Firstlightnetwork®

Information Disclosure

Assessment Period

1 April 2023 – 31 March 2024

1. Introduction

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

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

We're a team of people who, with our contractors, are responsible for keeping the lights on across 12,000 square kilometres of the East Coast.

We have a strong focus on sustainability. This includes installing a regionwide network of electric vehicle chargers, planning for new energy opportunities, and ensuring we can continue delivering a reliable service as the way people use electricity changes and grows.

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

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

2. Date prepared

The Information Disclosures were prepared on 29 August 2024.

EDB Information Disclosure Requirements
Information Templates

Schedules 1–10
excluding 5f–5h

Company Name	Firstlight Network Limited
Disclosure Date	31 August 2024
Disclosure Year (year ended)	31 March 2024

Templates for Schedules 1–10 excluding 5f–5h
Prepared 29 August 2024

Table of Contents

Disclosure Template Instructions

This document forms Schedules 1–10 to the Electricity Distribution Information Disclosure (Targeted Review 2024) Amendment Determination 2024 [2024] NZCC 2.

The Schedules take the form of templates for use by EDBs when making disclosures under clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1, and 2.5.2 of the Electricity Distribution Information Disclosure Determination 2012.

Company Name and Dates

To prepare the templates for disclosure, the supplier's company name should be entered in cell C8, the date of the last day of the current (disclosure) year should be entered in cell C12, and the date on which the information is disclosed should be entered in cell C10 of the CoverSheet worksheet.

The cell C12 entry (current year) is used to calculate disclosure years in the column headings that show above some of the tables and in labels adjacent to some entry cells. It is also used to calculate the ‘For year ended’ date in the template title blocks (the title blocks are the light green shaded areas at the top of each template).

The cell C8 entry (company name) is used in the template title blocks.

Dates should be entered in day/month/year order (Example -"1 April 2023").

Data Entry Cells and Calculated Cells

Data entered into this workbook may be entered only into the data entry cells. Data entry cells are the bordered, unshaded areas (white cells) in each template. Under no circumstances should data be entered into the workbook outside a data entry cell.

In some cases, where the information for disclosure is able to be ascertained from disclosures elsewhere in the workbook, such information is disclosed in a calculated cell.

Validation Settings on Data Entry Cells

To maintain a consistency of format and to help guard against errors in data entry, some data entry cells test keyboard entries for validity and accept only a limited range of values. For example, entries may be limited to a list of category names, to values between 0% and 100%, or either a numeric entry or the text entry “N/A”. Where this occurs, a validation message will appear when data is being entered. These checks are applied to keyboard entries only and not, for example, to entries made using Excel’s copy and paste facility.

Conditional Formatting Settings on Data Entry Cells

Schedule 2 cells G79 and I79:L79 will change colour if the total cashflows do not equal the corresponding values in table 2(ii).

Schedule 4 cells P99:P106 and P107 will change colour if the RAB values do not equal the corresponding values in table 4(ii).

Schedule 9b columns AA to AE (2013 to 2017) contain conditional formatting. The data entry cells for future years are hidden (are changed from white to yellow).

Schedule 9b cells in rows 10 to 60 of the column "Items at end of year (quantity)" will change colour if the total assets at year end for each asset class does not equal the corresponding values in column I in Schedule 9a.

Schedule 9c cell G30 will change colour if G30 (overhead circuit length by terrain) does not equal G18 (overhead circuit length by operating voltage).

Inserting Additional Rows and Columns

The schedule 4, 5b, 5c, 5d, 5e, 6a, 8, 9d, and 9e templates may require additional rows to be inserted in tables marked 'include additional rows if needed' or similar. Column A schedule references should not be entered in additional rows, and should be deleted from additional rows that are created by copying and pasting rows that have schedule references.

Additional rows in the schedule 5c, 6a, and 9e templates must not be inserted directly above the first row or below the last row of a table. This is to ensure that entries made in the new row are included in the totals.

The schedule 5d and 5e templates may require new cost or asset category rows to be inserted in allocation change tables 5d(iii) and 5e(ii). Accordingly, cell protection has been removed from rows 77 and 78 of the respective templates to allow blocks of rows to be copied. The four steps to add new cost category rows to table 5d(iii) are: Select Excel rows 69:77, copy, select Excel row 78, insert copied cells. Similarly, for table 5e(ii): Select Excel rows 70:78, copy, select Excel row 79, then insert copied cells.

The template for schedule 8 may require additional columns to be inserted between column L and Q, and between U and AF. If inserting additional columns, headings will need to be copied into the added columns. Additionally, the formulas for standard consumers total, non-standard consumers totals and total for all consumers will need to be copied into the cells of the added columns. The column headings and formulas can be found in the equivalent cells of the existing columns.

Disclosures by Sub-Network

If the supplier has sub-networks, schedules 8, 9a, 9b, 9c, 9e, and 10 must be completed for the network and for each sub-network. A copy of the schedule worksheet(s) must be made for each sub-network and named accordingly.

Description of Calculation References

Calculation cell formulas contain links to other cells within the same template or elsewhere in the workbook. Key cell references are described in a column to the right of each template. These descriptions are provided to assist data entry. Cell references refer to the row of the template and not the schedule reference.

Worksheet Completion Sequence

Calculation cells may show an incorrect value until precedent cell entries have been completed. Data entry may be assisted by completing the schedules in the following order:

1. Coversheet
2. Schedules 5a–5e
3. Schedules 6a–6b
4. Schedule 8
5. Schedule 3
6. Schedule 4
7. Schedule 2
8. Schedule 7
9. Schedules 9a–9e
10. Schedule 10

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 1: ANALYTICAL RATIOS

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

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

sch ref

7 **1(i): Expenditure metrics**

sch ref		Expenditure per GWh energy delivered to ICPs ($/GWh)	Expenditure per average no. of ICPs ($/ICP)	Expenditure per MW maximum coincident system demand ($/MW)	Expenditure per km circuit length ($/km)	Expenditure per MVA of capacity from EDB-owned distribution transformers ($/MVA)
8						
9	**Operational expenditure**	50,982	576	224,657	3,758	64,261
10	Network	25,504	288	112,384	1,880	32,146
11	Non-network	25,479	288	112,273	1,878	32,115
12						
13	**Expenditure on assets**	48,506	548	213,744	3,575	61,139
14	Network	45,059	509	198,555	3,321	56,794
15	Non-network	3,447	39	15,189	254	4,345
16						

17 **1(ii): Revenue metrics**

sch ref		Revenue per GWh energy delivered to ICPs ($/GWh)	Revenue per average no. of ICPs ($/ICP)
18			
19	**Total consumer line charge revenue**	101,301	1,145
20	Standard consumer line charge revenue	101,301	1,145
21	Non-standard consumer line charge revenue	–	–
22			

23 **1(iii): Service intensity measures**

sch ref			
24			
25	Demand density	17	*Maximum coincident system demand per km of circuit length (for supply) (kW/km)*
26	Volume density	74	*Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)*
27	Connection point density	7	*Average number of ICPs per km of circuit length (for supply) (ICPs/km)*
28	Energy intensity	11,301	*Total energy delivered to ICPs per average number of ICPs (kWh/ICP)*
29			

30 **1(iv): Composition of regulatory income**

sch ref		($000)	% of revenue
31			
32	Operational expenditure	14,942	49.83%
33	Pass-through and recoverable costs excluding financial incentives and wash-ups	4,932	16.45%
34	Total depreciation	7,840	26.15%
35	Total revaluations	8,417	28.07%
36	Regulatory tax allowance	224	0.75%
37	Regulatory profit/(loss) including financial incentives and wash-ups	10,465	34.90%
38	**Total regulatory income**	29,986	
39			

40 **1(v): Reliability**

sch ref			
41			
42	Interruption rate	26.08	*Interruptions per 100 circuit km*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

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

EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

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

sch ref		CY-2	CY-1	Current Year CY
7	**2(i): Return on Investment**			
9	**ROI – comparable to a post tax WACC**	%	%	%
10	Reflecting all revenue earned	9.41%	7.97%	4.61%
11	Excluding revenue earned from financial incentives	9.37%	7.97%	4.78%
12	Excluding revenue earned from financial incentives and wash-ups	9.37%	8.01%	4.81%
14	**Mid-point estimate of post tax WACC**	3.52%	4.88%	6.05%
15	25th percentile estimate	2.84%	4.20%	5.37%
16	75th percentile estimate	4.20%	5.56%	6.73%
19	**ROI – comparable to a vanilla WACC**			
20	Reflecting all revenue earned	9.71%	8.27%	5.31%
21	Excluding revenue earned from financial incentives	9.66%	8.27%	5.48%
22	Excluding revenue earned from financial incentives and wash-ups	9.66%	8.31%	5.51%
24	**WACC rate used to set regulatory price path**	4.57%	4.57%	4.57%
26	**Mid-point estimate of vanilla WACC**	3.82%	5.39%	6.75%
27	25th percentile estimate	3.14%	4.71%	6.07%
28	75th percentile estimate	4.50%	6.07%	7.43%

sch ref				($000)	
30	**2(ii): Information Supporting the ROI**				
32		Total opening RAB value	209,446		
33	*plus*	Opening deferred tax	(14,444)		
34	**Opening RIV**			195,003	
36	**Line charge revenue**			29,690	
38		Expenses cash outflow	19,874		
39	*add*	Assets commissioned	12,573		
40	*less*	Asset disposals	40		
41	*add*	Tax payments	(3,957)		
42	*less*	Other regulated income	295		
43	**Mid-year net cash outflows**			28,155	
45	**Term credit spread differential allowance**			–	
47		Total closing RAB value	222,587		
48	*less*	Adjustment resulting from asset allocation	30		
49	*less*	Lost and found assets adjustment	–		
50	*plus*	Closing deferred tax	(18,624)		
51	**Closing RIV**			203,933	
53	**ROI – comparable to a vanilla WACC**				5.31%
55		Leverage (%)			42%
56		Cost of debt assumption (%)			5.97%
57		Corporate tax rate (%)			28%
59	**ROI – comparable to a post tax WACC**				4.61%

Company Name	Firstlight Network Limited
For Year Ended	31 March 2024

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii).
EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

61 **2(iii): Information Supporting the Monthly ROI**

sch ref		
63	**Opening RIV**	N/A

sch ref		Line charge revenue	Expenses cash outflow	Assets commissioned	Asset disposals	Other regulated income	Monthly net cash outflows
67	April						–
68	May						–
69	June						–
70	July						–
71	August						–
72	September						–
73	October						–
74	November						–
75	December						–
76	January						–
77	February						–
78	March						–
79	**Total**	–	–	–	–	–	–

sch ref		
81	**Tax payments**	N/A
83	**Term credit spread differential allowance**	N/A
85	**Closing RIV**	N/A
88	**Monthly ROI – comparable to a vanilla WACC**	N/A
90	**Monthly ROI – comparable to a post tax WACC**	N/A

92 **2(iv): Year-End ROI Rates for Comparison Purposes**

sch ref		
94	**Year-end ROI – comparable to a vanilla WACC**	5.47%
96	**Year-end ROI – comparable to a post tax WACC**	4.76%

98 ** these year-end ROI values are comparable to the ROI reported in pre 2012 disclosures by EDBs and do not represent the Commission's current view on ROI.*

100 **2(v): Financial Incentives and Wash-Ups**

sch ref			
102	IRIS incentive adjustment	(293)	
103	Purchased assets – avoided transmission charge		
104	Energy efficiency and demand incentive allowance		
105	Quality incentive adjustment	(164)	
106	Other financial incentives		
107	**Financial incentives**		(457)
109	**Impact of financial incentives on ROI**		–0.17%
111	Input methodology claw-back		

pwc

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

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

EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

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

sch ref			
112	CPP application recoverable costs		
113	Catastrophic event allowance		
114	Capex wash-up adjustment	(81)	
115	Transmission asset wash-up adjustment		
116	2013–15 NPV wash-up allowance		
117	Reconsideration event allowance		
118	Other wash-ups		
119	**Wash-up costs**		(81)
120			
121	**Impact of wash-up costs on ROI**		–0.03%

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 3: REPORT ON REGULATORY PROFIT

This schedule requires information on the calculation of regulatory profit for the EDB for the disclosure year. All EDBs must complete all sections and provide explanatory comment on their regulatory profit in Schedule 14 (Mandatory Explanatory Notes).
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref				
7		**3(i): Regulatory Profit**		**($000)**
8		**Income**		
9		Line charge revenue		29,690
10	*plus*	Gains / (losses) on asset disposals		(3)
11	*plus*	Other regulated income (other than gains / (losses) on asset disposals)		298
12				
13		**Total regulatory income**		29,986
14		**Expenses**		
15	*less*	Operational expenditure		14,942
16				
17	*less*	Pass-through and recoverable costs excluding financial incentives and wash-ups		4,932
18				
19		**Operating surplus / (deficit)**		10,111
20				
21	*less*	Total depreciation		7,840
22				
23	*plus*	Total revaluations		8,417
24				
25		**Regulatory profit / (loss) before tax**		10,689
26				
27	*less*	Term credit spread differential allowance		–
28				
29	*less*	Regulatory tax allowance		224
30				
31		**Regulatory profit/(loss) including financial incentives and wash-ups**		10,465
32				
33		**3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups**	**($000)**	
34		**Pass through costs**		
35		Rates	250	
36		Commerce Act levies	104	
37		Industry levies	88	
38		CPP specified pass through costs	–	
39		**Recoverable costs excluding financial incentives and wash-ups**		
40		Electricity lines service charge payable to Transpower	4,416	
41		Transpower new investment contract charges	75	
42		System operator services	–	
43		Distributed generation allowance	–	
44		Extended reserves allowance	–	
45		Other recoverable costs excluding financial incentives and wash-ups	–	
46		**Pass-through and recoverable costs excluding financial incentives and wash-ups**		4,932
47				
48		**3(iv): Merger and Acquisition Expenditure**		
49				**($000)**
50		Merger and acquisition expenditure		
51				
52		*Provide commentary on the benefits of merger and acquisition expenditure to the electricity distribution business, including required disclosures in accordance with section 2.7, in Schedule 14 (Mandatory Explanatory Notes)*		
53		**3(v): Other Disclosures**		
54				**($000)**
55		Self-insurance allowance		

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2.
EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

4(i): Regulatory Asset Base Value (Rolled Forward)

	RAB CY-4 ($000)	RAB CY-3 ($000)	RAB CY-2 ($000)	RAB CY-1 ($000)	RAB CY ($000)
Total opening RAB value	161,678	166,070	172,870	188,035	209,446
less **Total depreciation**	6,248	6,483	6,504	7,106	7,840
plus **Total revaluations**	4,044	2,518	11,955	12,500	8,417
plus **Assets commissioned**	8,529	10,983	9,630	16,078	12,573
less **Asset disposals**	–	–	88	24	40
plus **Lost and found assets adjustment**	–	–	(21)	(38)	–
plus **Adjustment resulting from asset allocation**	(1,931)	(219)	193	–	30
Total closing RAB value	166,070	172,870	188,035	209,446	222,587

4(ii): Unallocated Regulatory Asset Base

	Unallocated RAB * ($000)	 ($000)	RAB ($000)	 ($000)
Total opening RAB value		212,590		209,446
less				
Total depreciation		7,840		7,840
plus				
Total revaluations		8,417		8,417
plus				
Assets commissioned (other than below)	1,281		1,281	
Assets acquired from a regulated supplier	–		–	
Assets acquired from a related party	11,292		11,292	
Assets commissioned		12,573		12,573
less				
Asset disposals (other than below)	(36)		40	
Asset disposals to a regulated supplier	–		–	
Asset disposals to a related party	3,089		–	
Asset disposals		3,053		40
plus **Lost and found assets adjustment**		–		–
plus **Adjustment resulting from asset allocation**				30
Total closing RAB value		222,688		222,587

** The 'unallocated RAB' is the total value of those assets used wholly or partially to provide electricity distribution services without any allowance being made for the allocation of costs to services provided by the supplier that are not electricity distribution services. The RAB value represents the value of these assets after applying this cost allocation. Neither value includes works under construction.*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2.
EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

51						
52	**4(iii): Calculation of Revaluation Rate and Revaluation of Assets**					
53						
54	CPI_4					1,267
55	CPI_4^{-4}					1,218
56	Revaluation rate (%)					4.02%
57						
58		**Unallocated RAB ***		**RAB**		
59		**($000)**	**($000)**	**($000)**	**($000)**	
60	Total opening RAB value	212,590		209,446		
61	*less* Opening value of fully depreciated, disposed and lost assets	3,356		212		
62						
63	Total opening RAB value subject to revaluation	209,234		209,234		
64	**Total revaluations**		8,417		8,417	
65						

66	**4(iv): Roll Forward of Works Under Construction**				
67		**Unallocated works under construction**		**Allocated works under construction**	
68	**Works under construction—preceding disclosure year**		355		355
69	*plus* Capital expenditure	14,111		14,111	
70	*less* Assets commissioned	12,573		12,573	
71	*plus* Adjustment resulting from asset allocation			–	
72	**Works under construction - current disclosure year**		1,893		1,893
73					
74	Highest rate of capitalised finance applied				–
75					

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2.
EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

76 **4(v): Regulatory Depreciation**

sch ref		Unallocated RAB *		RAB	
77					
78		($000)	($000)	($000)	($000)
79	Depreciation - standard	6,538		6,538	
80	Depreciation - no standard life assets	1,302		1,302	
81	Depreciation - modified life assets				
82	Depreciation - alternative depreciation in accordance with CPP				
83	**Total depreciation**		7,840		7,840
84					

85 **4(vi): Disclosure of Changes to Depreciation Profiles**

($000 unless otherwise specified)

sch ref	Asset or assets with changes to depreciation*	Reason for non-standard depreciation (text entry)	Depreciation charge for the period (RAB)	Closing RAB value under 'non-standard' depreciation	Closing RAB value under 'standard' depreciation
86					
87					
88					
89					
90					
91					
92					
93					
94					

95 ** include additional rows if needed*

96 **4(vii): Disclosure by Asset Category**

97 **($000 unless otherwise specified)**

sch ref			Subtransmission lines	Subtransmission cables	Zone substations	Distribution and LV lines	Distribution and LV cables	Distribution substations and transformers	Distribution switchgear	Other network assets	Non-network assets	Total
98												
99		**Total opening RAB value**	22,040	1,597	31,387	77,410	30,507	20,479	10,431	6,575	9,020	209,446
100	*less*	Total depreciation	822	42	1,207	2,419	941	812	493	590	513	7,840
101	*plus*	Total revaluations	885	64	1,262	3,113	1,227	823	419	264	360	8,417
102	*plus*	Assets commissioned	1,491	–	747	6,411	827	775	390	650	1,281	12,573
103	*less*	Asset disposals	–	–	–	–	–	–	–	–	40	40
104	*plus*	Lost and found assets adjustment	–	–	–	–	–	–	–	–	–	–
105	*plus*	Adjustment resulting from asset allocation	–	–	–	–	–	–	–	–	29	29
106	*plus*	Asset category transfers	–	–	–	–	–	–	–	–	–	–
107		**Total closing RAB value**	23,595	1,619	32,189	84,515	31,620	21,265	10,748	6,900	10,137	222,587
108												
109		**Asset Life**										
110		Weighted average remaining asset life	37.6	36.4	31.8	39.0	37.8	29.1	24.3	13.2	14.2	(years)
111		Weighted average expected total asset life	54.1	52.8	43.6	53.9	56.9	43.0	36.6	20.8	21.4	(years)

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8

sch ref

5a(i): Regulatory Tax Allowance

				($000)
	Regulatory profit / (loss) before tax			10,689
plus	Income not included in regulatory profit / (loss) before tax but taxable	–	*	
	Expenditure or loss in regulatory profit / (loss) before tax but not deductible	5	*	
	Amortisation of initial differences in asset values	1,901		
	Amortisation of revaluations	1,372		
				3,277
less	Total revaluations	8,417		
	Income included in regulatory profit / (loss) before tax but not taxable	–	*	
	Discretionary discounts and customer rebates	–		
	Expenditure or loss deductible but not in regulatory profit / (loss) before tax	–	*	
	Notional deductible interest	4,750		
				13,167
	Regulatory taxable income			799
less	Utilised tax losses	–		
	Regulatory net taxable income			799
	Corporate tax rate (%)	28%		
	Regulatory tax allowance			224

* Workings to be provided in Schedule 14

5a(ii): Disclosure of Permanent Differences

In Schedule 14, Box 5, provide descriptions and workings of items recorded in the asterisked categories in Schedule 5a(i).

