

Orion



CPP Application

Contents

1	Application	3
2	Applicant's details	3
3	Structure of application	3
4	Requirements of the Commerce Act 1986	3
4.1	Compliance with the Input Methodologies	4
4.2	Application date	4
4.3	Application fee	4
4.4	Application and adoption of relevant IMs	4
4.5	IM variations	4
4.6	Public disclosure	5
5	IM requirements: Part 5, Subpart 1	5
5.1	Consumer consultation	5
5.2	Verification material	5
5.3	Audit and assurance	6
5.4	Certification	6
5.5	IM modifications and exemptions granted	7
5.6	IM variations requested	7
6	IM requirements: Part 5, Subpart 1	7
6.1	Duration of regulatory period	8
6.2	Building blocks allowable revenue	8
6.3	X-factor	8
6.4	Cost allocation information (IM Schedule B)	8
6.5	Capex, opex, demand and network qualitative information (IM Schedule D)	9
6.6	Capex, opex, demand and network quantitative information (IM Schedule E)	9
7	Innovation incentive	9
Appendix A	Organisational charts	11
Appendix B	IM modifications, exemptions & variations relied upon	23
Appendix C	Commission's approval of IM modifications and exemptions	25
Appendix D	IM Schedule B: Cost allocation information	35
Appendix E	IM Schedule E: Capital and operating expenditure	48
Appendix F	Audit report	69
Appendix G	Directors' certificate	77
Appendix H	IM requirements not applicable	80
Appendix I	IM variations requested	83
Appendix J	Compliance checklists	93

1 Application

1 This is an application made by Orion New Zealand Limited (Orion) for a customised price-quality path (CPP), pursuant to:

- Section 53Q of the Commerce Act 1982 (the Act); and
- The Electricity Distribution Services Input Methodologies Determination (IMs).

2 Orion is applying to modify its regulated revenue path, only.

2 Applicant's details

Name: Orion New Zealand Limited

Address for service: 565 Wairakei Road
PO Box 12896
CHRISTCHURCH 8141

Website: www.oriongroup.co.nz

Contact person: David Freeman-Greene
CPP Director

3 Structure of application

3 Orion's CPP application comprises the following documents:

- Application (this document)
- Main Proposal
- 2026 Asset Management Plan
- Financial Model
- Financial Modelling and Information Report
- Engagement Report
- Independent Verifier's Report

4 Requirements of the Commerce Act 1986

4 Section 53Q of the Act requires that a proposal for a CPP must:

- comply with the input methodologies referred to in section 52T(1)(d) relating to the process for, and content of, customised price-quality path proposals;
- be made within the period, or by the annual date, specified for the purpose in the relevant section 52P determination;

- include the standard application fee for customised price-quality path proposals; and
- apply or adopt all relevant input methodologies.

5 Section 53Q also requires that a regulated supplier:

- may make only 1 proposal during a regulatory period, and may not make a proposal within the 12 months before a default price-quality path is due to be reset; and
- must make its proposal publicly available as soon as practicable after it has been made to the Commerce Commission (the Commission).

6 Orion's compliance with s53Q of the Act, and the IMs, is noted in sections 4 to 6

4.1 Compliance with the Input Methodologies

7 Orion has complied with the IMs, subject to modifications and exemptions granted by the Commission as detailed in section 5.5 of this document.

8 Orion has assessed its compliance with the IMs, which is recorded in compliance checklists in Appendix J. The compliance checklists provide a reference to the relevant sections of documents comprising this CPP Application, demonstrating compliance with each relevant IM requirement.

9 Additionally, Audit New Zealand has audited the financial model for compliance with the IM requirements (part 5, subparts 3 and 4).

4.2 Application date

10 Clause 7.2 of the Electricity Distribution Services Default Price-Quality Path Determination 2025 provides that where a non-exempt EDB elects to propose a customised price-quality path which commences 1 April 2027, that non-exempt EDB must submit a proposal for the customised price-quality path no later than 9 June 2026.

11 This CPP Application is made on 9 June 2026.

4.3 Application fee

12 Payment of \$23,000 has been made by direct deposit, being the application fee prescribed in clause 2(aa) of the Commerce Act (Fees) Regulations 1990.

4.4 Application and adoption of relevant IMs

13 Orion's CPP Application applies or adopts all relevant IMs, except to the extent that those requirements have been modified or exempted (refer Appendix C) or are the subject of an outstanding modification and exemption request (refer Appendix B) submitted prior to the submission of this CPP Application.

14 Orion's compliance with the IMs is recorded in compliance checklists in Appendix J.

15 IM requirements that do not apply to Orion's CPP are listed in Appendix H.

4.5 IM variations

16 Section 53V(2)(c) of the Act allows the Commission, with the agreement of the regulated supplier (Orion), to vary an IM that would otherwise apply to the supplier. In developing this CPP application, Orion has requested that the Commission vary certain IMs relating to events

that may give rise to reconsideration of Orion's CPP. The requested IM variation are detailed in Appendix I.

4.6 Public disclosure

- 17 Orion will make this CPP Application available on its website on 9 June 2026.
- 18 Orion will not publicly disclose documents and data made available to, and relied upon by, the independent verifier. Those documents and data are internal and confidential, and public disclosure would prejudice Orion's commercial interests.

5 IM requirements: Part 5, Subpart 1

- 19 Part 5, subpart 1 of the IMs specifies that a CPP application must contain:
- evidence of consumer consultation;
 - verification-related material;
 - audit and assurance reports;
 - certification;
 - information on modifications or exemptions of CPP application requirements; and
- 20 Additionally, a CPP application must provide the information specified in part 5, subpart 4 (refer section 6, below).

5.1 Consumer consultation

- 21 IM clause 5.1.2 requires Orion to provide specified information regarding its consultation with consumers on the CPP proposal.
- 22 Section 3 of the CPP Main Proposal document summarises Orion's consumer consultation process, including; how consumers and stakeholders were consulted, the feedback received through consultation, and a description of how Orion's CPP proposal has evolved because of consumer feedback.
- 23 Detailed information on Orion's consultation process is provided in the Engagement Report that forms part of this CPP Application.

5.2 Verification material

- 24 IM clause 5.5.2 requires Orion to provide the verifier with:
- the materials required by the verifier to verify the CPP proposal, in accordance with the terms of its engagement and IM Schedule G, and that Orion intends to submit to the Commission as a CPP proposal;
 - upon the verifier's request, the information described in clause D10 of IM schedule D pertaining to identified programmes after the verifier has notified Orion of its selection of identified programmes;
 - any information requested by the verifier pursuant to the verifier's right to ask for such information pursuant to its deed of engagement, and as specified in IM clause F6(2)(d); and

- in advance of the verifier’s selection of identified programmes, summary information on the forecast projects and programmes, in the format specified in Table 1: Projects and programmes of the regulatory templates.
- 25 Section 2.6 of the verifier’s report describes the process undertaken by the verifier.
- 26 The information provided to, and relied upon, by the verifier in the preparation of its verifier’s report is contained in Appendix D of the verifier’s report.
- 27 IM clause 5.1.3 requires that Orion provide, as part of its CPP Application:
- any information relating to the CPP proposal, other than information required to be included in a CPP proposal by Subpart 4, provided to the verifier by or on behalf of the CPP applicant, pursuant to IM clauses 5.5.2(3)(a)-(c) and 5.5.2(3)(e); and
 - any other information relied upon by the verifier relating to the CPP proposal pursuant to IM clause 5.5.2(3)(d).
- 28 The information responsive to the above requirements is the information set out in Appendix D of the verifier’s report. The information in Appendix D and relied upon by the verifier in preparing its verifier’s report has been made available to the Commission in the SharePoint Data Room, along with additional relevant supporting material.
- 29 Orion confirms that the certificate issued by the verifier (Appendix C of the verifier’s report) relates to verification of the relevant parts of the CPP proposal as submitted to the Commission, as required by IM clause 5.1.3(2).
- 30 In accordance with IM clause 5.4.32, the verifier’s terms of engagement and invoices, along with Orion’s records of payment and the initial procurement documents, have been provided to the Commission in the SharePoint Data Room.
- 31 Further information regarding independent verification is provided in section 3.4 of the CPP Main Proposal.

5.3 Audit and assurance

- 32 IM clause 5.1.4 requires Orion to provide an audit report in respect of an audit or assurance engagement undertaken of the matters specified in clause 5.5.3.
- 33 Under section 45(1) of the Energy Companies Act 1992, Orion is a public energy company (as defined in section 4 of the Public Audit Act 2001) and the Auditor-General is Orion’s auditor. The Auditor General appointed, and Orion engaged, Audit New Zealand to perform an assurance engagement of the matters specified in IM clause 5.5.3. Audit New Zealand’s assurance engagement report is provided in Appendix F of this Application document.
- 34 In accordance with IM clause 5.1.4(3), Orion confirms that the assurance engagement report provided by Audit New Zealand relates to the CPP proposal as submitted to the Commission.
- 35 In accordance with IM clause 5.4.32, the independent auditor’s terms of engagement and invoices, along with Orion’s records of payment, have been provided to the Commission in the SharePoint Data Room.

5.4 Certification

- 36 IM clause 5.1.5 requires Orion to provide certificates recording the certifications specified in IM clause 5.5.4.
- 37 In accordance with IM clauses 5.1.5 and 5.5.4, Appendix G contains certificates executed by Orion’s directors.

5.5 IM modifications and exemption granted

- 38 On 10 February 2026, Orion requested modifications and exemptions to certain IM requirements, pursuant to IM clause 5.1.7. The Commission approved IM modifications and exemptions on 30 April 2026.
- 39 IM clause 5.1.8 requires Orion to provide:
- copies of the Commission’s approvals. These are provided in Appendix C of this CPP Application document;
 - a list of the approved modifications and exemptions that Orion has elected to apply in its application. These are listed in Appendix B of this CPP Application document;
 - evidence that any conditions, upon which approval has been granted, have been met is provided in Appendix C of this CPP Application document;
 - an indication, at the relevant locations within the document or documents comprising the CPP application, as to where the modifications or exemptions have been applied. This information is provided in Appendix B of this CPP Application document.

5.6 IM variations requested

- 40 In addition to the IM modifications and exemptions described above, we are requesting that the Commission agree to six IM variations, in accordance with section 53V(2)(c) of the Commerce Act 1986. These are:
- a variation of IM clause 5.6.10(2)(c)(i) to reduce the financial threshold applying to contingent projects to \$2.5 million;
 - a variation of IM clause 5.6.11(b) to reduce the financial threshold applying to unforeseen projects to \$2.5 million;
 - a variation of subpart 6 of the IMs to insert listed projects as a new type of reopener event (prospective);
 - a variation of subpart 6 of the IMs to insert a capacity event as a new type of reopener event (prospective);
 - a variation of subpart 6 of the IMs to insert a capacity event as a new type of reopener event (responsive);
 - a variation to the urgent project allowance specified in IM clause 3.1.3(8) to allow Orion to recover its prudently incurred expenditure, above the DPP allowance, in the two disclosure years preceding the CPP period.
- 41 The detail and drafting of the variations requested is provided in Appendix I of this CPP Application document.
- 42 While these variations are only expected to be approved as part of the Commission’s determination of our CPP proposal, we have listed the proposed variations that we have relied upon in preparing our CPP proposal in Appendix B of this CPP Application document.

6 IM requirements: Part 5, Subpart 4

- 43 IM clause 5.4.1 requires that Orion’s CPP proposal must contain, in all material respects, the information specified in IM subpart 4.

- 44 The principal information requirements of IM subpart 4 are satisfied by the following documents, which form part of Orion's CPP proposal:
- CPP Application (this document);
 - CPP Financial Model; and
 - CPP Financial Modelling Information Report.
- 45 Appendix J of this CPP Application document sets out detailed document references supporting the information requirements specified in IM subpart 4. This document addresses only those requirements of IM subpart 4 that are not otherwise addressed elsewhere.

6.1 Duration of regulatory period

- 46 Orion is seeking a 'standard' 5-year CPP regulatory period, as defined by section 53W of the Act.

6.2 Building blocks allowable revenue

- 47 IM clause 5.4.7(2) requires that Orion's CPP proposal must contain all data, information, calculations and assumptions used to determine building blocks allowable revenue before tax and BBAR after tax for each disclosure year of the next period.
- 48 IM clause 5.4.7(4) requires that, where this information is included in a CPP proposal in a spreadsheet format, the information must be cross-referenced in the text of the CPP proposal document. Appendix J of this CPP Application document contains a compliance checklist that provides the required cross-reference, indicating where in the CPP Financial Model the required information can be found.

6.3 X-factor

- 49 IM clause 5.4.8(3) requires that Orion must apply the X-factor that is defined in its DPP determination; however, IM clause 5.4.8(4) provides that Orion may apply a different X-factor provided that an explanation and supporting evidence is given as to why that would better meet the purpose of Part 4 of the Act.
- 50 In the Electricity Distribution Services Default Price-Quality Path Determination 2025, Orion was assigned an alternative X-factor of -9.8%.
- 51 Orion proposes, and has applied, an X-factor of -7.5%.
- 52 Orion considers that the X-factor stated in paragraph 51 better meets the purpose of Part 4 of the Act than the DPP X-factor because it better manages the risk of price shocks while enabling timely recovery of efficient costs, and results in a more even distribution of price impacts across the CPP period by balancing the step change onto the CPP with the revenues required in the later years of the CPP period.

6.4 Cost allocation information (IM Schedule B)

- 53 IM Clause 5.4.9 requires Orion to provide the cost allocation information in Schedule B of the IMs. Schedule B is provided in Appendix D of this CPP Application document.

6.5 Capex, opex, demand and network qualitative information (IM Schedule D)

- 54 IM clause 5.4.28 requires that the information in IM schedule D must be contained in a CPP proposal and provided in accordance with the requirements of that schedule. Clause D2 of IM schedule D specifies instructions for providing that information.
- 55 Orion has provided a table in Appendix J of this CPP Application document that satisfies the information requirements by:
- providing a reference to the place where, in the CPP proposal, a response is provided; and
 - providing the document identifier for any separate document identified in response, including in the case where the document in question is provided in the CPP proposal.
- 56 Clause D3(1) of IM schedule D requires that Orion provide:
- the current organisational structure of the EDB and a description of any separate organisation used to manage Capex and Opex; and
 - the number of full-time equivalent employees, employed by the applicant, broken down by business units.
- 57 Orion has provided the required organisational information in Appendix A of this CPP Application document.

6.6 Capex, opex, demand and network quantitative information (IM Schedule E)

- 58 IM clause 5.4.29 requires that Orion's CPP proposal must contain the information specified in the regulatory schedules (IM schedule E), and that information must be:
- in spreadsheet format whereby each item of data is linked between all cells to which it is relevant, irrespective of whether such cells are on the same or different tabs; and
 - provided in accordance with the instructions specified in IM clause 5.4.30.
- 59 The regulatory templates specified in IM schedule E are provided in Appendix E of this CPP Application document.

7 Innovation incentive

- 60 In its DPP4 decision, the Commission implemented the innovation and non-traditional solutions allowance (INTSA) as an additional means of ensuring that EDBs have incentives to:
- innovate and invest under s52A(1) of the Act; and
 - invest in energy efficiency and demand side management, including reduction of energy losses, under s54Q;
- while having overall regard for the long-term benefit of consumers (s52A).
- 61 The IMs do not require a DPP or CPP to contain an INTSA. That decision is made at the Commission's discretion when determining a DPP or CPP, as is the exact form and nature of the incentive.

- 62 While Orion has a strong innovation focus as part of business-as-usual, we consider that continuation of an incentive to explore less certain innovative practices and approaches, including in collaboration with other EDBs, is in the long-term interest of consumers given the potential to derive efficiencies and be able to share them with consumers.
- 63 Orion requests that the Commission, in determining our CPP, include an INTSA as defined in Schedule 5.3 of the DPP4 determination. That would include setting the aggregate level of the allowance at 0.8% of maximum allowable revenue as stated in the CPP determination and reserving 25% of the allowance for collaborative projects.

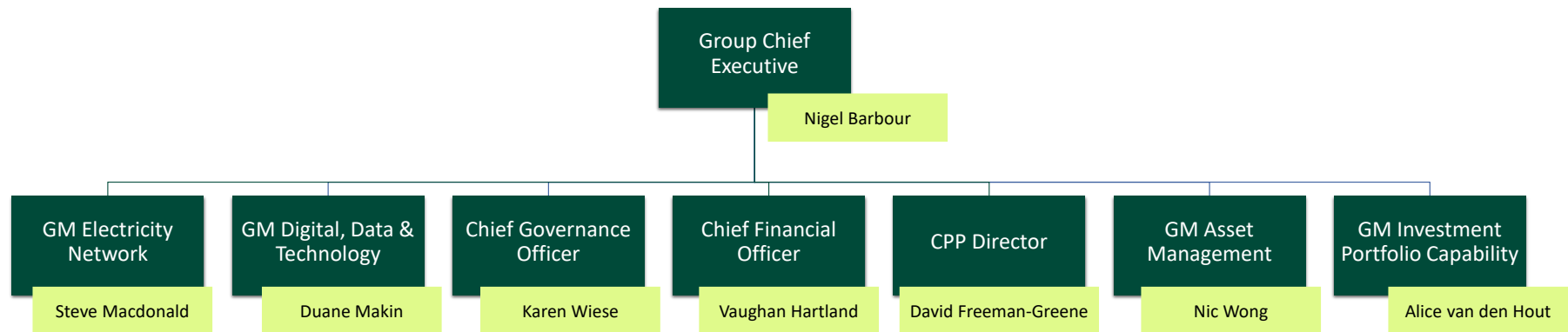
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Appendix A

Organisational charts

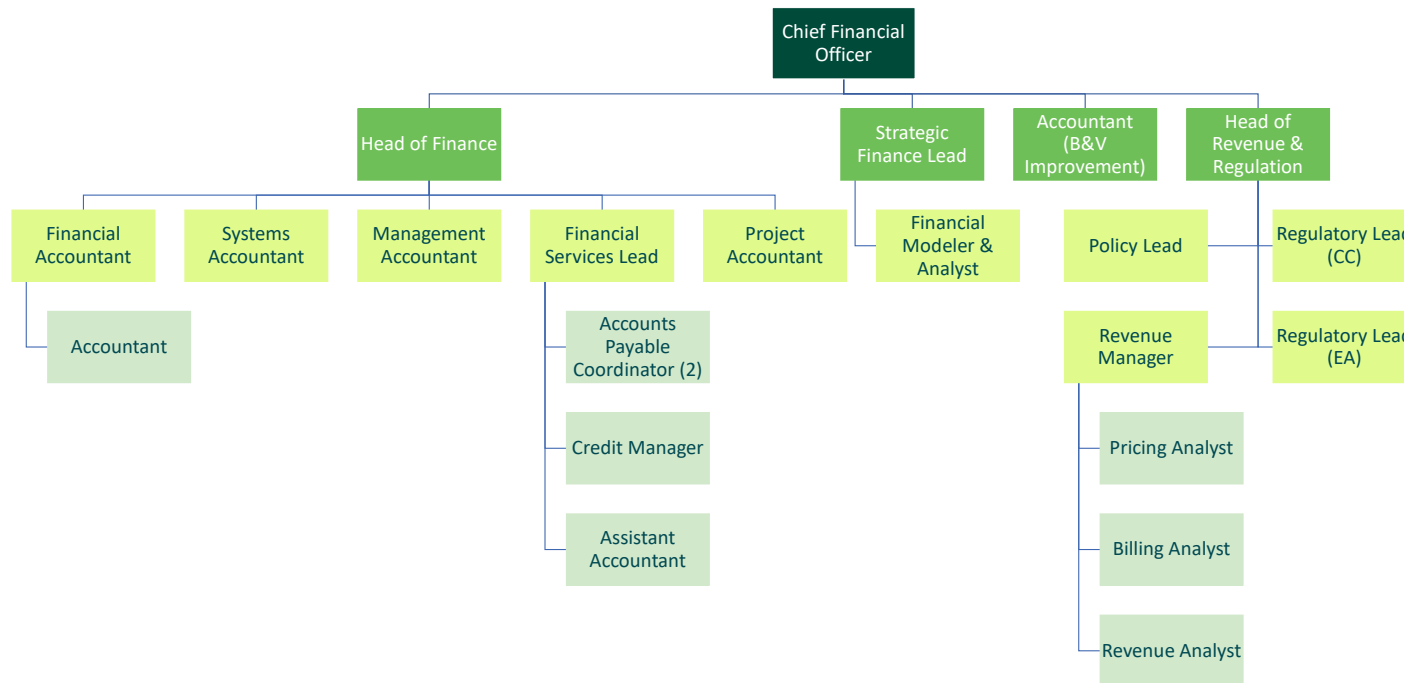
Integrated Leadership Team (Executive)

