

10 August 2026

Regulation Branch
Commerce Commission

By email: infrastructure.regulation@comcom.govt.nz

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Normalisation Application under clause 21 of the Transpower Individual Price-Quality Path Determination 2025 (IPP 2025)

On 12 April 2026 at 12.19 pm, Transpower's 110 kV Edgecumbe–Waiotahe (EDG–WAI) circuit tripped during severe weather causing a momentary loss of supply before it successfully auto-reclosed. At 12.42 pm it tripped a second time causing loss of supply to Horizon Networks (8 MW) and loss of connection to Lodestone's Waiotahe solar farm (0.67 MW). The cause of the second trip was later confirmed as a line becoming tangled in trees during the heavy rain and strong winds of Cyclone Vaianu.

This event is discussed in detail in our Periodic Report, dated 8 June 2026.

The outage durations were 25 hours and 40 minutes for Waiotahe 33 and 11 kV supply and 25 hours and 52 minutes for the 33 kV injection point. These outages are the subject of this normalisation application, to exclude the outages from the GP1 and GP2 grid performance measures.

Our normalisation event application, in accordance with clause 21 of IPP 2025, is **attached**.

Yours sincerely



Mark Ryall
Executive General Manager, Grid Delivery

ATTACHMENT – APPLICATION TO THE COMMERCE COMMISSION UNDER CLAUSE 21 OF THE TRANSPOWER INDIVIDUAL PRICE-QUALITY PATH DETERMINATION 2025

The outages

At 12.42 pm on 12 April 2026, Transpower's 110 kV Edgecumbe_Waiotaha_2 (EDG_WAI_2) circuit tripped and did not auto-reclose. It was returned to service and supply restored to grid exit points and grid injection points on 13 April at 2.22 pm and 2.34 pm, respectively.

The outages affect our Grid Performance (GP) measures (clauses 15 and 17 of Transpower's Individual Price-Quality Path). The GP measures focus on number and duration of unplanned interruptions by point of service sub-categories. The outages relevant to these performance measures are set out in the tables below.

Table 1: Unplanned interruptions by point of service sub-category

Point of service sub-category ¹	Point of service	Out of service	Return to service	Interruption (hrs)
N security material economic consequence (GP1D and GP2D)	WAI011S1	12/04/2026 12:42	13/04/2026 14:22	25.67
N security generator (GP1F)	WAI033I1	12/04/2026 12:42	13/04/2026 14:34	25.87
N security material economic consequence (GP1D and GP2D)	WAI033S1	12/04/2026 12:42	13/04/2026 14:22	25.67

Clause 21.3.1 – be made no later than 42 working days after the end of the disclosure year

This application is dated as per cover letter date and is within the timeframe of no later than 42 working days after the end of the disclosure year 2025/26.

Clause 21.3.2 – reasons why Transpower considers a normalisation event has occurred

A normalisation event is defined at clause 21 of the IPP 2025. To fit the definition, the event must satisfy four limbs at clauses 21.2.1 to 21.2.4.

¹ Table 4.2 of [Transpower's Individual Price-Quality Path Determination 2025](#)

Table 3: Definition of normalisation event

Clause	Requirement	Our response
21.2.1	The outage was beyond our reasonable control.	Refer section (a) below.
21.2.2	We did not cause, or materially contribute to the outage, by any failure to exercise good electricity industry practice (GEIP).	Refer section (c) below.
21.2.3	The duration of the outage was 24 hours or more, in circumstances where the duration was beyond our reasonable control; and not caused, or materially contributed to, by our failure to exercise GEIP.	The outage exceeded the 24 hours minimum duration. Please also refer to sections (b) and (c) below.
21.2.4	The outage was the result of one of the potential causes listed in this clause.	The outage was the result of natural disaster (clause 21.1.4(a)).

Why we consider:

(a) the outage was beyond Transpower's reasonable control

The outage was caused by trees striking conductors during severe weather due to Cyclone Vaianu. Three spans of conductor were caught in trees and did not release with directional wind changes or manual reclose attempts.

Transpower has an active approach to vegetation management around our assets. In 2023, we moved from service provider identification of vegetation hazards to a more proactive approach using LIDAR. A full LIDAR survey of vegetation is carried out every two years, with the data used to model conductor positions under maximum wind and snow. These are used to set work priorities and plans with our service providers, and support (along with other tools) negotiations with forest managers and owners. Our service providers work with forest managers and owners to address the highest-risk defects, generally sag defects, while the lower-priority swing and fall defects are addressed in conjunction with other work, where cost effective. The trees involved in this event were the lower priority swing and fall risk defect trees.

Managing vegetation risk in forestry areas remains challenging, time-consuming and costly. It requires engagement with individual forest managers and multiple forest owners to secure removal of trees that we assess as presenting a high risk to the network. Tree removal can impose costs on forest owners under the Emissions Trading Scheme and we cannot require forest owners or managers to agree to tree removal, except in the limited situations under the Tree Regulations. We are continuing to advocate for regulations that better support effective management of tree risk affecting the transmission network.