5a(iii): Amortisation of Initial Difference in Asset Values

			($000)
	Opening unamortised initial differences in asset values	36,073	
less	Amortisation of initial differences in asset values	1,901	
plus	Adjustment for unamortised initial differences in assets acquired	–	
less	Adjustment for unamortised initial differences in assets disposed	–	
	Closing unamortised initial differences in asset values		34,172
	Opening weighted average remaining useful life of relevant assets (years)		19

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8

sch ref				
44	**5a(iv): Amortisation of Revaluations**			**($000)**
46		Opening sum of RAB values without revaluations	171,772	
48		Adjusted depreciation	6,467	
49		Total depreciation	7,840	
50		Amortisation of revaluations		1,372
52	**5a(v): Reconciliation of Tax Losses**			**($000)**
54		**Opening tax losses**		
55	*plus*	Current period tax losses		
56	*less*	Utilised tax losses		
57		**Closing tax losses**		–
58	**5a(vi): Calculation of Deferred Tax Balance**			**($000)**
60		**Opening deferred tax**	(14,444)	
62	*plus*	Tax effect of adjusted depreciation	1,811	
64	*less*	Tax effect of tax depreciation	5,350	
66	*plus*	Tax effect of other temporary differences*	(51)	
68	*less*	Tax effect of amortisation of initial differences in asset values	532	
70	*plus*	Deferred tax balance relating to assets acquired in the disclosure year	–	
72	*less*	Deferred tax balance relating to assets disposed in the disclosure year	139	
74	*plus*	Deferred tax cost allocation adjustment	80	
76		**Closing deferred tax**		(18,624)
78	**5a(vii): Disclosure of Temporary Differences**			
79		*In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Schedule 5a(vi) (Tax effect of other temporary differences).*		
81	**5a(viii): Regulatory Tax Asset Base Roll-Forward**			
82				**($000)**
83		**Opening sum of regulatory tax asset values**	78,285	
84	*less*	Tax depreciation	19,107	
85	*plus*	Regulatory tax asset value of assets commissioned	9,633	
86	*less*	Regulatory tax asset value of asset disposals	534	
87	*plus*	Lost and found assets adjustment	46	
88	*plus*	Adjustment resulting from asset allocation	315	
89	*plus*	Other adjustments to the RAB tax value	485	
90		**Closing sum of regulatory tax asset values**		69,123

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5b: REPORT ON RELATED PARTY TRANSACTIONS

This schedule provides information on the valuation of related party transactions, in accordance with clause 2.3.6 of this ID determination.
This information is part of audited disclosure information (as defined in clause 1.4 of this ID determination), and so is subject to the assurance report required by clause 2.8.

sch ref				
7	**5b(i): Summary—Related Party Transactions**	**($000)**	**($000)**	
8	**Total regulatory income**		3,493	
9				
10	**Market value of asset disposals**		–	
11				
12	Service interruptions and emergencies	2,945		
13	Vegetation management	1,829		
14	Routine and corrective maintenance and inspection	2,175		
15	Asset replacement and renewal (opex)	145		
16	**Network opex**		7,094	
17	Business support	2,465		
18	System operations and network support	1,339		
19	Non-network solutions provided by a related party or third party	–		*Not Required before DY2025*
20	**Operational expenditure**		10,898	
21	Consumer connection	30		
22	System growth	124		
23	Asset replacement and renewal (capex)	12,116		
24	Asset relocations	–		
25	Quality of supply	330		
26	Legislative and regulatory	230		
27	Other reliability, safety and environment	109		
28	**Expenditure on non-network assets**		233	
29	**Expenditure on assets**		13,172	
30	Cost of financing			
31	Value of capital contributions			
32	Value of vested assets			
33	**Capital Expenditure**		13,172	
34	**Total expenditure**		24,071	
35				
36	**Other related party transactions**			

37 5b(iii): Total Opex and Capex Related Party Transactions

sch ref	Name of related party	Nature of opex or capex service provided	Total value of transactions ($000)
39	First Gas Limited	Business support	2,428
	Directors	Business support	37
40	Gas Services NZ Midco Limited	Service interruptions and emergencies	2,945
41	Gas Services NZ Midco Limited	Vegetation management	1,829
42	Gas Services NZ Midco Limited	Routine and corrective maintenance and inspection	2,175
43	Gas Services NZ Midco Limited	Asset replacement and renewal (opex)	145
44	Gas Services NZ Midco Limited	System operations and network support	1,339
45	Gas Services NZ Midco Limited	Consumer connection	30
46	Gas Services NZ Midco Limited	System growth	124
47	Gas Services NZ Midco Limited	Asset replacement and renewal (capex)	12,116
48	Gas Services NZ Midco Limited	Asset relocations	–
49	Gas Services NZ Midco Limited	Quality of supply	330
50	Gas Services NZ Midco Limited	Legislative and regulatory	230
51	Gas Services NZ Midco Limited	Other reliability, safety and environment	109
52	Gas Services NZ Midco Limited	Expenditure on non-network assets	233
54	**Total value of related party transactions**		24,071

55 ** include additional rows if needed*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5c: REPORT ON TERM CREDIT SPREAD DIFFERENTIAL ALLOWANCE

This schedule is only to be completed if, as at the date of the most recently published financial statements, the weighted average original tenor of the debt portfolio (both qualifying debt and non-qualifying debt) is greater than five years.
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5c(i): Qualifying Debt (may be Commission only)

Issuing party	Issue date	Pricing date	Original tenor (in years)	Coupon rate (%)	Book value at issue date (NZD)	Book value at date of financial statements (NZD)	Term Credit Spread Difference	Debt issue cost readjustment
** include additional rows if needed*						–	–	–

5c(ii): Attribution of Term Credit Spread Differential

Gross term credit spread differential		–
Total book value of interest bearing debt		
Leverage	42%	
Average opening and closing RAB values		
Attribution Rate (%)		–
Term credit spread differential allowance		–

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5d: REPORT ON COST ALLOCATIONS

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

sch ref

7	**5d(i): Operating Cost Allocations**					
8			**Value allocated ($000s)**			
9		**Arm's length deduction**	**Electricity distribution services**	**Non-electricity distribution services**	**Total**	**OVABAA allocation increase ($000s)**
10	**Service interruptions and emergencies**					
11	Directly attributable		2,945			
12	Not directly attributable				–	
13	**Total attributable to regulated service**		2,945			
14	**Vegetation management**					
15	Directly attributable		1,829			
16	Not directly attributable				–	
17	**Total attributable to regulated service**		1,829			
18	**Routine and corrective maintenance and inspection**					
19	Directly attributable		2,175			
20	Not directly attributable				–	
21	**Total attributable to regulated service**		2,175			
22	**Asset replacement and renewal**					
23	Directly attributable		526			
24	Not directly attributable				–	
25	**Total attributable to regulated service**		526			
26	**Non-network solutions provided by a related party or third party** *Not required before DY2025*					
27	Directly attributable					
28	Not directly attributable				–	
29	**Total attributable to regulated service**		–			
30	**System operations and network support**					
31	Directly attributable		2,792			
32	Not directly attributable				–	
33	**Total attributable to regulated service**		2,792			
34	**Business support**					
35	Directly attributable		4,676			
36	Not directly attributable				–	
37	**Total attributable to regulated service**		4,676			
38						
39	**Operating costs directly attributable**		14,942			
40	**Operating costs not directly attributable**	–	–	–	–	–
41	**Operational expenditure**		14,942			
42						

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5d: REPORT ON COST ALLOCATIONS

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

sch ref

5d(ii): Other Cost Allocations

Pass through and recoverable costs	($000)
Pass through costs	
Directly attributable	441
Not directly attributable	
Total attributable to regulated service	441
Recoverable costs	
Directly attributable	4,490
Not directly attributable	
Total attributable to regulated service	4,490

5d(iii): Changes in Cost Allocations* †

Change in cost allocation 1			CY-1 ($000)	Current Year (CY) ($000)
Cost category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

Change in cost allocation 2			CY-1 ($000)	Current Year (CY) ($000)
Cost category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

Change in cost allocation 3			CY-1 ($000)	Current Year (CY) ($000)
Cost category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

** a change in cost allocation must be completed for each cost allocator change that has occurred in the disclosure year. A movement in an allocator metric is not a change in allocator or component.*
† include additional rows if needed

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 5e: REPORT ON ASSET ALLOCATIONS

This schedule requires information on the allocation of asset values. This information supports the calculation of the RAB value in Schedule 4.
EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any changes in asset allocations. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5e(i): Regulated Service Asset Values

	Value allocated ($000s) Electricity distribution services
Subtransmission lines	
Directly attributable	23,595
Not directly attributable	
Total attributable to regulated service	23,595
Subtransmission cables	
Directly attributable	1,619
Not directly attributable	
Total attributable to regulated service	1,619
Zone substations	
Directly attributable	32,189
Not directly attributable	
Total attributable to regulated service	32,189
Distribution and LV lines	
Directly attributable	84,515
Not directly attributable	
Total attributable to regulated service	84,515
Distribution and LV cables	
Directly attributable	31,620
Not directly attributable	
Total attributable to regulated service	31,620
Distribution substations and transformers	
Directly attributable	21,265
Not directly attributable	
Total attributable to regulated service	21,265
Distribution switchgear	
Directly attributable	10,748
Not directly attributable	
Total attributable to regulated service	10,748
Other network assets	
Directly attributable	6,900
Not directly attributable	
Total attributable to regulated service	6,900
Non-network assets	
Directly attributable	10,137
Not directly attributable	
Total attributable to regulated service	10,137
Regulated service asset value directly attributable	222,587
Regulated service asset value not directly attributable	–
Total closing RAB value	222,587

5e(ii): Changes in Asset Allocations* †

			($000)	
Change in asset value allocation 1			**CY-1**	**Current Year (CY)**
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

			($000)	
Change in asset value allocation 2			**CY-1**	**Current Year (CY)**
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

			($000)	
Change in asset value allocation 3			**CY-1**	**Current Year (CY)**
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

** a change in asset allocation must be completed for each allocator or component change that has occurred in the disclosure year. A movement in an allocator metric is not a change in allocator or compone*

† include additional rows if needed

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

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

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs.
EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates).
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref			($000)	($000)
7		**6a(i): Expenditure on Assets**		
8		Consumer connection		30
9		System growth		124
10		Asset replacement and renewal		12,384
11		Asset relocations		–
12		Reliability, safety and environment:		
13		Quality of supply	330	
14		Legislative and regulatory	230	
15		Other reliability, safety and environment	109	
16		**Total reliability, safety and environment**		669
17		**Expenditure on network assets**		13,206
18		Expenditure on non-network assets		1,010
19				
20		**Expenditure on assets**		14,217
21	*plus*	Cost of financing		
22	*less*	Value of capital contributions		106
23	*plus*	Value of vested assets		
24				
25		**Capital expenditure**		14,111

sch ref		($000)
26	**6a(ii): Subcomponents of Expenditure on Assets (where known)**	
27	Energy efficiency and demand side management, reduction of energy losses	
28	Overhead to underground conversion	487
29	Research and development	

sch ref			($000)	($000)
31		**6a(iii): Consumer Connection**		
32		*Consumer types defined by EDB**	($000)	($000)
33		Residential	30	
34		Commercial		
35		Industrial		
36				
37				
38		** include additional rows if needed*		
39		**Consumer connection expenditure**		30
40				
41	*less*	Capital contributions funding consumer connection expenditure		
42		**Consumer connection less capital contributions**		30

sch ref			System Growth ($000)	Asset Replacement and Renewal ($000)
43		**6a(iv): System Growth and Asset Replacement and Renewal**		
44				
45				
46		Subtransmission	25	2,012
47		Zone substations	–	750
48		Distribution and LV lines	99	7,558
49		Distribution and LV cables	–	397
50		Distribution substations and transformers	–	840
51		Distribution switchgear	–	268
52		Other network assets	–	559
53		**System growth and asset replacement and renewal expenditure**	124	12,384
54	*less*	Capital contributions funding system growth and asset replacement and renewal	106	
55		**System growth and asset replacement and renewal less capital contributions**	19	12,384
56				

sch ref			($000)	($000)
57		**6a(v): Asset Relocations**		
58		*Project or programme**	($000)	($000)
59		[Description of material project or programme]		
60		[Description of material project or programme]		
61		[Description of material project or programme]		
62		[Description of material project or programme]		
63		[Description of material project or programme]		
64		** include additional rows if needed*		
65		All other projects or programmes - asset relocations		
66		**Asset relocations expenditure**		–
67	*less*	Capital contributions funding asset relocations		
68		**Asset relocations less capital contributions**		–

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

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

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs.
EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates).
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref				
69				
70		**6a(vi): Quality of Supply**		
71		*Project or programme**	**($000)**	**($000)**
72		11kV Field Recloser Automation Plan - additions	83	
73		SCADA Rural Automation -development	47	
74		Comms Replace Voice DMR servers	1	
75		Generator purchase (350kVA Container)	66	
75		110kVa generator trailer and install	87	
76		Mahia Radiator Refurbishment	46	
77		** include additional rows if needed*		
78		All other projects programmes - quality of supply		
79		**Quality of supply expenditure**		330
80	*less*	Capital contributions funding quality of supply		
81		**Quality of supply less capital contributions**		330
82		**6a(vii): Legislative and Regulatory**		
83		*Project or programme**	**($000)**	**($000)**
84		AUFLS/ Protection Relay install	214	
85		SCADA Switching & Outage Management System	16	
89		** include additional rows if needed*		
90		All other projects or programmes - legislative and regulatory		
91		**Legislative and regulatory expenditure**		230
92	*less*	Capital contributions funding legislative and regulatory		
93		**Legislative and regulatory less capital contributions**		230
94		**6a(viii): Other Reliability, Safety and Environment**		
95		*Project or programme**	**($000)**	**($000)**
96		Replace Galv Meter Box (Asbestos)	3	
97		Replace11kV SWGR Tokomaru Bay	68	
98		Zone Substation Tolaga Bay, Puha Install Sepa Units	38	
101		** include additional rows if needed*		
102		All other projects or programmes - other reliability, safety and environment		
103		**Other reliability, safety and environment expenditure**		109
104	*less*	Capital contributions funding other reliability, safety and environment		
105		**Other reliability, safety and environment less capital contributions**		109
106				
107		**6a(ix): Non-Network Assets**		
108		**Routine expenditure**		
109		*Project or programme**	**($000)**	**($000)**
110		Vehicle Replacement	103	
111		General asset replacement (Ntk)	1	
112		General building capex (FNL office, Eastech, Wairoa Depot)	122	
113		Property Capital Projects Wairoa office rebuild	7	
114		Transition Software Setup	777	
115		** include additional rows if needed*		
116		All other projects or programmes - routine expenditure		
117		**Routine expenditure**		1,010
118		**Atypical expenditure**		
119		*Project or programme**	**($000)**	**($000)**
120		[Description of material project or programme]		
121		[Description of material project or programme]		
122		[Description of material project or programme]		
123		[Description of material project or programme]		
124		[Description of material project or programme]		
125		** include additional rows if needed*		
126		All other projects or programmes - atypical expenditure		
127		**Atypical expenditure**		–
128				
129		**Expenditure on non-network assets**		1,010

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

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

This schedule requires a breakdown of operational expenditure incurred in the disclosure year.
EDBs must provide explanatory comment on their operational expenditure in Schedule 14 (Explanatory notes to templates). This includes explanatory comment on any atypical operational expenditure and assets replaced or renewed as part of asset replacement and renewal operational expenditure, and additional information on insurance.
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref				
7	**6b(i): Operational Expenditure** *Required for DY2024 and DY2025 only*		**($000)**	**($000)**
8	Service interruptions and emergencies		2,945	
9	Vegetation management		1,829	
10	Routine and corrective maintenance and inspection		2,175	
11	Asset replacement and renewal		526	
12	**Network opex**			7,475
13	Non-network solutions provided by a related party or third party	*Required for DY2025 only*		
14	System operations and network support		2,792	
15	Business support		4,676	
16	**Non-network opex**			7,468
17				
18	**Operational expenditure**			14,942
19	**6b(i): Operational Expenditure** *Not Required before DY2026*		**($000)**	**($000)**
20	Service interruptions and emergencies:			
21	Vegetation-related			
22	Other			
23	**Total service interruptions and emergencies**		–	
24	Vegetation management:			
25	Assessment and notification costs			
26	Felling or trimming vegetation - in-zone			
27	Felling or trimming vegetation - out-of-zone			
28	Other			
29	**Total vegetation management**		–	
30				
31	Routine and corrective maintenance and inspection:			

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

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

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

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

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

sch ref			
32	Asset replacement and renewal		
33	**Network opex**		–
34	Non-network solutions provided by a related party or third party		
35	System operations and network support		
36	Business support		
37	**Non-network opex**		–
38			
39	**Operational expenditure**		–
40	**6b(ii): Subcomponents of Operational Expenditure (where known)**		
41	Energy efficiency and demand side management, reduction of energy losses		
42	Direct billing*		
43	Research and development		
44	Insurance		366
45	** Direct billing expenditure by suppliers that directly bill the majority of their consumers*		

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 7: COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE

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

sch ref

		Target ($000) [1]	Actual ($000)	% variance
7	**7(i): Revenue**			
8	Line charge revenue	29,928	29,690	(1%)