Orion



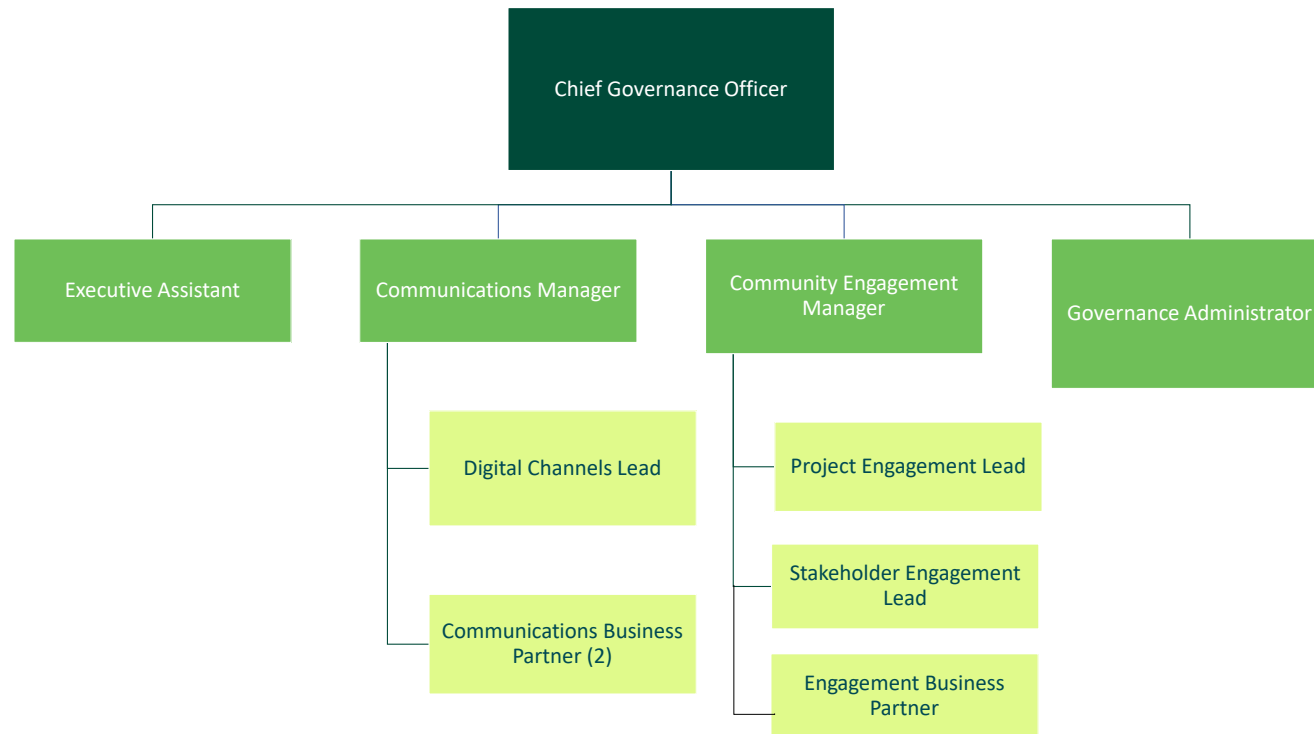
Value Optimisation

Orion



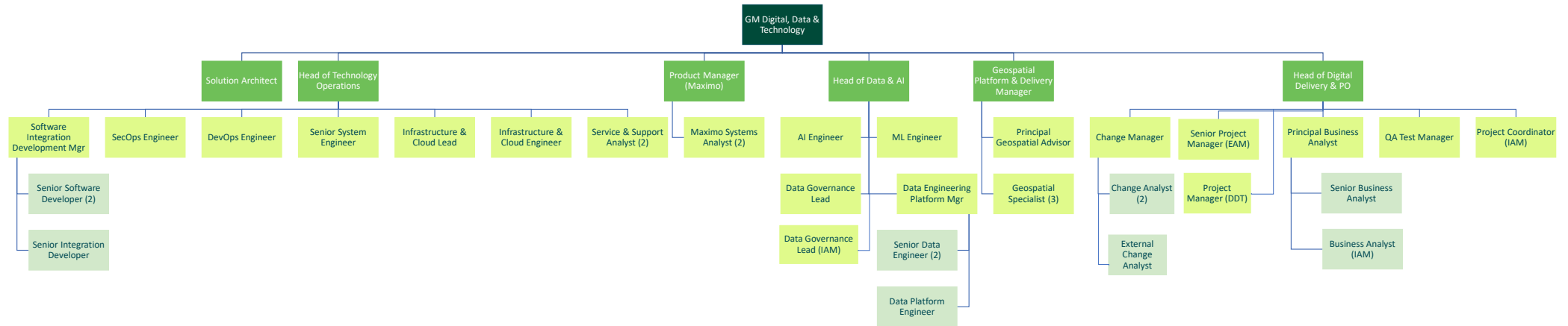
Governance, Communications and Engagement

Orion



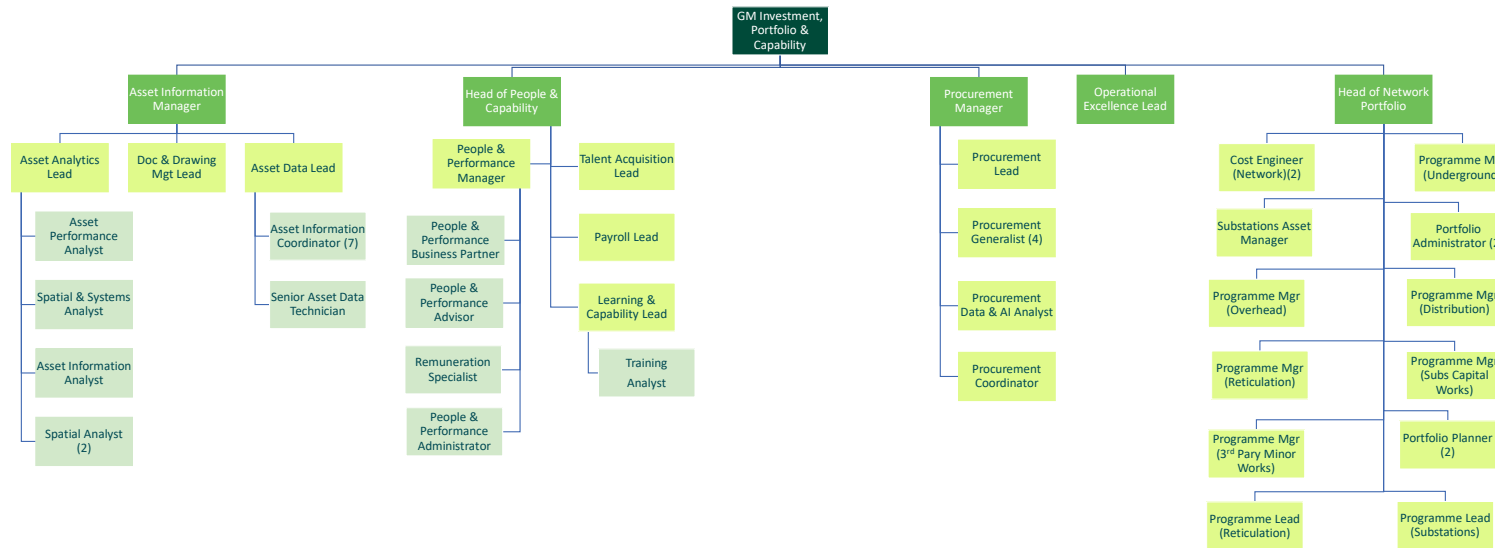
Digital, Data and Technology

Orion



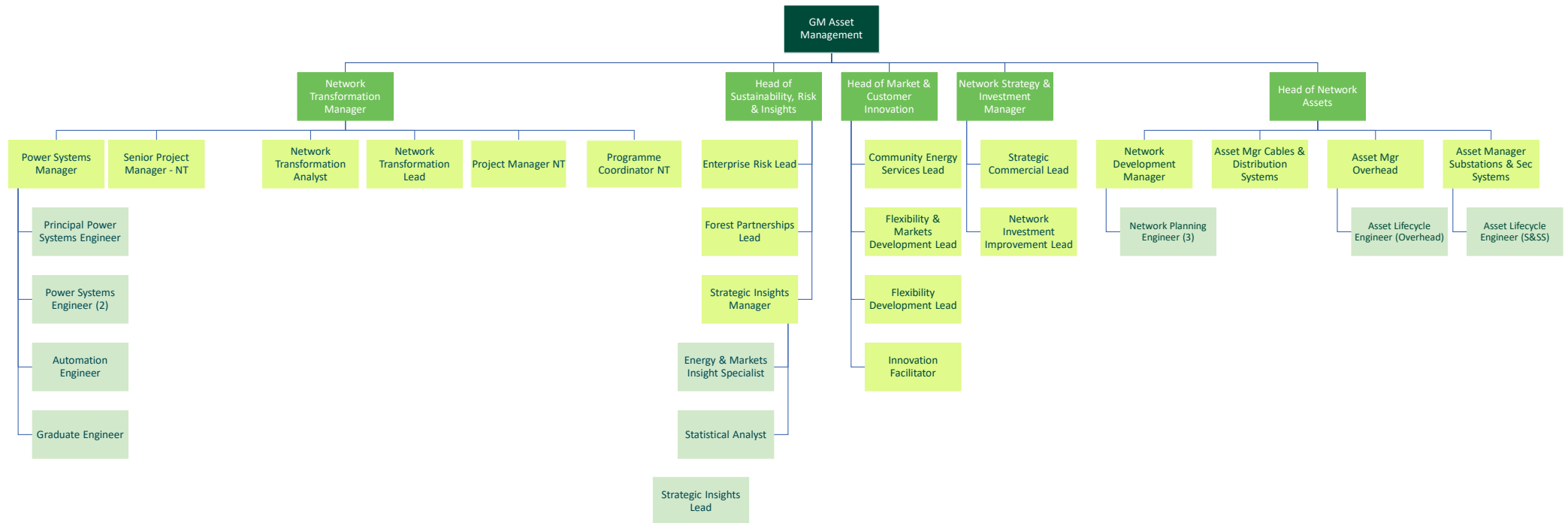
Investment, Portfolio & Capability

Orion



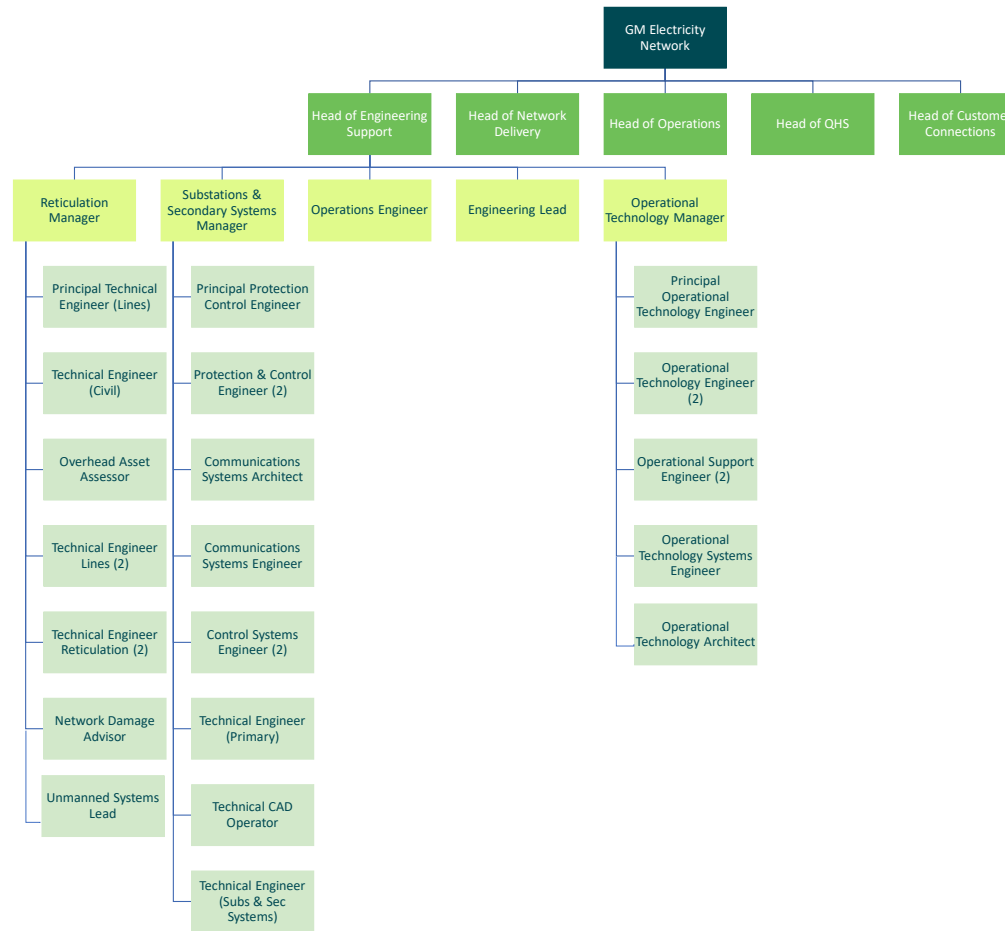
Asset Management

Orion



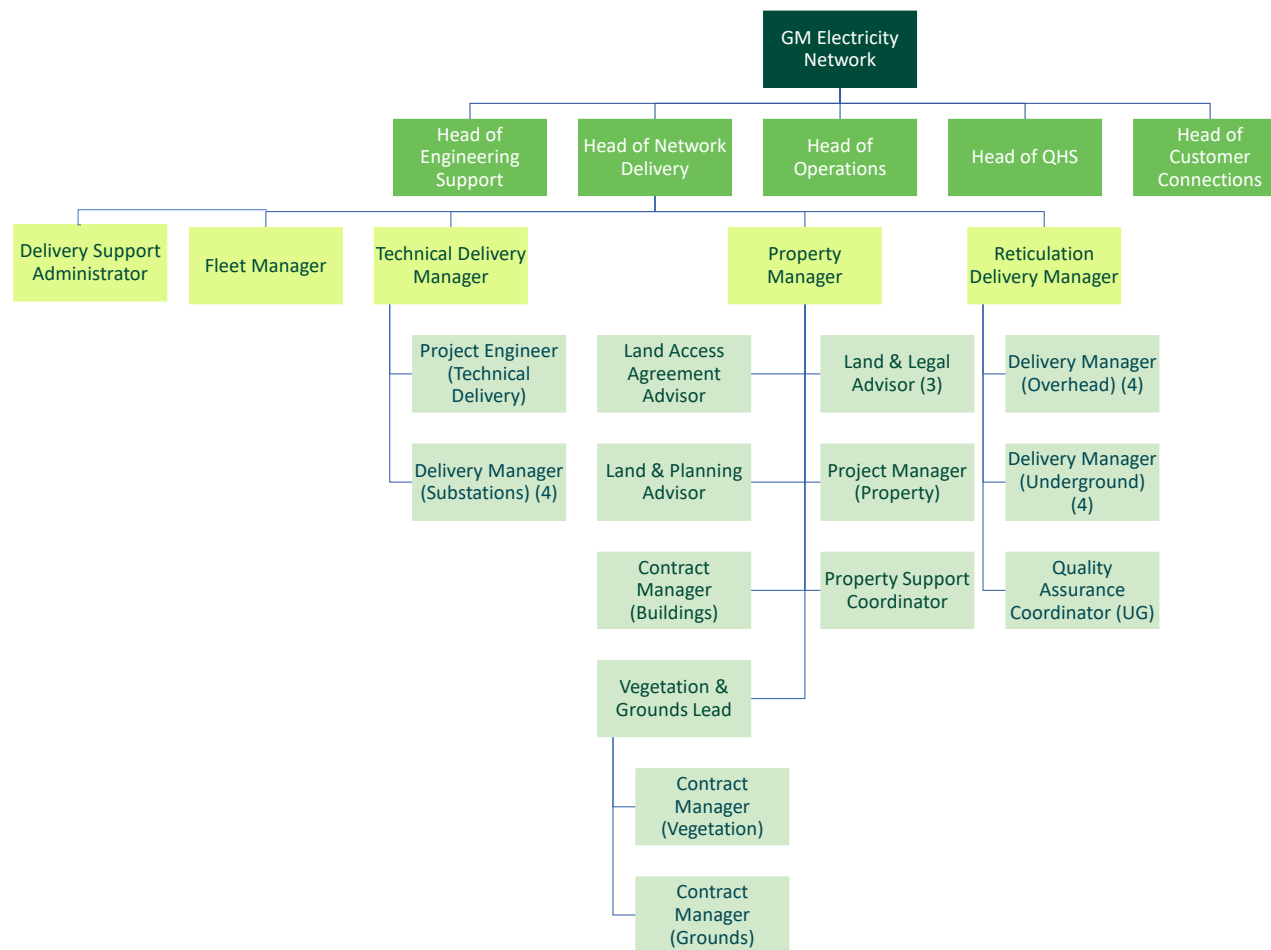
Electricity Network – Lead Team and Engineering Support

