i). A key pre-requisite of any robust policy is that the organisation's top management must be seen to endorse and fully support it. Also vital to the effective implementation of the policy, is to tell the appropriate people of its content and their obligations under it. Where an organisation outsources some of its asset-related activities, then these people and their organisations must equally be made aware of the policy's content. Also, there may be other stakeholders, such as regulatory authorities and shareholders who should be made aware of it.	Top management. The management team that has overall responsibility for asset management.	The organisation's asset management policy, its organisational strategic plan, documents indicating how the asset management policy was based upon the needs of the organisation and evidence of communication.
10	Asset management strategy	What has the organisation done to ensure that its asset management strategy is consistent with other appropriate organisational policies and strategies, and the needs of stakeholders?	2	Firstlight Network has a range of documents containing strategic direction relevant to asset management that consider other business functions and stakeholders needs. These documents are broadly aligned however an overarching framework to ensure consistency has not yet been developed.	In setting an organisation's asset management strategy, it is important that it is consistent with any other policies and strategies that the organisation has and has taken into account the requirements of relevant stakeholders. This question examines to what extent the asset management strategy is consistent with other organisational policies and strategies (eg, as required by PAS 55 para 4.3.1 b) and has taken account of stakeholder requirements as required by PAS 55 para 4.3.1 c). Generally, this will take into account the same polices, strategies and stakeholder requirements as covered in drafting the asset management policy but at a greater level of detail.	Top management. The organisation's strategic planning team. The management team that has overall responsibility for asset management.	The organisation's asset management strategy document and other related organisational policies and strategies. Other than the organisation's strategic plan, these could include those relating to health and safety, environmental, etc. Results of stakeholder consultation.
11	Asset management strategy	In what way does the organisation's asset management strategy take account of the lifecycle of the assets, asset types and asset systems over which the organisation has stewardship?	2	Firstlight Network is establishing Asset Class Strategies for all major asset fleets and this work is approaching completion. The Asset Class Strategies follow a consistent format and define lifecycle strategies for operations, maintenance, and renewal. Full implementation of the Asset Class Strategies into lifecycle planning is not yet complete.	Good asset stewardship is the hallmark of an organisation compliant with widely used AM standards. A key component of this is the need to take account of the lifecycle of the assets, asset types and asset systems. (For example, this requirement is recognised in 4.3.1 d) of PAS 55). This question explores what an organisation has done to take lifecycle into account in its asset management strategy.	Top management. People in the organisation with expert knowledge of the assets, asset types, asset systems and their associated life-cycles. The management team that has overall responsibility for asset management. Those responsible for developing and adopting methods and processes used in asset management	The organisation's documented asset management strategy and supporting working documents.
26	Asset management plan(s)	How does the organisation establish and document its asset management plan(s) across the life cycle activities of its assets and asset systems?	2	Firstlight Network is developing comprehensive asset management plans covering all lifecycle activities aligned with organisational objectives and strategy. Preventive maintenance and vegetation programmes are being enhanced, and improved decision-support tools are under development to strengthen planning and investment processes across asset fleets.	The asset management strategy need to be translated into practical plan(s) so that all parties know how the objectives will be achieved. The development of plan(s) will need to identify the specific tasks and activities required to optimize costs, risks and performance of the assets and/or asset system(s), when they are to be carried out and the resources required.	The management team with overall responsibility for the asset management system. Operations, maintenance and engineering managers.	The organisation's asset management plan(s).