		Forecast ($000) [2]	Actual ($000)	% variance
9	**7(ii): Expenditure on Assets**			
10	Consumer connection	141	30	(79%)
11	System growth	1,274	124	(90%)
12	Asset replacement and renewal	12,594	12,384	(2%)
13	Asset relocations	51	–	(100%)
14	Reliability, safety and environment:			
15	Quality of supply	203	330	63%
16	Legislative and regulatory	184	230	25%
17	Other reliability, safety and environment	191	109	(43%)
18	**Total reliability, safety and environment**	578	669	16%
19	**Expenditure on network assets**	14,638	13,207	(10%)
20	Expenditure on non-network assets	311	1,010	225%
21	Expenditure on assets	14,949	14,217	(5%)
22	**7(iii): Operational Expenditure**			
23	Service interruptions and emergencies	2,615	2,945	13%
24	Vegetation management	1,636	1,829	12%
25	Routine and corrective maintenance and inspection	3,059	2,175	(29%)
26	Asset replacement and renewal	859	526	(39%)
27	**Network opex**	8,169	7,475	(8%)
28	Non-network solutions provided by a related party or third party *Not Required before DY2025*	–	–	–
29	System operations and network support	2,264	2,792	23%
30	Business support	4,000	4,676	17%
31	**Non-network opex**	6,264	7,468	19%
32	**Operational expenditure**	14,433	14,942	4%
33	**7(iv): Subcomponents of Expenditure on Assets (where known)**			
34	Energy efficiency and demand side management, reduction of energy losses	–	–	–
35	Overhead to underground conversion	–	487	–
36	Research and development	–	–	–
37				
38	**7(v): Subcomponents of Operational Expenditure (where known)**			
39	Energy efficiency and demand side management, reduction of energy losses	–	–	–
40	Direct billing	–	–	–
41	Research and development	–	–	–
42	Insurance	–	366	–
43				

44 *1 From the nominal dollar target revenue for the disclosure year disclosed under clause 2.4.3(3) of this determination*

45 *2 From the CY+1 nominal dollar expenditure forecasts disclosed in accordance with clause 2.6.6 for the forecast period starting at the beginning of the disclosure year (the second to last disclosure of Schedules 11a and 11b)*

SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs.
EDBs should feel free to adjust the page break of this schedule to assist with readibility if needed.

sch ref

8 **8(i): Billed Quantities by Price Component**

11 **Billed quantities by price component** *Not Required after DY2024*

sch ref	Consumer group name or price category code	Standardised connection types	Standard or non-standard consumer group (specify)	Average no. of ICPs in disclosure year	Energy delivered to ICPs in disclosure year (MWh)	Fixed Component Only	Variable Uncontrolled	Variable Controlled	Variable Evening Peak (TOU)	Variable Morning Peak	Variable Off Peak	Variable Night (TOU)
12					Price component	Fixed Component Only	Variable Uncontrolled	Variable Controlled	Variable Evening Peak (TOU)	Variable Morning Peak	Variable Off Peak	Variable Night (TOU)
13					Unit charging basis (eg, days, kW of demand, kVA of capacity, etc.)	$ per day	$ per kWh	$ per kWh	$ per kWh	$ per kWh	$ per kWh	$ per kWh
15	DOMLFC	Domestic	Standard	12,226	63,261	4,474,823	24,181,030	13,196,977	–	8,441,390	17,442,082	–
16	DOMSTD	Domestic	Standard	8,181	70,659	2,994,141	26,906,958	14,002,003	–	9,193,139	20,557,247	–
17	COM0050	Non-Domestic, Commercial	Standard	4,632	39,263	1,695,141	26,657,353	2,214,471	–	3,075,202	7,315,483	–
18	COM0100	Non-Domestic, Commercial	Standard	432	22,743	157,928	16,067,565	307,559	–	1,766,153	4,601,354	–
19	COM0300	Non-Domestic, Commercial	Standard	121	20,574	44,408	9,997,146	–	1,671,990	2,819,173	3,516,720	2,568,850
20	COM0500	Non-Domestic, Commercial	Standard	23	10,743	8,509	–	–	1,665,179	2,692,676	3,354,282	3,030,962
21	COM1000	Non-Domestic, Commercial	Standard	24	33,382	8,784	–	–	5,431,932	8,037,023	10,448,701	9,464,731
22	COM4500	Non-Domestic, Industrial	Standard	3	26,134	1,098	–	–	4,325,841	5,979,640	8,001,135	7,827,732
23	COM6500	Non-Domestic, Industrial	Standard	1	4,486	366	–	–	530,215	1,372,254	1,496,682	1,087,167
	GEN1000	Security - Gensets	Standard	5	–	–	–	–	–	–	–	–
	GEN4500	Generation - Matawai Hydro	Standard	1	–	366	–	–	–	–	–	–
	GEN6500	Generation - Waihi Hydro	Standard	1	121	366	120,822	–	–	–	–	–
	GENCN01	Generation - Te Ihi	Standard	0	10	152	9,519	–	–	–	–	–
	OTH0003	Non-Domestic, Commercial	Standard	79	206	29,067	205,895	–	–	–	–	–
	DUML	Unmetered	Standard	173	1,476	1,933,116	1,475,719	–	–	–	–	–
24	STLGM	Metered	Standard	32	33	88,938	32,810	–	–	–	–	–
25	*Add extra rows for additional consumer groups or price category codes as necessary*											
26			**Standard consumer totals**	25,934	293,091	11,437,203	105,654,819	29,721,010	13,625,157	43,376,651		23,979,442
27			**Non-standard consumer totals**	–	–	–	–	–	–	–		–
28			**Total for all consumers**	25,934	293,091	11,437,203	105,654,819	29,721,010	13,625,157	43,376,651		23,979,442

SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs.
EDBs should feel free to adjust the page break of this schedule to assist with readibility if needed.

31 ### 8(ii): Line Charge Revenues ($000) by Price Component

32
33

Row	Consumer group name or price category code	Standardised connection types	Standard or non-standard consumer group (specify)	Total line charge revenue in disclosure year	Total distribution line charge revenue	Total transmission line charge revenue
37					*Not Required after DY2024*	*Not Required after DY2024*
38	DOMLFC	Domestic	Standard	$8,878	7,694	1,185
39	DOMSTD	Domestic	Standard	$8,651	7,598	1,053
40	COM0050	Non-Domestic, Commercial	Standard	$5,229	4,658	571
41	COM0100	Non-Domestic, Commercial	Standard	$2,440	1,999	440
42	COM0300	Non-Domestic, Commercial	Standard	$1,473	993	479
43	COM0500	Non-Domestic, Commercial	Standard	$515	364	151
44	COM1000	Non-Domestic, Commercial	Standard	$1,203	842	361
45	COM4500	Non-Domestic, Industrial	Standard	$735	640	95
	COM6500	Non-Domestic, Industrial	Standard	$214	168	46
	GEN1000	Security - Gensets	Standard	–	–	–
	GEN4500	Generation - Matawai Hydro	Standard	$23	23	–
	GEN6500	Generation - Waihi Hydro	Standard	$44	44	–
	GENCN01	Generation - Te Ihi	Standard	$4	4	–
	OTH0003	Non-Domestic, Commercial	Standard	$37	33	4
46	DUML	Unmetered	Standard	$234	190	45
47	STLGM	Metered	Standard	$9	7	1
48	*Add extra rows for additional consumer groups or price category codes as necessary*					
49			**Standard consumer totals**	$29,690	$25,259	$4,431
50			**Non-standard consumer totals**	–	–	–
51			**Total for all consumers**	$29,690	$25,259	$4,431

Line charge revenues ($000) by price componen *Not Required after DY2024*

Row	Consumer group name or price category code	Fixed Component Only	Variable Uncontrolled	Variable Controlled	Variable Evening Peak (TOU)	Variable Morning Peak	Variable Off Peak	Variable Night (TOU)
35	**Price component**	Fixed Component Only	Variable Uncontrolled	Variable Controlled	Variable Evening Peak (TOU)	Variable Morning Peak	Variable Off Peak	Variable Night (TOU)
36	**Rate (eg, $ per day, $ per kWh, etc.)**	$ per day	$ per kWh	$ per kWh	$ per kWh	$ per kWh	$ per kWh	$ per kWh
38	DOMLFC	$2,014	$2,694	$1,292	–	$1,340	$1,539	–
39	DOMSTD	$5,956	$1,147	$321	–	$651	$577	–
40	COM0050	$3,910	$919	$46	–	$181	$173	–
41	COM0100	$1,381	$750	$9	–	$146	$153	–
42	COM0300	$762	$411	–	$63	$99	$98	$40
43	COM0500	$341	–	–	$37	$55	$55	$28
44	COM1000	$692	–	–	$113	$156	$161	$81
45	COM4500	$240	–	–	$112	$145	$155	$83
	COM6500	$103	–	–	$17	$42	$37	$15
	GEN1000	–	–	–	–	–	–	–
	GEN4500	$23	–	–	–	–	–	–
	GEN6500	$41	$4	–	–	–	–	–
	GENCN01	$3	$0	–	–	–	–	–
	OTH0003	$15	$22	–	–	–	–	–
46	DUML	$131	$103	–	–	–	–	–
47	STLGM	$6	$3	–	–	–	–	–
49	Standard consumer totals	$15,619	$6,052	$1,668	$342	$2,816	$2,947	$247
50	Non-standard consumer totals	–	–	–	–	–	–	–
51	Total for all consumers	$15,619	$6,052	$1,668	$342	$2,816	$2,947	$247

52

53 ### 8(iii): Number of ICPs directly billed

Check OK

54 **Number of directly billed ICPs at year end**

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**ALL**

SCHEDULE 9a: ASSET REGISTER

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

sch ref

9a: Asset Register

sch ref	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
9	All	Overhead Line	Concrete poles / steel structure	No.	18,122	18,530	408	2
10	All	Overhead Line	Wood poles	No.	17,016	16,542	(474)	2
11	All	Overhead Line	Other pole types	No.	–	–	–	N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	336	336	(0)	2
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	307	302	(5)	2
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	1	2	1	2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	–	–	–	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	–	–	–	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	–	–	–	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	–	–	–	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	–	–	–	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	–	–	–	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	–	–	–	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	–	–	–	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	19	19	–	2
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	11	11	–	2
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	N/A
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	45	47	2	2
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	N/A
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	2	2	–	2
29	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	N/A
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	N/A
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	1	1	–	2
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	112	108	(4)	2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	7	13	6	2
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	36	35	(1)	2
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	2,387	2,370	(17)	2
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	N/A
37	HV	Distribution Line	SWER conductor	km	1	1	(0)	2
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	40	48	8	2
39	HV	Distribution Cable	Distribution UG PILC	km	101	108	7	2
40	HV	Distribution Cable	Distribution Submarine Cable	km	1	–	(1)	2
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	44	44	–	2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	15	15	–	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	4,413	4,473	60	2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	79	76	(3)	2
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	287	280	(7)	2
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	3,056	3,092	36	2
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	656	583	(73)	2
48	HV	Distribution Transformer	Voltage regulators	No.	9	10	1	2
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	–	N/A
50	LV	LV Line	LV OH Conductor	km	505	515	10	2
51	LV	LV Cable	LV UG Cable	km	277	295	18	2
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	8	13	5	2
53	LV	Connections	OH/UG consumer service connections	No.	26,300	26,804	504	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	191	240	49	2
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	1,129	1,236	107	2
56	All	Capacitor Banks	Capacitors including controls	No	1	1	–	3
57	All	Load Control	Centralised plant	Lot	8	8	–	2
58	All	Load Control	Relays	No	17,013	16,157	(856)	1
59	All	Civils	Cable Tunnels	km	–	–	–	N/A

Company Name	Firstlight Network Limited
For Year Ended	31 March 2024
Network / Sub-network Name	GIS

SCHEDULE 9a: ASSET REGISTER

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

sch ref

9a: Asset Register

8	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
9	All	Overhead Line	Concrete poles / steel structure	No.	14,441	14,717	276	2
10	All	Overhead Line	Wood poles	No.	13,323	13,012	(311)	2
11	All	Overhead Line	Other pole types	No.	–	–	–	N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	269	269	0	2
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	180	178	(2)	2
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	1	1	0	2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	–	–	–	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	–	–	–	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	–	–	–	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	–	–	–	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	–	–	–	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	–	–	–	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	–	–	–	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	–	–	–	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	17	17	–	2
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	5	5	–	2
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	N/A
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	42	43	1	2
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	N/A
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	–	–	–	2
29	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	N/A
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	N/A
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	–	–	–	2
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	86	82	(4)	2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	5	12	7	2
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	24	21	(3)	2
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	1,706	1,692	(14)	2
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	N/A
37	HV	Distribution Line	SWER conductor	km	–	–	–	2
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	35	42	7	2
39	HV	Distribution Cable	Distribution UG PILC	km	86	91	5	2
40	HV	Distribution Cable	Distribution Submarine Cable	km	1	–	(1)	2
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	30	29	(1)	2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	15	13	(2)	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	3,328	3,364	36	2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	63	60	(3)	2
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	246	240	(6)	2
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	2,267	2,297	30	2
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	470	477	7	2
48	HV	Distribution Transformer	Voltage regulators	No.	6	8	2	2
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	–	N/A
50	LV	LV Line	LV OH Conductor	km	371	383	12	2
51	LV	LV Cable	LV UG Cable	km	224	240	16	2
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	8	13	5	2
53	LV	Connections	OH/UG consumer service connections	No.	21,329	21,819	490	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	152	198	46	2
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	969	1,074	105	2
56	All	Capacitor Banks	Capacitors including controls	No	1	1	–	3
57	All	Load Control	Centralised plant	Lot	5	5	–	2
58	All	Load Control	Relays	No	17,013	16,039	(974)	1
59	All	Civils	Cable Tunnels	km	–	–	–	N/A

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**WRA**

SCHEDULE 9a: ASSET REGISTER

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

sch ref

9a: Asset Register

8	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
9	All	Overhead Line	Concrete poles / steel structure	No.	3,681	3,813	132	2
10	All	Overhead Line	Wood poles	No.	3,693	3,530	(163)	2
11	All	Overhead Line	Other pole types	No.	–	–	–	N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	67	67	(0)	2
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	127	124	(3)	2
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	–	0	0	2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	–	–	–	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	–	–	–	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	–	–	–	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	–	–	–	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	–	–	–	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	–	–	–	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	–	–	–	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	–	–	–	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	2	–	(2)	2
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	6	–	(6)	2
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	2
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	3	4	1	2
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	2
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	2	2	–	2
29	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	2
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	2
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	1	1	–	2
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	26	26	–	2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	2	1	(1)	2
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	12	14	2	2
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	680	678	(2)	2
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	N/A
37	HV	Distribution Line	SWER conductor	km	1	1	(0)	2
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	5	5	0	2
39	HV	Distribution Cable	Distribution UG PILC	km	15	16	1	2
40	HV	Distribution Cable	Distribution Submarine Cable	km	–	–	–	N/A
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	14	15	1	2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	–	2	2	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	1,089	1,109	20	2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	16	16	–	2
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	41	40	(1)	2
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	789	795	6	2
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	95	106	11	2
48	HV	Distribution Transformer	Voltage regulators	No.	3	2	(1)	2
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	–	N/A
50	LV	LV Line	LV OH Conductor	km	134	132	(2)	2
51	LV	LV Cable	LV UG Cable	km	53	55	2	2
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	1	–	(1)	2
53	LV	Connections	OH/UG consumer service connections	No.	4,971	4,985	14	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	39	42	3	2
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	160	162	2	2
56	All	Capacitor Banks	Capacitors including controls	No	–	–	–	N/A
57	All	Load Control	Centralised plant	Lot	3	3	–	2
58	All	Load Control	Relays	No	118	118	–	N/A
59	All	Civils	Cable Tunnels	km	–	–	–	N/A

Company Name: **Firstlight Network Limited**
For Year Ended: **31 March 2024**
Network / Sub-network Name: **ALL**

SCHEDULE 9b: ASSET AGE PROFILE

This schedule requires a summary of the age profile (based on year of installation) of the assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