Orion



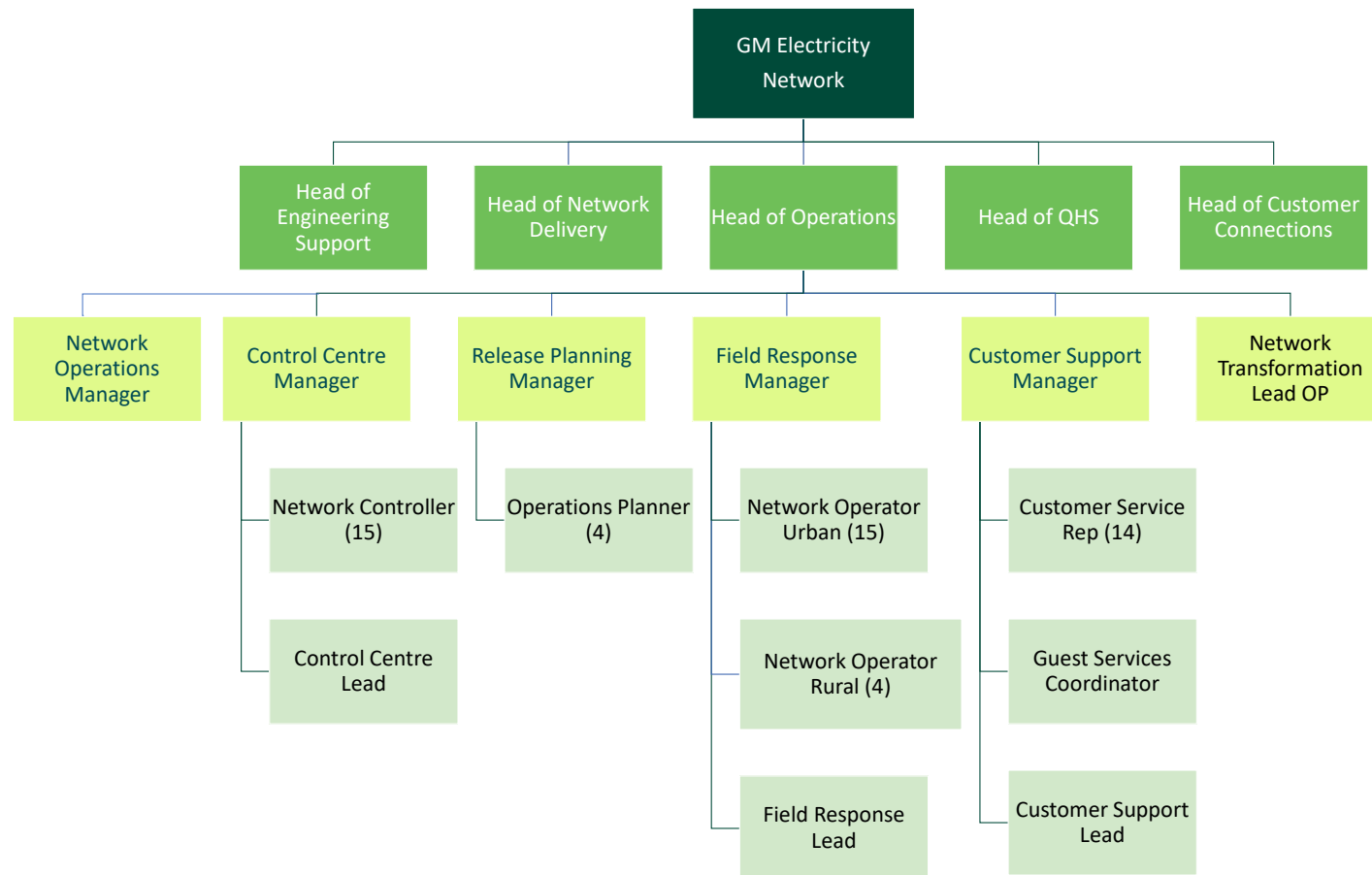
Electricity Network – Network Delivery

Orion



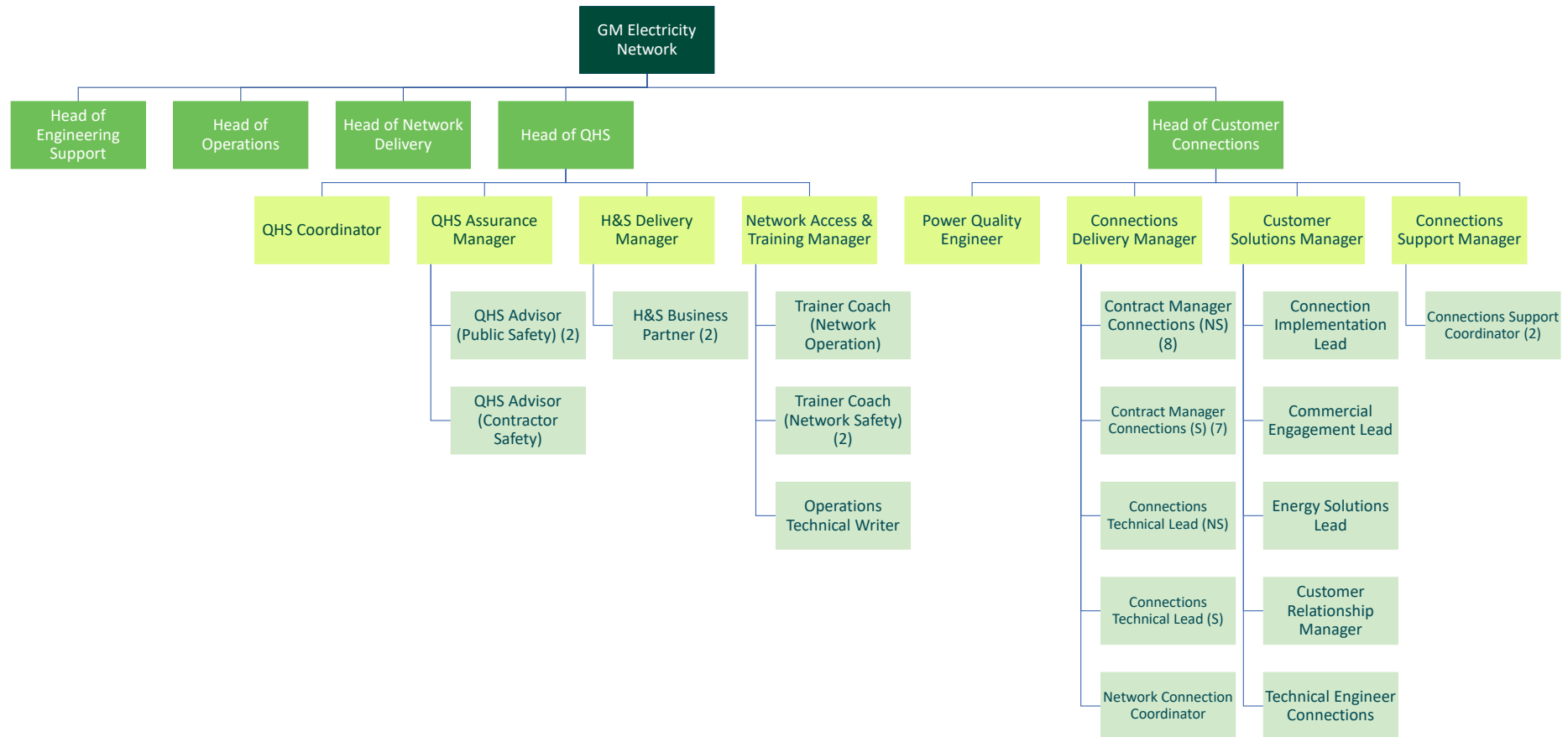
Electricity Network – Operations

Orion



Electricity Network – QHS and Connections

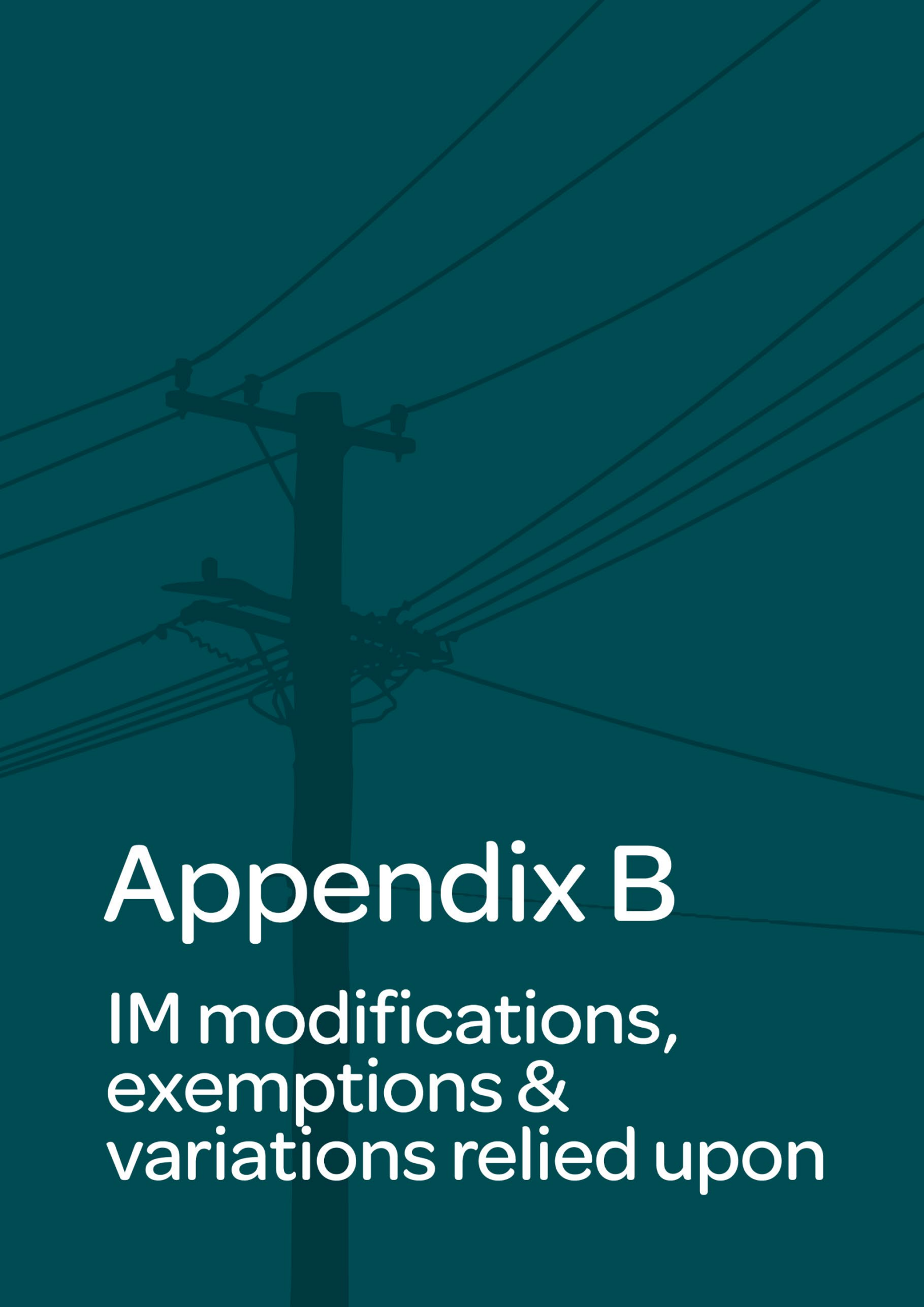
Orion



Organisational breakdown

Orion

Division	FTE	Headcount
Electricity Network	155.45	165
Invest Portfolio & Capability	49.25	52
Asset Management	40.2	41
Digital Data and Technology	39.7	41
Value Optimization	20.35	22
Governance, Communications and Engagement	9.70	10
ILT	8	8
CPP	1	1

The background is a solid teal color. Overlaid on this is a dark silhouette of a utility pole. Several power lines extend from the pole towards the top right corner of the frame, creating a sense of depth and perspective.

Appendix B

IM modifications,
exemptions &
variations relied upon

IM modifications and exemptions requested

On 10 February 2026, Orion submitted a modification and exemption request in accordance with IM clause 5.1.6. The three modifications and one exemption requested are summarised in Table 1, below, along with the location where the modification/exemption has been applied.

Table 1: Summary of modifications and exemption request, 10 February 2026

Issue	IM clause	Modification/exemption	Location where applied
Interpretation	1.1.4	A modification to the definition of 'current period' and 'assessment period' to align with the availability of audited disclosure information and to maintain consistency with the tables of IM Schedule E.	The revised definitions have been applied throughout this CPP proposal; in all relevant charts, tables, regulatory schedules and the financial model.
Priority of proposals	5.4.3	An exemption from the requirement to provide prioritisation information.	N/A - this is an exemption from providing information.
Interpretation	D1	A modification to include non-network solutions provided by a related party or third party within the definition of system operations and network support opex.	This modification is applied in IM Schedule E (Appendix E), Tables 3 & 7.
Related parties	D12	A modification to related party information requirements to exclude information that is materially satisfied by other, routine information disclosures (duplicative).	N/A - this is modification that allows Orion to omit aspects of related party information.

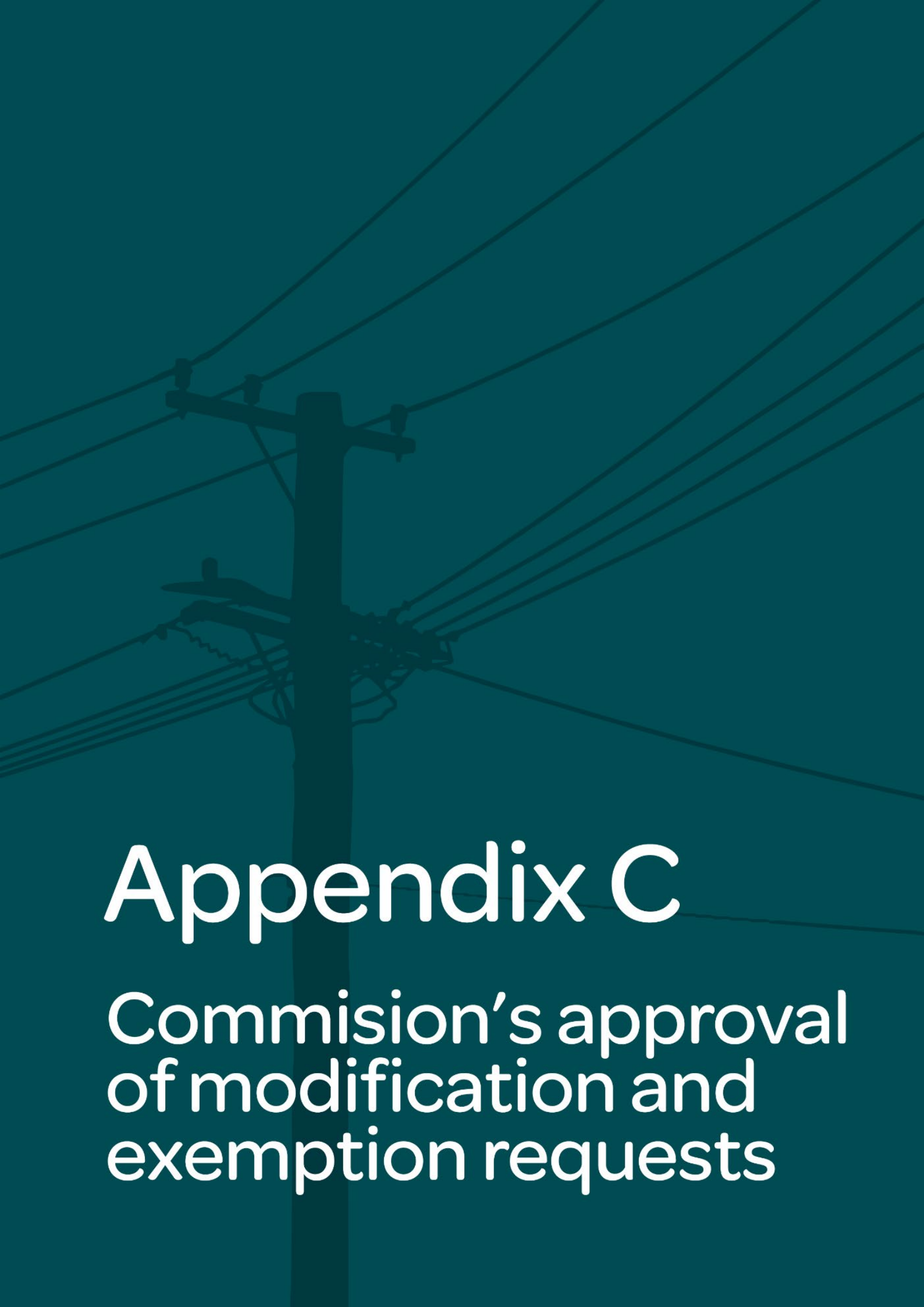
IM Variations requested

As part of our CPP applications, we are requesting that the Commission agrees to **six** IM variations, in accordance with section 53V(2)(c) of the Commerce Act 1986, as detailed in Table 2, below.

Table 2: Summary of IM variations request

Issue	Relevant clause	Variation requested
Contingent projects	5.6.10	Reduction of the financial threshold for contingent projects
Unforeseen projects	5.6.11	Reduction of the financial threshold for unforeseen projects
Listed projects	5.6.10A (new)	Creation of a new, listed project reopener (prospective)
Capacity event	5.6.11A (new)	Creation of a new, capacity event reopener (prospective)
Capacity event	5.6.11A (new)	Creation of a new, capacity event reopener (responsive)
Urgent project allowance	3.1.3	A varied urgent project allowance to permit Orion's prudently incurred 'ramp-up' costs

Application of the IM variations is contingent on agreement by the Commission. Further, the IM variations requested are predominantly targeted at uncertainty management mechanisms that would apply after the CPP is determined. Therefore, we have not relied upon the proposed variations; however, in respect of the 'listed project' reopener, we have provided the information that would be required if the variation to IM clause D16 is agreed (refer to Appendix J – compliance checklists).

The background is a solid teal color. Overlaid on this is a dark silhouette of a utility pole with several power lines extending from it across the frame. The lines are thin and dark, creating a network of intersecting paths.

Appendix C

Commission's approval
of modification and
exemption requests

On 30 April 2026, the Commission approved the modifications and exemptions we requested, except for our requested exemption from clause D12(2)(a). The Commission's approval letter is provided below.

The Commission has granted approval subject to conditions.

Condition 1

In relation to approval of the modification of the terms 'current period' and 'assessment period', the Commission has imposed a condition that *"As soon as it is available, and no later than 1 September 2026, Orion provides all audited and certified financial information that would be required by Schedule E for disclosure year 2026 (DY2026) had this modification not been applied."* We will comply with that conditions by:

- updating the 'CA' columns of relevant tables within Schedule E with finalised figures;
- subjecting Schedule E to re-audit and re-certification in accordance with IM clauses 5.5.3 and 5.5.4; and
- submitting to the Commission no later than 1 September 2026.

Condition 2

In relation to the modification to include non-network solutions provided by a related party or third party within the definition of system operations and network support opex, the Commission has imposed a condition that *"Orion clearly identifies the total of 'non-network solutions provided by a related party or third party' opex as a separate line item in Table 7 section 7a when completing Schedule E, similar to the requirement in Schedules 6b and 11b of the information disclosure determination (ID determination)"*. We have complied with that condition by showing 'non-network solutions provided by a related party or third party' opex as a separate line item in section 7a of Table 7 within Schedule E. Refer to Appendix E of this Application document.

30 April 2026

Alec Findlater
Regulatory Lead – Commerce Commission
Orion New Zealand Limited

By email: [REDACTED]

Dear Alec

Commerce Commission response: Orion CPP Proposal – Request for IM modifications and exemptions dated 10 February 2026

1. On 10 February 2026, Orion New Zealand Limited (Orion) requested four modifications to, and exemptions from, the Electricity Distribution Services Input Methodologies Determination 2012 (EDB IMs), under clause 5.1.6.¹
2. This letter advises you of our decision on each of Orion's modification and exemption requests and sets out any conditions applicable to our approval.

Summary of decisions

3. We approve Orion electing to apply, as part of its customised price-quality path (CPP) proposal in June 2026:
 - 3.1 modification of the term 'current period' as it appears in subparts 1, 4 and 5 of Part 5 and the schedules to those subparts by replacing each occasion where 'current period' occurs in those subparts and schedules with the following text:

means the 5 disclosure years preceding the commencement of the assessment period
 - 3.2 modification of the term 'assessment period' as it appears in subparts 1, 4 and 5 of Part 5 and the schedules to those subparts by replacing each occasion where 'assessment period' occurs in those subparts and schedules with the following text:

means the 2 disclosure years preceding the EDB's anticipated commencement date of the CPP...

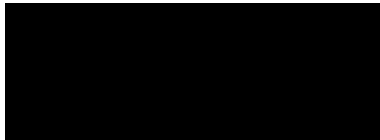
¹ [Electricity Distribution Services Input Methodologies Determination 2012\[2012\] NZCC 26](#) as amended by [Electricity Distribution Services Input Methodologies \(Reopeners and Other Matters\) Amendment Determination 2025 \[2025\] NZCC 5](#). Please note that all clause, part, subpart and schedule references in this letter are to the EDB IMs unless otherwise stated.

- 3.3 The modifications outlined at paragraphs 3.1 and 3.2 are approved on the following condition:
- 3.3.1 As soon as it is available, and no later than 1 September 2026, Orion provides all audited and certified financial information that would be required by Schedule E for disclosure year 2026 (DY2026) had this modification not been applied.
- 3.4 exemption from the requirement for the CPP proposal to explain why the proposal deserves to be prioritised for assessment before other CPP proposals;
- 3.5 modification to Schedule D to include a new defined term for ‘non-network solutions provided by a related party or third party’:
- non-network solutions provided by a related party or third party means operational expenditure relating to non-network solutions provided by a related party or third party
- 3.6 modification to Schedule D to the definition of ‘system operations and network support opex’ to include a new subclause (q) for ‘non-network solutions provided by a related party or third party’:
- system operations and network support opex means opex where the primary driver is the management of the network and includes expenditure relating to control centre and office-base system operations, including-
- (a) asset management planning including the preparation of the asset management plan, load forecasting and network modelling;
- ...
- (q) non-network solutions provided by a related party or third party
- 3.7 The modifications at paragraphs 3.5 and 3.6 are approved on the following condition:
- 3.7.1 Orion clearly identifies the total of ‘non-network solutions provided by a related party or third party’ opex as a separate line item in Table 7 section 7a when completing Schedule E, similar to the requirement in Schedules 6b and 11b of the information disclosure determination (ID determination).²
- 3.8 modification to delete subclauses D12(1), (2)(a) and (5) in Schedule D to remove the requirements to provide information about related parties.
4. We do not approve Orion electing to apply, as part of its CPP proposal in June 2026, the following modifications to the requirements to provide information on related party transactions:

² [Electricity Distribution Information Disclosure \(amendments related to IM Review 2023\) Amendment Determination 2024\[2024\] NZCC 31](#), Schedule 16.

- 4.1 modification to delete subclause D12(2)(b); and
- 4.2 modification to the chapeau of subclause D12(3).
- 5. The legal framework, relevant context and rationale for our decisions are detailed below in the Appendix.
- 6. If Orion relies on any of the modifications or exemptions approved in this letter, it must specify its reliance on that modification or exemption as part of its CPP application.³
- 7. The modifications and exemptions approved in this letter only apply to a CPP proposal submitted by Orion in June 2026.
- 8. We have considered each of the modifications and exemptions proposed by Orion on its merits and in the context of Orion's proposed 2026 CPP proposal. Nothing in this letter should be taken as an indication that a similar modification or exemption would be approved with respect to a different CPP proposal.
- 9. If you have any questions regarding this matter, please contact Ben Woodham at infrastructure.regulation@comcom.govt.nz.

Nāku iti noa, nā



Nathan Strong

Commissioner

³ Clause 5.1.8(1)(d)

Appendix Legal framework and decision rationale

Legal Framework

- A1 Under clause 5.1.6(1), the Commission may modify or exempt any requirement of the EDB IMs in Part 5 Subpart 1 (Contents of a CPP application), Part 5 Subpart 4 (Information required in a CPP proposal), Part 5 Subpart 5 (Consumer consultation, verification, audit and certification) or any of the schedules relating to those subparts.
- A2 The requirements that apply in the Commission's decision-making for modifications or exemptions are set out in clauses 5.1.6(2) and (3), and essentially restrict any changes that materially affect the Commission's CPP evaluation, consultation and CPP determination:
- (2) A modification or exemption may be approved where, in the Commission's opinion, the modification or exemption will not detract, to an extent that is more than minor, from—
- (a) the Commission's evaluation of the CPP proposal;
- (b) the Commission's determination of a CPP; and
- (c) the ability of interested persons to consider and provide their views on the CPP proposal.
- A3 Under clauses 5.1.6(4)(a) and 5.1.7(1), the Commission's approval of the modification or exemption must be previously approved before the CPP application is submitted.
- A4 Under clause 5.1.6(4)(c)(i), in giving approval to Orion's application, the Commission may set conditions and requirements that apply to the modification or exemption.
- A5 Procedural rules for Orion to ask for a modification or exemption are set out in clauses 5.1.7(2) and (3).
- A6 Under clause 5.1.7(4), we may consult with interested persons or use expert advice in making our decision on modifications and exemptions.

Modification and exemption requests and rationale for our decisions

- A7 We are satisfied that the approved modifications and exemptions will not detract, to an extent that is more than minor, from our evaluation or determination of Orion's CPP proposal or the ability of interested persons to consider and provide their views on the CPP proposal. The rationale supporting the conclusions for each modification and exemption is set out below.

Modifications to the definition of 'current period' and 'assessment period' (clause 1.1.4)

- A8 Orion seeks to modify the terms 'current period' and 'assessment period'⁴ to align with the availability of audited disclosure information and to maintain consistency with the tables set out in Schedule E (Capital and Operating Expenditure – Regulatory Templates). The

⁴ As it appears in subparts 1,3 and 4 of Part 5 (including schedules to those subparts).

modification is only sought to apply to subparts 1, 4 and 5 (and the schedules to those subparts) of Part 5.

Current period

A9 The term ‘current period’ is defined in clause 1.1.4 to mean ‘the 5 disclosure years preceding the disclosure year in which the CPP application is submitted’. Orion will submit its CPP application in DY2027. As such, the ‘current period’ for the purposes of Orion’s CPP proposal would be DY2022 – DY2026.

A10 Orion seeks to modify the definition of ‘current period’ so that the five years it needs to provide information for would be DY2021-DY2025 instead of DY2022-DY2026. It seeks this modification on the basis that it will have insufficient time to provide audited and certified information for DY2026 (disclosure year ending 31 March 2026) as part of its CPP proposal. Normally, audited disclosures are published no later than 31 August of each year. Orion states that it intends to provide:

A10.1 the information required by, and consistent with, Schedule E in its CPP proposal; and

A10.2 audited and certified information for DY2026 in accordance with the requirements of the ID determination ie, by 31 August 2026.

Assessment period

A11 Orion’s request also seeks an amendment to the definition of ‘assessment period’.⁵

A12 Relevant for our purposes clause 1.1.4 defines ‘assessment period’ to mean ‘the period between the end of the most recent disclosure year prior to submission of the CPP application in question and the EDB’s anticipated commencement date of the CPP’.⁶ Orion will submit its CPP application on 9 June 2026 (DY 2027) to take effect on 1 April 2027 (DY2028).⁷

A13 Applying the definition in the IMs, the resulting ‘assessment period’ for Orion’s CPP application would be a single year, ie, DY2027. This is contrary to Schedule E, (the capital and operating expenditure tables) which require Orion to populate information on the basis of a two-year assessment period. Orion seeks to modify the definition of ‘assessment

⁵ Changing the definition of ‘current period’ to remove DY2026 information will also necessitate changes to the definition of ‘assessment period’. Orion’s request sought a change to both definitions for the purposes of its CPP proposal.