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
27	Asset management plan(s)	How has the organisation communicated its plan(s) to all relevant parties to a level of detail appropriate to the receiver's role in their delivery?	3	Firstlight Network communicates its asset management plans through cross functional meetings, internal updates, and published materials. Roles and responsibilities are clearly defined for employees and contractors, with planning information shared at appropriate levels, confirming effective use of plans across business units and service providers.	Plans will be ineffective unless they are communicated to all those, including contracted suppliers and those who undertake enabling function(s). The plan(s) need to be communicated in a way that is relevant to those who need to use them.	The management team with overall responsibility for the asset management system. Delivery functions and suppliers.	Distribution lists for plan(s). Documents derived from plan(s) which detail the receivers role in plan delivery. Evidence of communication.
29	Asset management plan(s)	How are designated responsibilities for delivery of asset plan actions documented?	3	Roles and responsibilities for asset plan delivery are documented in position descriptions, action tracking systems, and planning records. Responsible persons and escalation pathways are defined, ensuring accountability and clarity across functions involved in delivering asset management activities.	The implementation of asset management plan(s) relies on (1) actions being clearly identified, (2) an owner allocated and (3) that owner having sufficient delegated responsibility and authority to carry out the work required. It also requires alignment of actions across the organisation. This question explores how well the plan(s) set out responsibility for delivery of asset plan actions.	The management team with overall responsibility for the asset management system. Operations, maintenance and engineering managers. If appropriate, the performance management team.	The organisation's asset management plan(s). Documentation defining roles and responsibilities of individuals and organisational departments.
31	Asset management plan(s)	What has the organisation done to ensure that appropriate arrangements are made available for the efficient and cost effective implementation of the plan(s)? (Note this is about resources and enabling support)	2	Firstlight Network has arrangements for implementing asset management plans, including service agreements, unit rate development, and planning improvements. Efficiency is limited by environmental constraints, internal resourcing gaps, and procurement processes, though initiatives are underway to improve capability, responsiveness, and overall implementation effectiveness.	It is essential that the plan(s) are realistic and can be implemented, which requires appropriate resources to be available and enabling mechanisms in place. This question explores how well this is achieved. The plan(s) not only need to consider the resources directly required and timescales, but also the enabling activities, including for example, training requirements, supply chain capability and procurement timescales.	The management team with overall responsibility for the asset management system. Operations, maintenance and engineering managers. If appropriate, the performance management team. If appropriate, the performance management team. Where appropriate the procurement team and service providers working on the organisation's asset-related activities.	The organisation's asset management plan(s). Documented processes and procedures for the delivery of the asset management plan.
33	Contingency planning	What plan(s) and procedure(s) does the organisation have for identifying and responding to incidents and emergency situations and ensuring continuity of critical asset management activities?	3	Firstlight Network has established crisis management, emergency management, and asset response plans providing an overall framework for response. Contingency plans for some specific events have been developed. Key personnel are trained and processes are aligned with CIMS. Consideration has been given to staffing levels in Control Room during crisis or emergency events.	Widely used AM practice standards require that an organisation has plan(s) to identify and respond to emergency situations. Emergency plan(s) should outline the actions to be taken to respond to specified emergency situations and ensure continuity of critical asset management activities including the communication to, and involvement of, external agencies. This question assesses if, and how well, these plan(s) triggered, implemented and resolved in the event of an incident. The plan(s) should be appropriate to the level of risk as determined by the organisation's risk assessment methodology. It is also a requirement that relevant personnel are competent and trained.	The manager with responsibility for developing emergency plan(s). The organisation's risk assessment team. People with designated duties within the plan(s) and procedure(s) for dealing with incidents and emergency situations.	The organisation's plan(s) and procedure(s) for dealing with emergencies. The organisation's risk assessments and risk registers.

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
37	Structure, authority and responsibilities	What has the organisation done to appoint member(s) of its management team to be responsible for ensuring that the organisation's assets deliver the requirements of the asset management strategy, objectives and plan(s)?	2	An Asset Management Governance Committee has been established, including senior managers responsible for operations, projects, asset management, planning, and engineering. Executive-level accountability for the asset management system is not yet clearly defined, and delegated authority remains limited.	In order to ensure that the organisation's assets and asset systems deliver the requirements of the asset management policy, strategy and objectives responsibilities need to be allocated to appropriate people who have the necessary authority to fulfil their responsibilities. (This question, relates to the organisation's assets eg, para b), s 4.4.1 of PAS 55, making it therefore distinct from the requirement contained in para a), s 4.4.1 of PAS 55).	Top management. People with management responsibility for the delivery of asset management policy, strategy, objectives and plan(s). People working on asset-related activities.	Evidence that managers with responsibility for the delivery of asset management policy, strategy, objectives and plan(s) have been appointed and have assumed their responsibilities. Evidence may include the organisation's documents relating to its asset management system, organisational charts, job descriptions of post-holders, annual targets/objectives and personal development plan(s) of post-holders as appropriate.
40	Structure, authority and responsibilities	What evidence can the organisation's top management provide to demonstrate that sufficient resources are available for asset management?	2	Resource requirements for asset management are identified using existing arrangements, though a formal process is not yet in place. External consultants supplement internal capability, and new service agreements are improving resource certainty, but skills shortages and incomplete contractual coverage continue to limit overall resourcing adequacy.	Optimal asset management requires top management to ensure sufficient resources are available. In this context the term 'resources' includes manpower, materials, funding and service provider support.	Top management. The management team that has overall responsibility for asset management. Risk management team. The organisation's managers involved in day-to-day supervision of asset-related activities, such as frontline managers, engineers, foremen and chargehands as appropriate.	Evidence demonstrating that asset management plan(s) and/or the process(es) for asset management plan implementation consider the provision of adequate resources in both the short and long term. Resources include funding, materials, equipment, services provided by third parties and personnel (internal and service providers) with appropriate skills competencies and knowledge.
42	Structure, authority and responsibilities	To what degree does the organisation's top management communicate the importance of meeting its asset management requirements?	3	Top management communicates asset management priorities through quarterly executive meetings and monthly all staff updates. Business objectives and performance expectations are clearly conveyed, supported by accessible organisational documents, ensuring alignment with asset management requirements across all levels of the organisation.	Widely used AM practice standards require an organisation to communicate the importance of meeting its asset management requirements such that personnel fully understand, take ownership of, and are fully engaged in the delivery of the asset management requirements (eg, PAS 55 s 4.4.1 g).	Top management. The management team that has overall responsibility for asset management. People involved in the delivery of the asset management requirements.	Evidence of such activities as road shows, written bulletins, workshops, team talks and management walk-abouts would assist an organisation to demonstrate it is meeting this requirement of PAS 55.
45	Outsourcing of asset management activities	Where the organisation has outsourced some of its asset management activities, how has it ensured that appropriate controls are in place to ensure the compliant delivery of its organisational strategic plan, and its asset management policy and strategy?	3	Firstlight Network controls outsourced activities through service agreements, prequalification, and performance monitoring. Contractor KPIs, competency tracking, and periodic audits ensure compliance with strategic, policy, and safety requirements. Agreements and procurement processes incorporate quality and control provisions within the asset management system.	Where an organisation chooses to outsource some of its asset management activities, the organisation must ensure that these outsourced process(es) are under appropriate control to ensure that all the requirements of widely used AM standards (eg, PAS 55) are in place, and the asset management policy, strategy objectives and plan(s) are delivered. This includes ensuring capabilities and resources across a time span aligned to life cycle management. The organisation must put arrangements in place to control the outsourced activities, whether it be to external providers or to other in-house departments. This question explores what the organisation does in this regard.	Top management. The management team that has overall responsibility for asset management. The manager(s) responsible for the monitoring and management of the outsourced activities. People involved with the procurement of outsourced activities. The people within the organisations that are performing the outsourced activities. The people impacted by the outsourced activity.	The organisation's arrangements that detail the compliance required of the outsourced activities. For example, this this could form part of a contract or service level agreement between the organisation and the suppliers of its outsourced activities. Evidence that the organisation has demonstrated to itself that it has assurance of compliance of outsourced activities.