9b: Asset Age Profile

8 Disclosure Year (year ended)

Number of assets at disclosure year end by installation date

9	Voltage	Asset category	Asset class	Units	pre-1940	1940–1949	1950–1959	1960–1969	1970–1979	1980–1989	1990–1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	No. with age unknown	Items at end of year	No. with default dates	Data accuracy (1–4)
10	All	Overhead Line	Concrete poles / steel structure	No.	–	3	91	254	1,871	3,153	2,841	524	1,410	794	243	272	390	249	222	384	398	423	419	436	355	388	387	257	220	363	481	323	383	510	364	122	–	–	18,530		2
11	All	Overhead Line	Wood poles	No.	–	136	1,708	3,348	1,455	1,380	2,856	446	820	244	127	182	148	169	187	284	265	239	209	183	203	146	195	192	101	161	139	292	163	236	243	85	–	–	16,542		2
12	All	Overhead Line	Other pole types	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
13	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	–	–	72	115	71	37	6	7	4	3	11	–	5	4	0	0	–	–	–	–	0	–	0	0	–	0	–	–	–	–	0	0	–	–	336		2
14	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	0	17	84	59	111	30	–	0	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1	–	0	0	–	–	–	–	–	–	–	302		2
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	–	–	–	–	–	–	0	–	0	–	–	–	1	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0	–	0	–	–	–	2		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.	–	–	–	–	2	3	5	–	2	–	1	1	–	1	1	1	–	1	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	19		2
25	HV	Zone substation Buildings	Zone substations 110kV+	No.	–	–	–	–	–	7	2	–	–	–	–	–	–	–	–	–	–	1	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	11		2
26	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
27	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	–	–	1	–	–	4	1	5	2	2	–	3	5	4	6	2	–	2	2	2	–	–	–	3	–	–	3	–	–	–	–	–	–	–	47		2
28	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
29	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	–	–	–	–	–	–	–	–	2	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	2		2
30	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
31	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
32	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		2
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	–	–	–	–	17	26	5	9	–	9	10	–	–	7	–	4	–	–	–	–	4	–	8	–	–	1	5	–	–	–	3	–	–	–	108		2
34	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	–	–	1	1	1	–	1	–	–	1	–	1	–	1	6	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	13		2
35	HV	Zone Substation Transformer	Zone Substation Transformers	No.	–	1	8	2	1	4	4	3	2	–	1	1	–	2	1	–	–	–	–	–	–	–	–	–	–	4	–	1	–	–	–	–	–	–	35		2
36	HV	Distribution Line	Distribution OH Open Wire Conductor	km	62	81	502	862	346	194	167	11	7	11	4	8	8	6	9	2	1	4	3	2	4	2	7	3	6	6	5	2	11	13	14	5	–	–	2,370		2
37	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
38	HV	Distribution Line	SWER conductor	km	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		2
39	HV	Distribution Cable	Distribution UG XLPE or PVC	km	–	–	0	1	3	6	6	0	1	0	0	0	1	2	1	3	0	2	2	0	0	0	1	2	1	4	2	1	1	2	3	0	–	–	48		2
40	HV	Distribution Cable	Distribution UG PILC	km	–	–	1	8	12	28	23	3	5	4	2	1	2	3	3	1	2	1	1	0	0	0	0	1	4	0	0	–	–	–	1	–	–	–	108		2
41	HV	Distribution Cable	Distribution Submarine Cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	–	–	1	1	1	2	2	5	3	3	4	1	–	1	–	–	–	–	–	1	1	–	1	–	–	2	3	2	8	2	–	–	–	–	44		2
43	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	–	–	–	–	2	–	11	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	15		2
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	–	–	196	733	633	390	435	52	111	127	99	113	79	133	75	71	93	91	76	57	62	88	110	86	57	79	74	93	88	82	68	22	–	–	4,473		2
45	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	–	–	–	5	5	7	7	3	19	14	2	–	–	11	–	1	–	1	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	76		2
46	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	–	–	–	3	7	10	56	6	27	22	2	7	2	17	4	9	4	5	4	3	2	4	7	21	8	12	6	8	7	11	5	1	–	–	280		2
47	HV	Distribution Transformer	Pole Mounted Transformer	No.	–	–	76	538	413	306	312	26	91	51	79	70	115	58	56	50	55	66	42	53	58	64	57	40	47	59	46	76	47	69	48	24	–	–	3,092		2
48	HV	Distribution Transformer	Ground Mounted Transformer	No.	–	–	9	24	16	25	34	31	54	32	13	28	20	21	29	16	15	20	14	17	13	20	14	18	18	8	18	22	16	11	6	1	–	–	583		2
49	HV	Distribution Transformer	Voltage regulators	No.	–	–	–	3	–	3	–	–	1	–	–	1	–	–	–	–	–	–	–	–	2	–	–	–	–	–	–	–	–	–	–	–	–	–	10		2
50	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
51	LV	LV Line	LV OH Conductor	km	7	32	112	163	68	55	52	2	8	5	1	2	0	1	1	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	–	–	–	515		2
52	LV	LV Cable	LV UG Cable	km	0	0	3	21	44	66	40	8	17	15	9	5	5	4	7	6	5	2	3	3	3	1	3	2	3	3	5	2	2	4	2	1	–	–	295		2
53	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	–	–	1	1	0	4	4	0	1	0	–	0	–	0	0	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	13		2
54	LV	Connections	OH/UG consumer service connections	No.	45	522	1,953	5,005	4,829	4,845	3,848	292	317	313	351	318	272	349	359	287	214	184	230	157	173	158	186	145	156	170	175	169	279	259	205	39	–	–	26,804		2
55	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	–	–	–	–	–	10	11	10	24	2	22	7	5	10	9	1	–	–	2	–	23	4	–	25	7	12	4	11	6	2	4	29	–	–	240		2
56	All	SCADA and communications	SCADA and communications equipment operating as a single sys	Lot	–	–	–	1	–	26	115	61	58	41	103	50	63	26	21	24	20	19	35	23	40	155	126	23	36	44	15	36	25	12	29	9	–	–	1,236		2
57	All	Capacitor Banks	Capacitors including controls	No	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		3
58	All	Load Control	Centralised plant	Lot	–	–	–	–	5	2	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	8		2
59	All	Load Control	Relays	No	–	–	–	–	2,294	2,555	3,773	522	1,014	1,133	1,010	477	835	624	931	110	87	50	88	104	62	64	86	50	28	51	44	19	17	129	–	–	–	–	16,157		1
60	All	Civils	Cable Tunnels	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**GIS**

SCHEDULE 9b: ASSET AGE PROFILE

This schedule requires a summary of the age profile (based on year of installation) of the assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

9b: Asset Age Profile

8 **Disclosure Year (year ended)**

Number of assets at disclosure year end by installation date

sch ref	Voltage	Asset category	Asset class	Units	pre-1940	1940 –1949	1950 –1959	1960 –1969	1970 –1979	1980 –1989	1990 –1999	2000	2001	2002	2003	2004	2005	2006
9																		
10	All	Overhead Line	Concrete poles / steel structure	No.	–	3	30	161	1,594	2,314	2,663	380	1,037	590	159	192	321	195
11	All	Overhead Line	Wood poles	No.	–	57	1,181	3,007	1,138	1,119	2,305	190	575	188	85	124	95	98
12	All	Overhead Line	Other pole types	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
13	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	–	–	72	115	37	5	6	7	4	3	11	–	5	4
14	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	0	17	29	59	49	23	–	–	–	–	–	–	–	–
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	–	–	–	–	–	–	–	–	–	–	–	–	1	1
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
18	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
22	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
23	HV	Subtransmission Cable	Subtransmission submarine cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
24	HV	Zone substation Buildings	Zone substations up to 66kV	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
25	HV	Zone substation Buildings	Zone substations 110kV+	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
26	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
27	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	–	–	–	–	–	4	1	3	2	2	–	3	5	4
28	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
29	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
30	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
31	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
32	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	–	–	–	–	17	16	5	9	–	9	10	–	–	4
34	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	–	–	1	1	1	–	–	–	–	1	–	1	–	1
35	HV	Zone Substation Transformer	Zone Substation Transformers	No.	–	–	–	2	1	2	4	1	2	–	1	1	–	2
36	HV	Distribution Line	Distribution OH Open Wire Conductor	km	0	6	298	685	302	133	162	11	5	7	2	2	5	4
37	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
38	HV	Distribution Line	SWER conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
39	HV	Distribution Cable	Distribution UG XLPE or PVC	km	–	–	0	0	3	6	5	0	1	0	0	0	1	2
40	HV	Distribution Cable	Distribution UG PILC	km	–	–	1	8	9	21	21	3	5	4	2	1	2	1
41	HV	Distribution Cable	Distribution Submarine Cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	–	–	1	–	–	–	2	5	1	3	4	1	–	1
43	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	–	–	–	–	1	–	11	–	–	–	–	–	–	1
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	–	–	193	472	465	249	322	40	95	93	64	72	63	110
45	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	–	–	–	5	5	3	7	3	14	14	1	–	–	5
46	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	–	–	–	3	3	5	51	6	21	21	1	7	2	12
47	HV	Distribution Transformer	Pole Mounted Transformer	No.	–	–	76	304	304	218	238	20	80	43	53	47	75	47
48	HV	Distribution Transformer	Ground Mounted Transformer	No.	–	–	7	15	15	19	28	30	52	27	11	20	12	17
49	HV	Distribution Transformer	Voltage regulators	No.	–	–	–	3	–	3	–	–	–	–	–	1	–	–
50	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
51	LV	LV Line	LV OH Conductor	km	0	2	71	133	59	46	50	1	8	5	1	1	0	1
52	LV	LV Cable	LV UG Cable	km	–	–	1	17	33	49	33	7	17	14	8	5	4	3
53	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	–	–	1	1	0	4	4	0	1	0	–	0	–	0
54	LV	Connections	OH/UG consumer service connections	No.	45	522	1,878	3,530	3,990	4,000	3,348	256	255	183	79	204	229	311
55	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	–	–	–	–	–	–	11	8	17	2	21	7	3	10
56	All	SCADA and communications	SCADA and communications equipment operating as a single sys	Lot	–	–	–	1	–	24	100	55	33	32	84	47	33	21
57	All	Capacitor Banks	Capacitors including controls	No	–	–	–	–	–	–	1	–	–	–	–	–	–	–
58	All	Load Control	Centralised plant	Lot	–	–	–	–	5	–	–	–	–	–	–	–	–	–
59	All	Load Control	Relays	No	–	–	–	–	2,285	2,555	3,764	522	1,009	1,129	996	461	815	609
60	All	Civils	Cable Tunnels	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–

sch ref	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	No. with age unknown	Items at end of year	No. with default dates	Data accuracy (1–4)
10	192	327	347	409	409	429	327	364	342	224	109	175	293	217	225	338	244	107	–	–	14,717		2
11	127	265	173	228	189	157	161	130	178	184	62	82	110	207	145	185	195	72	–	–	13,012		2
12	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
13	0	0	–	–	–	–	0	–	0	0	–	0	–	–	–	–	0	0	–	–	269		2
14	–	–	–	–	–	–	–	–	–	1	–	0	–	–	–	–	–	–	–	–	178		2
15	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0	–	–	–	–	–	1		2
16	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
17	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
18	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
19	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
20	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
21	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
22	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
23	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
24	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
25	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
26	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
27	6	2	–	2	2	2	–	–	–	3	–	–	2	–	–	–	–	–	–	–	43		2
28	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
29	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
30	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
31	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
32	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
33	–	4	–	–	–	–	4	–	–	–	–	1	–	–	–	–	3	–	–	–	82		2
34	6	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	12		2
35	1	–	–	–	–	–	–	–	–	–	–	3	–	1	–	–	–	–	–	–	21		2
36	3	2	1	4	3	2	3	1	7	2	5	5	2	2	4	11	10	5	–	–	1,692		2
37	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
38	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
39	1	2	0	1	2	0	0	0	1	2	1	3	2	1	1	1	3	0	–	–	42		2
40	1	1	2	1	1	0	0	0	0	1	4	0	0	–	–	–	1	–	–	–	91		2
41	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
42	–	–	–	–	–	–	–	–	1	–	–	2	1	1	5	1	–	–	–	–	29		2
43	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	13		2
44	51	60	82	83	65	51	51	82	89	73	41	59	64	75	65	60	54	21	–	–	3,364		2
45	–	1	–	1	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	60		2
46	3	8	3	5	4	2	2	2	7	20	8	11	6	8	6	9	3	1	–	–	240		2
47	48	42	53	59	34	51	43	57	43	31	36	46	33	65	32	53	42	24	–	–	2,297		2
48	20	7	15	19	11	13	12	14	12	17	12	8	16	22	12	10	4	–	–	–	477		2
49	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	8		2
50	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
51	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	–	–	–	383		2
52	6	5	5	2	3	3	3	1	2	2	3	2	3	2	2	4	1	0	–	–	240		2
53	0	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	13		2
54	315	245	169	153	198	136	134	123	151	121	121	149	137	147	239	226	188	37	–	–	21,819		2
55	8	1	–	–	1	–	23	4	–	14	7	7	3	11	6	1	4	29	–	–	198		2
56	20	16	17	17	32	20	39	153	117	20	31	42	11	36	25	12	28	8	–	–	1,074		2
57	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		3
58	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	5		2
59	918	104	87	50	87	102	61	64	85	50	27	51	43	19	17	129	–	–	–	–	16,039		1
60	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**WRA**

SCHEDULE 9b: ASSET AGE PROFILE

This schedule requires a summary of the age profile (based on year of installation) of the assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

9b: Asset Age Profile

8 **Disclosure Year (year ended)**

Number of assets at disclosure year end by installation date

sch ref	Voltage	Asset category	Asset class	Units	pre-1940	1940–1949	1950–1959	1960–1969	1970–1979	1980–1989	1990–1999	2000	2001	2002	2003	2004	2005	2006
10	All	Overhead Line	Concrete poles / steel structure	No.	–	–	61	93	277	839	178	144	373	204	84	80	69	54
11	All	Overhead Line	Wood poles	No.	–	79	527	341	317	261	551	256	245	56	42	58	53	71
12	All	Overhead Line	Other pole types	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
13	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	–	–	–	–	34	32	–	–	0	–	–	–	–	–
14	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	–	0	55	–	62	7	–	0	–	–	–	–	–	–
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	–	–	–	–	–	–	0	–	0	–	–	–	–	–
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
18	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
22	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
23	HV	Subtransmission Cable	Subtransmission submarine cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
24	HV	Zone substation Buildings	Zone substations up to 66kV	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
25	HV	Zone substation Buildings	Zone substations 110kV+	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
26	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
27	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	–	–	1	–	–	–	–	2	–	–	–	–	–	–
28	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
29	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	–	–	–	–	–	–	–	–	2	–	–	–	–	–
30	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
31	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
32	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	1	–
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	–	–	–	–	–	10	–	–	–	–	–	–	–	3
34	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	–	–	–	–	–	–	1	–	–	–	–	–	–	–
35	HV	Zone Substation Transformer	Zone Substation Transformers	No.	–	1	8	–	–	2	–	2	–	–	–	–	–	–
36	HV	Distribution Line	Distribution OH Open Wire Conductor	km	62	76	204	178	44	61	5	–	2	3	2	6	3	2
37	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
38	HV	Distribution Line	SWER conductor	km	–	–	–	–	–	1	–	–	–	–	–	–	–	–
39	HV	Distribution Cable	Distribution UG XLPE or PVC	km	–	–	–	0	–	0	1	0	0	0	0	0	0	0
40	HV	Distribution Cable	Distribution UG PILC	km	–	–	–	0	3	7	2	0	0	0	0	0	0	2
41	HV	Distribution Cable	Distribution Submarine Cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionaliser:	No.	–	–	–	1	1	2	–	–	2	–	–	–	–	–
43	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	–	–	–	–	1	–	–	–	–	–	–	–	–	–
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	–	–	3	261	168	141	113	12	16	34	35	41	16	23
45	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	–	–	–	–	–	4	–	–	5	–	1	–	–	6
46	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	–	–	–	–	4	5	5	–	6	1	1	–	–	5
47	HV	Distribution Transformer	Pole Mounted Transformer	No.	–	–	–	234	109	88	74	6	11	8	26	23	40	11
48	HV	Distribution Transformer	Ground Mounted Transformer	No.	–	–	2	9	1	6	6	1	2	5	2	8	8	4
49	HV	Distribution Transformer	Voltage regulators	No.	–	–	–	–	–	–	–	–	1	–	–	–	–	–
50	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–
51	LV	LV Line	LV OH Conductor	km	7	30	41	30	9	9	2	1	0	0	0	1	0	0
52	LV	LV Cable	LV UG Cable	km	0	0	1	4	11	17	7	1	0	0	1	1	1	1
53	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–
54	LV	Connections	OH/UG consumer service connections	No.	–	–	75	1,475	839	845	500	36	62	130	272	114	43	38
55	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	–	–	–	–	–	10	–	2	7	–	1	–	2	–
56	All	SCADA and communications	SCADA and communications equipment operating as a single sys	Lot	–	–	–	–	–	2	15	6	25	9	19	3	30	5
57	All	Capacitor Banks	Capacitors including controls	No	–	–	–	–	–	–	–	–	–	–	–	–	–	–
58	All	Load Control	Centralised plant	Lot	–	–	–	–	–	2	–	–	–	–	–	–	–	–
59	All	Load Control	Relays	No	–	–	–	–	9	–	9	–	5	4	14	16	20	15
60	All	Civils	Cable Tunnels	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–

sch ref	Asset class	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	No. with age unknown	Items at end of year	No. with default dates	Data accuracy (1–4)
10	Concrete poles / steel structure	30	57	51	14	10	7	28	24	45	33	111	188	188	106	158	172	120	15	–	–	3,813		2
11	Wood poles	60	19	92	11	20	26	42	16	17	8	39	79	29	85	18	51	48	13	–	–	3,530		2
12	Other pole types	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
13	Subtransmission OH up to 66kV conductor	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0	–	–	–	67		2
14	Subtransmission OH 110kV+ conductor	–	–	–	–	–	–	–	–	–	–	–	–	0	–	–	–	–	–	–	–	124		2
15	Subtransmission UG up to 66kV (XLPE)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0	–	–	–	0		2
16	Subtransmission UG up to 66kV (Oil pressurised)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
17	Subtransmission UG up to 66kV (Gas pressurised)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
18	Subtransmission UG up to 66kV (PILC)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
19	Subtransmission UG 110kV+ (XLPE)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
20	Subtransmission UG 110kV+ (Oil pressurised)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
21	Subtransmission UG 110kV+ (Gas Pressurised)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
22	Subtransmission UG 110kV+ (PILC)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
23	Subtransmission submarine cable	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
24	Zone substations up to 66kV	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
25	Zone substations 110kV+	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
26	50/66/110kV CB (Indoor)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
27	50/66/110kV CB (Outdoor)	–	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	4		2
28	33kV Switch (Ground Mounted)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
29	33kV Switch (Pole Mounted)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	2		2
30	33kV RMU	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
31	22/33kV CB (Indoor)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
32	22/33kV CB (Outdoor)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		2
33	3.3/6.6/11/22kV CB (ground mounted)	–	–	–	–	–	–	–	–	8	–	–	–	5	–	–	–	–	–	–	–	26		2
34	3.3/6.6/11/22kV CB (pole mounted)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		2
35	Zone Substation Transformers	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	14		2
36	Distribution OH Open Wire Conductor	6	1	–	0	–	0	1	0	1	1	1	0	3	0	7	2	4	–	–	–	678		2
37	Distribution OH Aerial Cable Conductor	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
38	SWER conductor	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		2
39	Distribution UG XLPE or PVC	0	1	–	0	–	0	0	0	0	–	0	1	0	0	0	0	0	–	–	–	5		2
40	Distribution UG PILC	2	0	–	–	–	–	0	–	–	0	0	0	–	–	–	–	0	–	–	–	16		2
41	Distribution Submarine Cable	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
42	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionaliser:	–	–	–	–	–	1	1	–	–	–	–	–	2	1	3	1	–	–	–	–	15		2
43	3.3/6.6/11/22kV CB (Indoor)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	2		2
44	3.3/6.6/11/22kV Switches and fuses (pole mounted)	24	11	11	8	11	6	11	6	21	13	16	20	10	18	23	22	14	1	–	–	1,109		2
45	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	16		2
46	3.3/6.6/11/22kV RMU	1	1	1	–	–	1	–	2	–	1	–	1	–	–	1	2	2	–	–	–	40		2
47	Pole Mounted Transformer	8	8	2	7	8	2	15	7	14	9	11	13	13	11	15	16	6	–	–	–	795		2
48	Ground Mounted Transformer	9	9	–	1	3	4	1	6	2	1	6	–	2	–	4	1	2	1	–	–	106		2
49	Voltage regulators	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	2		2
50	Ground Mounted Substation Housing	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
51	LV OH Conductor	0	–	–	0	–	–	–	0	1	0	0	0	0	0	0	0	0	–	–	–	132		2
52	LV UG Cable	2	1	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	–	–	55		2
53	LV OH/UG Streetlight circuit	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		2
54	OH/UG consumer service connections	44	42	45	31	32	21	39	35	35	24	35	21	38	22	40	33	17	2	–	–	4,985		2
55	Protection relays (electromechanical, solid state and numeric)	1	–	–	–	1	–	–	–	–	11	–	5	1	–	–	1	–	–	–	–	42		2
56	SCADA and communications equipment operating as a single sys	1	8	3	2	3	3	1	2	9	3	5	2	4	–	–	–	1	1	–	–	162		2
57	Capacitors including controls	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
58	Centralised plant	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	3		2
59	Relays	13	6	–	–	1	2	1	–	1	–	1	–	1	–	–	–	–	–	–	–	118		2
60	Cable Tunnels	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**ALL**