⁶ The full definition of ‘assessment period’ is “means the period between the end of the most recent disclosure year prior to submission of the CPP application in question and the EDB’s anticipated commencement date of the CPP, assuming that- (a) the CPP application is neither discontinued in accordance with s 53S of the Act nor deferred in accordance with s 53Z of the Act; and (b) reasonable time is allotted for the Commission to undertake its assessment of the CPP application in accordance with ss 53S, 53T and 53U of the Act.”

⁷ As per clause 7.2 of [Electricity Distribution Services Default Price-Quality Path Determination 2025\[2024\] NZCC 28](#).

period’ to resolve the inconsistency between the definition of ‘assessment period’ and the requirements of Schedule E.

Our consideration of both modification requests

A14 We note that Orion will not be able to provide audited and certified DY2026 information as part of its CPP proposal. We are satisfied that changing the definition of ‘current period’ for the purposes of this CPP proposal would still provide us with complete information to evaluate and determine Orion’s CPP because:

A14.1 unaudited DY2026 information for Schedule E will be provided as part of the CPP proposal; and

A14.2 audited and certified DY2026 information will be provided by 31 August 2026.

A15 We agree that the modification to the definition of ‘assessment period’ is required to ensure completeness of information. Without this change, the currently defined ‘assessment period’ would only require Orion’s CPP proposal to include forecast information for the disclosure year prior to the proposed CPP commencing on 1 April 2027 ie DY2027. The current definition of ‘current period’ would have required DY2026 information whereas the modified definition removes the requirement to provide DY2026 information (see para A10). The modified definition of ‘assessment period’ ensures that DY2026 information is provided and aligns with Schedule E requirements to provide two-year information instead of one-year.

Exemption from the requirement to provide prioritisation information (clause 5.4.3)

A16 Clause 5.4.3 requires a CPP proposal to explain why the proposal deserves to be prioritised for assessment before other CPP proposals, were the Commission to exercise its prioritisation powers under s 53Z of the Commerce Act 1986 (the Act).

A17 Orion seeks an exemption from the requirement set out in clause 5.4.3. It considers it unnecessary and inefficient to meet this requirement, suggesting that there does not appear to be any prospect of the Commission needing to exercise its prioritisation powers under s 53Z of the Act. It states that no other EDB is contemplating submitting a CPP proposal before 1 April 2027 and that prioritisation is only triggered when the Commission has received more than four CPP proposals for the same type of regulated goods or services in any one year.

A18 We agree with Orion that because we will not need to exercise our prioritisation powers at this time, an explanation of prioritisation is not needed.

Modification to include ‘non-network solutions provided by a related party or third party’ within the definition of ‘system operations and network support opex’ (clause D1)

A19 Orion is likely to be forecasting opex for ‘non-network solutions’ in its CPP proposal. Orion requests that ‘non-network solutions’ be defined so that it can include this type of expenditure in its CPP proposal.

A20 Orion seeks two modifications to clause D1:

A20.1 to include a new definition of ‘non-network solutions provided by a related party or third party’; and

A20.2 to modify the definition of ‘system operations and network support opex’ to include the new defined term for ‘non-network solutions provided by a related party or third party’.

A21 ‘Non-network solutions provided by a related party or third party’ is not defined in the EDB IMs nor included in the defined term ‘system operations and network support opex’ in Clause D1. We agree with Orion that a new definition for ‘non-network solutions provided by a related party or third party’ is required to accommodate opex that it is considering forecasting in its CPP proposal. We also agree with the definition that Orion has proposed, as this new definition is identical to the definition that is in our ID Determination.⁸

A22 We agree with Orion that it is appropriate to include ‘non-network solutions provided by a related party or third party’ in the ‘system operations and network support opex’ category. It is the correct opex category for the nature of the proposed expenditure.

A23 We are satisfied that these modifications will allow us to appropriately consider the proposed opex that Orion will be forecasting.

Modification to related party information requirements to exclude information that is satisfied by other information disclosures (clause D12)

A24 Clause D12 requires information on related party transactions.

A25 Orion seeks the requirements of clause D12 be modified, as it considers that some of the requirements in clause D12 are duplicated by information disclosure requirements on related party transactions in the ID determination.⁹ Orion considers the requirement to provide information that is, in all material respects, already disclosed elsewhere, is generally inefficient for CPP applicants.

A26 We agree with Orion that where requirements of clause D12 (ie subclauses D12(1), D12(2)(a) and D12(5)), are met by information disclosure requirements, these duplicative requirements are not necessary.

A27 We do not approve the remaining modifications Orion requested to clause D12. We disagree that these are duplicated in information disclosure requirements. The requested modifications would result in Orion providing incomplete information for us to evaluate and determine its CPP:

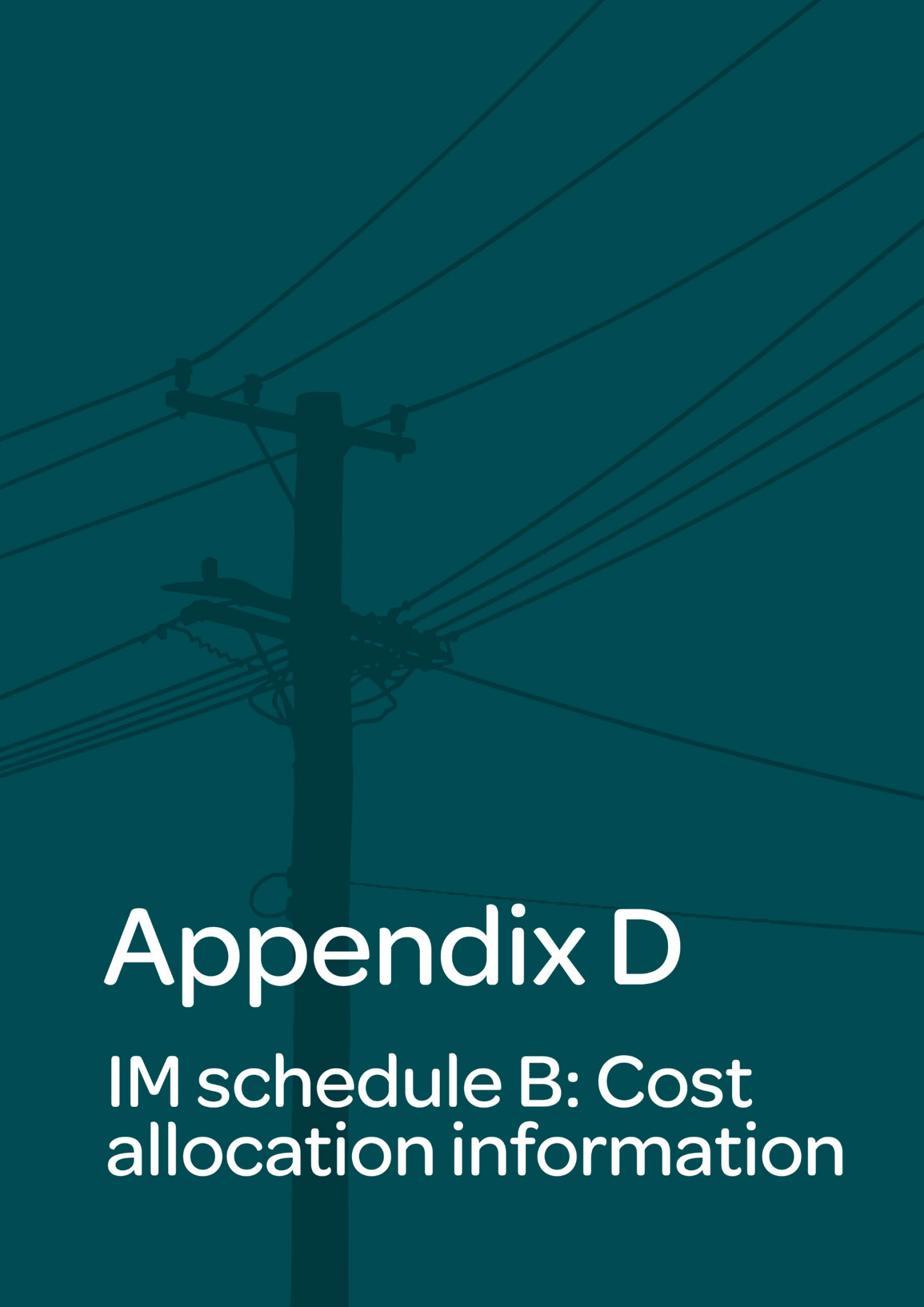
A27.1 We disagree with Orion that the requirements of subclause D12(2)(b) are met by the information disclosed under ID clauses 2.3.10, 2.3.11 and 2.12(1)-(2).

⁸ [Electricity Distribution Information Disclosure \(amendments related to IM Review 2023\) Amendment Determination 2024\[2024\] NZCC 31, Schedule 16](#)

⁹ Ibid, clauses 2.3.8(1), 2.3.8(2), 2.3.8(3), 2.3.10, 2.3.11, 2.3.12(1)-(5)

The information from ID would only be for DY2026 whereas subclause D12(2)(b) seeks information for the assessment period which with the amended definition, would also include DY2027.

- A27.2 We disagree with Orion's proposed amendment to the chapeau of subclause D12(3) as that limits the extent of information provided to DY2026 only and does not include DY2027 information.

The background is a solid teal color. Overlaid on this is a dark silhouette of a utility pole with several cross-arms and a dense network of power lines extending across the frame from the top left towards the right.

Appendix D

IM schedule B: Cost
allocation information

Schedule B - Cost allocation information

Electricity Distribution Business

<u>Table</u>	<u>Table name</u>
Table 1	Allocation of regulated asset values
Table 2	Report supporting allocations of asset values (non-public)
Table 3	Allocation of operating costs
Table 4	Report supporting allocation of operating costs (non-public)
Table 5	Rationale for selecting proxy allocator

Table 1: Allocation of asset values

	Value allocated (\$000s) Electricity distribution services
Subtransmission lines	
Directly attributable	98,908
Not directly attributable	–
Total attributable to regulated service	98,908
Subtransmission cables	
Directly attributable	145,529
Not directly attributable	–
Total attributable to regulated service	145,529
Zone substations	
Directly attributable	201,450
Not directly attributable	–
Total attributable to regulated service	201,450
Distribution and LV lines	
Directly attributable	182,207
Not directly attributable	–
Total attributable to regulated service	182,207
Distribution and LV cables	
Directly attributable	510,262
Not directly attributable	–
Total attributable to regulated service	510,262
Distribution substations and transformers	
Directly attributable	187,806
Not directly attributable	–
Total attributable to regulated service	187,806
Distribution switchgear	
Directly attributable	225,239
Not directly attributable	–
Total attributable to regulated service	225,239
Other network assets	
Directly attributable	49,744
Not directly attributable	–
Total attributable to regulated service	49,744
Non-network assets	
Directly attributable	62,339
Not directly attributable	11,173
Total attributable to regulated service	73,512
Regulated service asset value directly attributable	1,663,483
Regulated service asset value not directly attributable	11,173
Total closing RAB value	1,674,656

Table 3: Allocation of operating costs

	Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable		12,754		
Not directly attributable				–
Total attributable to regulated service		12,754		
Vegetation management				
Directly attributable		5,184		
Not directly attributable				–
Total attributable to regulated service		5,184		
Routine and corrective maintenance and inspection				
Directly attributable		13,574		
Not directly attributable				–
Total attributable to regulated service		13,574		
Asset replacement and renewal				
Directly attributable		–		
Not directly attributable				–
Total attributable to regulated service		–		
System operations and network support				
Directly attributable		21,626		
Not directly attributable				–
Total attributable to regulated service		21,626		
Business support				
Directly attributable		37,170		
Not directly attributable				–
Total attributable to regulated service		37,170		
Non-network solutions provided by a related party or third party				
Directly attributable		–		
Not directly attributable				–
Total attributable to regulated service		–		
Operating costs directly attributable		90,309		
Operating costs not directly attributable	–	–	–	–
Operating expenditure		90,309		

Table 3: Allocation of operating costs

	Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable		12,917		
Not directly attributable			–	–
Total attributable to regulated service		12,917		
Vegetation management				
Directly attributable		7,314		
Not directly attributable			–	–
Total attributable to regulated service		7,314		
Routine and corrective maintenance and inspection				
Directly attributable		16,683		
Not directly attributable			–	–
Total attributable to regulated service		16,683		
Asset replacement and renewal				
Directly attributable		–		
Not directly attributable			–	–
Total attributable to regulated service		–		
System operations and network support				
Directly attributable		22,937		
Not directly attributable			–	–
Total attributable to regulated service		22,937		
Business support				
Directly attributable		42,519		
Not directly attributable				–
Total attributable to regulated service		42,519		
Non-network solutions provided by a related party or third party				
Directly attributable		–		
Not directly attributable				–
Total attributable to regulated service		–		
Operating costs directly attributable		102,371		
Operating costs not directly attributable	–	–	–	–
Operating expenditure		102,371		

Table 3: Allocation of operating costs

	Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable		13,418		
Not directly attributable			–	–
Total attributable to regulated service		13,418		
Vegetation management				
Directly attributable		8,752		
Not directly attributable			–	–
Total attributable to regulated service		8,752		
Routine and corrective maintenance and inspection				
Directly attributable		19,279		
Not directly attributable			–	–
Total attributable to regulated service		19,279		
Asset replacement and renewal				
Directly attributable		–		
Not directly attributable			–	–
Total attributable to regulated service		–		
System operations and network support				
Directly attributable		24,606		
Not directly attributable			–	–
Total attributable to regulated service		24,606		
Business support				
Directly attributable		48,331		
Not directly attributable				–
Total attributable to regulated service		48,331		
Non-network solutions provided by a related party or third party				
Directly attributable		–		
Not directly attributable				–
Total attributable to regulated service		–		
Operating costs directly attributable		114,386		
Operating costs not directly attributable	–	–	–	–
Operating expenditure		114,386		

Table 3: Allocation of operating costs

Value allocated (\$000s)				
Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable	13,938			
Not directly attributable			–	–
Total attributable to regulated service	13,938			
Vegetation management				
Directly attributable	10,369			
Not directly attributable			–	–
Total attributable to regulated service	10,369			
Routine and corrective maintenance and inspection				
Directly attributable	19,907			
Not directly attributable			–	–
Total attributable to regulated service	19,907			
Asset replacement and renewal				
Directly attributable	–			
Not directly attributable			–	–
Total attributable to regulated service	–			
System operations and network support				
Directly attributable	28,495			
Not directly attributable			–	–
Total attributable to regulated service	28,495			
Business support				
Directly attributable	50,135			
Not directly attributable				–
Total attributable to regulated service	50,135			
Non-network solutions provided by a related party or third party				
Directly attributable	406			
Not directly attributable				–
Total attributable to regulated service	406			
Operating costs directly attributable	123,251			
Operating costs not directly attributable	–	–	–	–
Operating expenditure	123,251			

Table 3: Allocation of operating costs

	Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable		14,475		
Not directly attributable				–
Total attributable to regulated service		14,475		
Vegetation management				
Directly attributable		11,032		
Not directly attributable				–
Total attributable to regulated service		11,032		
Routine and corrective maintenance and inspection				
Directly attributable		20,259		
Not directly attributable				–
Total attributable to regulated service		20,259		
Asset replacement and renewal				
Directly attributable		–		
Not directly attributable				–
Total attributable to regulated service		–		
System operations and network support				
Directly attributable		29,183		
Not directly attributable				–
Total attributable to regulated service		29,183		
Business support				
Directly attributable		52,332		
Not directly attributable				–
Total attributable to regulated service		52,332		
Non-network solutions provided by a related party or third party				
Directly attributable		946		
Not directly attributable				–
Total attributable to regulated service		946		
Operating costs directly attributable		128,227		
Operating costs not directly attributable	–	–	–	–
Operating expenditure		128,227		

Table 3: Allocation of operating costs

	Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable		15,032		
Not directly attributable			–	–
Total attributable to regulated service		15,032		
Vegetation management				
Directly attributable		11,555		
Not directly attributable			–	–
Total attributable to regulated service		11,555		
Routine and corrective maintenance and inspection				
Directly attributable		21,874		
Not directly attributable			–	–
Total attributable to regulated service		21,874		
Asset replacement and renewal				
Directly attributable		–		
Not directly attributable			–	–
Total attributable to regulated service		–		
System operations and network support				
Directly attributable		29,970		
Not directly attributable			–	–
Total attributable to regulated service		29,970		
Business support				
Directly attributable		54,449		
Not directly attributable				–
Total attributable to regulated service		54,449		
Non-network solutions provided by a related party or third party				
Directly attributable		223		
Not directly attributable				–
Total attributable to regulated service		223		
Operating costs directly attributable		133,103		
Operating costs not directly attributable	–	–	–	–
Operating expenditure		133,103		

Table 3: Allocation of operating costs

	Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	OVABAA allocation increase (\$000s)
Service interruptions and emergencies				
Directly attributable		15,611		
Not directly attributable			–	–
Total attributable to regulated service		15,611		
Vegetation management				
Directly attributable		12,087		
Not directly attributable			–	–
Total attributable to regulated service		12,087		
Routine and corrective maintenance and inspection				
Directly attributable		20,876		
Not directly attributable			–	–
Total attributable to regulated service		20,876		
Asset replacement and renewal				
Directly attributable		–		
Not directly attributable			–	–
Total attributable to regulated service		–		
System operations and network support				
Directly attributable		29,958		
Not directly attributable			–	–
Total attributable to regulated service		29,958		
Business support				
Directly attributable		54,776		
Not directly attributable				–
Total attributable to regulated service		54,776		
Non-network solutions provided by a related party or third party				
Directly attributable		1,001		
Not directly attributable				–
Total attributable to regulated service		1,001		
Operating costs directly attributable		134,308		
Operating costs not directly attributable	–	–	–	–
Operating expenditure		134,308		

Table 5: Rationale for selecting proxy allocator

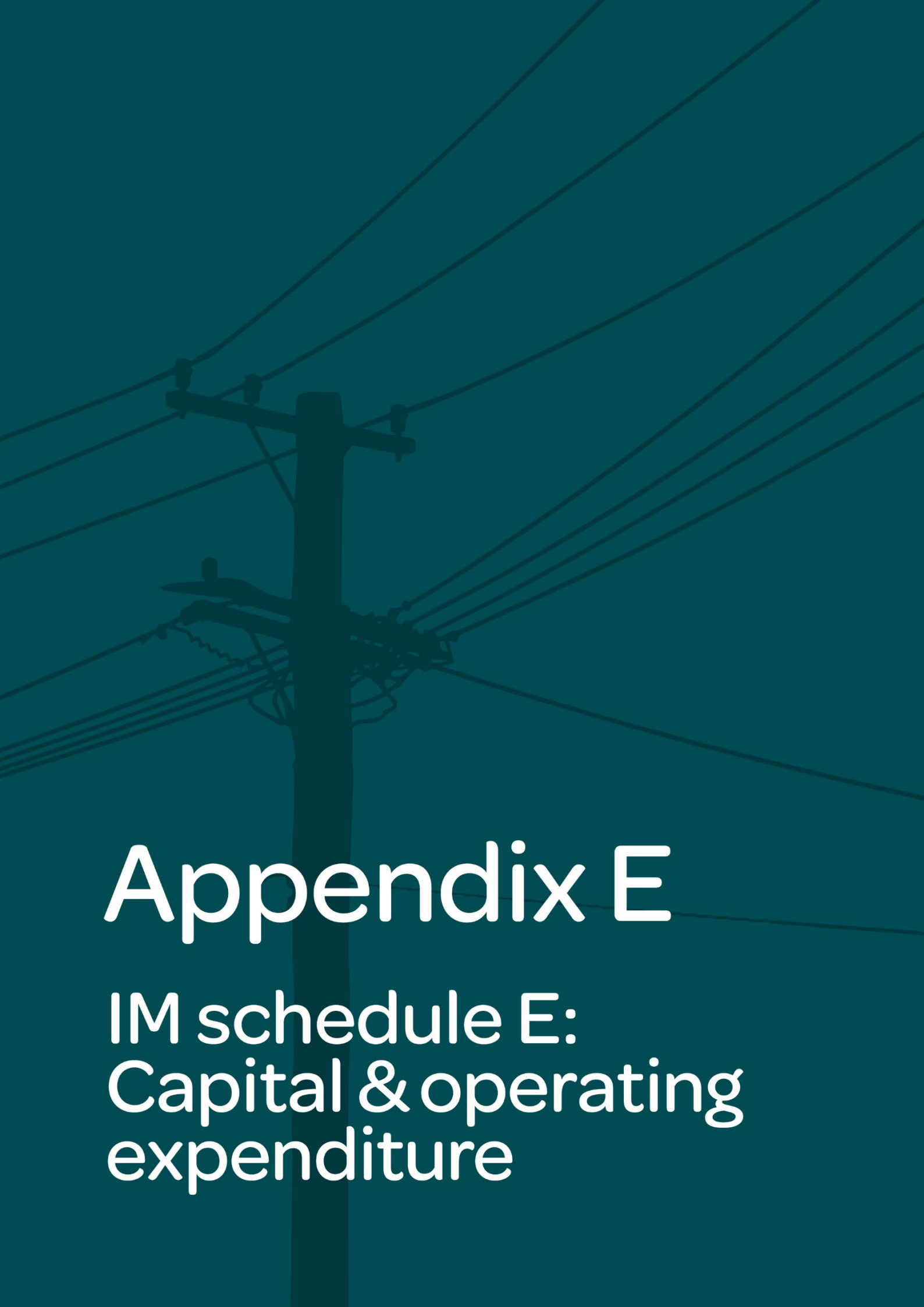
Tables 5a and 5b must be completed for each line item where proxy allocated is used

Table 5a: Rationale for selecting proxy allocator for asset values

Asset description	Allocation methodology type	Allocator	Allocator type	Rationale for selecting proxy allocator
Subtransmission lines				
All costs are Directly Attributable				
Subtransmission cables				
All costs are Directly Attributable				
Zone substations				
All costs are Directly Attributable				
Distribution and LV lines				
All costs are Directly Attributable				
Distribution and LV cables				
All costs are Directly Attributable				
Distribution substations and transformers				
All costs are Directly Attributable				
Distribution switchgear				
All costs are Directly Attributable				
Other network assets				
All costs are Directly Attributable				
Non-network assets				
A causal allocator is used				