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
48	Training, awareness and competence	How does the organisation develop plan(s) for the human resources required to undertake asset management activities - including the development and delivery of asset management strategy, process(es), objectives and plan(s)?	2	Firstlight Network develops human resource plans through individual development plans, technical skills mapping, and training initiatives. Knowledge sharing and participation in industry development are encouraged, though formal succession and knowledge management processes are still being developed to fully align workforce capability with asset management needs.	There is a need for an organisation to demonstrate that it has considered what resources are required to develop and implement its asset management system. There is also a need for the organisation to demonstrate that it has assessed what development plan(s) are required to provide its human resources with the skills and competencies to develop and implement its asset management systems. The timescales over which the plan(s) are relevant should be commensurate with the planning horizons within the asset management strategy considers e.g. if the asset management strategy considers 5, 10 and 15 year time scales then the human resources development plan(s) should align with these. Resources include both 'in house' and external resources who undertake asset management activities.	Senior management responsible for agreement of plan(s). Managers responsible for developing asset management strategy and plan(s). Managers with responsibility for development and recruitment of staff (including HR functions). Staff responsible for training. Procurement officers. Contracted service providers.	Evidence of analysis of future work load plan(s) in terms of human resources. Document(s) containing analysis of the organisation's own direct resources and contractors resource capability over suitable timescales. Evidence, such as minutes of meetings, that suitable management forums are monitoring human resource development plan(s). Training plan(s), personal development plan(s), contract and service level agreements.
49	Training, awareness and competence	How does the organisation identify competency requirements and then plan, provide and record the training necessary to achieve the competencies?	3	Firstlight Network identifies competency requirements through regulatory and industry guidance, mapping them to roles and individuals. Training uses formal qualifications, on the job learning, and refresher programmes. Competencies are recorded in a structured system covering staff and contractors, ensuring alignment with asset management objectives and operational needs.	Widely used AM standards require that organisations to undertake a systematic identification of the asset management awareness and competencies required at each level and function within the organisation. Once identified the training required to provide the necessary competencies should be planned for delivery in a timely and systematic way. Any training provided must be recorded and maintained in a suitable format. Where an organisation has contracted service providers in place then it should have a means to demonstrate that this requirement is being met for their employees. (eg, PAS 55 refers to frameworks suitable for identifying competency requirements).	Senior management responsible for agreement of plan(s). Managers responsible for developing asset management strategy and plan(s). Managers with responsibility for development and recruitment of staff (including HR functions). Staff responsible for training. Procurement officers. Contracted service providers.	Evidence of an established and applied competency requirements assessment process and plan(s) in place to deliver the required training. Evidence that the training programme is part of a wider, co-ordinated asset management activities training and competency programme. Evidence that training activities are recorded and that records are readily available (for both direct and contracted service provider staff) e.g. via organisation wide information system or local records database.
50	Training, awareness and competence	How does the organization ensure that persons under its direct control undertaking asset management related activities have an appropriate level of competence in terms of education, training or experience?	3	Firstlight Network ensures competency through defined regulatory and industry requirements mapped to roles and individuals. Competencies for staff and contractors are recorded in a structured system, with refresher training conducted at set intervals to maintain alignment with asset management and operational standards.	A critical success factor for the effective development and implementation of an asset management system is the competence of persons undertaking these activities. organisations should have effective means in place for ensuring the competence of employees to carry out their designated asset management function(s). Where an organisation has contracted service providers undertaking elements of its asset management system then the organisation shall assure itself that the outsourced service provider also has suitable arrangements in place to manage the competencies of its employees. The organisation should ensure that the individual and corporate competencies it requires are in place and actively monitor, develop and maintain an appropriate balance of these competencies.	Managers, supervisors, persons responsible for developing training programmes. Staff responsible for procurement and service agreements. HR staff and those responsible for recruitment.	Evidence of a competency assessment framework that aligns with established frameworks such as the asset management Competencies Requirements Framework (Version 2.0); National Occupational Standards for Management and Leadership; UK Standard for Professional Engineering Competence, Engineering Council, 2005.