As such, we consider the incident and its associated outages were beyond our reasonable control. Our response to the outage was in line with GEIP as described in (c) below.

Why we consider:

- (b) that the effect of the outage on the grid, including managing to a shorter duration than that which actually occurred, was beyond Transpower's reasonable control**

The effect of the outage on the grid was beyond Transpower's reasonable control. Ground patrols during the afternoon of the event covered all public areas and limited forestry areas indicated by distance-to-fault information. The patrol was stopped at 6.30 pm due to safety concerns related to high winds, downed trees on access roads, and loss of daylight. Most of the forestry areas under the circuit were unable to be accessed until the following morning. We communicated with Horizon Networks regarding its ability to backfeed its customers or supply from embedded generation, and attempted two manual recloses, in case the change in wind direction had resolved the fault.

Early the following morning, a helicopter patrol quickly identified three conductor spans caught in trees within the forestry area. As they were undamaged, we decided to use a helicopter supplier with the required equipment and capability to re-position the conductor spans. This had a significant time advantage over a ground-based approach. We also mobilised vegetation crews, line crews and excavators in case a ground-based approach was needed.

We believe we managed the outage to the shortest duration possible as discussed in our Periodic Report on the event. Two manual recloses supported by risk assessments were attempted but did not resolve the outage. The outage duration was primarily driven by the need to work safely due to tree fall and wind hazards, and to undertake the work during daylight hours. We were able to return the circuit earlier using a helicopter to relocate the conductors than would have been possible using a ground-based approach.

Why we consider:

- (c) Transpower exercised good electricity industry practice² in relation to the cause and effects of the outage**

We consider that Transpower exercised GEIP in relation to the cause and effects of the outages.

² Good electricity industry practice in relation to transmission, means the exercise of that degree of skill, diligence, prudence, foresight and economic management, as determined by reference to good international practice, which would reasonably be expected from a skilled and experienced asset owner engaged in the management of a transmission network under conditions comparable to those applicable to the grid consistent with applicable law, safety and environmental protection. The determination is to take into account factors such as the relative size, duty, age and technological status of the relevant transmission network and the applicable law.

Patrols and remediations

Ground patrols on the first day of the outage did not locate the cause. Only limited access to forestry areas was possible on the first day due to continuing high winds raising the risk of tree fall and blocked access roads, together with loss of daylight. A helicopter patrol the following morning quickly identified the three spans that were caught in trees, and a plan was agreed to relocate the conductors to their normal positions as quickly as practicable. This used an approach that is new to us, that of a helicopter with a grapple to grasp the conductors. The helicopter company engaged had done similar work on distribution networks in the past and had the relevant standard operating procedures in place. We also had a backup in the form of ground crews in the event our preferred approach was not successful. There were no delays returning the assets to service that were due to factors within our control. The outage duration was primarily driven by the need to patrol the circuit and remediate the issues once the wind had passed, and in daylight.

Vegetation management

Vegetation risk has long been a significant area of concern to Transpower. In recent years we have moved to a more comprehensive approach³ to identifying risks but our ability to mitigate some forestry vegetation risks remains limited.

As described earlier, we have implemented vegetation-specific LIDAR surveys, from which we use the data to prioritise tree defects and plan negotiations with forest owners and managers. Over a period of years, Transpower has been advocating for stronger regulations around management of hazard/defect trees, so we can better manage risk in forestry areas.⁴ Prior to the event we had been actively working with forest managers in the area traversed by the Edgecumbe–Waioatahe circuit regarding management of high-risk trees. The trees involved in this incident were not assessed to be high risk.

Clause 21.3.4 – proposed reassessed values of measures of grid performance and asset performance measures

Should the Commission decide that the outages set out in this report were a normalisation event, the outages will be excluded from calculations of grid performance measures (GP1 and GP2).

GP1 refers to the number of unplanned of unplanned interruptions for each point of service sub-category during a disclosure year. The sub-categories relevant to this event are GP1D and GP1F.

³ Previously our service providers advised of hazards identified through their work.

⁴ MBIE is currently progressing an update to the Electricity (Hazards from Trees) Regulations 2003 (Tree Regulations). The changes included in the draft version provide limited assistance with tree risk management.

GP2 measures the average duration of unplanned interruptions for each point of service sub-category during a disclosure year. The sub-categories relevant to this event are GP2D and GP2F.

The impact of excluding the interruptions listed in Table 1 is shown in Table 2. The final column shows the proposed reassessed values for the relevant GP1 and GP2 subcategories.

Table 2: Proposed reassessed values - GP1 and GP2

Measure	Point of service sub-category	Units	Including this event	Excluding this event
GP1	GP1D: N security, material economic consequence	Number	9	7
GP1	GP1F: N security generator	Number	13	12
GP2	GP2D: N security, material economic consequence	Minutes (average)	395.6	68.6
GP2	GP2F: N security generator	Minutes (average)	193.3	80.1

Clause 20.3.5 – other information that Transpower considers is relevant to this application

Refer to the report dated 8 June 2026 (under clause 28 of IPP 2025) titled "Interruption Report: Waioatahe Loss of Supply, 12/13 April 2026".