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

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

sch ref

9 **9c: Overhead Lines and Underground Cables**

10

sch ref		Overhead (km)	Underground (km)	Total circuit length (km)	
11	**Circuit length by operating voltage (at year end)**				
12	> 66kV	302	–	302	
13	50kV & 66kV	301	1	303	
14	33kV	34	0	34	
15	SWER (all SWER voltages)	1	–	1	
16	22kV (other than SWER)	–	–	–	
17	6.6kV to 11kV (inclusive—other than SWER)	2,371	156	2,527	
18	Low voltage (< 1kV)	514	295	809	
19	**Total circuit length (for supply)**	3,524	452	3,976	
20					
21	Dedicated street lighting circuit length (km)	13	–	13	
22	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)				
23					
24	**Overhead circuit length by terrain (at year end)**	**Circuit length (km)**	**(% of total overhead length)**		
25	Urban	187	5%		
26	Rural	1,502	43%		
27	Remote only	305	9%		
28	Rugged only	1,174	33%		
29	Remote and rugged	345	10%		
30	Unallocated overhead lines	11	0%		
31	**Total overhead length**	3,524	100%		
32					
33		**Circuit length (km)**	**(% of total circuit length)**		
34	Length of circuit within 10km of coastline or geothermal areas (where known)	1,778	45%		
35					
36		**Circuit length (km)**	**(% of total overhead length)**		
37	Overhead circuit requiring vegetation management	3,524	100%	*Not required after DY2025*	
38		**Total newly identified throughout the disclosure year**	**Total remaining at high risk at the disclosure year-end**		
39	Number of overhead circuit sites at high risk from vegetation damage		–	*Not required before DY2026*	
40					

41 **Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end**

sch ref	Category of overhead circuit site	Number of overhead circuit sites at high risk from vegetation damage at disclosure year-end	Number of overhead circuit sites involving critical assets at disclosure year-end	
42				
43	[Single tree]			*Not required before DY2026*
44	[Single tree - Urban]			*Not required before DY2026*
45	[Single tree - Rural]			*Not required before DY2026*
46	[Row of trees]			*Not required before DY2026*
47	[Span between two poles (X metres)]			*Not required before DY2026*
48	[Other]			*Not required before DY2026*
49	**Total number of sites**	–	–	*Not required before DY2026*

50 ** Insert new rows in table above Total line as necessary*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**GIS**

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

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

sch ref

9 ## 9c: Overhead Lines and Underground Cables

sch ref		Overhead (km)	Underground (km)	Total circuit length (km)	
10					
11	**Circuit length by operating voltage (at year end)**				
12	> 66kV	178	–	178	
13	50kV & 66kV	269	1	271	
14	33kV	–	–	–	
15	SWER (all SWER voltages)	–	–	–	
16	22kV (other than SWER)	–	–	–	
17	6.6kV to 11kV (inclusive—other than SWER)	1,693	134	1,826	
18	Low voltage (< 1kV)	382	240	622	
19	**Total circuit length (for supply)**	2,522	375	2,897	
20					
21	Dedicated street lighting circuit length (km)	13	–	13	
22	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)				
23					

sch ref		Circuit length (km)	(% of total overhead length)	
24	**Overhead circuit length by terrain (at year end)**			
25	Urban	165	7%	
26	Rural	1,197	47%	
27	Remote only	253	10%	
28	Rugged only	750	30%	
29	Remote and rugged	147	6%	
30	Unallocated overhead lines	10	0%	
31	**Total overhead length**	2,522	100%	
32				

sch ref		Circuit length (km)	(% of total circuit length)	
33				
34	Length of circuit within 10km of coastline or geothermal areas (where known)	1,308	45%	
35				

sch ref		Circuit length (km)	(% of total overhead length)	
36				
37	Overhead circuit requiring vegetation management	2,522	100%	*Not required after DY2025*

sch ref		Total newly identified throughout the disclosure year	Total remaining at high risk at the disclosure year-end	
38				
39	Number of overhead circuit sites at high risk from vegetation damage		–	*Not required before DY2026*
40				

41 **Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end**

sch ref	Category of overhead circuit site	Number of overhead circuit sites at high risk from vegetation damage at disclosure year-end	Number of overhead circuit sites involving critical assets at disclosure year-end	
42				
43	[Single tree]			*Not required before DY2026*
44	[Single tree - Urban]			*Not required before DY2026*
45	[Single tree - Rural]			*Not required before DY2026*
46	[Row of trees]			*Not required before DY2026*
47	[Span between two poles (X metres)]			*Not required before DY2026*
48	[Other]			*Not required before DY2026*
49	**Total number of sites**	–	–	*Not required before DY2026*

50 ** Insert new rows in table above Total line as necessary*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**WRA**

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

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

sch ref

9 **9c: Overhead Lines and Underground Cables**

sch ref		Overhead (km)	Underground (km)	Total circuit length (km)
10				
11	**Circuit length by operating voltage (at year end)**			
12	> 66kV	124	–	124
13	50kV & 66kV	32	–	32
14	33kV	34	0	34
15	SWER (all SWER voltages)	1	–	1
16	22kV (other than SWER)	–	–	–
17	6.6kV to 11kV (inclusive—other than SWER)	679	22	701
18	Low voltage (< 1kV)	132	55	187
19	**Total circuit length (for supply)**	1,003	77	1,080
20				
21	Dedicated street lighting circuit length (km)	–	–	–
22	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)			
23				

sch ref		Circuit length (km)	(% of total overhead length)
24	**Overhead circuit length by terrain (at year end)**		
25	Urban	23	2%
26	Rural	305	30%
27	Remote only	52	5%
28	Rugged only	424	42%
29	Remote and rugged	198	20%
30	Unallocated overhead lines	1	0%
31	**Total overhead length**	1,003	100%
32			

sch ref		Circuit length (km)	(% of total circuit length)
33			
34	Length of circuit within 10km of coastline or geothermal areas (where known)	470	44%
35			

sch ref		Circuit length (km)	(% of total overhead length)	
36				
37	Overhead circuit requiring vegetation management	1,003	100%	*Not required after DY2025*

sch ref		Total newly identified throughout the disclosure year	Total remaining at high risk at the disclosure year-end	
38				
39	Number of overhead circuit sites at high risk from vegetation damage		–	*Not required before DY2026*
40				

41 **Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end**

sch ref	Category of overhead circuit site	Number of overhead circuit sites at high risk from vegetation damage at disclosure year-end	Number of overhead circuit sites involving critical assets at disclosure year-end	
42				
43	[Single tree]			*Not required before DY2026*
44	[Single tree - Urban]			*Not required before DY2026*
45	[Single tree - Rural]			*Not required before DY2026*
46	[Row of trees]			*Not required before DY2026*
47	[Span between two poles (X metres)]			*Not required before DY2026*
48	[Other]			*Not required before DY2026*
49	**Total number of sites**	–	–	*Not required before DY2026*

50 ** Insert new rows in table above Total line as necessary*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**

SCHEDULE 9d: REPORT ON EMBEDDED NETWORKS

This schedule requires information concerning embedded networks owned by an EDB that are embedded in another EDB’s network or in another embedded network.

sch ref	Location *	Average number of ICPs in disclosure year	Line charge revenue ($000)
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

26 ** Extend embedded distribution networks table as necessary to disclose each embedded network owned by the EDB which is embedded in another EDB’s network or in another embedded network*

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	

SCHEDULE 9e: REPORT ON NETWORK DEMAND

This schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new connections including distributed generation, peak demand and electricity volumes conveyed).

sch ref

8	**9e(i): Consumer Connections and Decommissionings**		
9	*Number of ICPs connected during year by consumer type*		
10	*Consumer types defined by EDB**	**Number of connections (ICPs)**	
11	Domestic/Residential	198	
12	Commercial	118	
13	Large Commercial	8	
14	Industrial	–	
15	GENCN01	1	
16	** include additional rows if needed*		
17	**Connections total**	325	
18			
19	*Number of ICPs decommissioned during year by consumer type*		
20	*Consumer types defined by EDB**	**Number of decommissionings**	
21	Domestic/Residential	41	
22	Commercial	32	
23	Large Commercial	2	
24	Industrial	–	
25	0	–	
26	** include additional rows if needed*		
27	**Decommissionings total**	75	
28			
29	**Distributed generation**		
30	Number of connections made in year	106	**connections**
31	Capacity of distributed generation installed in year	1	**MVA**
32			
33	**9e(ii): System Demand**		
34			
35			
36	**Maximum coincident system demand**	**Demand at time of maximum coincident demand (MW)**	
37	GXP demand	64	
38	*plus* Distributed generation output at HV and above	2	
39	**Maximum coincident system demand**	67	
40	*less* Net transfers to (from) other EDBs at HV and above	–	
41	**Demand on system for supply to consumers' connection points**	67	
42	**Electricity volumes carried**	**Energy (GWh)**	
43	Electricity supplied from GXPs	304	
44	*less* Electricity exports to GXPs	–	
45	*plus* Electricity supplied from distributed generation	16	
46	*less* Net electricity supplied to (from) other EDBs	–	
47	**Electricity entering system for supply to consumers' connection points**	321	
48	*less* Total energy delivered to ICPs	293	
49	**Electricity losses (loss ratio)**	27	8.6%
50			
51	**Load factor**	0.55	
52	**9e(iii): Transformer Capacity**		
53		**(MVA)**	
54	Distribution transformer capacity (EDB owned)	233	
55	Distribution transformer capacity (Non-EDB owned)	55	
56	**Total distribution transformer capacity**	288	
57			
58		**(MVA)**	
59	Zone substation transformer capacity (EDB owned)	337	
60	Zone substation transformer capacity (Non-EDB owned)	–	
61	**Total zone substation transformer capacity**	337	

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**Gisborne**

SCHEDULE 9e: REPORT ON NETWORK DEMAND

This schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new connections including distributed generation, peak demand and electricity volumes conveyed).

sch ref

9e(i): Consumer Connections and Decommissionings

Number of ICPs connected during year by consumer type

*Consumer types defined by EDB**	Number of connections (ICPs)
Domestic/Residential	187
Commercial	102
Large Commercial	6
Industrial	–
GENCN01	1
** include additional rows if needed*	
Connections total	296

Number of ICPs decommissioned during year by consumer type

*Consumer types defined by EDB**	Number of decommissionings
Domestic/Residential	33
Commercial	25
Large Commercial	2
Industrial	–
** include additional rows if needed*	
Decommissionings total	60

Distributed generation

Number of connections made in year	100	**connections**
Capacity of distributed generation installed in year	1	**MVA**

9e(ii): System Demand

		Demand at time of maximum coincident demand (MW)
	Maximum coincident system demand	
	GXP demand	56
plus	Distributed generation output at HV and above	1
	Maximum coincident system demand	57
less	Net transfers to (from) other EDBs at HV and above	–
	Demand on system for supply to consumers' connection points	57

		Energy (GWh)	
	Electricity volumes carried		
	Electricity supplied from GXPs	255	
less	Electricity exports to GXPs	–	
plus	Electricity supplied from distributed generation	3	
less	Net electricity supplied to (from) other EDBs	–	
	Electricity entering system for supply to consumers' connection points	258	
less	Total energy delivered to ICPs	236	
	Electricity losses (loss ratio)	21	8.2%
	Load factor	0.52	

9e(iii): Transformer Capacity

	(MVA)
Distribution transformer capacity (EDB owned)	188
Distribution transformer capacity (Non-EDB owned)	46
Total distribution transformer capacity	234

	(MVA)
Zone substation transformer capacity (EDB owned)	284
Zone substation transformer capacity (Non-EDB owned)	–
Total zone substation transformer capacity	284

Company Name	Firstlight Network Limited
For Year Ended	31 March 2024
Network / Sub-network Name	Wairoa

SCHEDULE 9e: REPORT ON NETWORK DEMAND

This schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new connections including distributed generation, peak demand and electricity volumes conveyed).

sch ref				
8	**9e(i): Consumer Connections and Decommissionings**			
9	*Number of ICPs connected during year by consumer type*			
10	*Consumer types defined by EDB**		**Number of connections (ICPs)**	
11	Domestic/Residential		11	
12	Commercial		16	
13	Large Commercial		2	
14	Industrial		–	
15				
16	** include additional rows if needed*			
17	**Connections total**		29	
18				
19	*Number of ICPs decommissioned during year by consumer type*			
20	*Consumer types defined by EDB**		**Number of decommissionings**	
21	Domestic/Residential		8	
22	Commercial		7	
23	Large Commercial		–	
24	Industrial		–	
25				
26	** include additional rows if needed*			
27	**Decommissionings total**		15	
28				
29	**Distributed generation**			
30	Number of connections made in year		6	**connections**
31	Capacity of distributed generation installed in year		0	**MVA**
32				
33	**9e(ii): System Demand**			
34				
35				
36	**Maximum coincident system demand**		**Demand at time of maximum coincident demand (MW)**	
37	GXP demand		7	
38	Distributed generation output at HV and above	*plus*	4	
39	**Maximum coincident system demand**		12	
40	Net transfers to (from) other EDBs at HV and above	*less*	–	
41	**Demand on system for supply to consumers' connection points**		12	
42	**Electricity volumes carried**		**Energy (GWh)**	
43	Electricity supplied from GXPs		50	
44	Electricity exports to GXPs	*less*	–	
45	Electricity supplied from distributed generation	*plus*	13	
46	Net electricity supplied to (from) other EDBs	*less*	–	
47	**Electricity entering system for supply to consumers' connection points**		63	
48	Total energy delivered to ICPs	*less*	58	
49	**Electricity losses (loss ratio)**		5	8.1%
50				
51	**Load factor**		0.62	
52	**9e(iii): Transformer Capacity**			
53			**(MVA)**	
54	Distribution transformer capacity (EDB owned)		44	
55	Distribution transformer capacity (Non-EDB owned)		10	
56	**Total distribution transformer capacity**		54	
57				
58			**(MVA)**	
59	Zone substation transformer capacity (EDB owned)		54	
60	Zone substation transformer capacity (Non-EDB owned)		–	
61	**Total zone substation transformer capacity**		54	

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**ALL**

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

sch ref

8 10(i): Interruptions

sch ref	Interruptions by class	Number of interruptions
10	Class A (planned interruptions by Transpower)	
11	Class B (planned interruptions on the network)	313
12	Class C (unplanned interruptions on the network)	724
13	Class D (unplanned interruptions by Transpower)	
14	Class E (unplanned interruptions of EDB owned generation)	
15	Class F (unplanned interruptions of generation owned by others)	
16	Class G (unplanned interruptions caused by another disclosing entity)	
17	Class H (planned interruptions caused by another disclosing entity)	
18	Class I (interruptions caused by parties not included above)	
19	**Total**	1,037
20		

sch ref	Interruption restoration	≤3Hrs	>3hrs
22	Class C interruptions restored within	385	339
23			

sch ref	SAIFI and SAIDI by class	SAIFI	SAIDI
25	Class A (planned interruptions by Transpower)		
26	Class B (planned interruptions on the network)	0.5111	122.1992
27	Class C (unplanned interruptions on the network)	3.8266	470.8738
28	Class D (unplanned interruptions by Transpower)		
29	Class E (unplanned interruptions of EDB owned generation)		
30	Class F (unplanned interruptions of generation owned by others)		
31	Class G (unplanned interruptions caused by another disclosing entity)		
32	Class H (planned interruptions caused by another disclosing entity)		
33	Class I (interruptions caused by parties not included above)		
34	**Total**	4.34	593.1
35			

sch ref	Normalised SAIFI and SAIDI	Normalised SAIFI	Normalised SAIDI	
37	Classes B & C (interruptions on the network)	3.6986	530.3128	*Not required after DY2024*
38				

sch ref	Transitional SAIFI and SAIDI (previous method)	SAIFI	SAIDI
40	Class B (planned interruptions on the network)	0.5111	122.1992
41	Class C (unplanned interruptions on the network)	3.4324	470.8738
42			

43 *Where EDBs do not currently record their SAIFI and SAIDI values using the 'multi-count' approach, they shall continue to record their SAIFI and SAIDI values on the same basis that they employed as at 31 March 2023 as 'Transitional SAIFI' and 'Transitional SAIDI' values, in addition to their SAIFI and SAIDI values (Classes B & C) using the 'multi-count approach'.* ***This is a transitional reporting requirement that shall be in place for the 2024, 2025, and 2026 disclosure years.***

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**ALL**

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

10(ii): Class C Interruptions and Duration by Cause

Cause	SAIFI	SAIDI	
Lightning	0.0952	10.6097	
Vegetation	0.5048	90.2287	
Adverse weather	0.2020	43.3596	
Adverse environment	0.1587	101.1427	
Third party interference	0.4874	29.7654	
Wildlife	0.2887	18.7691	
Human error	0.0964	2.4608	
Defective equipment	1.2945	124.2332	
Cause unknown	0.6989	50.3046	*Not required after DY2024*
Other cause	–	–	*Not required before DY2025*
Unknown	–	–	*Not required before DY2025*

Breakdown of third party interference	SAIFI	SAIDI
Dig-in	0.0002	0.0822
Overhead contact	0.0012	0.3025
Vandalism	–	–
Vehicle damage	0.1732	20.0262
Other	0.3128	9.3545

Breakdown of vegetation interruptions (vegetation cause)	SAIFI	SAIDI	
In-zone			*Not required before DY2026*
Out-of-zone			*Not required before DY2026*

10(iii): Class B Interruptions and Duration by Main Equipment Involved

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	0.0031	0.8244
Subtransmission cables	–	–
Subtransmission other	–	–
Distribution lines (excluding LV)	0.5073	121.1674
Distribution cables (excluding LV)	0.0007	0.2074
Distribution other (excluding LV)	–	–

10(iv): Class C Interruptions and Duration by Main Equipment Involved

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	1.3505	56.5137
Subtransmission cables	–	–
Subtransmission other	–	–
Distribution lines (excluding LV)	2.2775	391.3410
Distribution cables (excluding LV)	0.1986	23.0191
Distribution other (excluding LV)	–	–

10(v): Fault Rate

Main equipment involved	Number of Faults	Circuit length (km)	Fault rate (faults per 100km)
Subtransmission lines	17	638	2.66
Subtransmission cables	–	2	–
Subtransmission other	–		
Distribution lines (excluding LV)	693	2,371	29.23
Distribution cables (excluding LV)	14	156	8.99
Distribution other (excluding LV)	–		
Total	724		