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
53	Communication, participation and consultation	How does the organisation ensure that pertinent asset management information is effectively communicated to and from employees and other stakeholders, including contracted service providers?	3	Firstlight Network maintains two way communication through regular operational, performance, and governance meetings involving staff and contractors. Structured forums and daily coordination processes ensure asset management information is effectively shared, supporting alignment with strategic, planning, and operational requirements across all relevant parties.	Widely used AM practice standards require that pertinent asset management information is effectively communicated to and from employees and other stakeholders including contracted service providers. Pertinent information refers to information required in order to effectively and efficiently comply with and deliver asset management strategy, plan(s) and objectives. This will include for example the communication of the asset management policy, asset performance information, and planning information as appropriate to contractors.	Top management and senior management representative(s), employee's representative(s), employee's trade union representative(s); contracted service provider management and employee representative(s); representative(s) from the organisation's Health, Safety and Environmental team. Key stakeholder representative(s).	Asset management policy statement prominently displayed on notice boards, intranet and internet; use of organisation's website for displaying asset performance data; evidence of formal briefings to employees, stakeholders and contracted service providers; evidence of inclusion of asset management issues in team meetings and contracted service provider contract meetings; newsletters, etc.
59	Asset Management System documentation	What documentation has the organisation established to describe the main elements of its asset management system and interactions between them?	1	Firstlight Network is developing documentation to describe its asset management system and component interactions. Limited legacy materials exist, but current system documentation is incomplete. Work is underway to formalise and align documentation within corporate document control standards.	Widely used AM practice standards require an organisation maintain up to date documentation that ensures that its asset management systems (ie, the systems the organisation has in place to meet the standards) can be understood, communicated and operated. (eg, s 4.5 of PAS 55 requires the maintenance of up to date documentation of the asset management system requirements specified throughout s 4 of PAS 55).	The management team that has overall responsibility for asset management. Managers engaged in asset management activities.	The documented information describing the main elements of the asset management system (process(es)) and their interaction.
62	Information management	What has the organisation done to determine what its asset management information system(s) should contain in order to support its asset management system?	2	Firstlight Network has developed draft asset information requirements, asset hierarchy, and asset datasheets to define necessary asset data and information. Implementation of these structures is underway to support the asset management system and its transition to new enterprise asset management software.	Effective asset management requires appropriate information to be available. Widely used AM standards therefore require the organisation to identify the asset management information it requires in order to support its asset management system. Some of the information required may be held by suppliers. The maintenance and development of asset management information systems is a poorly understood specialist activity that is akin to IT management but different from IT management. This group of questions provides some indications as to whether the capability is available and applied. Note: To be effective, an asset information management system requires the mobilisation of technology, people and process(es) that create, secure, make available and destroy the information required to support the asset management system.	The organisation's strategic planning team. The management team that has overall responsibility for asset management. Information management team. Operations, maintenance and engineering managers	Details of the process the organisation has employed to determine what its asset information system should contain in order to support its asset management system. Evidence that this has been effectively implemented.
63	Information management	How does the organisation maintain its asset management information system(s) and ensure that the data held within it (them) is of the requisite quality and accuracy and is consistent?	2	Firstlight Network maintains its asset information system through defined data requirements, validation checks, and a data quality tracker. Asset information is verified against existing records, with discrepancies corrected through established processes. Ongoing system enhancements aim to strengthen data quality and consistency.	The response to the questions is progressive. A higher scale cannot be awarded without achieving the requirements of the lower scale. This question explores how the organisation ensures that information management meets widely used AM practice requirements (eg, s 4.4.6 (a), (c) and (d) of PAS 55).	The management team that has overall responsibility for asset management. Users of the organisational information systems.	The asset management information system, together with the policies, procedure(s), improvement initiatives and audits regarding information controls.