Table 5b: Rationale for selecting proxy allocator for operating expenses

Cost description	Allocation methodology type	Cost allocator	Allocator type	Rationale for selecting proxy allocator
Service interruptions and emergencies				
All costs are Directly Attributable				
Vegetation management				
All costs are Directly Attributable				
Routine and corrective maintenance and inspection				
All costs are Directly Attributable				
Asset replacement and renewal				
All costs are Directly Attributable				
System operations and network support				
All costs are Directly Attributable				
Business support				
All costs are Directly Attributable				



Appendix E

IM schedule E:
Capital & operating
expenditure

Electricity Distribution Services Input Methodology Determination

CPP proposal

Capital and operating expenditure templates

Tables 1 to 10

Company Name	Orion New Zealand Limited
Proposal Date	9 June 2026
CPP regulatory period	1 April 2027 - 31 March 2032

Prepared on

Template Version

<u>Table of contents</u>	<u>Description</u>
Table 1	Projects and programmes
Table 2	Capex summary
Table 3	Opex summary
Table 4	Capex projects and programmes
Table 5	Capex by asset categories
Table 6	Opex projects and programmes
Table 7	Non-network opex
Table 8	Aggregate forecast commissioned assets by asset categories
Table 9	Cost escalation factors
Table 10	Network demand forecasts

Table 1: Projects and programmes

Table 1a Summary of all capex projects and programmes

Number	Project reference	Project/programme name	Capex category	Brief description of project/programme	Forecast costs in constant prices \$('000)	Reference to primary supporting information
1	24	Protection	Asset replacement and renewal		19,881	CPP201 - Forecast Tracker.xlsx
2	25	Batteries and DC Supplies	Asset replacement and renewal		2,009	CPP201 - Forecast Tracker.xlsx
3	26	Communications	Asset replacement and renewal		2,344	CPP201 - Forecast Tracker.xlsx
4	27	Signalling / Comms Cables	Asset replacement and renewal		26,927	CPP201 - Forecast Tracker.xlsx
5	28	SCADA (RTUs)	Asset replacement and renewal		1,000	CPP201 - Forecast Tracker.xlsx
6	29	Metering	Asset replacement and renewal		805	CPP201 - Forecast Tracker.xlsx
7	23	Generators	Asset replacement and renewal		150	CPP201 - Forecast Tracker.xlsx
8	3	Steel Structures	Asset replacement and renewal		17,620	CPP201 - Forecast Tracker.xlsx
9	4	Subtransmission Conductors	Asset replacement and renewal		1,903	CPP201 - Forecast Tracker.xlsx
10	5	Distribution Conductors	Asset replacement and renewal		6,181	CPP201 - Forecast Tracker.xlsx
11	6	Low Voltage Conductors	Asset replacement and renewal		10,308	CPP201 - Forecast Tracker.xlsx
12	7	Subtransmission Cables	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
13	8	Distribution Cables	Asset replacement and renewal		49,902	CPP201 - Forecast Tracker.xlsx
14	9	Low Voltage Cables	Asset replacement and renewal		2,849	CPP201 - Forecast Tracker.xlsx
15	13	Buildings and Grounds	Asset replacement and renewal		4,095	CPP201 - Forecast Tracker.xlsx
16	14	ZS Ancillary Equipment	Asset replacement and renewal		6,486	CPP201 - Forecast Tracker.xlsx
17	15	Pole Mounted Switches	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
18	16	Pole Mounted Fuses	Asset replacement and renewal		5,560	CPP201 - Forecast Tracker.xlsx
19	17	Ground Mount Switchgear	Asset replacement and renewal		53,355	CPP201 - Forecast Tracker.xlsx
20	18	Enclosures	Asset replacement and renewal		64,698	CPP201 - Forecast Tracker.xlsx
21	20	Ground Mounted Transformers	Asset replacement and renewal		10,450	CPP201 - Forecast Tracker.xlsx
22	21	Pole Mounted Transformers	Asset replacement and renewal		5,800	CPP201 - Forecast Tracker.xlsx
23	22	Voltage Regulators and Capacitors	Asset replacement and renewal		5,161	CPP201 - Forecast Tracker.xlsx
24	1b	Telecommunication Poles	Asset replacement and renewal		25,572	CPP201 - Forecast Tracker.xlsx
25	4	BRM-HTE 66kV Conductor Replacement	Asset replacement and renewal		4,569	CPP201 - Forecast Tracker.xlsx
26	4	HAL-HTE 66kV Conductor Replacement	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
27	7	HAL-HOO 66kV Oil Filled Cable Replacement	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
28	7	MIL-OXF 66kV XLPE Cable and OXF 66kV Switchroom - Re	Asset replacement and renewal		16,060	CPP201 - Forecast Tracker.xlsx
29	7	ADD-FEN 66kV Oil Filled Cable Replacement	Asset replacement and renewal		23,640	CPP201 - Forecast Tracker.xlsx
30	7	OXT-LAN 66kV XLPE Cable - Replacing ADD-OXF	Asset replacement and renewal		10,855	CPP201 - Forecast Tracker.xlsx
31	7	PAP-MCF 66kV Oil Filled Cable Replacement (Prev FY37-FY	Asset replacement and renewal		16,498	CPP201 - Forecast Tracker.xlsx
32	7	ADD-ARM 66kV Oil Filled Cable Replacement	Asset replacement and renewal		1,926	CPP201 - Forecast Tracker.xlsx
33	7	ADD-MIL 66kV Oil Filled Cable Replacement	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
34	10	Middleton ZS 11kV CB Replacement and Building	Asset replacement and renewal		1,168	CPP201 - Forecast Tracker.xlsx
35	10	Halswell 66kV OD Switchyard Replacement	Asset replacement and renewal		2,150	CPP201 - Forecast Tracker.xlsx
36	10	Little River ZS 33kV CB and Power TX Replacement	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
37	10	Diamond Harbour ZS 33kV ODID	Asset replacement and renewal		548	CPP201 - Forecast Tracker.xlsx
38	10	Darfield ZS Replacement	Asset replacement and renewal		2,842	CPP201 - Forecast Tracker.xlsx
39	10	Addington OD Switchgear and Transformer Replacement	Asset replacement and renewal		11,375	CPP201 - Forecast Tracker.xlsx
40	10	Hororata ZS 33 kV ODID Conversion & TX Replacement	Asset replacement and renewal		4,444	CPP201 - Forecast Tracker.xlsx
41	10	Shands Road ZS Rebuild	Asset replacement and renewal		10,724	CPP201 - Forecast Tracker.xlsx
42	10	Dallington ZS 11kV Switchboard Replacement	Asset replacement and renewal		6,114	CPP201 - Forecast Tracker.xlsx
43	10	Bankside ZS 11kV Switchgear Replacement	Asset replacement and renewal		2,395	CPP201 - Forecast Tracker.xlsx
44	10	Portman ZS - 11kV Switchboard Replacement	Asset replacement and renewal		3,465	CPP201 - Forecast Tracker.xlsx
45	10	McFaddens 11kV Switchboard Replacement	Asset replacement and renewal		6,339	CPP201 - Forecast Tracker.xlsx
46	10	Papanui ZS 66kV Disconnecter Replacements	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
47	10	Annat ZS 11kV CB and Power TX Replacement	Asset replacement and renewal		-	CPP201 - Forecast Tracker.xlsx
48	10	Moffett St 11kV Switchgear Replacement	Asset replacement and renewal		3,948	CPP201 - Forecast Tracker.xlsx
49	30	Project Closeout	System growth		-	CPP201 - Forecast Tracker.xlsx
50	32	Burnham ZS - New 66/11kV Substation	System growth		-	CPP201 - Forecast Tracker.xlsx
51	35	Transformer Emergency Spares	System growth		3,031	CPP201 - Forecast Tracker.xlsx
52	36	Templeton Commercial Growth	System growth		11,215	CPP201 - Forecast Tracker.xlsx
53	39	Lower Selwyn Growth - Stage 1	System growth		-	CPP201 - Forecast Tracker.xlsx
54	43	Malvern Industrial Growth	System growth		2,251	CPP201 - Forecast Tracker.xlsx
55	62	Network Transformation	System growth		7,595	CPP201 - Forecast Tracker.xlsx
56	80	Routine ICT	Non-network capex		38,404	CPP201 - Forecast Tracker.xlsx
57	81	Routine	Non-network capex		13,174	CPP201 - Forecast Tracker.xlsx
58	82	Head Office Building Extension	Non-network capex		3,360	CPP201 - Forecast Tracker.xlsx
59	62	Network Transformation	Non-network capex		7,013	CPP201 - Forecast Tracker.xlsx
60	31	Milton Hoon Hay Cables + Switchroom	System growth		-	CPP201 - Forecast Tracker.xlsx
61	34	Lincoln Township Growth	System growth		13,946	CPP201 - Forecast Tracker.xlsx
62	37	Lytellon Port Company growth	System growth		9,114	CPP201 - Forecast Tracker.xlsx
63	1	End of life Poles (proactive and reactive)	Asset replacement and renewal		71,148	CPP201 - Forecast Tracker.xlsx
64	1a	Wildfire Risk Poles	Asset replacement and renewal		8,928	CPP201 - Forecast Tracker.xlsx
65	2	Crossarms	Asset replacement and renewal		31,910	CPP201 - Forecast Tracker.xlsx
66	60	Distribution	System growth		32,609	CPP201 - Forecast Tracker.xlsx
67	61	Low Voltage	System growth		59,255	CPP201 - Forecast Tracker.xlsx
68	72	Quality of Supply	Quality of supply		9,779	CPP201 - Forecast Tracker.xlsx
69	72	Other Reliability, Safety and Environment	Other reliability, safety and environment		6,025	CPP201 - Forecast Tracker.xlsx
70	70	Consumer Connection	Consumer connection		203,342	CPP201 - Forecast Tracker.xlsx
71	71	Asset Relocations	Asset relocations and undergrounding		21,919	CPP201 - Forecast Tracker.xlsx

Table 1b Summary of all opex projects and programmes

Number	Project reference	Project/programme name	Opex category	Brief description of project/programme	Forecast costs in constant prices \$('000)	Reference to primary supporting information
1	90	Reactive Maintenance	Service interruptions and emergencies		65,774	CPP201 - Forecast Tracker.xlsx
2	91	Preventive Maintenance	Routine and corrective maintenance and inspection		45,097	CPP201 - Forecast Tracker.xlsx
3	92	Corrective Maintenance	Routine and corrective maintenance and inspection		48,163	CPP201 - Forecast Tracker.xlsx
5	93	Vegetation	Vegetation management		48,712	CPP201 - Forecast Tracker.xlsx
6	100	SONS	System operations and network support		113,339	CPP201 - Forecast Tracker.xlsx
7	101	Corporate Support	Business Support		170,357	CPP201 - Forecast Tracker.xlsx
8	102	ICT opex	Business Support		67,269	CPP201 - Forecast Tracker.xlsx
9	103	Network Transformation	System operations and network support		17,087	CPP201 - Forecast Tracker.xlsx
10	104	Flexibility Services	Non-network solutions provided by a related party or third party		2,321	CPP201 - Forecast Tracker.xlsx

Table 2: Capex summary

2a Actual and forecast capex in constant prices \$(000)

Capex Categories

Consumer connection
System growth
Asset replacement and renewal
Asset relocations

Reliability, safety and environment:

Quality of supply
Legislative and regulatory
Other reliability, safety and environment

Total reliability, safety and environment

Total expenditure on network assets

Total expenditure on non-network assets

Total expenditure on assets

Current period												Assessment Period		CPP Regulatory Period			Total CPP
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5						
\$000 (in constant prices)																	
23,551	34,333	42,374	37,435	39,785	42,936	38,605	39,308	39,887	40,475	41,787	41,886	203,342					
22,437	24,513	39,336	47,491	27,661	36,678	16,630	20,580	30,787	33,391	31,578	22,680	139,016					
40,295	32,523	35,785	38,997	36,398	65,343	80,417	95,459	111,585	121,593	120,777	114,687	564,100					
1,162	1,603	1,053	1,801	4,224	4,143	4,201	4,261	4,322	4,383	4,445	4,508	21,919					
238	166	204	975	645	3,355	1,074	1,775	1,881	1,929	1,977	2,217	9,779					
-	-	-	-	-	-	-	-	-	-	-	-	-					
7,969	10,484	9,120	7,391	8,769	6,685	4,059	1,045	1,145	1,245	1,345	1,245	6,025					
8,207	10,651	9,324	8,366	9,414	10,040	5,134	2,820	3,026	3,174	3,322	3,462	15,804					
95,652	103,623	127,872	134,090	117,483	159,139	144,987	162,428	189,606	203,015	201,908	187,223	944,181					
6,022	3,676	5,375	9,874	15,570	18,256	18,180	18,156	12,617	10,570	11,324	9,285	61,952					
101,674	107,298	133,248	143,963	133,053	177,395	163,168	180,584	202,224	213,585	213,233	196,508	1,006,133					

2b Actual and forecast capex in nominal prices \$(000)

Capex Categories

Consumer connection
System growth
Asset replacement and renewal
Asset relocations

Reliability, safety and environment:

Quality of supply
Legislative and regulatory
Other reliability, safety and environment

Total reliability, safety and environment

Total expenditure on network assets

Total expenditure on non-network assets

Total expenditure on assets

Current period					Assessment Period		CPP Regulatory Period						Total CPP
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5		
\$000 (in nominal prices)													
18,902	29,015	38,353	35,604	38,806	42,936	39,383	40,274	41,643	43,093	45,373	46,385	216,768	
18,008	20,716	35,603	45,169	26,981	36,678	16,998	21,255	32,591	36,001	34,880	25,686	150,412	
32,341	27,485	32,389	37,090	35,503	65,343	82,366	99,238	118,635	132,185	134,394	130,747	615,198	
933	1,355	953	1,713	4,120	4,143	4,298	4,446	4,612	4,782	4,958	5,141	23,939	
191	141	185	928	629	3,355	1,102	1,868	2,029	2,132	2,238	2,572	10,839	
-	-	-	-	-	-	-	-	-	-	-	-	-	
6,396	8,860	8,254	7,030	8,554	6,685	4,166	1,100	1,235	1,376	1,523	1,444	6,678	
6,587	9,001	8,439	7,957	9,183	10,040	5,268	2,968	3,264	3,508	3,761	4,016	17,517	
76,770	87,571	115,737	127,533	114,593	159,139	148,314	168,181	200,745	219,568	223,366	211,975	1,023,834	
4,833	3,106	4,865	9,391	15,187	18,256	18,710	19,195	13,695	11,772	12,939	10,883	68,484	
81,604	90,678	120,603	136,923	129,780	177,395	167,024	187,376	214,440	231,340	236,304	222,858	1,092,318	
-	-	-	-	771	4,814	3,934	4,644	5,111	5,161	4,833	4,180	23,928	
2,079	3,645	3,314	5,309	9,779	13,648	13,423	14,647	15,517	16,066	16,626	17,055	79,910	
-	-	-	-	-	-	-	-	-	-	-	-	-	
79,525	87,033	117,289	131,614	120,771	168,561	157,535	177,374	204,034	220,435	224,511	209,983	1,036,336	

plus Cost of financing

less Value of capital contributions

plus Value of vested assets

Total capital expenditure

2c Actual and forecast commissioned asset values in nominal prices \$(000)
Capex Categories

Consumer connection
System growth
Asset replacement and renewal
Asset relocations and undergrounding

Reliability, safety and environment:

Quality of supply
Legislative and regulatory
Other reliability, safety and environment

Total reliability, safety and environment
Total forecast network capex

Total forecast non-network capex

Total value of commissioned assets

Current period					Assessment Period		CPP Regulatory Period						Total CPP
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5		
\$000 (in nominal prices)													
12,320	31,071	33,779	29,678	44,126	41,552	24,342	28,838	28,985	30,081	32,812	34,041	154,757	
11,737	22,184	31,357	37,650	30,680	14,001	41,118	16,231	28,891	37,299	37,022	31,803	151,247	
21,079	29,433	28,526	30,916	40,370	67,405	63,125	98,762	112,390	140,969	138,634	146,774	637,528	
608	1,451	840	1,428	4,685	1,122	757	934	953	991	1,057	1,113	5,048	
125	151	163	773	715	4,283	914	1,849	1,976	2,082	2,249	2,623	10,780	
-	-	-	-	-	-	-	-	-	-	-	-	-	
4,169	9,488	7,270	5,860	9,726	8,533	3,456	1,089	1,203	1,344	1,530	1,473	6,639	
4,293	9,639	7,433	6,633	10,442	12,816	4,370	2,938	3,179	3,426	3,780	4,096	17,418	
50,036	93,777	101,935	106,305	130,303	136,896	133,713	147,703	174,398	212,767	213,305	217,826	965,999	
3,150	3,327	4,285	7,828	17,269	23,304	15,520	19,023	13,357	11,499	13,002	11,099	67,979	
53,187	97,104	106,220	114,133	147,572	160,200	149,233	166,726	187,755	224,266	226,307	228,925	1,033,978	

2d Actual and forecast commissioned asset values by provider in nominal prices (\$000)

EDB
Related party
Other sources
Unknown

Total value of commissioned assets

Totals in table 2c and table 2d must reconcile.

EDB													-
Related party	15,639	25,659	45,349	60,310	79,637								-
Other sources	37,548	71,445	60,871	53,823	67,935								
Unknown						160,200	149,233	166,726	187,755	224,266	226,307	228,925	1,033,978
Total value of commissioned assets	53,187	97,104	106,220	114,133	147,572	160,200	149,233	166,726	187,755	224,266	226,307	228,925	1,033,978

Table 3: Opex summary

3a Actual and forecast opex in constant prices \$(000)

Opex Categories

Service interruptions and emergencies
Vegetation management
Routine and corrective maintenance and inspection
Asset replacement and renewal
Total network opex
System operations and network support
Business support
Non-network solutions provided by a related party or third party
Total non-network opex
Total operating expenditure

Current period					Assessment Period		CPP Regulatory Period						Total CPP period
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5		
\$ (000) in constant prices													
12,253	11,914	11,804	13,836	12,431	12,754	12,607	12,786	12,968	13,152	13,339	13,528	65,774	
5,301	5,769	4,981	4,602	4,568	5,184	7,132	8,331	9,638	10,017	10,250	10,475	48,712	
15,782	13,905	13,023	13,007	11,110	13,574	16,303	18,417	18,591	18,498	19,529	18,225	93,260	
2,461	1,344	978	659	575	-	-	-	-	-	-	-	-	
35,797	32,932	30,786	32,105	28,684	31,512	36,043	39,534	41,197	41,667	43,118	42,228	207,746	
19,228	15,635	15,689	18,651	20,633	21,626	22,449	23,576	26,727	26,800	26,949	26,375	130,426	
26,176	27,243	31,792	35,054	36,375	37,170	41,551	46,189	46,866	47,866	48,733	47,974	237,626	
					-	-	-	380	865	200	876	2,321	
45,404	42,877	47,481	53,705	57,007	58,796	64,000	69,764	73,972	75,530	75,881	75,225	370,373	
81,201	75,809	78,267	85,809	85,691	90,309	100,043	109,298	115,170	117,197	119,000	117,454	578,119	

3b Actual and forecast opex in nominal prices \$(000)

Opex Categories

Service interruptions and emergencies
Vegetation management
Routine and corrective maintenance and inspection
Asset replacement and renewal
Total network opex
System operations and network support
Business support
Non-network solutions provided by a related party or third party
Total non-network opex
Total operating expenditure

Current period					Assessment Period		CPP Regulatory Period					Total CPP
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	
\$ (000) in nominal prices												
9,834	10,068	10,684	13,160	12,125	12,754	12,917	13,418	13,938	14,475	15,032	15,611	72,474
4,254	4,875	4,508	4,377	4,456	5,184	7,314	8,752	10,369	11,032	11,555	12,087	53,795
12,667	11,751	11,787	12,371	10,836	13,574	16,683	19,279	19,907	20,259	21,874	20,876	102,195
1,976	1,136	885	627	561	-	-	-	-	-	-	-	-
28,731	27,830	27,864	30,535	27,978	31,512	36,914	41,449	44,215	45,766	48,460	48,573	228,463
15,432	13,213	14,200	17,739	20,125	21,626	22,937	24,606	28,495	29,183	29,970	29,958	142,212
21,009	23,023	28,775	33,339	35,480	37,170	42,519	48,331	50,135	52,332	54,449	54,776	260,023
					-	-	-	406	946	223	1,001	2,576
36,441	36,236	42,975	51,079	55,605	58,796	65,457	72,937	79,036	82,461	84,642	85,735	404,811
65,172	64,066	70,839	81,613	83,583	90,309	102,371	114,386	123,251	128,227	133,103	134,308	633,274

3c Actual and forecast opex by provider (optional)