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**Gisborne**

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

sch ref				
8	**10(i): Interruptions**			
9	**Interruptions by class**	**Number of interruptions**		
10	Class A (planned interruptions by Transpower)			
11	Class B (planned interruptions on the network)	246		
12	Class C (unplanned interruptions on the network)	565		
13	Class D (unplanned interruptions by Transpower)			
14	Class E (unplanned interruptions of EDB owned generation)			
15	Class F (unplanned interruptions of generation owned by others)			
16	Class G (unplanned interruptions caused by another disclosing entity)			
17	Class H (planned interruptions caused by another disclosing entity)			
18	Class I (interruptions caused by parties not included above)			
19	**Total**	811		
20				
21	**Interruption restoration**	**≤3Hrs**	**>3hrs**	
22	Class C interruptions restored within	288	277	
23				
24	**SAIFI and SAIDI by class**	**SAIFI**	**SAIDI**	
25	Class A (planned interruptions by Transpower)			
26	Class B (planned interruptions on the network)	0.3981	106.4287	
27	Class C (unplanned interruptions on the network)	3.2940	436.7998	
28	Class D (unplanned interruptions by Transpower)			
29	Class E (unplanned interruptions of EDB owned generation)			
30	Class F (unplanned interruptions of generation owned by others)			
31	Class G (unplanned interruptions caused by another disclosing entity)			
32	Class H (planned interruptions caused by another disclosing entity)			
33	Class I (interruptions caused by parties not included above)			
34	**Total**	3.6921	543.2285	
35				
36	**Normalised SAIFI and SAIDI**	**Normalised SAIFI**	**Normalised SAIDI**	
37	Classes B & C (interruptions on the network)	3.0616	459.9908	*Not required after DY2024*
38				
39	**Transitional SAIFI and SAIDI (previous method)**	**SAIFI**	**SAIDI**	
40	Class B (planned interruptions on the network)	0.3981	106.4287	
41	Class C (unplanned interruptions on the network)	3.0546	436.7998	
42				
43	*Where EDBs do not currently record their SAIFI and SAIDI values using the 'multi-count' approach, they shall continue to record their SAIFI and SAIDI values on the same basis that they employed as at 31 March 2023 as 'Transitional SAIFI' and 'Transitional SAIDI' values, in addition to their SAIFI and SAIDI values (Classes B & C) using the 'multi-count approach'.* ***This is a transitional reporting requirement that shall be in place for the 2024, 2025, and 2026 disclosure years.***			

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**Gisborne**

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

10(ii): Class C Interruptions and Duration by Cause

Cause	SAIFI	SAIDI	
Lightning	0.0828	9.6008	
Vegetation	0.4823	77.7832	
Adverse weather	0.1475	28.9007	
Adverse environment	0.1771	123.3547	
Third party interference	0.5380	28.2107	
Wildlife	0.3134	18.5087	
Human error	0.1127	2.5753	
Defective equipment	0.7796	93.8211	
Cause unknown	0.6606	54.0445	*Not required after DY2024*
Other cause	–	–	*Not required before DY2025*
Unknown	–	–	*Not required before DY2025*

Breakdown of third party interference	SAIFI	SAIDI
Dig-in	0.0002	0.1009
Overhead contact	0.0013	0.3442
Vandalism	–	–
Vehicle damage	0.1526	16.2868
Other	0.3839	11.4788

Breakdown of vegetation interruptions (vegetation cause)	SAIFI	SAIDI	
In-zone			*Not required before DY2026*
Out-of-zone			*Not required before DY2026*

10(iii): Class B Interruptions and Duration by Main Equipment Involved

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	0.0038	1.0116
Subtransmission cables	–	–
Subtransmission other	–	–
Distribution lines (excluding LV)	0.3942	105.4171
Distribution cables (excluding LV)	–	–
Distribution other (excluding LV)	–	–

10(iv): Class C Interruptions and Duration by Main Equipment Involved

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	1.1467	52.2592
Subtransmission cables	–	–
Subtransmission other	–	–
Distribution lines (excluding LV)	1.9459	360.2433
Distribution cables (excluding LV)	0.2014	24.2973
Distribution other (excluding LV)	–	–

10(v): Fault Rate

Main equipment involved	Number of Faults	Circuit length (km)	Fault rate (faults per 100km)
Subtransmission lines	11	447	2.46
Subtransmission cables	–	1	–
Subtransmission other	–		
Distribution lines (excluding LV)	544	1,692	32.14
Distribution cables (excluding LV)	10	134	7.47
Distribution other (excluding LV)	–		
Total	565		

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**Wairoa**

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

sch ref

8 10(i): Interruptions

sch ref	Interruptions by class	Number of interruptions
10	Class A (planned interruptions by Transpower)	
11	Class B (planned interruptions on the network)	67
12	Class C (unplanned interruptions on the network)	159
13	Class D (unplanned interruptions by Transpower)	
14	Class E (unplanned interruptions of EDB owned generation)	
15	Class F (unplanned interruptions of generation owned by others)	
16	Class G (unplanned interruptions caused by another disclosing entity)	
17	Class H (planned interruptions caused by another disclosing entity)	
18	Class I (interruptions caused by parties not included above)	
19	**Total**	226
20		

sch ref	Interruption restoration	≤3Hrs	>3hrs
22	Class C interruptions restored within	97	62
23			

sch ref	SAIFI and SAIDI by class	SAIFI	SAIDI
25	Class A (planned interruptions by Transpower)		
26	Class B (planned interruptions on the network)	1.0090	191.6458
27	Class C (unplanned interruptions on the network)	6.1720	620.9223
28	Class D (unplanned interruptions by Transpower)		
29	Class E (unplanned interruptions of EDB owned generation)		
30	Class F (unplanned interruptions of generation owned by others)		
31	Class G (unplanned interruptions caused by another disclosing entity)		
32	Class H (planned interruptions caused by another disclosing entity)		
33	Class I (interruptions caused by parties not included above)		
34	**Total**	7.1809	812.5682
35			

sch ref	Normalised SAIFI and SAIDI	Normalised SAIFI	Normalised SAIDI	
37	Classes B & C (interruptions on the network)	5.2494	663.1062	*Not required after DY2024*
38				

sch ref	Transitional SAIFI and SAIDI (previous method)	SAIFI	SAIDI
40	Class B (planned interruptions on the network)	1.0090	191.6458
41	Class C (unplanned interruptions on the network)	5.3977	620.9223
42			

43 *Where EDBs do not currently record their SAIFI and SAIDI values using the 'multi-count' approach, they shall continue to record their SAIFI and SAIDI values on the same basis that they employed as at 31 March 2023 as 'Transitional SAIFI' and 'Transitional SAIDI' values, in addition to their SAIFI and SAIDI values (Classes B & C) using the 'multi-count approach'.* ***This is a transitional reporting requirement that shall be in place for the 2024, 2025, and 2026 disclosure years.***

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	**Wairoa**

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

10(ii): Class C Interruptions and Duration by Cause

Cause	SAIFI	SAIDI	
Lightning	0.1499	15.0525	
Vegetation	0.6038	145.0335	
Adverse weather	0.4418	107.0308	
Adverse environment	0.0777	3.3300	
Third party interference	0.2646	36.6117	
Wildlife	0.1801	19.9161	
Human error	0.0248	1.9567	
Defective equipment	3.5617	258.1557	
Cause unknown	0.8676	33.8353	*Not required after DY2024*
Other cause	–	–	*Not required before DY2025*
Unknown	–	–	*Not required before DY2025*

Breakdown of third party interference	SAIFI	SAIDI
Dig-in	–	–
Overhead contact	0.0004	0.1187
Vandalism	–	–
Vehicle damage	0.2642	36.4930
Other	–	–

Breakdown of vegetation interruptions (vegetation cause)	SAIFI	SAIDI	
In-zone			*Not required before DY2026*
Out-of-zone			*Not required before DY2026*

10(iii): Class B Interruptions and Duration by Main Equipment Involved

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	–	–
Subtransmission cables	–	–
Subtransmission other	–	–
Distribution lines (excluding LV)	1.0052	190.5253
Distribution cables (excluding LV)	0.0037	1.1205
Distribution other (excluding LV)	–	–

10(iv): Class C Interruptions and Duration by Main Equipment Involved

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	2.2482	75.2488
Subtransmission cables	–	–
Subtransmission other	–	–
Distribution lines (excluding LV)	3.7375	528.2829
Distribution cables (excluding LV)	0.1863	17.3906
Distribution other (excluding LV)	–	–

10(v): Fault Rate

Main equipment involved	Number of Faults	Circuit length (km)	Fault rate (faults per 100km)
Subtransmission lines	6	190	3.15
Subtransmission cables	–	0	–
Subtransmission other	–		
Distribution lines (excluding LV)	149	678	21.97
Distribution cables (excluding LV)	4	22	18.29
Distribution other (excluding LV)	–		
Total	159		

Company Name	**Firstlight Network Limited**
For Year Ended	**31 March 2024**
Network / Sub-network Name	

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

sch ref

10(vi): Worst-performing feeders (unplanned)

Not required before DY2025

SAIDI

Rank	Feeder name	Unplanned SAIDI values	Number of Unplanned Interruptions	Most Common Cause of Unplanned Interruptions	Circuit Length of Feeder	Number of ICPs	% of Feeder Overhead (optional)
1							
2							
3							
4							

[1] *Extend table as necessary to disclose all worst-performing feeders*

SAIFI

Rank	Feeder name	Unplanned SAIFI values	Number of Unplanned Interruptions	Most Common Cause of Unplanned Interruptions	Circuit Length of Feeder	Number of ICPs	% of Feeder Overhead (optional)
1							
2							
3							
4							

[1] *Extend table as necessary to disclose all worst-performing feeders*

Customer Impact

Rank	Feeder name	Customer Impact Ratio	Number of Unplanned Interruptions	Most Common Cause of Unplanned Interruptions	Circuit Length of Feeder	Number of ICPs	% of Feeder Overhead (optional)
1							
2							
3							
4							

[1] *Extend table as necessary to disclose all worst-performing feeders*

Appendix A - Information Disclosure for Related Parties

Assessment Period

1 April 2023 – 31 March 2024

1. Introduction

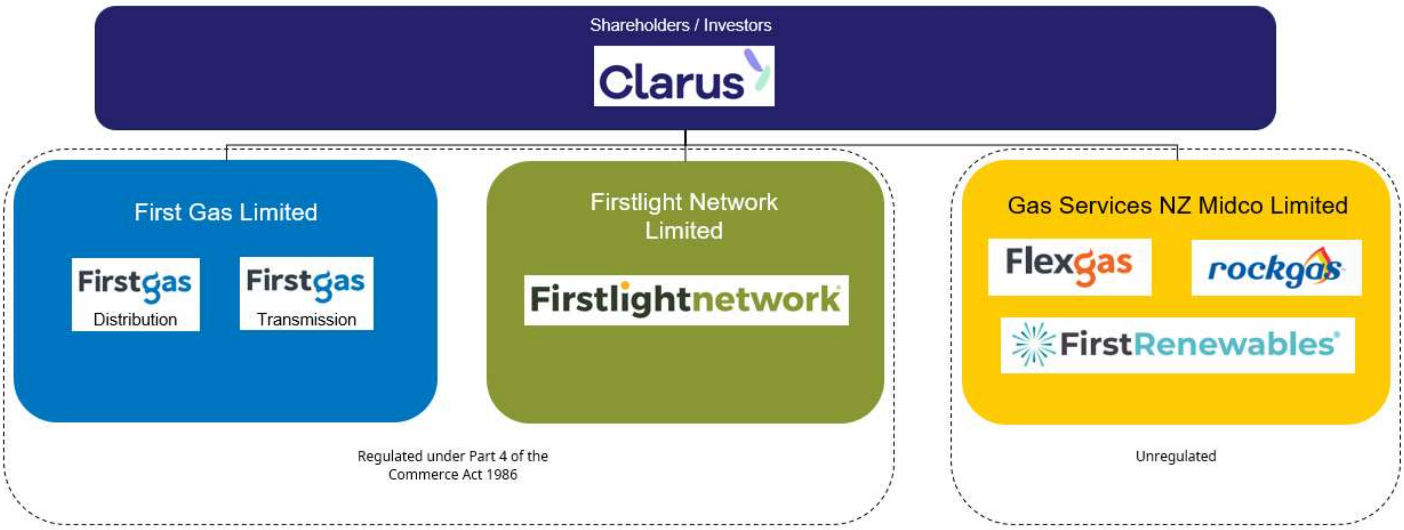
Firstlight Network (Firstlight) is the electricity lines company for Tairāwhiti and Wairoa. We own and maintain the poles, wires, transformers and underground cabling used by electricity retailers to supply customers with electricity.

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

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

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

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



2. Information Disclosure requirements

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

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

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

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

This disclosure was prepared on 29 August 2024 and where required, has been audited as part of the annual information disclosure process.

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

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

Clause 2.3.8 of the ID Determination requires that:

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

(1) the relationship between the EDB and the related party

(2) the principal activities of the related party

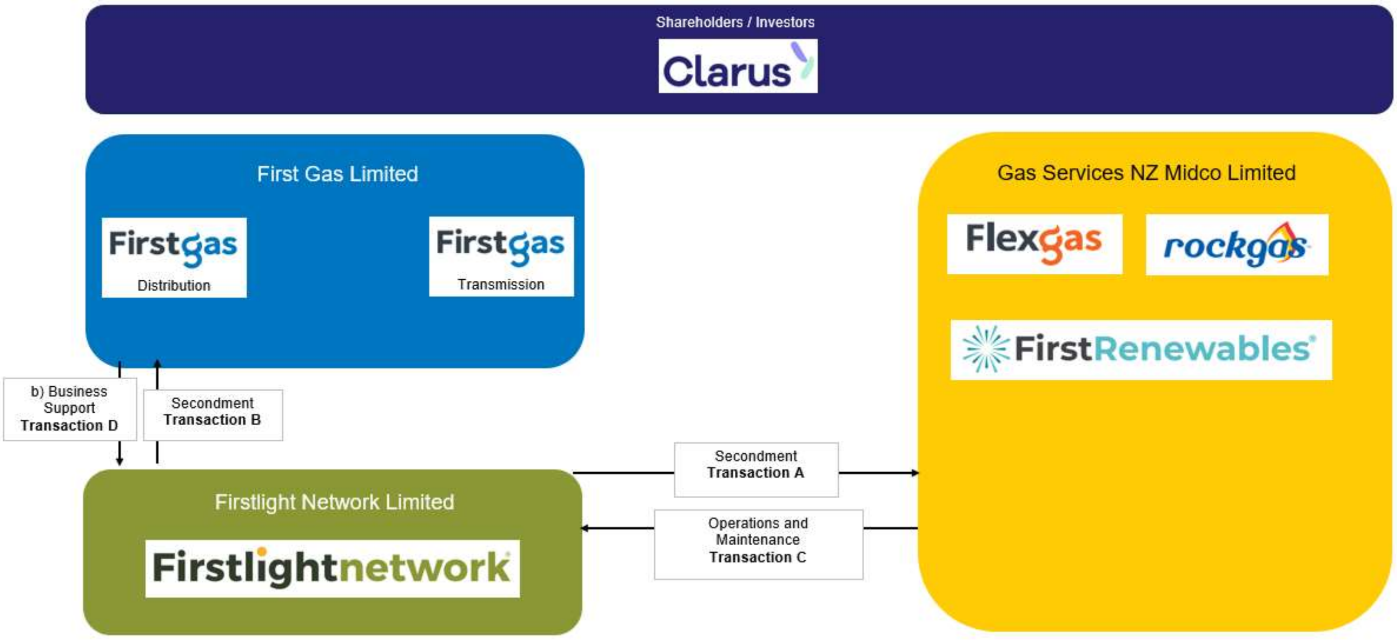
(3) the total annual expenditure incurred by the EDB with the related party.

In FY2024, Firstlight:

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

Firstlight provides unregulated services to GSNZ Midco. In the FY2024 disclosure period, Firstlight seconded staff to GSNZ Midco and Firstgas. The supply of these unregulated services was valued using independent and objective measures.

These related party transactions are illustrated in Figure 2.



The following table describes the connection between Firstlight and its related parties with which it has had transactions with during the 2024 disclosure year. A breakdown of these transactions is also provided in schedule 5b of our Information Disclosure schedules.

Table 1: The nature and extent of related party transactions in disclosure year 2024

Related Party	Nature of relationship	Principle activities of the related party	FY2024 expenditure/revenue between Firstlight and its related party
GSNZ Midco (Transaction A)	Firstlight and GSNZ Midco have the same ultimate shareholders	Firstlight seconded staff to GSNZ Midco to provide operations and maintenance services	Unregulated income received of $3.457 million is included in Schedule 5b for the provision of these services. This unregulated income is included in *total regulatory income* in Schedule 5b (and is not included in Schedule 2 or Schedule 3 as it is non-regulatory in nature)
Firstgas (Transaction B)	Firstgas and Firstlight have the same ultimate shareholders	Firstlight seconded staff to Firstgas to provide regulated gas transmission and gas distribution services	Unregulated income received of $0.036 million
GSNZ Midco (Transaction C)	Firstlight and GSNZ Midco have the same ultimate shareholders	Firstlight acquired operations and maintenance services from GSNZ Midco.	Network Capex $12.940 million Non-Network Capex $0.233 million Network Opex $7.094 million System operations Opex and Network support Opex $1.339 million
Firstgas (Transaction D)	Firstgas and Firstlight have the same ultimate shareholders	Firstgas provided corporate function services to Firstlight	$2.465 million including $0.037 million Directors Fees

Gas Services (Midco) New Zealand Limited

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

In the 2024 disclosure year, GSNZ Midco provided 93% of the Firstlight total Capex and 56% of all Operating Expenditure (Opex) under an Operations and Maintenance agreement (O&M agreement).

Services provided under the O&M agreement include:

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

Operations and Maintenance (O&M) Agreement

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

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

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

Corporate Function and Secondment Services Agreements (CFSA).

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

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

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

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

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

Summary of Clarus' procurement policy

Clause 2.3.10 of the ID Determination requires that:

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

(1) a summary of its current policy in respect of the procurement of assets or goods or services from any related party; or

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

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

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

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

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

Procurement principles

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

Principle	Description
Health & Safety First	The health and safety of staff and suppliers must be taken into consideration when procuring goods and/or services.
Open and Effective Competition	Firstlight purchasing must be conducted in a manner that encourages competition amongst suppliers.
Get the best for Clarus	Making quality decisions that consider the life of the contract (or whole-of-life cost) not just selecting the lowest price.
Play by the Rules	Building trust and relationships with suppliers and keeping a reputation as a fair buyer.

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

The competitive process

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

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

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

Other typical reasons for selecting sole sourcing include:

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

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

Monitoring and compliance

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

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

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

Application of the procurement policy

Clause 2.3.12 of the ID Determination requires that:

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

(1) a description of how the EDB applies its current policy for the procurement of assets or goods or services from a related party in practice;

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

(3) subject to subclause (5), at least one representative example transaction from the disclosure year of how the current policy for the procurement of assets or goods or services from a related party is applied in practice;

(4) for each representative example transaction specified in accordance with subclause

(5) separate representative example transactions where the EDB has applied the current policy for the procurement of assets or goods or services from a related party significantly differently between expenditure categories.

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

In the 2024 disclosure period, Firstlight has procured goods and services from GSNZ Midco under the O&M agreement.