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
64	Information management	How has the organisation's ensured its asset management information system is relevant to its needs?	2	Firstlight Network is implementing processes to ensure its asset management information system meets organisational needs. Identified gaps are being addressed through the transition to new enterprise software and configuration of defined asset hierarchy and information requirements.	Widely used AM standards need not be prescriptive about the form of the asset management information system, but simply require that the asset management information system is appropriate to the organisations needs, can be effectively used and can supply information which is consistent and of the requisite quality and accuracy.	The organisation's strategic planning team. The management team that has overall responsibility for asset management. Information management team. Users of the organisational information systems.	The documented process the organisation employs to ensure its asset management information system aligns with its asset management requirements. Minutes of information systems review meetings involving users.
69	Risk management process(es)	How has the organisation documented process(es) and/or procedure(s) for the identification and assessment of asset and asset management related risks throughout the asset life cycle?	2	Firstlight Network is developing documentation for identifying and assessing asset related risks. A corporate risk matrix is applied to enterprise and project risks, with supporting tools such as Repex modelling and defect grading used. Alignment and integration of these approaches are still being established.	Risk management is an important foundation for proactive asset management. Its overall purpose is to understand the cause, effect and likelihood of adverse events occurring, to optimally manage such risks to an acceptable level, and to provide an audit trail for the management of risks. Widely used standards require the organisation to have process(es) and/or procedure(s) in place that set out how the organisation identifies and assesses asset and asset management related risks. The risks have to be considered across the four phases of the asset lifecycle (eg, para 4.3.3 of PAS 55).	The top management team in conjunction with the organisation's senior risk management representatives. There may also be input from the organisation's Safety, Health and Environment team. Staff who carry out risk identification and assessment.	The organisation's risk management framework and/or evidence of specific process(es) and/ or procedure(s) that deal with risk control mechanisms. Evidence that the process(es) and/or procedure(s) are implemented across the business and maintained. Evidence of agendas and minutes from risk management meetings. Evidence of feedback in to process(es) and/or procedure(s) as a result of incident investigation(s). Risk registers and assessments.
79	Use and maintenance of asset risk information	How does the organisation ensure that the results of risk assessments provide input into the identification of adequate resources and training and competency needs?	3	Firstlight Network uses enterprise and asset level risk registers to identify and manage risks. Regular review meetings ensure risk assessments inform resource allocation, training, and competency needs, integrating outcomes directly into asset management and business improvement activities.	Widely used AM standards require that the output from risk assessments are considered and that adequate resource (including staff) and training is identified to match the requirements. It is a further requirement that the effects of the control measures are considered, as there may be implications in resources and training required to achieve other objectives.	Staff responsible for risk assessment and those responsible for developing and approving resource and training plan(s). There may also be input from the organisation's Safety, Health and Environment team.	The organisations risk management framework. The organisation's resourcing plan(s) and training and competency plan(s). The organisation should be able to demonstrate appropriate linkages between the content of resource plan(s) and training and competency plan(s) to the risk assessments and risk control measures that have been developed.
82	Legal and other requirements	What procedure does the organisation have to identify and provide access to its legal, regulatory, statutory and other asset management requirements, and how is requirements incorporated into the asset management system?	3	Firstlight Network ensures compliance with legal and regulatory requirements through dedicated roles, including a Regulatory Advisor and in house legal support. Regulatory and contractual obligations are managed through standardised frameworks, with external legal advisors engaged as needed to maintain current compliance.	In order for an organisation to comply with its legal, regulatory, statutory and other asset management requirements, the organisation first needs to ensure that it knows what they are (eg, PAS 55 specifies this in s 4.4.8). It is necessary to have systematic and auditable mechanisms in place to identify new and changing requirements. Widely used AM standards also require that requirements are incorporated into the asset management system (e.g. procedure(s) and process(es))	Top management. The organisations regulatory team. The organisation's legal team or advisors. The management team with overall responsibility for the asset management system. The organisation's health and safety team or advisors. The organisation's policy making team.	The organisational processes and procedures for ensuring information of this type is identified, made accessible to those requiring the information and is incorporated into asset management strategy and objectives