EDB
Related party
Other sources
Unknown

Table 4: Capex projects and programmes

		Actual and forecast capex in constant prices (\$'000)															
Project reference	Project/programme name	Current period					Assessment Period		CPP Regulatory Period					Total CPP Period			
		CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5				
4a Consumer connection																	
	Consumer types defined by EDB																
	Consumer Connection	23,551	34,333	42,374	37,435	39,785	42,936	38,605	39,308	39,887	40,475	41,787	41,886	203,342			
	Total consumer connection expenditure	23,551	34,333	42,374	37,435	39,785	42,936	38,605	39,308	39,887	40,475	41,787	41,886	203,342			
less	Capital contributions funding consumer connection	1,915	3,014	2,877	3,419	6,680	10,385	9,839	10,877	11,382	11,551	11,715	11,743	57,269			
	Total consumer connection less capital contributions	21,636	31,319	39,497	34,016	33,104	32,551	28,766	28,431	28,504	28,923	30,072	30,143	146,073			
4b System growth																	
	Project Closeout	-	-	-	-	-	1,882	-	-	-	-	-	-	-	-		
	Burnham ZS - New 66/11kV Substation	-	-	-	-	-	8,398	3,771	-	-	-	-	-	-	-		
	Transformed Emergency Spares	-	-	-	-	-	-	-	2,879	152	-	-	-	-	-		
	Templeton Commercial Growth	-	-	-	-	-	-	-	-	673	5,271	5,271	-	-	3,031		
	Maldern Industrial Growth	-	-	-	-	-	-	196	1,126	1,126	-	-	-	-	-		
	Milton Hoon Hay Cables + Switchroom	-	-	-	-	-	17,311	1,046	-	-	-	-	-	-	2,251		
	Lincoln Township Growth	-	-	-	-	-	-	-	837	6,554	6,554	-	-	-	13,946		
	Lyttelton Port Company growth	-	-	-	-	-	-	-	-	547	4,284	4,284	-	-	9,114		
	Network Transformation	547	1,132	1,151	1,468	1,182	1,025	400	950	2,725	1,425	1,445	1,050	7,595			
	Distribution	5,473	5,285	3,087	8,682	3,434	5,408	6,975	6,725	5,930	5,973	6,968	7,013	32,609			
	Low Voltage	21	254	693	827	1,572	2,652	4,243	8,052	13,628	13,610	10,334	99,252	-	-		
	Historical	16,395	17,841	34,406	35,514	21,473	-	-	-	-	-	-	-	-	-		
	Total system growth expenditure	22,437	24,513	39,336	47,491	27,661	36,678	16,630	20,580	30,787	33,391	31,578	22,680	139,016			
less	Capital contributions funding system growth	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Total system growth less capital contributions	22,437	24,513	39,336	47,491	27,661	36,678	16,630	20,580	30,787	33,391	31,578	22,680	139,016			
4c Asset replacement and renewal by projects or programmes																	
	Protection	5,111	3,245	4,674	2,082	1,568	3,251	2,349	2,974	3,704	4,444	4,254	4,504	19,881			
	Batteries and DC Supplies	104	89	96	39	10	107	285	300	373	411	450	475	2,009			
	Communications	201	284	268	413	396	125	191	268	454	438	509	655	2,344			
	Signalling / Comms Cables	118	13	58	95	-	914	4,698	4,874	5,105	5,285	5,649	6,014	26,927			
	SCADA (RTUs)	15	120	327	109	207	223	200	200	200	200	200	200	1,000			
	Metering	21	67	78	1	2	44	96	141	156	180	135	193	805			
	Generators	-	-	11	29	-	4	130	30	30	30	30	30	150			
	Steel Structures	-	-	-	-	-	1,147	1,988	2,946	3,186	3,696	3,746	4,046	17,620			
	Subtransmission Conductors	51	13	-	-	2	1,545	622	602	298	317	335	351	1,903			
	Distribution Conductors	1,724	110	592	-	-	308	1,092	1,128	1,172	1,225	1,290	1,367	6,181			
	Low Voltage Conductors	-	6	-	-	-	311	1,587	1,739	1,697	2,058	2,223	2,391	10,308			
	Subtransmission Cables	31	42	6	122	650	-	-	-	-	-	-	-	-	-		
	Distribution Cables	328	363	57	318	-	1,863	5,456	7,561	9,631	10,611	10,823	11,276	49,902			
	Low Voltage Cables	62	14	-	-	2	245	441	483	518	560	616	672	2,849			
	Buildings and Grounds	883	395	581	409	819	1,751	819	819	819	819	819	819	4,095			
	ZS Ancillary Equipment	99	14	180	395	680	649	1,755	1,565	1,110	1,152	1,052	1,567	6,486			
	Pole Mounted Switches	1,516	1,583	1,049	1,378	625	-	-	-	-	-	-	-	-	-		
	Pole Mounted Fuses	-	-	-	273	262	585	920	1,002	1,047	1,122	1,167	1,220	5,560			
	Ground Mount Switchgear	7,364	6,796	3,562	6,021	3,824	9,252	8,703	8,430	9,825	11,220	11,815	11,985	53,355			
	Enclosures	2,484	2,138	4,310	2,491	3,101	5,576	5,669	7,625	11,646	14,091	15,272	16,095	64,698			
	Ground Mounted Transformers	1,742	889	959	638	1,422	1,231	1,585	1,735	1,885	2,035	2,260	2,535	10,450			
	Pole Mounted Transformers	-	-	-	-	-	536	1,080	1,100	1,120	1,140	1,200	1,240	5,800			
	Voltage Regulators and Capacitors	-	37	49	26	16	53	429	775	1,220	973	1,105	1,088	5,161			
	Telecommunication Poles	-	-	-	-	-	1,090	2,784	3,564	4,728	5,340	5,916	6,024	25,572			
	BRM-MTE 66kV Conductor Replacement	-	-	-	-	-	-	-	-	-	557	4,011	-	4,569			
	HAL-HOO 66kV Oil Filled Cable Replacement	-	-	-	-	-	9,048	325	-	-	-	-	-	-	-		
	ADD-OFX	-	-	-	-	-	-	4,012	8,630	8,630	-	-	-	16,990			
	ADD-FEN 66kV Oil Filled Cable Replacement	-	-	-	-	-	-	-	4,728	9,456	9,456	-	-	23,640			
	OWT-LAN 66kV XLPE Cable - Replacing ADD-OFX	-	-	-	-	-	-	-	-	1,155	3,926	5,774	-	10,855			
	PAP-MCF 66kV Oil Filled Cable Replacement (Prev FY37-FY39)	-	-	-	-	-	-	-	-	-	3,300	6,599	6,599	16,498			
	ADD-ARM 66kV Oil Filled Cable Replacement	-	-	-	-	-	-	-	-	-	-	-	1,926	1,926			
	Middleton ZS 11kV CB Replacement and Building	-	-	-	-	-	497	5,200	1,168	-	-	-	-	1,168			
	Halswell 66kV OD Switchgear Replacement	-	-	-	-	-	2,593	6,119	2,150	-	-	-	-	2,150			
	Little River ZS 33kV CB and Power TX Replacement	-	-	-	-	-	192	285	-	-	-	-	-	-	-		
	Diamond Harbour ZS 33kV ODD	-	-	-	-	-	211	1,337	548	-	-	-	-	548			
	Darfield ZS Replacement	-	-	-	-	-	-	710	2,842	-	-	-	-	2,842			
	Addition OD Switchgear and Transformer Replacement	-	-	-	-	-	-	-	2,275	4,550	4,550	-	-	11,375			
	Hororata ZS 33 kV ODD Conversion & TX Replacement	-	-	-	-	-	-	284	2,222	2,222	-	-	-	4,444			
	Shands Road ZS Rebuild	-	-	-	-	-	-	-	-	2,145	4,290	4,290	-	10,724			
	Dallington ZS 11kV Switchboard Replacement	-	-	-	-	-	-	-	-	1,529	4,586	-	-	6,114			
	Bankside ZS 11kV Switchgear Replacement	-	-	-	-	-	-	-	-	-	-	-	479	1,916	2,395		
	Portman ZS - 11kV Switchboard Replacement	-	-	-	-	-	-	-	-	-	-	-	1,733	3,455			
	McFaddens 11kV Switchboard Replacement	-	-	-	-	-	-	-	-	-	-	-	1,268	5,071	6,339		
	Moffett St 11kV Switchgear Replacement	-	-	-	-	-	-	-	-	790	3,159	-	-	3,948			
	End of life Poles (Proactive and Reactive)	8,092	10,739	13,697	19,227	17,628	16,939	16,023	14,977	14,302	13,949	13,677	14,043	71,148			
	Wildfire Risk Poles	-	-	-	-	-	2,619	1,492	1,492	1,860	1,860	1,860	1,860	8,928			
	Crossarms	-	-	-	-	-	2,543	3,963	5,170	6,213	6,843	6,843	6,843	31,910			
	Historical	10,352	5,554	5,028	4,932	5,205	-	-	-	-	-	-	-	-	-		
	Total asset replacement and renewal expenditure	40,295	32,523	35,785	38,997	36,398	65,343	80,417	95,459	111,585	121,593	120,777	114,687	564,100			
less	Capital contributions funding asset replacement and renewal	-	31	-	18	-	-	-	-	-	-	-	-	-	-		
	Total asset replacement and renewal less capital contributions	40,295	32,492	35,785	38,979	36,398	65,343	80,417	95,459	111,585	121,593	120,777	114,687	564,100			
4d Asset relocations																	
	Project or programme*																
	Asset Relocations	1,162	1,603	1,053	1,801	4,224	4,143	4,201	4,261	4,322	4,383	4,445	4,508	21,819			
	Total asset relocations expenditure	1,162	1,603	1,053	1,801	4,224	4,143	4,201	4,261	4,322	4,383	4,445	4,508	21,819			
less	Capital contributions funding asset relocations	675	1,268	784	1,552	3,345	3,294	3,310	3,357	3,405	3,453	3,502	3,552	17,288			
	Asset relocations less capital contributions	487	335	269	249	879	879	892	904	917	930	943	957	4,531			
4e Reliability, safety and environment:																	
4e1 Quality of supply																	
	Project or programme*																
	Quality of Supply	238	166	204	975	645	3,355	1,074	1,775	1,881	1,929	1,977	2,217	9,779			
	Total quality of supply expenditure	238	166	204	975	645	3,355	1,074	1,775	1,881	1,929	1,977	2,217	9,779			
less	Capital contributions funding quality of supply	-	-	-	593	-	-	-	-	-	-	-	-	-	-		
	Quality of supply less capital contributions	238	166	204	382	645	3,355	1,074	1,775	1,881	1,929	1,977	2,217	9,779			
4e2 Legislative and regulatory																	
	Project or programme*																
	Legislative and Regulatory Expenditure	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Total legislative and regulatory expenditure	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
less	Capital contributions funding legislative and regulatory	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Legislative and regulatory less capital contributions	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4e3 Other reliability, safety and environment																	
	Project or programme*																
	Other Reliability, Safety and Environment	7,969	10,484	9,120	7,391	8,769	6,685	4,059	1,045	1,145	1,245	1,345	1,245	6,025			
	Total other reliability, safety and environment	7,969	10,484	9,120	7,391	8,769	6,685	4,059	1,045	1,145	1,245	1,345	1,245	6,025			
less	Capital contributions funding other reliability, safety and environment	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Other reliability, safety and environment less capital contributions	7,969	10,484	9,120	7,391	8,769	6,685	4,059	1,045	1,145	1,245	1,345	1,245	6,025			
4f Non-network assets																	
4f1 Routine non-network expenditure																	
	Project or programme*																
	Routine ICT	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Network Transformation	-	-	-	-	135	605	856	1,211	1,405	1,336	1,180	1,291	1,801	7,013		
	Routine	1,746	1,391	1,656	1,442	3,298	7,833	3,389	3,245	1,827	2,397	2,460	3,245	13,174			
	Total routine non-network expenditure	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4f2 Non-network assets - atypical expenditure																	
	Project or programme*																
	Head Office Building Extension	-	-	-	-												

Table 4: Capex projects and programmes

		Actual and forecast capex in nominal prices (\$'000)														
Project reference	Project/programme name	Current period					Assessment Period		CPP Regulatory Period					Total CPP Period		
		CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	Total CPP	Period	
4a Consumer connection																
	Consumer types defined by EDB															
	Consumer Connection	18,902	29,015	38,353	35,604	38,806	42,936	39,383	40,274	41,643	43,093	45,373	46,385	216,768		
	Total consumer connection expenditure	18,902	29,015	38,353	35,604	38,806	42,936	39,383	40,274	41,643	43,093	45,373	46,385	216,768		
less	Capital contributions funding consumer connection	1,537	2,547	2,604	3,252	6,516	10,385	10,037	11,144	11,884	12,299	12,720	13,005	81,051		
	Total consumer connection less capital contributions	17,365	26,468	35,749	32,352	32,290	32,551	29,346	29,130	29,760	30,795	32,652	33,380	155,717		
4b System growth																
	Project Closeout	-	-	-	-	-	1,882	-	-	-	-	-	-	-		
	Burnham ZS - New 66/11kV Substation	-	-	-	-	-	8,398	3,854	-	-	-	-	-	-		
	Transformer Emergency Spares	-	-	-	-	-	-	-	2,848	152	-	-	-	3,000		
	Templeton Commercial Growth	-	-	-	-	-	-	-	-	897	5,679	5,698	-	11,674		
	Malden Industrial Growth	-	-	-	-	-	-	-	201	1,158	1,162	-	-	2,341		
	Milton Hoon Hay Cables + Switchroom	-	-	-	-	-	17,311	1,067	-	-	-	-	-	18,378		
	Lincoln Township Growth	-	-	-	-	-	-	-	853	6,810	6,956	-	-	14,619		
	Lyfferton Port Company growth	-	-	-	-	-	-	-	-	686	4,683	4,776	-	10,045		
	Network Transformation	439	957	1,042	1,396	1,153	1,025	411	988	2,936	1,574	1,636	1,218	8,962		
	Distribution	4,393	4,467	2,794	8,258	3,350	5,408	7,129	7,002	6,310	6,495	7,741	7,951	35,510		
	Low Voltage	17	215	627	786	1,533	2,652	4,336	8,394	14,503	14,811	15,121	11,731	64,561		
	Historical	13,159	15,078	31,141	34,729	20,945	-	-	-	-	-	-	-	-		
	Total system growth expenditure	15,008	20,716	35,603	45,169	26,961	36,678	16,999	21,255	32,691	36,001	34,880	25,688	150,412		
less	Capital contributions funding system growth	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Total system growth less capital contributions	15,008	20,716	35,603	45,169	26,961	36,678	16,999	21,255	32,691	36,001	34,880	25,688	150,412		
4c Asset replacement and renewal by projects or programmes																
	Protection	4,102	2,742	4,412	1,080	1,529	3,251	2,404	3,114	3,969	4,873	4,773	5,171	21,901		
	Batteries and DC Supplies	83	76	87	37	10	107	292	314	400	450	505	545	2,215		
	Communications	181	240	243	393	386	126	195	281	487	480	593	751	2,892		
	Signalling / Comms Cables	94	11	53	90	-	914	4,818	5,122	5,497	5,820	6,382	6,958	29,789		
	SCADA (RTUs)	12	101	296	103	202	223	205	209	214	219	224	230	1,097		
	Metering	16	57	71	1	2	44	98	148	167	197	151	221	885		
	Generators	-	-	10	27	-	4	132	39	31	31	32	33	157		
	Steel Structures	-	-	-	-	-	1,147	2,032	3,085	3,414	4,053	4,203	4,645	19,400		
	Subtransmission Conductors	41	11	-	-	1	1,545	634	624	315	342	368	395	2,044		
	Distribution Conductors	1,384	93	536	-	-	308	1,113	1,168	1,239	1,322	1,420	1,536	6,686		
	Low Voltage Conductors	-	-	5	-	-	311	1,617	1,802	2,006	2,221	2,448	2,688	11,164		
	Subtransmission Cables	25	36	5	116	634	-	-	-	-	-	-	-	-		
	Distribution Cables	263	307	52	303	-	1,863	5,581	7,890	10,277	11,577	12,072	12,857	54,673		
	Low Voltage Cables	50	12	-	-	2	245	451	504	553	611	687	766	3,121		
	Buildings and Grounds	708	298	526	389	799	1,751	843	886	889	912	936	960	4,563		
	ZS Ancillary Equipment	80	12	163	375	644	649	1,800	1,645	1,195	1,315	1,188	1,813	7,155		
	Pole Mounted Switches	1,217	1,338	949	1,310	609	-	-	-	-	-	-	-	-		
	Pole Mounted Fuses	-	-	-	260	256	585	943	1,054	1,128	1,238	1,319	1,412	6,150		
	Ground Mount Switchgear	5,910	5,743	3,224	5,727	3,730	9,252	6,912	8,629	10,263	12,099	12,929	13,393	57,306		
	Enclosures	1,993	1,807	3,901	2,369	3,025	5,576	5,813	8,014	12,541	15,542	17,252	18,588	71,936		
	Ground Mounted Transformers	1,398	836	868	806	1,387	1,231	1,604	1,727	1,804	2,093	2,366	2,793	10,793		
	Pole Mounted Transformers	-	-	-	-	-	536	1,093	1,095	1,131	1,172	1,256	1,322	5,977		
	Voltage Regulators and Capacitors	-	91	44	25	16	83	434	771	1,232	1,000	1,157	1,160	5,321		
	Telecommunication Poles	-	-	-	-	-	1,090	2,857	3,750	5,099	5,901	6,698	6,988	28,438		
	BRM-HTE 66kV Conductor Replacement	-	-	-	-	-	-	-	-	-	601	4,417	-	5,019		
	HAL-HOD 66kV Oil Filled Cable Replacement	-	-	-	-	-	9,048	331	-	-	-	-	-	-		
	ADD-OXF	-	-	-	-	-	-	4,094	8,314	8,496	-	-	-	15,802		
	ADD-FEN 66kV Oil Filled Cable Replacement	-	-	-	-	-	-	-	8,895	9,992	10,195	-	-	25,083		
	OXF-LAN 66kV XLPE Cable - Replacing ADD-OXF	-	-	-	-	-	-	-	1,220	4,233	6,352	-	-	11,805		
	PAP-MCF 66kV Oil Filled Cable Replacement (Prev FY37-FY39)	-	-	-	-	-	-	-	-	-	3,568	7,259	7,407	18,224		
	ADD-ARM 66kV Oil Filled Cable Replacement	-	-	-	-	-	-	-	-	-	-	-	2,162	2,162		
	Middleton ZS 11kV CB Replacement and Building	-	-	-	-	-	497	5,314	1,191	-	-	-	-	1,191		
	Halwell 66kV OD Switchgear Replacement	-	-	-	-	-	2,593	6,254	2,192	-	-	-	-	2,192		
	Little River ZS 33kV CB and Power TX Replacement	-	-	-	-	-	182	272	-	-	-	-	-	454		
	Diamond Harbour ZS 33kV ODD	-	-	-	-	-	211	1,366	558	-	-	-	-	558		
	Darfield ZS Replacement	-	-	-	-	-	726	2,897	-	-	-	-	-	2,897		
	Addition OD Switchgear and Transformer Replacement	-	-	-	-	-	-	2,319	4,727	4,829	-	-	-	11,875		
	Horowhenua ZS 33 kV ODD Conversion & TX Replacement	-	-	-	-	-	-	290	2,265	2,309	-	-	-	4,574		
	Shands Road ZS Rebuild	-	-	-	-	-	-	-	2,229	4,552	4,650	-	-	11,431		
	Dallington ZS 11kV Switchboard Replacement	-	-	-	-	-	-	-	-	1,588	4,867	-	-	6,455		
	Bankside ZS 11kV Switchgear Replacement	-	-	-	-	-	-	-	-	-	-	519	2,122	2,641		
	Portman ZS - 11kV Switchboard Replacement	-	-	-	-	-	-	-	-	-	-	1,878	1,919	3,797		
	McFadden's 11kV Switchboard Replacement	-	-	-	-	-	-	-	-	-	-	1,374	5,616	6,991		
	Moffett St 11kV Switchgear Replacement	-	-	-	-	-	-	-	-	-	838	3,424	-	4,262		
	End of life Poles (Proactive and Reactive)	6,494	9,078	12,397	18,287	17,194	16,939	16,444	15,759	15,425	15,416	15,712	15,291	78,603		
	Wildfire Risk Poles	-	-	-	-	-	2,510	1,336	1,566	2,006	2,056	2,106	2,158	9,691		
	Crossarms	-	-	-	-	-	2,543	4,067	5,440	6,700	7,562	7,747	7,938	35,387		
	Historical	8,308	4,694	4,551	4,691	5,077	-	-	-	-	-	-	-	-		
	Total asset replacement and renewal expenditure	32,341	27,485	32,389	37,090	35,503	65,343	82,366	99,238	116,635	132,185	134,394	130,747	615,198		
less	Capital contributions funding asset replacement and renewal	-	-	28	-	17	-	-	-	-	-	-	-	-		
	Total asset replacement and renewal less capital contributions	32,341	27,459	32,389	37,073	35,503	65,343	82,366	99,238	116,635	132,185	134,394	130,747	615,198		
4d Asset relocations																
	Project or programme*															
	Asset Relocations	933	1,355	953	1,713	4,120	4,143	4,298	4,446	4,612	4,782	4,958	5,141	23,939		
	Total asset relocations expenditure	933	1,355	953	1,713	4,120	4,143	4,298	4,446	4,612	4,782	4,958	5,141	23,939		
less	Capital contributions funding asset relocations	542	1,072	710	1,476	3,263	3,254	3,359	3,503	3,633	3,767	3,906	4,050	18,855		
	Asset relocations less capital contributions	391	283	244	237	857	879	912	944	979	1,015	1,052	1,091	5,084		
4e Reliability, safety and environment:																
4e1 Quality of supply																
	Project or programme*															
	Quality of Supply	191	141	185	928	629	3,355	1,102	1,668	2,029	2,132	2,238	2,572	10,839		
	Total quality of supply expenditure	191	141	185	928	629	3,355	1,102	1,668	2,029	2,132	2,238	2,572	10,839		
less	Capital contributions funding quality of supply	-	-	-	504	-	-	-	-	-	-	-	-	-		
	Quality of supply less capital contributions	191	141	185	384	629	3,355	1,102	1,668	2,029	2,132	2,238	2,572	10,839		
4e2 Legislative and regulatory																
	Project or programme*															
	Total legislative and regulatory expenditure															
less	Capital contributions funding legislative and regulatory															
	Legislative and regulatory less capital contributions															
4e3 Other reliability, safety and environment																
	Project or programme*															
	Other Reliability, Safety and Environment	6,396	8,860	8,254	7,030	8,554	6,685	4,166	1,100	1,235	1,376	1,523	1,444	6,678		
	Total other reliability, safety and environment	6,396	8,860	8,254	7,030	8,554	6,685	4,166	1,100	1,235	1,376	1,523	1,444	6,678		
less	Capital contributions funding other reliability, safety and environment															
	Other reliability, safety and environment less capital contributions	6,396	8,860	8,254	7,030	8,554	6,685	4,166	1,100	1,235	1,376	1,523	1,444	6,678		
4f Non-network assets																
4f1 Routine non-network expenditure																
	Project or programme*															
	Routine ICT	3,433	1,930	3,366	7,892	11,379	9,567	13,976	11,678	9,285	7,788	8,653	4,968	42,372		
	Network Transformation	-	-	-	128	591	856	1,246	1,486	1,450	1,314	1,475	2,111	7,836		
	Route	1,401	1,176	1,499	1,371	3,217	7,833	3,488	3,431	1,983	2,670	2,811	3,804	14,698		
	Total routine non-network expenditure															
4f2 Non-network assets - atypical expenditure																
	Project or programme*															
	Head Office Building Extension	-	-	-	-	-	-	-	2,601	977	-	-	-	3,578		
	Total atypical non-network	-	-	-	-	-	-	-	2,601	977	-	-	-	3,578		
	Total capex non-network assets	4,833	3,106	4,865	9,391	15,187	12,556	18,710	19,195	13,695	11,772	12,939	10,883	66,484		
Total capex network assets																
	Total capex network assets	76,770	87,571	115,737	127,533	114,593	159,139	148,314	168,181	206,748	219,568	233,366	211,973	1,923,834		
	Total capex network assets less capital contributions	74,681	83,926	112,424	122,234	104,814	145,491	134,891	153,534	185,2						