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

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

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

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

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

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

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

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

- Planning to ensure O&M works plans align with Firstlight requirements efficiently and in a cost-effective manner. This may include benchmarking of costs to ensure the O&M agreement continues to meet efficiency targets and is compliant with the related party rules for regulated businesses

- Service level agreements including a range of key performance indicators that are linked to payments

- Provisions around meeting stringent safety standards.

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

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

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

Planning

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

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

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

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

Challenge and benchmarking process

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

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

The Benchmark will:

- Compare the O&M Services and Service Fee, including the component parts of the Service Fee, with the services, charges and margins being obtained under other similar service contracts in New Zealand and / or good international market services, charges and margins for third parties

- Assess, in light of this comparison, whether:

    - The scope of the O&M Services being provided is necessary to meet the Service Standards and

    - The Service Fee, including the component parts of the Service Fee, is market competitive and otherwise meets the Information Disclosure Determination requirements.

Under the O&M agreement, we anticipate that prices charged by GSNZ Midco will not change significantly from year to year (unless there is strong evidence that input costs have permanently changed). This is consistent with a competitive market where companies with long-term contracts in place (such as the O&M agreement and CFSA) tend to set prices for longer terms. This gives service providers greater certainty to invest in staff and equipment required to fulfill the contract terms over the duration of the contract. For FY2024 Firstlight engaged independent experts to:

- Confirm the margin charged by GSNZ Midco under the O&M agreement was within the range of providers of similar services

- Cross-checked that GSNZ Midco costs remain efficient and consistent with the input prices Firstlight would have paid in an arm's length transaction by completing benchmarking against others in the industry.

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

For RY2024, our O&M agreement remains aligned with current market practices and prices. This was last tested in April 2023 when we engaged an independent expert to:

- Consider changes in market practices or pricing for similar services and how this may affect arm's length margins
- Conduct a sample of relevant margin data to ensure no substantive and permanent change has occurred in the market since margins were established under the O&M Agreement for RY2024.

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

Execution of works including monitoring and reporting

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

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

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

Completion of works

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

Corporate Function and Secondment Services Agreement (CFSA)

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

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

Section 2.3.12 of the ID Determination requires that:

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

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

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

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

Representative examples of how the procurement policy is applied

Regulatory requirements

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

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

(3) subject to subclause (5), at least one representative example transaction from the disclosure year of how the current policy for the procurement of assets or goods or services from a related party is applied in practice;

(4) for each representative example transaction specified in accordance with subclause (3), how and when the EDB last tested the arm's-length terms of those transactions; and

(5) separate representative example transactions where the EDB has applied the current policy for the procurement of assets or goods or services from a related party significantly differently between expenditure categories.

Representative examples

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

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

Expenditure category	Representative example	Procurement method	How and when were the arm's length terms last tested
All network Capex categories All network Opex categories System operations and network support Non-network assets	Network Opex and Capex and system operations and network support across the network. We provide example below of procurement undertaken by GSNZ Midco on our behalf under the O&M agreement	Direct procurement from a 'sole supplier' under the existing O&M agreement.	The arm's length terms were tested as part of a benchmarking process that was undertaken during the 2024 disclosure year. In RY2023 Firstlight engaged an independent expert to benchmark: - The margins applied to the costs of O&M services provided by GSNZ Midco to Firstlight - Total service costs against comparable businesses. The margin benchmarking compared services supplied by GSNZ Midco to companies providing similar services across New Zealand. Benchmarking against comparable businesses indicated that Firstlight costs are aligned with our peers and the wider market. This demonstrates that the cost of the underlying service is consistent with the input price that Firstlight would have paid in an arm's length transaction. Benchmarking was undertaken with the permission of GSNZ Midco. Benchmarking is allowed for under the O&M agreement.
Business Support Opex	Corporate Services and IT Services for Firstlight Network. Payable by Management Fee which is set prior to regulatory year. Monthly Management Fee issued providing breakdown of services. Inclusive in the Management Fee are Directors Fees We provide below a schedule of services undertaken under the CFSA agreement.	Direct procurement from a 'sole supplier' under the existing CFSA agreement.	The arm's length terms were tested as part of a benchmarking process that was undertaken during the 2023 disclosure year. In RY2023 in preparation for Firstlight engaged an independent expert to benchmark: - The margins applied to the costs of Business Support services provided to Firstlight Benchmarking undertaken against comparable businesses indicated that Firstlight costs are aligned with our peers and the wider market. This demonstrates that the cost of the underlying service is consistent with the input price that Firstlight would have paid in an arm's length transaction.

Example of procurement undertaken by GSNZ Midco on our behalf

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

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

Project name:	Ngatapa Pole Replacement Stage 1
Project date	The scope was issued in October 2023 with works completed in November 2023
Project or work order number:	4000.C.0200.01.03
Project expenditure (estimated)	$0.07 million
Project cost type	Asset Replacement and Renewal Capex
Project managed by:	GSNZ Midco acting on behalf of Firstlight under the O&M agreement.
Subcontractors:	Electrinet managed the delivery of the project. Works were completed under the terms and rates specified in the service agreement with Electrix.

Planning

Leading into RY2024, it was identified that there were poles earmarked for replacement, in particular the Ngatapa area. The AMP for RY2024 had included $1.6 million in the asset replacement and renewal Capex forecast for the ongoing replacement of 11KV poles in the Gisborne region.

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

Completion of works

The scope of works and plan included supply and upgrade of existing 8 poles, 2 stud poles and 1 low voltage pole. Also included in the works was to carry out the 11KV maintenance in the area. The scope was reviewed by GSNZ Midco and Electrinet and the report reviewed by GSNZ Midco's project manager and engineers.

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

Market testing

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

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

Outcomes:

The project was completed in time and within budget

Corporate Function Services undertaken as per the CFSA agreement

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

Map of anticipated network expenditure and constraints

Section 2.3.13 of the ID Determination requires that:

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

(1) subject to clause 2.3.15, a brief explanatory description of the 10 largest forecast operational expenditure projects in the AMP planning period and the likely timing, value and location of the projects;

(2) subject to clause 2.3.15 , a brief explanatory description of the 10 largest forecast capital expenditure projects in the AMP planning period and the likely timing, value and location of the projects;

(3) subject to clause 2.3.16, a brief explanatory description of possible future network or equipment constraints and their location, where the responses to the constraints would involve one of the 10 largest future operational expenditure projects in the AMP planning period; and

(4) subject to clause 2.3.16, a brief explanatory description of possible future network or equipment constraints and their location, where the responses to the constraints would involve one of the 10 largest future capital expenditure projects in the AMP planning period.

Section 2.3.14 further specifies the map must:

(1) identify whether the forecast or possible operational expenditure or capital expenditure is-

(a) already subject to a contract and, if so, whether that contract is with a related party;

(b) forecast to require the supply of assets or goods or services by a related party; or

(c) currently not indicated for supply by a related party; and

(2) be consistent with the AMP information specified in-

(a) clause 11.8.3 of Attachment A on network or equipment constraints; and

(b) clause 11.8.4 of Attachment A on the projected impact of demand management initiatives.

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

Largest Opex activities

Figure 3 sets out the location of the largest ten activities in the AMP planning period (RY2024-RY2033), with greater detail in Table 3. All network Opex is forecast to be completed by our related party, Gas Services New Zealand Midco Limited (GSNZ Midco) under the Operations and Management (O&M) agreement between Firstlight and GSNZ Midco. GSNZ Midco manages a number of third-party contractors to deliver this network Opex. All activities are network related works, and none are a result of future network or equipment constraints.

Figure 3: Map showing largest Opex projects in the planning period (RY24-RY33)

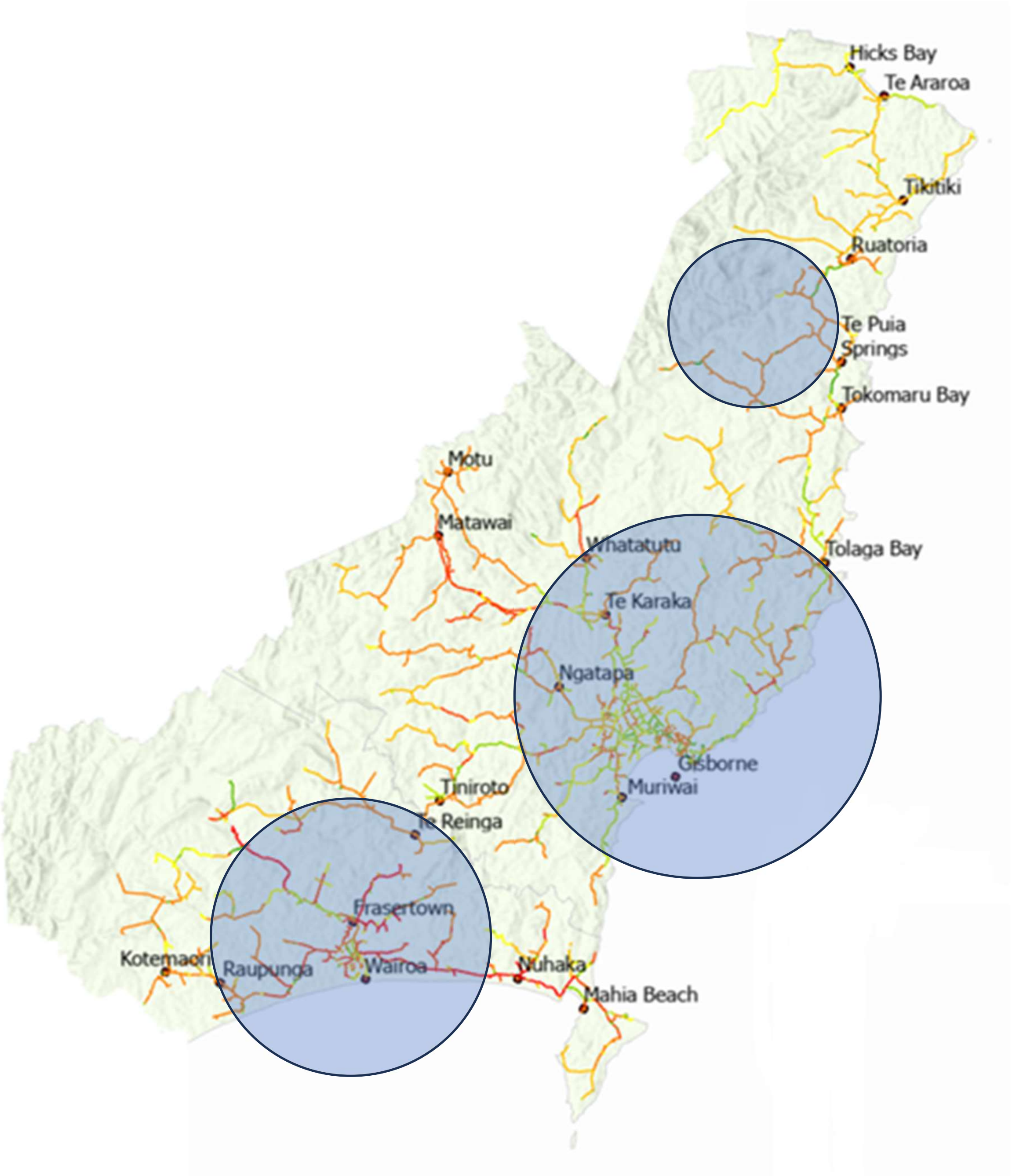


Table 3: 10 largest Opex projects in the planning period (RY24-RY33)

Activity	Description	Region	Total Cost (constant)	Period
11kV Tree Control Program Northern	Routine vegetation management	Gisborne	$6 million	RY24-RY33
11kV Tree Control Program Southern	Routine vegetation management	Wairoa	$6 million	RY24-RY33
11kV Patrols & general maintenance	Routine corrective maintenance and inspection	Network Wide	$3.1 million	RY24-RY33
Zone SubAverage Routine Maintenance/major maint	Routine corrective maintenance and inspection	Network Wide	$1.7 million	RY24-RY33
110kV Inspections & routine maint	Routine corrective maintenance and inspection	Network Wide	$1.6 million	RY24-RY33
Zone Sub Grounds Maintenance	Routine corrective maintenance and inspection	Network Wide	$1.5 million	RY24-RY33
Subtransmission - Vegetation Control	Routine vegetation management	Network Wide	$1.2 million	RY24-RY33
GIS-TOK 110kV - Patrols	Routine corrective maintenance and inspection	Gisborne	$1 million	RY24-RY33
110kV Condition Assessment Report	Routine corrective maintenance and inspection	Network Wide	$0.9 million	RY24-RY33
Zone Substation Building Maintenance (paint/spouting/doors/windows)	Routine corrective maintenance and inspection	Network Wide	$0.8 million	RY24-RY33

Largest Capex activities

Figure 4 sets out the location of the largest ten activities in the AMP planning period (RY2024-RY2033), with greater detail in Table 4. All network Capex is forecast to be completed by our related party, Gas Services New Zealand Midco Limited (GSNZ Midco) under the Operations and Management (O&M) agreement between Firstlight and GSNZ Midco. GSNZ Midco manages a number of third-party contractors to deliver this network Opex. All activities are network related works, and none are a result of future network or equipment constraints.

Figure 4: Heatmap illustrating largest Capex projects in the planning period (RY24-RY33)

Table 4: 10 largest Capex projects in the planning period (RY24-RY33)

Activity	Description	Region	Total Cost (constant)	Period
11kV Replacement Poles	Asset Replacement and Renewal	Gisborne	$15.9 million	RY24-RY33
Red Tagged Pole Project	Accelerated pole replacement programme	Network Wide	$12.6 million	RY24-RY33
Thermal Upgrade Project	Capacity strengthening on the 110KV circuits	Gisborne	$9.2 million	RY24-RY32
11kV Pole Replacements Wairoa	Asset Replacement and Renewal	Wairoa	$8.9 million	RY24-RY33
Replacement 50kV poles	Asset Replacement and Renewal	Network Wide	$6.3 million	RY24-RY33
11kV Replacement 50 poles (fault & premature failure)	Asset Replacement and Renewal	Network Wide	$5.8 million	RY24-RY33
Replace 11kV SWGR Tokomaru Bay, Matawhero, Kaiti, Kiwi & Parkinson	Asset Replacement and Renewal	Gisborne	$3.3 million	RY24-RY33
Conductor replacement	Asset Replacement and Renewal	Gisborne	$3.1 million	RY24-RY33
Wairoa Reconfiguration	System Growth	Wairoa	$3.1 million	RY25-RY33
New Generators - Security of Supply - 780kVA	Reliability, Safety and Environment	Network Wide	$3 million	RY25-RY29

Company Name	Firstlight Network Limited
For Year Ended	31 March 2024

Schedule 14 Mandatory Explanatory Notes

(Guidance Note: This Microsoft Word version of Schedules 14, 14a and 15 is from the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018. Clause references in this template are to that determination)

1. This schedule requires EDBs to provide explanatory notes to information provided in accordance with clauses 2.3.1, 2.4.21, 2.4.22, and subclauses 2.5.1(1)(f),and 2.5.2(1)(e).

2. This schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.1. Information provided in boxes 1 to 11 of this schedule is part of the audited disclosure information, and so is subject to the assurance requirements specified in section 2.8.

3. Schedule 15 (Voluntary Explanatory Notes to Schedules) provides for EDBs to give additional explanation of disclosed information should they elect to do so.

Return on Investment (Schedule 2)

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

Box 1: Explanatory comment on return on investment

In RY2024, the vanilla ROI was 5.28%. This is below the ROI of 8.27% reported for RY2023. This decrease in ROI is primarily due to a decrease in Assets Commissioned compared with RY2024. Reclassified items are noted in box 10 below and have no impact on ROI.

In RY2023, the mid-point estimate of vanilla and post tax WACC values were incorrect. Correct values included in RY2024 in the CY-1 column.

Regulatory Profit (Schedule 3)

5. In the box below, comment on regulatory profit for the disclosure year as disclosed in Schedule 3. This comment must include-

   5.1 a description of material items included in other regulated income (other than gains / (losses) on asset disposals), as disclosed in 3(i) of Schedule 3

   5.2 information on reclassified items in accordance with subclause 2.7.1(2).

Box 2: Explanatory comment on regulatory profit
Our regulated profit including financial incentives and wash-ups for the year is $10.4m which is a 31% decrease compared to regulated profit in FY23. The $4.6m decrease is attributable to a $2.05m increase in operational expenditure, $4.08m decrease in revaluation, and $795k increase in depreciation. Material items included in other regulated income were electricity sales income from gensets, LCE rebate processing fee, vehicle lease, compensation receipts and new connections fees. Reclassified items are noted in box 10 below and have no impact on regulated profit.

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

6. If the EDB incurred merger and acquisitions expenditure during the disclosure year, provide the following information in the box below-

   6.1 information on reclassified items in accordance with subclause 2.7.1(2).

   6.2 any other commentary on the benefits of the merger and acquisition expenditure to the EDB.

Box 3: Explanatory comment on merger and acquisition expenditure
There were no merger or acquisition expenditure during the year.

Value of the Regulatory Asset Base (Schedule 4)

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

Box 4: Explanatory comment on the value of the regulatory asset based (rolled forward)
The RAB has increased from $209.4m to $222.6m, an increase of 6.3%. Assets commissioned in RY24 of $12.6m was 22% lower than RY23 of $16.08m due largely to the capital remedial works required as a result of Cyclones Hale and Gabrielle in January and February 2023 respectively. Carry over WIP was also higher than RY23 and coupled with underspend in system growth were the main drivers of the reduced value of assets commissioned in RY24. The CPI adjustment of 4.02% in RY24 was also considerably lower than that of 6.65% in RY23.

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

8. In the box below, provide descriptions and workings of the material items recorded in the following asterisked categories of 5a(i) of Schedule 5a-

    8.1 Income not included in regulatory profit / (loss) before tax but taxable;

    8.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible;

    8.3 Income included in regulatory profit / (loss) before tax but not taxable;

    8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax.

Box 5: Regulatory tax allowance: permanent differences
There was a immaterial permanent difference for entertainment expenses.

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

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

Box 6: Tax effect of other temporary differences (current disclosure year)
The amounts are immaterial.

Cost allocation (Schedule 5d)

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

Box 7: Cost allocation
Reclassified items are noted in box 10 below.

Asset allocation (Schedule 5e)

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

Box 8: Commentary on asset allocation

No asset allocation has been applied and items reclassified.

Capital Expenditure for the Disclosure Year (Schedule 6a)

12. In the box below, comment on expenditure on assets for the disclosure year, as disclosed in Schedule 6a. This comment must include-

    12.1 a description of the materiality threshold applied to identify material projects and programmes described in Schedule 6a;

    12.2 information on reclassified items in accordance with subclause 2.7.1.