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
88	Life Cycle Activities	How does the organisation establish implement and maintain process(es) for the implementation of its asset management plan(s) and control of activities across the creation, acquisition or enhancement of assets. This includes design, modification, procurement, construction and commissioning activities?	3	Firstlight Network manages asset creation and modification through standardised project, design, procurement, and commissioning processes. Defined templates, competency checks, audits, and post project reviews ensure control, quality, and compliance across design, construction, and operational phases within the asset management framework.	Life cycle activities are about the implementation of asset management plan(s) i.e. they are the "doing" phase. They need to be done effectively and well in order for asset management to have any practical meaning. As a consequence, widely used standards (eg, PAS 55 s 4.5.1) require organisations to have in place appropriate process(es) and procedure(s) for the implementation of asset management plan(s) and control of lifecycle activities. This question explores those aspects relevant to asset creation.	Asset managers, design staff, construction staff and project managers from other impacted areas of the business, e.g. Procurement	Documented process(es) and procedure(s) which are relevant to demonstrating the effective management and control of life cycle activities during asset creation, acquisition, enhancement including design, modification, procurement, construction and commissioning.
91	Life Cycle Activities	How does the organisation ensure that process(es) and/or procedure(s) for the implementation of asset management plan(s) and control of activities during maintenance (and inspection) of assets are sufficient to ensure activities are carried out under specified conditions, are consistent with asset management strategy and control cost, risk and performance?	2	Firstlight Network is implementing processes to manage maintenance and inspection activities. Preventive routines, inspection standards, quality checks, and defect management systems are in place. Improvements are underway to integrate workflows, address backlogs, and ensure control of maintenance cost, risk, and performance against asset management objectives.	Having documented process(es) which ensure the asset management plan(s) are implemented in accordance with any specified conditions, in a manner consistent with the asset management policy, strategy and objectives and in such a way that cost, risk and asset system performance are appropriately controlled is critical. They are an essential part of turning intention into action (eg, as required by PAS 55 s 4.5.1).	Asset managers, operations managers, maintenance managers and project managers from other impacted areas of the business	Documented procedure for review. Documented procedure for audit of process delivery. Records of previous audits, improvement actions and documented confirmation that actions have been carried out.
95	Performance and condition monitoring	How does the organisation measure the performance and condition of its assets?	2	Firstlight Network measures asset performance through outage reporting, reliability metrics, and condition monitoring via inspections and testing. Additional monitoring includes tilt sensors on critical assets and fault indicators with remote communication, supporting improved performance tracking and early issue detection.	Widely used AM standards require that organisations establish implement and maintain procedure(s) to monitor and measure the performance and/or condition of assets and asset systems. They further set out requirements in some detail for reactive and proactive monitoring, and leading/lagging performance indicators together with the monitoring or results to provide input to corrective actions and continual improvement. There is an expectation that performance and condition monitoring will provide input to improving asset management strategy, objectives and plan(s).	A broad cross-section of the people involved in the organisation's asset-related activities from data input to decision-makers, i.e. an end-to end assessment. This should include contactors and other relevant third parties as appropriate.	Functional policy and/or strategy documents for performance or condition monitoring and measurement. The organisation's performance monitoring frameworks, balanced scorecards etc. Evidence of the reviews of any appropriate performance indicators and the action lists resulting from these reviews. Reports and trend analysis using performance and condition information. Evidence of the use of performance and condition information shaping improvements and supporting asset management strategy, objectives and plan(s).
99	Investigation of asset-related failures, incidents and nonconformities	How does the organisation ensure responsibility and the authority for the handling, investigation and mitigation of asset-related failures, incidents and emergency situations and non conformances is clear, unambiguous, understood and communicated?	3	Firstlight Network defines and assigns responsibilities for investigating asset failures, incidents, and emergencies. Control Room, Health and Safety, and Engineering teams manage reviews and root cause investigations, with regular reliability meetings ensuring accountability and coordinated mitigation actions.	Widely used AM standards require that the organisation establishes implements and maintains process(es) for the handling and investigation of failures incidents and non-conformities for assets and sets down a number of expectations. Specifically this question examines the requirement to define clearly responsibilities and authorities for these activities, and communicate these unambiguously to relevant people including external stakeholders if appropriate.	The organisation's safety and environment management team. The team with overall responsibility for the management of the assets. People who have appointed roles within the asset-related investigation procedure, from those who carry out the investigations to senior management who review the recommendations. Operational controllers responsible for managing the asset base under fault conditions and maintaining services to consumers. Contractors and other third parties as appropriate.	Process(es) and procedure(s) for the handling, investigation and mitigation of asset-related failures, incidents and emergency situations and non conformances. Documentation of assigned responsibilities and authority to employees. Job Descriptions, Audit reports. Common communication systems i.e. all Job Descriptions on Internet etc.