Table 4: Capex projects and programmes

		Forecast commissioned assets values in nominal terms \$'000								
Project reference	Project/programme name	Assessment Period	CPP Regulatory Period					Total CPP Period		
		CA	CA+1	Year 1	Year 2	Year 3	Year 4		Year 5	
4a Consumer connection										
	Consumer types defined by EDB									
	Consumer Connection	51,596	32,654	39,672	40,646	42,240	45,389	46,937	214,884	
	Total consumer connection expenditure	51,596	32,654	39,672	40,646	42,240	45,389	46,937	214,884	
less	Capital contributions funding consumer connection	10,044	8,311	10,834	11,602	12,159	12,577	12,896	60,127	
	Total consumer connection less capital contributions	41,552	24,342	28,838	28,985	30,081	32,812	34,041	154,757	
4b System growth										
	Project Closeout	1,882	-	-	-	-	-	-	-	
	Burnham ZS - New 66/11kV Substation	-	12,078	-	-	-	-	-	-	
	Transformer Emergency Spares	-	-	-	3,159	-	-	-	-	3,159
	Templeton Commercial Growth	-	-	-	-	-	12,407	-	-	12,407
	Malden Industrial Growth	-	-	-	2,602	-	-	-	-	2,602
	Milton Hoon Hay Cables + Switchroom	-	19,191	-	-	-	-	-	-	-
	Lincoln Township Growth	-	-	-	-	14,952	-	-	-	14,952
	Lythell Port Company growth	-	-	-	-	-	-	10,479	-	10,479
	Network Transformation	1,367	341	988	2,859	1,537	1,643	1,241	8,268	
	Distribution	7,214	5,913	6,932	6,146	6,344	7,779	8,119	35,320	
	Low Voltage	3,538	3,597	8,310	14,125	14,466	15,194	11,963	64,059	
	Historical	-	-	-	-	-	-	-	-	
	Total system growth expenditure	14,001	41,118	16,231	28,891	37,299	37,022	31,803	151,247	
less	Capital contributions funding system growth	-	-	-	-	-	-	-	-	
	Total system growth less capital contributions	14,001	41,118	16,231	28,891	37,299	37,022	31,803	151,247	
4c Asset replacement and renewal by projects or programmes										
	Protection	4,150	1,994	3,083	3,866	4,760	4,796	5,272	21,776	
	Batteries and DC Supplies	137	242	311	390	440	508	556	2,204	
	Communications	160	162	278	474	469	596	786	2,853	
	Signalling / Comms Cables	1,166	3,997	5,070	5,353	5,693	6,412	7,094	29,622	
	SCADA (RTUs)	285	170	207	209	214	225	234	1,090	
	Metering	56	81	146	163	193	192	225	879	
	Generators	5	109	30	30	31	32	33	196	
	Steel Structures	1,464	1,686	3,054	3,325	3,958	4,223	4,736	19,296	
	Subtransmission Conductors	1,972	526	618	307	334	370	403	2,032	
	Distribution Conductors	393	923	1,157	1,207	1,292	1,428	1,567	6,650	
	Low Voltage Conductors	397	1,342	1,784	1,954	2,170	2,460	2,742	11,109	
	Subtransmission Cables	-	-	-	-	-	-	-	-	
	Distribution Cables	2,378	4,630	7,810	10,010	11,308	12,130	13,112	54,371	
	Low Voltage Cables	313	374	499	538	597	690	781	3,106	
	Buildings and Grounds	2,236	699	857	866	891	940	979	4,532	
	ZS Ancillary Equipment	829	1,493	1,628	1,164	1,284	1,194	1,848	7,118	
	Pole Mounted Switches	-	-	-	-	-	-	-	-	
	Pole Mounted Fuses	746	783	1,043	1,098	1,209	1,325	1,439	6,114	
	Ground Mount Switchgear	11,810	5,733	8,545	9,999	11,623	12,990	13,683	57,019	
	Enclosures	7,118	4,822	7,932	12,212	15,178	17,332	18,951	71,606	
	Ground Mounted Transformers	1,572	1,331	1,711	1,856	2,046	2,381	2,760	10,754	
	Pole Mounted Transformers	684	907	1,085	1,103	1,146	1,264	1,350	5,948	
	Voltage Regulators and Capacitors	69	360	764	1,201	976	1,164	1,185	5,202	
	Telecommunication Poles	1,392	2,370	3,712	4,966	5,763	6,729	7,125	28,294	
	BRM-HTE 66kV Conductor Replacement	-	-	-	-	-	5,076	-	5,076	
	HAL-HOO 66kV Oil Filled Cable Replacement	-	9,842	-	-	-	-	-	-	
	ADD-OXF	-	-	-	21,634	-	-	-	21,634	
	ADD-FEN 66kV Oil Filled Cable Replacement	-	-	-	-	26,000	-	-	26,000	
	OWT-LAN 66kV XLPE Cable - Replacing ADD-OXF	-	-	-	-	-	12,225	-	12,225	
	PAP-MCF 66kV Oil Filled Cable Replacement (Prev FY37-FY39)	-	-	-	-	-	-	19,209	19,209	
	ADD-ARM 66kV Oil Filled Cable Replacement	-	-	-	-	-	-	-	-	
	Middleton ZS 11kV CB Replacement and Building	-	-	7,354	-	-	-	-	7,354	
	Halwell 66kV OD Switchyard Replacement	-	-	11,682	-	-	-	-	11,682	
	Little River ZS 33kV CB and Power TX Replacement	-	429	-	-	-	-	-	-	
	Diamond Harbour ZS 33kV ODID	-	-	2,233	-	-	-	-	2,233	
	Darfield ZS Replacement	-	-	3,637	-	-	-	-	3,637	
	Addition OD Switchgear and Transformer Replacement	-	-	-	-	12,311	-	-	12,311	
	Hororata ZS 33 kV ODID Conversion & TX Replacement	-	-	-	4,969	-	-	-	4,969	
	Shands Road ZS Rebuild	-	-	-	-	-	11,981	-	11,981	
	Dallington ZS 11kV Switchboard Replacement	-	-	-	-	6,435	-	-	6,435	
	Bankside ZS 11kV Switchgear Replacement	-	-	-	-	-	-	2,714	2,714	
	Portman ZS - 11kV Switchboard Replacement	-	-	-	-	-	-	3,944	3,944	
	McFaddens 11kV Switchboard Replacement	-	-	-	-	-	-	7,184	7,184	
	Moffett St 11kV Switchgear Replacement	-	-	-	-	-	4,329	-	4,329	
	End of life Poles (Proactive and Reactive)	21,623	13,640	15,599	15,021	15,054	15,784	16,608	78,067	
	Wildfire Risk Poles	3,204	1,108	1,650	1,853	2,007	2,116	2,209	9,826	
	Crossarms	3,247	3,373	5,385	6,525	7,385	7,783	8,093	35,170	
	Historical	-	-	-	-	-	-	-	-	
	Total asset replacement and renewal expenditure	67,405	63,125	98,762	112,390	140,969	136,634	146,774	637,528	
less	Capital contributions funding asset replacement and renewal	-	-	-	-	-	-	-	-	
	Total asset replacement and renewal less capital contributions	67,405	63,125	98,762	112,390	140,969	136,634	146,774	637,528	
4d Asset relocations										
	Project or programme*									
	Asset Relocations	4,278	3,560	4,339	4,516	4,715	4,919	5,129	23,621	
	Total asset relocations expenditure	4,278	3,560	4,339	4,516	4,715	4,919	5,129	23,621	
less	Capital contributions funding asset relocations	3,156	2,804	3,405	3,565	3,724	3,862	4,016	18,572	
	Asset relocations less capital contributions	1,122	757	934	953	991	1,057	1,113	5,048	
4e Reliability, safety and environment:										
4e1 Quality of supply										
	Project or programme*									
	Quality of Supply	4,283	914	1,849	1,876	2,082	2,249	2,623	10,780	
	Total quality of supply expenditure	4,283	914	1,849	1,876	2,082	2,249	2,623	10,780	
less	Capital contributions funding quality of supply	-	-	-	-	-	-	-	-	
	Quality of supply less capital contributions	4,283	914	1,849	1,876	2,082	2,249	2,623	10,780	
4e2 Legislative and regulatory										
	Project or programme*									
	Legislative and regulatory expenditure	-	-	-	-	-	-	-	-	
less	Capital contributions funding legislative and regulatory	-	-	-	-	-	-	-	-	
	Legislative and regulatory less capital contributions	-	-	-	-	-	-	-	-	
4e3 Other reliability, safety and environment										
	Project or programme*									
	Other Reliability, Safety and Environment	8,533	3,456	1,089	1,203	1,344	1,530	1,473	6,639	
	Total other reliability, safety and environment	8,533	3,456	1,089	1,203	1,344	1,530	1,473	6,639	
less	Capital contributions funding other reliability, safety and environment	-	-	-	-	-	-	-	-	
	Other reliability, safety and environment less capital contributions	8,533	3,456	1,089	1,203	1,344	1,530	1,473	6,639	
4f Non-network assets										
4f1 Routine non-network expenditure										
	Project or programme*									
	Routine ICT	12,212	11,593	11,573	9,056	7,608	8,695	5,067	41,998	
	Network Transformation	1,093	1,034	1,472	1,414	1,284	1,482	2,153	7,806	
	Routine	9,999	2,893	3,400	1,934	2,608	2,824	3,879	14,645	
	Total routine non-network expenditure	23,304	15,520	16,445	12,404	11,500	12,999	11,099	64,448	
4f2 Non-network assets - atypical expenditure										
	Project or programme*									
	Head Office Building Extension	-	-	2,577	953	-	-	-	3,530	
	Total atypical non-network	-	-	2,577	953	-	-	-	3,530	
	Total capex non-network assets	23,304	15,520	19,022	13,357	11,499	13,002	11,099	67,979	
	Total capex network assets	150,096	144,828	161,942	189,624	228,649	229,744	234,738	1,044,698	
	Total capex network assets less capital contributions	136,696	133,713	147,703	174,386	212,767	213,305	217,266	965,999	

Table 5: Capex by asset categories

5a System Growth

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	
System growth expenditure	
Less Capital contributions funding system growth	
System growth less capital contributions	

Actual and forecast capex in constant prices \$(000)												
Current period					Assessment Period		CPP Regulatory Period					Total CPP period
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	11,772	711	59	459	459	-	-	976
16,395	17,841	34,406	36,514	21,473	15,820	4,301	4,783	8,046	11,367	5,271	-	29,467
548	531	316	876	359	567	740	753	729	734	833	805	3,853
4,393	4,406	2,954	7,525	3,848	6,183	8,550	11,024	14,283	14,805	18,956	16,699	75,768
6	71	194	231	440	743	1,188	2,257	3,816	3,814	3,811	2,893	16,591
1,095	1,663	1,466	2,344	1,541	1,592	1,140	1,703	3,454	2,213	2,706	2,283	12,360
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
22,437	24,513	39,336	47,491	27,661	36,678	16,630	20,580	30,787	33,391	31,578	22,680	139,016
-	-	-	-	-	-	-	-	-	-	-	-	-
22,437	24,513	39,336	47,491	27,661	36,678	16,630	20,580	30,787	33,391	31,578	22,680	139,016

5b Asset Replacement and Renewal

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 asset replacement and renewal expenditure	
Less Capital contributions funding asset replacement and renewal	
Total asset replacement and renewal less capital contributions	

-	-	-	-	-	4,740	4,263	5,278	5,366	6,469	9,986	6,301	33,400
537	658	822	1,154	1,059	9,048	4,336	12,758	18,641	16,682	12,373	8,526	68,979
31	42	6	122	650	5,893	16,490	13,589	12,375	16,226	12,799	11,105	66,093
11,333	5,873	5,789	5,736	6,684	21,654	25,096	26,337	28,289	29,376	30,114	30,624	144,739
9,331	10,212	13,468	18,074	16,570	2,108	5,897	8,044	10,149	11,171	11,439	11,948	52,751
390	377	57	318	2	1,820	3,094	3,610	4,225	4,148	4,565	4,863	21,411
1,742	1,026	1,008	664	1,438	15,413	13,291	17,058	22,518	26,533	28,254	29,250	123,613
11,364	10,517	8,921	10,162	7,812	4,669	7,949	8,787	10,022	10,988	11,248	12,070	53,115
5,569	3,818	5,713	2,767	2,182	-	-	-	-	-	-	-	-
40,295	32,523	35,785	38,997	36,398	65,343	80,417	95,459	111,585	121,593	120,777	114,687	564,100
-	31	-	18	-	-	-	-	-	-	-	-	-
40,295	32,492	35,785	38,979	36,398	65,343	80,417	95,459	111,585	121,593	120,777	114,687	564,100

Table 5: Capex by asset categories

5a System Growth

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	
System growth expenditure	
Less Capital contributions funding system growth	
System growth less capital contributions	

Actual and forecast capex in nominal prices \$(000)												
Current period					Assessment Period		CPP Regulatory Period					Total CPP Period
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	11,772	726	60	477	487	-	-	1,023
13,159	15,078	31,141	34,729	20,945	15,820	4,397	4,800	8,365	12,048	5,698	-	30,911
439	449	286	834	350	567	756	784	776	798	925	913	4,197
3,526	3,724	2,674	7,157	3,753	6,183	8,738	11,478	15,200	16,091	20,993	18,879	82,642
5	60	176	220	429	743	1,214	2,350	4,061	4,147	4,234	3,285	18,077
879	1,405	1,327	2,230	1,503	1,592	1,167	1,783	3,712	2,430	3,029	2,609	13,563
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
18,008	20,716	35,603	45,169	26,981	36,678	16,998	21,255	32,591	36,001	34,880	25,686	150,412
-	-	-	-	-	-	-	-	-	-	-	-	-
18,008	20,716	35,603	45,169	26,981	36,678	16,998	21,255	32,591	36,001	34,880	25,686	150,412

5b Asset Replacement and Renewal

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 asset replacement and renewal expenditure	
Less Capital contributions funding asset replacement and renewal	
Total asset replacement and renewal less capital contributions	

-	-	-	-	-	4,740	4,365	5,529	5,759	7,094	11,133	7,248	36,764
431	556	744	1,097	1,033	9,048	4,425	13,209	19,698	17,986	13,611	9,569	74,073
25	36	5	116	634	5,893	16,865	13,933	12,938	17,313	13,970	12,429	70,583
9,096	4,963	5,240	5,456	6,520	21,654	25,736	27,666	30,446	32,379	33,987	35,389	159,867
7,489	8,630	12,190	17,190	16,163	2,108	6,032	8,394	10,830	12,188	12,759	13,624	57,794
313	319	52	303	2	1,820	3,131	3,593	4,267	4,265	4,779	5,186	22,090
1,398	867	912	631	1,402	15,413	13,669	17,696	23,931	28,879	31,493	33,392	135,392
9,121	8,888	8,075	9,665	7,620	4,669	8,144	9,219	10,765	12,081	12,661	13,909	58,635
4,470	3,226	5,171	2,632	2,129	-	-	-	-	-	-	-	-
32,341	27,485	32,389	37,090	35,503	65,343	82,366	99,238	118,635	132,185	134,394	130,747	615,198
-	26	-	17	-	-	-	-	-	-	-	-	-
32,341	27,459	32,389	37,073	35,503	65,343	82,366	99,238	118,635	132,185	134,394	130,747	615,198

Table 5: Capex by asset categories

5a System Growth

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	
System growth expenditure	
Less Capital contributions funding system growth	
System growth less capital contributions	

Forecast commissioned asset values in nominal terms \$(000)							
Assessment Period		CPP Regulatory Period					Total CPP Period
CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	
-	-	-	-	-	-	-	-
-	13,050	-	-	1,046	-	-	1,046
2,403	18,219	-	5,761	13,903	12,405	-	32,069
724	627	776	756	779	930	932	4,173
7,893	7,248	11,363	14,804	15,203	16,860	24,300	82,530
948	1,007	2,327	3,955	4,051	4,255	3,350	17,937
2,033	968	1,765	3,615	2,316	2,573	3,221	13,491
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
14,001	41,118	16,231	28,891	37,299	37,022	31,803	151,247
-	-	-	-	-	-	-	-
14,001	41,118	16,231	28,891	37,299	37,022	31,803	151,247

5b Asset Replacement and Renewal

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 asset replacement and renewal expenditure	
Less Capital contributions funding asset replacement and renewal	
Total asset replacement and renewal less capital contributions	

6,050	3,620	5,474	5,609	6,342	11,824	7,392	36,640
-	9,842	-	21,633	25,998	12,223	19,207	79,061
3,064	2,621	27,388	6,999	20,917	18,440	16,664	90,407
27,642	21,348	27,389	29,653	31,629	34,153	36,090	158,914
2,691	5,004	8,309	10,548	11,905	12,821	13,894	57,478
2,323	2,597	3,557	4,156	4,166	4,803	5,288	21,970
19,675	11,338	17,519	23,308	28,210	31,647	34,054	134,737
5,960	6,756	9,126	10,485	11,801	12,723	14,185	58,320
-	-	-	-	-	-	-	-
67,405	63,125	98,762	112,390	140,969	138,634	146,774	637,528
-	-	-	-	-	-	-	-
67,405	63,125	98,762	112,390	140,969	138,634	146,774	637,528

Table 6: Opex projects and programmes

Adjust the column widths as required

Project reference		Project/programme name													
Current period						Assessment Period		CPP Regulatory Period						Total CPP Period	
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5				
6a	Service interruptions and emergencies														
	Reactive Maintenance														
	12,253	11,914	11,804	13,836	12,431	12,754	12,607	12,786	12,968	13,152	13,339	13,528	65,774		
Total Service interruptions and emergencies															
12,25311,91411,80413,83612,43112,75412,60712,78612,96813,15213,33913,52865,774															
6b	Vegetation management														
	Vegetation														
	5,301	5,769	4,981	4,602	4,568	5,184	7,132	8,331	9,638	10,017	10,250	10,475	48,712		
Total Vegetation management															
5,3015,7694,9814,6024,5685,1847,1328,3319,63810,01710,25010,47548,712															
6c	Routine and corrective maintenance and inspection														
	Preventive Maintenance														
	Corrective Maintenance														
	15,782	13,905	13,023	13,007	11,110	13,574	16,303	18,417	18,591	18,498	19,529	18,225	93,260		
6d	Asset replacement and renewal														
	Preventive Maintenance														
	Corrective Maintenance														
	2,461	1,344	978	659	575	-	-	-	-	-	-	-	-		
Total Asset replacement and renewal															
2,4611,344978659575- - - - - - - -															
Total network opex															
35,79732,93230,78632,10528,68431,51236,04339,53441,19741,66743,11842,228207,746															

Table 6: Opex projects and programmes

Adjust the column widths as required

Project reference	Project/programme name	Actual and forecast opex in nominal prices ((\$000))												
		Current period				Assessment Period		CPP Regulatory Period						Total CPP Period
		CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	
6a	Service interruptions and emergencies													
	Reactive Maintenance	9,834	10,068	10,684	13,160	12,125	12,754	12,917	13,418	13,938	14,475	15,032	15,611	72,474
	Total Service interruptions and emergencies	9,834	10,068	10,684	13,160	12,125	12,754	12,917	13,418	13,938	14,475	15,032	15,611	72,474
6b	Vegetation management													
	Vegetation	4,254	4,875	4,508	4,377	4,456	5,184	7,314	8,752	10,369	11,032	11,555	12,087	53,795
	Total Vegetation management	4,254	4,875	4,508	4,377	4,456	5,184	7,314	8,752	10,369	11,032	11,555	12,087	53,795
6c	Routine and corrective maintenance and inspection													
	Preventive Maintenance	4,975	4,757	4,753	5,624	5,288	7,076	9,248	9,557	9,753	9,642	10,793	9,645	49,389
	Corrective Maintenance	7,691	6,994	7,035	6,747	5,549	6,499	7,435	9,722	10,155	10,617	11,081	11,232	52,806
	Total Routine and corrective maintenance and inspection	12,667	11,751	11,787	12,371	10,836	13,574	16,683	19,279	19,907	20,259	21,874	20,876	102,195
6d	Asset replacement and renewal													
	Preventive Maintenance	-	-	-	-	-	-	-	-	-	-	-	-	-
	Corrective Maintenance	1,976	1,136	885	627	561	-	-	-	-	-	-	-	-
	Total Asset replacement and renewal	1,976	1,136	885	627	561	-	-	-	-	-	-	-	-
	Total network opex	28,731	27,830	27,864	30,535	27,978	31,512	36,914	41,449	44,215	45,766	48,460	48,573	228,463

Table 7: Non-network opex

		Actual and forecast opex in constant prices \$(000)												
Project reference	Project/programme name	Current period					Assessment Period		CPP Regulatory Period					Total CPP Period
		CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	
System operations and network support														
	SONS	19,228	15,635	15,500	17,435	19,335	20,296	20,636	21,423	22,662	23,181	23,287	22,786	113,339
	Network Transformation	-	-	189	1,216	1,298	1,330	1,813	2,153	4,065	3,618	3,661	3,589	17,087
Total System operations and network support		19,228	15,635	15,689	18,651	20,633	21,626	22,449	23,576	26,727	26,800	26,949	26,375	130,426
Business support														
	Corporate Support	23,683	24,622	28,289	30,125	28,961	29,012	30,886	32,096	34,074	34,872	35,033	34,282	170,357
	ICT opex	2,493	2,621	3,503	4,929	7,413	8,158	10,665	14,093	12,792	12,993	13,700	13,691	67,269
Total Business support		26,176	27,243	31,792	35,054	36,375	37,170	41,551	46,189	46,866	47,866	48,733	47,974	237,626
Non-network solutions provided by a related party or third party														
	Flexibility provision						-	-	-	380	865	200	876	2,321
Total Non-network solutions provided by		-	-	-	-	-	-	-	-	380	865	200	876	2,321
Total non network opex		45,404	42,877	47,481	53,705	57,007	58,796	64,000	69,764	73,972	75,530	75,881	75,225	370,373

Table 7: Non-network opex

		Actual and forecast opex in nominal prices \$(000)												
Project reference	Project/programme name	Current period					Assessment Period		CPP Regulatory Period					
		CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5	Total CPP Period
7a	System operations and network support													
	SONS	15,432	13,213	14,029	16,582	18,859	20,296	21,085	22,359	24,161	25,243	25,899	25,881	123,542
	Network Transformation	-	-	171	1,157	1,266	1,330	1,853	2,247	4,334	3,940	4,072	4,077	18,670
	Total System operations and network support	15,432	13,213	14,200	17,739	20,125	21,626	22,937	24,606	28,495	29,183	29,970	29,958	142,212
7b	Business support													
	Corporate Support	19,008	20,808	25,604	28,652	28,249	29,012	31,606	33,585	36,450	38,126	39,142	39,143	186,447
	ICT opex	2,001	2,215	3,171	4,688	7,231	8,158	10,914	14,746	13,684	14,206	15,307	15,633	73,576
	Total Business support	21,009	23,023	28,775	33,339	35,480	37,170	42,519	48,331	50,135	52,332	54,449	54,776	260,023
7c	Non-network solutions provided by a related party													
	Flexibility provision						-	-	-	406	946	223	1,001	2,576
	Total Non-network solutions provided	-	-	-	-	-	-	-	-	406	946	223	1,001	2,576
	Total non network opex	36,441	36,236	42,975	51,079	55,605	58,796	65,457	72,937	79,036	82,461	84,642	85,735	404,811

Table 8: Aggregate forecast commissioned assets by asset categories

Applicant may disaggregate other assets by asset types

Forecast amounts should be net after adjustments for any capital contributions and related party transactions.