Box 9: Explanation of capital expenditure for the disclosure year

Capital expenditure is focused on asset replacement and renewal to maintain the network by replacing aging assets and contributed $12.4m of total expenditure of $14.2m or 87%. Non-network expenditure of $1.01m included some one-off transitional costs as Firstlight was acquired by Clarus (formerly Firstgas Group) on 31 March 2023. System Growth projects were 90% under forecast pending scopes of work being completed and landowner consents.

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

- Red tag poles accelerated replacement project
- 11kV pole replacements in Gisborne and Wairoa regions
- Cyclone Gabrielle restorative and remedial work
- Subtransmission grillage and foundations replacements
- Conductor replacements Gisborne and Wairoa regions

There is no materiality threshold applied to the schedule

There are no items reclassified during the year.

Operational Expenditure for the Disclosure Year (Schedule 6b)

13. In the box below, comment on operational expenditure for the disclosure year, as disclosed in Schedule 6b. This comment must include-

    13.1 Commentary on assets replaced or renewed with asset replacement and renewal operational expenditure, as reported in 6b(i) of Schedule 6b;

13.2 Information on reclassified items in accordance with subclause 2.7.1(2);

13.3 Commentary on any material atypical expenditure included in operational expenditure disclosed in Schedule 6b, a including the value of the expenditure the purpose of the expenditure, and the operational expenditure categories the expenditure relates to.

Box 10: Explanation of operational expenditure for the disclosure year

Operational expenditure is broken down to Network opex relating to network maintenance ($7.5m) and non-network opex supporting the business operations ($7.5m).

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

The major component of asset replacement and renewal expenditure is the avoided cost of distribution charges paid to Eastland Generation Limited. This provides network security in the form of distributed generation from Waihi Hydro and avoids electricity distribution capital expenditure due to the provision of alternate security services.

Service interruptions and emergencies expenditure was 13% or $330k above target for RY24. The region was once again heavily affected by adverse weather conditions, and this resulted in overspend in service interruptions.

Non-network opex expenditure of $7.5m was comprised of $2.8m on system operations and network support (SONS) and business support costs of $4.7m. Business support costs were $676k over budget. The main drivers of this overspend were the reclassification of software/licence costs and telecommunication costs coupled with one-off transition and payroll payments. Overspends to budget on consultancy fees, marketing/communication fees and audit fees. These overspends were partially offset by a reduction in business support management fee as this is now split between business support and network support. SONS expenditure was $528k over budget. As noted above, management fee is now split between the business support and network operational components and this along with overspends in payroll and travel costs were largely attributable to overspend on budget. Offsets were treatment of software and licencing fees that had historically been included as SONS costs but have been reclassified as deemed more appropriate to be classed as business support along with telecommunication costs.

Variance between forecast and actual expenditure (Schedule 7)

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

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

CAPITAL EXPENDITURE

Customer Connections variance (-$111k)

This variance relates to an underspend on low voltage switchgear allowance for new installations.

System Growth variances (-$1,150k)

The main drivers of underspend were the Mahia extension project that has been put on hold pending scopes of work and landowner consents, progress on thermal upgrade has been impacted by supply chain issues and second injection point Gisborne project has also been on hold pending further investigations at to best options.

Asset Replacement and Renewal variances (-$209k)

Asset replacement and renewal expenditure was within 2% of budget. Underspends in distribution switchgear and other network assets primarily being deferment of lock upgrade project were offset by overspends in transformer replacements.

Reliability, Safety and Environment +$92k

Overspends were observed in 11kV field recloser automation plan, SCADA rural automation, protection relay installations offset partially by underspends in Zone Sub sepa unit replacements.

Asset Relocations (-$51k)

$51k was set aside based on historical averages. Expenditure in any year could vary materially

Non- network Assets +699k

This variance relates primarily to transition setup costs including Maximo & GIS software, two vehicle replacements and Carnarvon Street Office refurbishment.

<u>OPERATIONAL EXPENDITURE</u>

<u>Asset Replacement & Renewal (-$333k)</u>

Asset Replacement and Renewal underspent by $333k or 39%. Underspends on budget included 110kV Zone Substation maintenance (-$50k), 400V OH Service Fuse Base & Carrier replacement (-$48k), TX Earthing system repairs (-$42k) and comms maintenance/calibration (-$42k).

<u>Routine & Corrective Maintenance & Inspection (-$884k)</u>

Costs in this area were underspent to budget by 29%. This was primarily due to underspends in 11kV patrols and general maintenance (-$270k), general unscheduled tower/line repairs (-$117k), 110kV inspections and routine maintenance (-$102k) and zone sub repairs (-$87k).

<u>Service Interruption & Emergencies +$330k</u>

2024 again saw a number of adverse weather events causing damage to the Network and as a result saw an overspend in this category. The main drivers of the overspend were observed in 11kV defect fault repairs (+251k), 400V fault repairs (+$264k).

<u>Vegetation Management +$193</u>

The introduction of timewriting to opex in RY24 saw a large increase on initial calculations and this resulted in a $345k variance to budget. This was partially offset by a $138k underspend in tree control program North.

<u>System Operations & Network Support Costs +528k</u>

The main drivers of overspend to budget were payroll, management fees and travel costs. The composition of the management fee is now broken down and reported as business support and SONS costs where historically it has been budgeted for as a business support cost. These overspends were offset by reallocation of software/licence fees and telecommunication costs to business support, these costs have historically been budgeted for as SONS costs.

<u>Business Support Costs +$676k</u>

Business support overspends were largely attributable to reclassification of software/licence fees, payroll costs, consultancy fees, audit fees and one-off transition costs.

Information relating to revenues and quantities for the disclosure year

15. In the box below provide-

 15.1 a comparison of the target revenue disclosed before the start of the disclosure year, in accordance with clause 2.4.1 and subclause 2.4.3(3) to total billed line charge revenue for the disclosure year, as disclosed in Schedule 8; and

15.2 explanatory comment on reasons for any material differences between target revenue and total billed line charge revenue.

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

Network Reliability for the Disclosure Year (Schedule 10)

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

Box 13: Commentary on network reliability for the disclosure year

Weather events		
Financial year	**Events**	**% change**
RY20	14	
RY21	27	93%
RY22	32	19%
RY23	44	38%
RY24	38	-14%

**RY23 witnessed 35 weather event days excluding 9 weather days in cyclone Gabreille*

Gisborne and Wairoa have seen a significant rise in weather events in recent years. Compared to the RY22, the number of weather events days increased by 38% in RY23. This trend continued in RY24, with a 9% increase. (excluding Cyclone Gabrielle weather event days in RY23).

These intensified weather events have led to several challenges for Firstlight Network. SAIDI increased by 4% compared to RY23. The number of outages also rose by 13%, outages lasting longer than 3 hours increased by 19%. Limited access to fault locations due to adverse weather conditions was a major factor in these extended outages.

Slips caused by adverse environment have increased by 167% compared to RY23 which were responsible for 46 outages in RY24, contributing significantly to both SAIDI and the number of extreme weather days. Defective equipment was the leading cause of the outages in RY24, accounting for 26%, followed by Adverse environment contributing to 21%, followed by vegetation contributing 19% of the total SAIDI.

Note- RY23 figures exclude Cyclone Gabrielle, as it's a rare 1 in 550-year event

The data stated in this year's Schedule 10 is consistent with how Firstlight has been treating SAIDI and SAIFI in the past and as in the past SAIDI and SAIFI calculations for Information Disclosures uses a different way of normalising customer minutes leading to different reported SAIDI and SAIFI to those in Annual Compliance Statement.

The information provided in Schedule 10 has been derived from the records kept by the control room. These processes follow Firstlight Outage Data Recording Procedures contained in our Quality Standards Manuals and are typical of industry control room procedures. There are inherent limitations in the ability to collect and record the network reliability information to be disclosed in Schedule 10(i) to 10(iv). Consequently, there is no independent evidence available to support the accuracy and completeness of recorded faults, and Firstlight has limited control over the accuracy and completeness of installation control point (ICP) data included in the SAIDI and SAIFI calculations.

Insurance cover

17. In the box below, provide details of any insurance cover for the assets used to provide electricity distribution services, including-

    17.1 The EDB's approaches and practices in regard to the insurance of assets used to provide electricity distribution services, including the level of insurance;

    17.2 In respect of any self-insurance, the level of reserves, details of how reserves are managed and invested, and details of any reinsurance.

Box 14: Explanation of insurance cover
Network assets such as the substation buildings, zone sub transformers and switchgear, SCADA, other communications equipment excluding fibre-optic cables are insured but lines, poles and cables are not. These assets are insured for replacement cost to a maximum of $79 million. Firstlight Network Limited has no self-insurance cover.

Amendments to previously disclosed information

18. In the box below, provide information about amendments to previously disclosed information disclosed in accordance with clause 2.12.1 in the last 7 years, including:

    18.1 a description of each error; and

    18.2 for each error, reference to the web address where the disclosure made in accordance with clause 2.12.1 is publicly disclosed.

Box 15: Disclosure of amendment to previously disclosed information
There were no amendments to the previously disclosed information.

Company Name Firstlight Network Limited

For Year Ended 31 March 2024

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.

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

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

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

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

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

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

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

Company Name	Firstlight Network Limited
For Year Ended	31 March 2024

Schedule 15 Voluntary Explanatory Notes

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

1. This schedule enables EDBs to provide, should they wish to-

   1.1 additional explanatory comment to reports prepared in accordance with clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1 and 2.5.2.

   1.2 information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.

2. Information in this schedule is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.

3. Provide additional explanatory comment in the box below.

Box 1: Voluntary explanatory comment on disclosed information

Unallocated RAB disposals to a related party are made up of investment properties that were sold to Eastland Investment Property Limited.

In 2021 a private binding ruling relating to depreciation was obtained. In March 2024, Inland Revenue provided clarification on the application of the binding ruling that was in place in the prior period. This has resulted in high tax depreciation in schedule 5a.

Regulatory depreciation in schedule 4a has been split between standard and no standard life assets in RY24. Total depreciation has all been disclosed as standard depreciation historically.

Clause 2.9.2

We, Mark Adrian Ratcliffe and Fiona Ann Oliver, being directors of Firstlight Network Limited certify that, having made all reasonable enquiry, to the best of our knowledge-

a) the information prepared for the purposes of clauses 2.3.1, 2.3.2, 2.4.21, 2.4.22, 2.5.1, 2.5.2, and 2.7.1 of the Electricity Distribution Information Disclosure Determination 2012 in all material respects complies with that determination; and

b) the historical information used in the preparation of Schedules 8, 9a, 9b, 9c, 9d, 9e, 10, and 14 has been properly extracted from the Firstlight Network Limited's accounting and other records sourced from its financial and non-financial systems, and that sufficient appropriate records have been retained.

c) In respect of information concerning assets, costs and revenues valued or disclosed in accordance with clause 2.3.6 of the Electricity Distribution Information Disclosure Determination 2012 and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012, we are satisfied that-

   i. the costs and values of assets or goods or services acquired from a related party comply, in all material respects, with clauses 2.3.6(1) and 2.3.6(3) of the Electricity Distribution Information Disclosure Determination 2012 and clauses 2.2.11(1)(g) and 2.2.11(5)(a)-2.2.11(5)(b) of the Electricity Distribution Services Input Methodologies Determination 2012; and

   ii. the value of assets or goods or services sold or supplied to a related party comply, in all material respects, with clause 2.3.6(2) of the Electricity Distribution Information Disclosure Determination 2012.

Director: Mark Ratcliffe	Director:Fiona Oliver
29 August 2024	29 August 2024
Date	Date

Independent Assurance Report

To the Directors of Firstlight Network Limited and the Commerce Commission

Assurance report pursuant to the Electricity Distribution Information Disclosure (Targeted Review 2024) Amendment Determination 2024 [2024] NZCC 2

We have undertaken a reasonable assurance engagement in respect of the compliance of Firstlight Network Limited (the "Company") with the Electricity Distribution Information Disclosure (Targeted Review 2024) Amendment Determination 2024 [2024] NZCC 2, (the "Determination") for the disclosure year ended 31 March 2024 where we are required to opine on:

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

Qualified Opinion

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

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

Basis for Qualified Opinion

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

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

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

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

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

Our assurance approach

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

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

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

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

We have determined that there are two key assurance matters:

- Regulatory Asset Base
- Related Party Transactions.

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

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

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

These procedures have been undertaken to form an opinion as to whether the Company has complied, in all material respects, with the Determination in the preparation of the Disclosure Information for the year ended 31 March 2024, and whether the basis for valuation of related party transactions complies, in all material respects, with the Determination and the IM Determination.

Key Assurance Matters

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

Key Assurance Matter	How our procedures addressed the key assurance matter
Regulatory Asset Base The Regulatory Asset Base (RAB), as set out in Schedule 4, reflects the value of the Firstlight Network Limited's electricity distribution assets. These are valued using an indexed historic cost methodology prescribed by the Determination. It is a measure which is used widely and is key to measuring the Firstlight Network Limited's return on investment and therefore important when monitoring financial performance or setting electricity distribution prices. The RAB inputs, as set out in the IM Determination, are similar to those used in the measurement of fixed assets in the financial statements, however, there are a number of different requirements and complexities which require careful consideration. Due to the importance of the RAB within the regulatory regime, the incentives to overstate the RAB value, and complexities within the regulations, we have considered it to be a key area of focus.	We have obtained an understanding of the compliance requirements relevant to the RAB as set out in the Determination and the IM Determination. Our procedures over the regulatory asset base included the following: **Assets commissioned** • We inspected the assets commissioned during the period, as per the regulatory fixed asset register, to identify any specific cost or asset type exclusions, as set out in the Determination, which are required to be removed from the RAB; • We reconciled the assets commissioned, as per the regulatory fixed asset register, to the asset additions disclosed in the audited annual financial statements and investigated any material reconciling items; and • We tested a sample of assets commissioned during the disclosure period for appropriate asset category classification. **Depreciation** • For assets with no standard asset lives we assessed the reasonableness of the lives used by reference to the accounting depreciation rates used in preparing the financial statements; • We compared the spreadsheet formula utilised to calculate regulatory depreciation expense with IM Determination clause 2.2.5; and • We compared the standard asset lives by asset category to those set out in the IM Determination. **Revaluation** • We recalculated the revaluation rate set out in the IM Determination using the relevant Consumer Price Index indices taken from the Statistics New Zealand website; and • We tested the mathematical accuracy of the revaluation calculation performed by management.

Key Assurance Matter	How our procedures addressed the key assurance matter
	Disposals ● We considered the nature of the asset disposals within the accounting fixed asset register and tested a sample of RAB disposals to ensure disposals in the RAB meet the definition of a disposal per the IM Determination.
Related party transactions Disclosures over related party transactions including related party relationships, procurement policies/processes, application of these policies/processes and examples of market testing of transaction terms as required under the Determination and the IM Determination are set out in Appendix A. The Determination and the IM Determination require the Company to value its transactions with related parties, disclosed in Schedule 5b, in accordance with the principles-based approach to the arm's length valuation rule. This rule states that the value of goods or services acquired from a related party cannot be greater than if it had been acquired under the terms of an arm's length transaction with an unrelated party, nor may it exceed the actual cost to the related party. A sale or supply to a related party cannot be valued at an amount less than if it had been sold or supplied under the terms of an arm's-length transaction with an unrelated party. Arm's-length valuation, as defined in the IM Determination, is the value at which a transaction, with the same terms and conditions, would be entered into between a willing seller and a willing buyer who are unrelated and who are acting independently of each other and pursuing their own best interests. Firstlight Network Limited is required to use an objective and independent measure to demonstrate compliance with the arm's-length principle. In the absence of an active market for similar transactions, assigning an objective arm's	We have obtained an understanding of the compliance requirements relevant to related party transactions as set out in the Determination and the IM Determination. We have ensured Schedule 5(b) and Appendix A includes all required disclosures including current procurement policies, descriptions of how they are applied in practice, representative example transactions and when and how market testing was last performed. Our procedures over the related party transactions included the following: **Completeness and accuracy of related party relationships and transactions** We have tested the completeness and accuracy of the related party relationships and transactions by: ● Agreeing the disclosures within Schedule 5(b) to the underlying financial records for the year ended 31 March 2024, investigating any material differences and determining whether any such differences are justified; and ● Applying our understanding of the business structure against the related party definition in IM Determination clause 1.1.4(2)(b) to assess management's identification of any "unregulated parts" of the entity. **Practical application of procurement policies** ● Testing a sample of operating expenditure and capital expenditure transactions disclosed in Schedule 5(b) by inspecting supporting documentation to determine compliance with the disclosed procurement policy and practices. **Arm's length valuation rule** We obtained Firstlight Network Limited's assessment of available independent and objective measures used in supporting the arm's length valuation principal and performed the following procedures: Obtained the report from the management's expert and for a sample: ● Evaluated the accuracy of the quoted amounts used by the management's expert to perform the

Key Assurance Matter	How our procedures addressed the key assurance matter
length value to a related party transaction is difficult and requires significant judgement. Management appointed a management expert to assist with benchmarking certain classes of expenditure to demonstrate compliance with the arm's-length principle. We have identified related party transactions at arm's-length as a key assurance matter due to the judgement involved	benchmarking by agreeing it to the related party quote; ● Evaluated the accuracy of the benchmark amount by agreeing the value in the report to the underlying management's expert's workbooks; ● Evaluated management's assessment of the management's expert's output; and ● Assessed whether the related party transaction values fell within an acceptable range. Qualitative factors were considered in determining the appropriate acceptable range. For expenditure classes not included in the management expert's report, we have: ● Reperformed the calculations and agreed key inputs and assumptions to supporting documentation; and ● Where benchmarking or other market information was used as independent and objective measures, we assessed whether the related party transaction values fell within a reasonable range. Qualitative factors were considered in determining the appropriate acceptable range.

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

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

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

We are independent of the Company. Our firm carries out other services for the Company in the areas of compliance with the Electricity Distribution Default Price-Quality Path Determination 2020, independent appraiser of related party transactions, other assurance around compliance with Commerce Act requirements and our capacity as auditors. The provision of these other services has not impaired our independence.

Assurance Practitioner's responsibilities

Our responsibility is to express an opinion on whether the Company has complied, in all material respects, with the Determination in the preparation of the Disclosure Information for the disclosure year ended 31 March 2024 and on whether the basis for valuation of related party transactions complies, in all material respects, with the Determination and the IM Determination.

Our engagement has been conducted in accordance with ISAE (NZ) 3000 (Revised) and SAE 3100 (Revised) which require that we plan and perform our procedures to obtain reasonable assurance about whether the Company has complied in all material respects with the Determination in the preparation of the Disclosure Information for the disclosure year ended 31 March 2024, and whether the basis for valuation of related party transactions complies, in all material respects, with the Determination and the IM Determination.

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

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance may occur and not be detected. A reasonable assurance engagement for the disclosure year ended 31 March 2024 does not provide assurance on whether compliance with the Determination and the IM Determination will continue in the future.

Use of Report

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

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

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

PricewaterhouseCoopers.

Chartered Accountants
30 August 2024

Christchurch, New Zealand