Question No.	Function	Question	Score	Evidence—Summary	Why	Who	Record/documented Information
105	Audit	What has the organisation done to establish procedure(s) for the audit of its asset management system (process(es))?	2	Firstlight Network is developing audit procedures for its asset management system. Health, safety, and quality audits are conducted, and internal assurance applies through the parent organisation. Independent maturity assessments occur periodically, but a comprehensive asset management audit programme is still being established.	This question seeks to explore what the organisation has done to comply with the standard practice AM audit requirements (eg, the associated requirements of PAS 55 s 4.6.4 and its linkages to s 4.7).	The management team responsible for its asset management procedure(s). The team with overall responsibility for the management of the assets. Audit teams, together with key staff responsible for asset management. For example, Asset Management Director, Engineering Director. People with responsibility for carrying out risk assessments	The organisation's asset-related audit procedure(s). The organisation's methodology(s) by which it determined the scope and frequency of the audits and the criteria by which it identified the appropriate audit personnel. Audit schedules, reports etc. Evidence of the procedure(s) by which the audit results are presented, together with any subsequent communications. The risk assessment schedule or risk registers.
109	Corrective & Preventative action	How does the organisation instigate appropriate corrective and/or preventive actions to eliminate or prevent the causes of identified poor performance and non conformance?	3	Corrective and preventive actions are systematically initiated and tracked through tools such as Maximo, SafetyCulture/iAuditor, and Risk Manager. Defects and non-conformances are reviewed, prioritised, and followed up, with evidence of timely completion of actions.	Having investigated asset related failures, incidents and non-conformances, and taken action to mitigate their consequences, an organisation is required to implement preventative and corrective actions to address root causes. Incident and failure investigations are only useful if appropriate actions are taken as a result to assess changes to a businesses risk profile and ensure that appropriate arrangements are in place should a recurrence of the incident happen. Widely used AM standards also require that necessary changes arising from preventive or corrective action are made to the asset management system.	The management team responsible for its asset management procedure(s). The team with overall responsibility for the management of the assets. Audit and incident investigation teams. Staff responsible for planning and managing corrective and preventive actions.	Analysis records, meeting notes and minutes, modification records. Asset management plan(s), investigation reports, audit reports, improvement programmes and projects. Recorded changes to asset management procedure(s) and process(es). Condition and performance reviews. Maintenance reviews
113	Continual Improvement	How does the organisation achieve continual improvement in the optimal combination of costs, asset related risks and the performance and condition of assets and asset systems across the whole life cycle?	3	Continuous improvement processes are systematically applied, integrating cost, risk, performance, and condition across the asset life cycle. The Strategic Reliability Management Plan and risk identification process support structured initiatives improving network performance, resilience, and data quality, demonstrating coordinated delivery of enhancement programmes.	Widely used AM standards have requirements to establish, implement and maintain process(es)/procedure(s) for identifying, assessing, prioritising and implementing actions to achieve continual improvement. Specifically there is a requirement to demonstrate continual improvement in optimisation of cost risk and performance/condition of assets across the life cycle. This question explores an organisation's capabilities in this area—looking for systematic improvement mechanisms rather that reviews and audit (which are separately examined).	The top management of the organisation. The manager/team responsible for managing the organisation's asset management system, including its continual improvement. Managers responsible for policy development and implementation.	Records showing systematic exploration of improvement. Evidence of new techniques being explored and implemented. Changes in procedure(s) and process(es) reflecting improved use of optimisation tools/techniques and available information. Evidence of working parties and research.
115	Continual Improvement	How does the organisation seek and acquire knowledge about new asset management related technology and practices, and evaluate their potential benefit to the organisation?	3	The organisation engages with industry groups, forums, and training to share knowledge and assess emerging practices. It monitors technology developments and collaborates with other electricity distribution businesses, applying relevant innovations to enhance asset management capability and performance.	One important aspect of continual improvement is where an organisation looks beyond its existing boundaries and knowledge base to look at what 'new things are on the market'. These new things can include equipment, process(es), tools, etc. An organisation which does this (eg, by the PAS 55 s 4.6 standards) will be able to demonstrate that it continually seeks to expand its knowledge of all things affecting its asset management approach and capabilities. The organisation will be able to demonstrate that it identifies any such opportunities to improve, evaluates them for suitability to its own organisation and implements them as appropriate. This question explores an organisation's approach to this activity.	The top management of the organisation. The manager/team responsible for managing the organisation's asset management system, including its continual improvement. People who monitor the various items that require monitoring for 'change'. People that implement changes to the organisation's policy, strategy, etc. People within an organisation with responsibility for investigating, evaluating, recommending and implementing new tools and techniques, etc.	Research and development projects and records, benchmarking and participation knowledge exchange professional forums. Evidence of correspondence relating to knowledge acquisition. Examples of change implementation and evaluation of new tools, and techniques linked to asset management strategy and objectives.

Schedule 14a: Mandatory Explanatory Notes on Forecast Information

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018.)

1. This Schedule requires EDBs to provide explanatory notes to reports prepared in accordance with clause 2.6.6.

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

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

2. 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

The difference between constant RY26 and nominal prices capital expenditure forecasts is based on New Zealand Reserve Bank CPI forecasts for RY27, after which it is based on an escalation of 2%.

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

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

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

Our approach for operational expenditure is equivalent to the approach for capital expenditure, described above.

APPENDIX B. DISCLOSURE REQUIREMENTS

This compliance matrix provides a look-up reference for each AMP-related Information Disclosure requirement.

Table B.1: Disclosure requirements checklist

REGULATORY REQUIREMENTS		AMP REFERENCE
2.6	**ASSET MANAGEMENT PLANS AND FORECAST INFORMATION**	
2.6.3	Subject to clause 2.6.4, an EDB may elect to complete and publicly disclose an AMP update, as described under clause 2.6.5, before the start of a disclosure year, instead of an AMP, as described under clause 2.6.1(1), unless the start of that disclosure year is- (1) one year after the start of the DPP regulatory period; or (2) two years before the start of the next DPP regulatory period.	We have published an AMP Update for disclosure year 2026 as we received an exemption from publishing a full AMP. Confirmed by a letter from Commerce Commission dated 5 February 2026.
2.6.4	An EDB must not complete and publicly disclose an AMP update instead of an AMP if it has not previously publicly disclosed an AMP under clause 2.6.1.	Firstlight's most recent, previous disclosure was its 2023 AMP.
2.6.5	For the purpose of clause 2.6.3, the AMP update must— (1) Relate to the electricity distribution services supplied by the EDB; (2) Identify any material changes to the network development plans disclosed in the last AMP under clause 11 and clause 17.5-17.7 of Attachment A or in the last AMP update disclosed under this clause; (3) Identify any material changes to the lifecycle asset management (maintenance and renewal) plans disclosed in the last AMP pursuant to clause 12 of Attachment A or in the last AMP update disclosed under this section; (4) Provide the reasons for any material changes to the previous disclosures in the Report on Forecast Capital Expenditure set out in Schedule 11a and Report on Forecast Operational Expenditure set out in Schedule 11b; (5) Identify any changes to the asset management practices of the EDB that would affect a Schedule 13 Report on Asset Management Maturity disclosure; and (6) Contain the information set out in the schedules described in clause 2.6.6.	(1) Confirmed in Chapter 1 (2) included in Chapter 6 (3) included in Chapter 6 (4) included in Chapter 6 (5) Included in Chapter 4 and in Schedule 13 as set out in Appendix A. (6) See 2.6.6 below

REGULATORY REQUIREMENTS		AMP REFERENCE
2.6.6	Each EDB— (1) must, except as provided in subclause 2.6.6(2), before the start of each disclosure year, complete and publicly disclose each of the following reports by inserting all information relating to the electricity distribution services supplied by the EDB for the disclosure years provided for in the following reports— (a) the Report on Forecast Capital Expenditure in Schedule 11a; (b) the Report on Forecast Operational Expenditure in Schedule 11b; (c) the Report on Asset Condition in Schedule 12a; (d) the Report on Forecast Capacity in Schedule 12b; (e) the Report on Forecast Network Demand in Schedule 12c; (f) the Report on Forecast Interruptions and Duration in Schedule 12d; (2) must, before the start of each disclosure year, complete and disclose to the Commission the Report on Cybersecurity Expenditure Forecast in Schedule 11c by inserting all information relating to the electricity distribution services supplied by the EDB for the disclosure years provided for in that report; and (3) must, if the EDB has sub-networks, complete and publicly disclose the Report on Forecast Interruptions and Duration set out in Schedule 12d by inserting all information relating to the electricity distribution services supplied by the EDB in relation to each sub-network for the disclosure years provided for in the report.	(1) This information is included in Appendix A. (2) Provided separately (3) This information is included in Appendix A.
2.7	**EXPLANATORY NOTES TO DISCLOSED INFORMATION**	
2.7.2	Before the start of each disclosure year, every EDB must complete and publicly disclose the Mandatory Explanatory Notes on Forecast Information in Schedule 14a by inserting all relevant information relating to information disclosed in accordance with clause 2.6.6.	This information is included in Appendix A.
2.9	**CERTIFICATES**	
2.9.1	Where an EDB is required to publicly disclose any information under clauses 2.4.1, 2.6.1, 2.6.3, 2.6.6 and 2.7.2, the EDB must at that time publicly disclose a certificate in the form set out in Schedule 17 in respect of that information, duly signed by 2 directors of the EDB.	A copy of the certificate is included in Appendix C.

APPENDIX C. DIRECTOR'S CERTIFICATE

We, Mark Adrian Ratcliffe and Jason John McDonald, being directors of Firstlight Network Limited certify that, having made all reasonable enquiry, to the best of our knowledge

a) The following attached information of Firstlight Network Limited prepared for the purposes of clauses 2.4.1, 2.6.1, 2.6.3, 2.6.6 and 2.7.2 of the Electricity Distribution Information Disclosure Determination 2012 in all material respects complies with that determination.

b) The prospective financial or non-financial information included in the attached information has been measured on a basis consistent with regulatory requirements or recognised industry standards.

c) The forecasts in Schedules 11a, 11b, 12a, 12b, 12c and 12d are based on objective and reasonable assumptions which both align with Firstlight Network Limited's corporate vision and strategy and are documented in retained records.

Mark Adrian Ratcliffe	
Director Name	Signature
Jason John McDonald	
Director Name	Signature

27 March 2026