Asset category	Forecast commissioned asset values in nominal terms \$(000)						
	Assessment Period		CPP Regulatory Period				
	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5
Subtransmission lines	5,934	3,696	5,567	5,704	6,441	11,929	7,503
Subtransmission cables	-	22,891	-	21,633	27,045	12,223	19,207
Zone substations	6,087	21,277	27,682	13,077	35,163	31,222	17,074
Distribution and LV lines	29,876	22,656	29,006	31,267	33,300	36,035	38,023
Distribution and LV cables	34,262	24,423	34,092	39,845	42,149	46,087	55,214
Distribution substations and transformers	11,521	7,692	10,503	12,777	13,072	14,357	14,154
Distribution switchgear	40,028	21,451	28,550	36,394	40,445	45,069	48,652
Other network assets	11,474	9,627	12,304	13,701	15,152	16,382	17,998
Non-network assets	21,018	15,520	19,023	13,357	11,499	13,002	11,099
Total forecast commissioned assets	160,200	149,233	166,726	187,755	224,266	226,307	228,925

Table 9: Cost escalation factors

Supplier must provide inflation and other factors used to convert real prices into nominal prices.

Supplier may modify this table to suit its processes

Escalator name and description	Current Period					Assessment Period		CPP Regulatory Period				
	CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5
Historical capital expenditure												
CPI series	-	5.30%	7.10%	5.08%	2.55%							
Forecast capital expenditure												
Overhead Structures Poles						1.29%	2.63%	2.53%	2.50%	2.46%	2.45%	2.46%
Overhead Structures Poles						1.29%	2.63%	2.53%	2.50%	2.46%	2.45%	2.46%
Overhead Structures Crossarms						1.29%	2.63%	2.53%	2.50%	2.46%	2.45%	2.46%
Overhead Structures Steel Structures						1.66%	2.34%	2.33%	2.33%	2.32%	2.32%	2.32%
Overhead Conductors Subtransmission Conductors						3.32%	1.91%	1.66%	2.07%	2.05%	2.05%	2.05%
Overhead Conductors Distribution Conductors						3.32%	1.91%	1.66%	2.07%	2.05%	2.05%	2.05%
Overhead Conductors Low Voltage Conductors						3.32%	1.91%	1.66%	2.07%	2.05%	2.05%	2.05%
Cables Subtransmission Cables						4.10%	2.04%	1.47%	2.06%	2.03%	2.03%	2.03%
Cables Distribution Cables						2.62%	2.29%	2.01%	2.27%	2.24%	2.23%	2.24%
Cables Low Voltage Cables						2.62%	2.29%	2.01%	2.27%	2.24%	2.23%	2.24%
Zone Substations Zone Substations						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Shands Road ZS Rebuild						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Middleton ZS 11kV CB Replacement and Building						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Halswell 66kV OD Switchyard Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Little River ZS 33kV CB and Power TX Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Diamond Harbour ZS 33kV ODID						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Darfield ZS Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Addington OD Switchgear and Transformer Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Hororata ZS 33 kV ODID Conversion & TX Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Dallington ZS 11kV Switchboard Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Bankside ZS 11kV Switchgear Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Portman ZS - 11kV Switchboard Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations McFaddens 11kV Switchboard Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Papanui ZS 66kV Disconnectors Replacements						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Annat ZS 11kV CB and Power TX Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Moffett St 11kV Switchgear Replacement						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Zone Substations Buildings and Grounds						0.93%	2.91%	2.73%	2.66%	2.61%	2.59%	2.59%
Zone Substations ZS Ancillary Equipment						1.39%	2.55%	2.48%	2.46%	2.43%	2.42%	2.42%
Distribution Switchgear Pole Mounted Switches						1.11%	2.77%	2.63%	2.58%	2.54%	2.52%	2.53%
Distribution Switchgear Pole Mounted Fuses						1.39%	2.55%	2.48%	2.46%	2.43%	2.42%	2.42%
Distribution Switchgear Ground Mount Switchgear						7.23%	3.12%	(0.74%)	2.05%	2.32%	2.33%	2.34%
Distribution Switchgear Enclosures						1.39%	2.55%	2.48%	2.46%	2.43%	2.42%	2.42%
Distribution Switchgear Ancillary Equipment						1.39%	2.55%	2.48%	2.46%	2.43%	2.42%	2.42%
Distribution Switchgear DS Ancillary Equipment						1.39%	2.55%	2.48%	2.46%	2.43%	2.42%	2.42%
Distribution Transformers Ground Mounted Transformers						6.72%	1.19%	(1.65%)	1.48%	1.81%	1.83%	1.84%
Distribution Transformers Pole Mounted Transformers						6.72%	1.19%	(1.65%)	1.48%	1.81%	1.83%	1.84%
Distribution Transformers Voltage Regulators and Capacitors						6.72%	1.19%	(1.65%)	1.48%	1.81%	1.83%	1.84%
Distribution Transformers Generators						5.46%	1.44%	(0.67%)	1.68%	1.92%	1.94%	1.95%
Secondary Systems Protection						1.66%	2.34%	2.33%	2.33%	2.32%	2.32%	2.32%

Escalator name and description	Current Period					Assessment Period		CPP Regulatory Period				
	CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5
Secondary Systems Batteries and DC Supplies						1.66%	2.34%	2.33%	2.33%	2.32%	2.32%	2.32%
Secondary Systems Communications						1.66%	2.34%	2.33%	2.33%	2.32%	2.32%	2.32%
Secondary Systems Signalling / Comms Cables						1.39%	2.55%	2.48%	2.46%	2.43%	2.42%	2.42%
Secondary Systems SCADA (RTUs)						1.66%	2.34%	2.33%	2.33%	2.32%	2.32%	2.32%
Secondary Systems Metering						1.66%	2.34%	2.33%	2.33%	2.32%	2.32%	2.32%
Major Projects Milton Hoon Hay Cables + Switchroom						4.10%	2.04%	1.47%	2.06%	2.03%	2.03%	2.03%
Major Projects Templeton Commercial Growth						5.93%	2.22%	(0.49%)	1.89%	2.12%	2.13%	2.14%
Major Projects Lower Selwyn Growth - Stage 1						5.93%	2.22%	(0.49%)	1.89%	2.12%	2.13%	2.14%
Major Projects Lincoln township Growth - Stage 1						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Major Projects Lincoln township Growth						5.48%	2.20%	(0.25%)	1.93%	2.14%	2.15%	2.16%
Major Projects Transformer Emergency Spares						7.37%	1.07%	(2.14%)	1.38%	1.75%	1.77%	1.79%
Major Projects Malvern Industrial Growth						5.76%	2.76%	0.15%	2.08%	2.25%	2.25%	2.26%
Major Projects Burnham ZS - New 66/11kV Substation						5.93%	2.22%	(0.49%)	1.89%	2.12%	2.13%	2.14%
Major Projects Project Closeout						5.93%	2.22%	(0.49%)	1.89%	2.12%	2.13%	2.14%
System Growth Reinforcements						2.93%	2.20%	1.88%	2.21%	2.18%	2.18%	2.18%
Major Projects Lyttelton Port Company Growth						4.86%	2.00%	1.10%	1.98%	1.96%	1.96%	1.97%
Other Growth Network Transformation						1.45%	2.67%	2.37%	2.52%	2.49%	2.48%	2.49%
Other Network Capex Consumer Connection						5.49%	2.02%	0.43%	1.90%	1.98%	1.98%	1.99%
Other Network Capex Asset Relocations						2.62%	2.29%	2.01%	2.27%	2.24%	2.23%	2.24%
Other Network Capex RSE						1.29%	2.63%	2.53%	2.50%	2.46%	2.45%	2.46%
Non-network Capex Information Communications Technology						0.93%	2.91%	2.73%	2.66%	2.61%	2.59%	2.59%
Non-network Capex Other Non-network Capex						0.93%	2.91%	2.73%	2.66%	2.61%	2.59%	2.59%
Non-network Capex Network Transformation						0.93%	2.91%	2.73%	2.66%	2.61%	2.59%	2.59%
Historical operating expenditure												
CPI series	-	5.30%	7.10%	5.08%	2.55%							
Forecast operating expenditure												
Network opex Reactive Maintenance						2.65%	2.46%	2.42%	2.42%	2.40%	2.39%	2.40%
Network opex Preventive Maintenance						2.62%	2.33%	2.30%	2.29%	2.28%	2.27%	2.27%
Network opex Corrective Maintenance						2.62%	2.33%	2.30%	2.29%	2.28%	2.27%	2.27%
Network opex Vegetation						3.12%	2.55%	2.44%	2.41%	2.37%	2.35%	2.36%
Non-Network opex SONS						2.52%	2.17%	2.15%	2.15%	2.14%	2.13%	2.13%
Non-Network opex Business Support						2.88%	2.33%	2.26%	2.23%	2.20%	2.19%	2.19%
Non-Network opex Network Transformation and Flexibility Provision						2.88%	2.33%	2.26%	2.23%	2.20%	2.19%	2.19%
Non-Network opex Non-network Solutions						2.88%	2.33%	2.26%	2.23%	2.20%	2.19%	2.19%

Table 10: Network demand forecasts

Consumer Connections

Number of ICPs connected in year by consumer type

*Consumer types defined by EDB**

Streetlighting
General
Irrigation
Major Customer
Large Capacity

Total number of connections

**include additional rows if needed*

Current period					Assessment Period		CPP Regulatory Period				
CY-4	CY-3	CY-2	CY-1	CY0	CA	CA+1	Year 1	Year 2	Year 3	Year 4	Year 5
-	1	1	2	2	16	5	5	5	5	5	5
5,774	5,988	7,202	6,429	6,590	6,700	6,034	6,107	6,198	6,290	6,379	6,394
4	4	5	2	5	5	5	5	5	5	5	5
12	20	17	18	19	20	20	20	20	20	20	20
27	7	11	4	2	3	3	3	3	3	3	3
5,817	6,020	7,236	6,455	6,618	6,744	6,067	6,140	6,231	6,323	6,412	6,427

Distributed generation

Number of connected generator units > 10 MW

Total capacity of all distributed generation (MVA)

					1	1	2	1	3		

System Demand

Maximum coincident system demand (MW)

GXP demand

plus Distributed generation output at HV and above

Maximum system coincident peak demand

less Net transfers to (from) other EDBs at HV and above

Demand on system for supply to consumers' connection points

623	712	655	692	677	697	718	740	756	780	807	834
2	1	-	-	1	-	-	0	2	2	3	4
625	713	655	692	678	697	718	740	758	782	810	838
625	713	655	692	678	697	718	740	758	782	810	838

Electricity volumes carried (GWh)

Electricity supplied from GXPs

less Electricity exports to GXPs

plus Electricity supplied from distributed generation

less Net electricity supplied to (from) other EDBs

Electricity entering system for supply to ICPs

less Total energy delivered to ICPs

3,372	3,401	3,501	3,598	3,629	3,632	3,847	4,034	4,198	4,445	4,662	4,878
-	-	-	-	-							
12	15	20	30	40	82	67	73	78	81	83	86
-	0	-	-	-							
3,384	3,416	3,521	3,627	3,668	3,714	3,914	4,107	4,275	4,525	4,746	4,964
3,249	3,281	3,377	3,478	3,519	3,475	3,680	3,860	4,016	4,253	4,461	4,666

The background is a solid teal color. Overlaid on this is a dark silhouette of a utility pole. Several power lines extend from the pole towards the top right corner of the image, creating a sense of depth and perspective.

Appendix F

Audit report

Independent Assurance Report

To the Board of Directors of Orion New Zealand Limited

The Auditor-General is the auditor of Orion New Zealand Limited (the company). The Auditor-General has appointed me, Dereck Ollsson, using the staff and resources of Audit New Zealand, to provide a conclusion, on his behalf, on the extent to which the Customised Price-Quality Path Proposal (the CPP proposal) prepared by the company and dated 9 June 2026, complies with the Electricity Distribution Services Input Methodologies Determination 2012 [2023] NZCC 35 (as amended) (the Determination).

Responsibilities of the Board of Directors

The Board of Directors of the company are responsible for the preparation of the CPP proposal in accordance with the Determination, and for such internal control as is necessary to enable the preparation of the CPP proposal that is free from material misstatement.

In particular, Subpart 5, clause 5.5.4 of the Determination states that the directors are responsible for ensuring that the information contained in the CPP proposal has been derived and is provided in accordance with the Determination and properly represents the company's operations and events which occurred during the current period, and that the assumptions made in respect of the forecast information for the next period in the CPP proposal are relevant and reasonable.

Responsibilities of the Auditor

General responsibilities

Our responsibility is to express a conclusion on the CPP proposal, as required by clauses 5.1.4 and 5.5.3 of the Determination. We conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised): *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, and Standard on Assurance Engagements 3100 (Revised): *Compliance Engagements*, issued by the New Zealand Auditing and Assurance Standards Board.

In addition, our responsibility to express a conclusion on whether the quantitative forecast information provided in spreadsheets has been properly compiled on the basis of relevant and reasonable disclosed assumptions was carried out with regard to the International Standard on Assurance Engagements 3400: *The Examination of Prospective Financial Information*, issued by the International Auditing and Assurance Standards Board.

Reasonable assurance

Our engagement was designed to provide reasonable assurance in respect of:

- proper record keeping (clause 5.5.3(1)(a) of the Determination);
- actual financial information relating to the current period (clause 5.5.3(1)(b) of the Determination);
- forecast financial information relating to the next period (clause 5.5.3(1)(c) of the Determination);
- quantitative historical information provided in spreadsheets (clause 5.5.3(1)(d) of the Determination); and
- the matters over which a conclusion is required under clauses 5.5.3(2)(a) and 5.5.3(2)(b) of the Determination.

A reasonable assurance engagement involves performing procedures to obtain a high level of assurance about the matters on which we are required to form a conclusion. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the CPP proposal, whether due to fraud, error, or non-compliance with the Determination. In making those risk assessments, the auditor considers internal control relevant to the company's preparation of the CPP proposal in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing a conclusion on the effectiveness of the company's internal control.

Limited assurance

Our engagement was designed to provide limited assurance in respect of whether the quantitative forecast information provided in spreadsheets has been properly compiled on the basis of relevant and reasonable disclosed assumptions (clause 5.5.3(1)(e) of the Determination).

A limited assurance engagement is substantially less in scope, and provides less assurance, than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgement and included making enquiries primarily of the Board of Directors and personnel of the company and applying analytical and other review procedures. Based on these enquiries and procedures we determined whether anything has come to our attention to suggest that the quantitative forecast information provided in spreadsheets has not been properly compiled on the basis of relevant and reasonable disclosed assumptions.

Generally accepted international practice, as prescribed by the International Standard on Assurance Engagements 3400: *The Examination of Prospective Financial Information*, is that auditors do not provide reasonable assurance on matters relating to future periods, and particularly on whether the disclosed assumptions are relevant and reasonable, as anticipated events frequently do not occur as expected and the variation could be material.

Our examination of the company's records

For the purpose of forming our conclusion as to whether, as far as appears from an examination of them, proper records have been kept enabling the complete and accurate compilation of information required by Subpart 4 of the Determination, we carried out the following work:

- Our work on the records underlying historical information was limited to assessing the design of the company's systems, processes, procedures and records and in carrying out limited tests to assess whether the company's systems, processes and procedures were operating as intended.
- Our work on the records underlying forecast information was limited to assessing whether adequate documentation had been retained that records the assumptions underlying the forecasts and that shows how the assumptions had been applied to produce forecast financial information for the next period and quantitative forecast information provided in spreadsheets in accordance with the Determination.

Actual historical information for the current period, quantitative historical information provided in spreadsheets, and forecast financial information for the next period

We planned and performed our work to obtain all the information and explanations we considered necessary in order to obtain reasonable assurance that the actual financial information relating to the current period, quantitative historical information provided in spreadsheets and forecast financial information for the next period has been properly compiled in all material respects in accordance with the Determination.

The work we completed in respect of the actual financial information relating to the current period, and the quantitative historical information provided in spreadsheets was as follows:

- Work in respect of amounts and disclosures that were previously verified as part of the assurance engagements covering the information disclosure under the Electricity Distribution Information Disclosure Determination 2012 (as amended) was limited to:
 - agreeing the amounts and disclosures to the underlying records, and, where possible, to the relevant Electricity Distribution Information Disclosure of the company; and
 - checking that the information presented has been prepared in accordance with the Determination, in all material respects.
- Work in respect of amounts and disclosures that were not verified as part of the Electricity Distribution Information Disclosure Determination 2012 (as amended) information disclosure included:
 - examining reconciliations or other evidence to check that these amounts and disclosures were consistent with the Electricity Distribution Information Disclosure Determination 2012 (as amended) information disclosure and the underlying records; and
 - checking that the information presented has been prepared in accordance with the Determination in all material respects.

The work completed in respect of the forecast financial information for the next period involved checking that the information presented has been prepared in accordance with the Determination in all material respects. For detailed inputs into the models this involved testing compliance on a sample basis. Actual results are likely to be different from the forecast financial information since anticipated events frequently do not occur as expected and the variation could be material. Accordingly, we express no conclusion as to whether results consistent with the forecast financial information will be achieved.

We have obtained all information and explanations that we required to provide a basis for our conclusion.

Quantitative forecast information provided in spreadsheets

We are required to form a conclusion as to whether the quantitative forecast information provided in spreadsheets has been properly compiled on the basis of relevant and reasonable disclosed assumptions. Forming a conclusion on whether the disclosed assumptions are relevant and reasonable is also part of the role of the verifier, engaged by the company in accordance with clause 5.5.2(2) of the Determination. We provide limited assurance on this matter in accordance with the appropriate standard, International Standard on Assurance Engagements 3400: *The Examination of Prospective Financial Information*.

Actual results are likely to be different from the quantitative forecast information provided in spreadsheets since anticipated events frequently do not occur as expected and the variation could be material. Accordingly, we express no conclusion as to whether results consistent with the quantitative forecast information provided in spreadsheets will be achieved.

We have obtained all information and explanations that we required to provide a basis for our conclusion.

Inherent limitations

Because of the inherent limitations in evidence gathering procedures, it is possible that fraud, error, or non-compliance with the Determination may occur and not be detected. As the procedures performed in respect of the company's compliance with the Determination are undertaken on a test basis, our engagement cannot be relied on to detect all instances where the company may not have complied with the Determination.

In addition, our examination of the quantitative forecast information provided in spreadsheets, on which we provide limited assurance, is not designed to detect all instances of non-compliance with the Determination. Our examination generally involved making enquiries, primarily of the Board of Directors and personnel of the company and applying analytical and other review procedures.

The conclusions expressed in this report have been formed on the basis outlined above.

Use of this report

This report has been prepared solely for your use and solely for the purpose of preparing and presenting the CPP proposal. We understand that a copy of our report has been requested by the Commerce Commission solely for the purpose of assessing the CPP proposal. We agree that a copy of our report may be provided to the Commerce Commission.

This report is not to be used for any other purpose, provided to any other person, or referred to in whole or in part without our prior written consent. We disclaim any assumption of responsibility for any reliance on this report to any persons or users other than you, or for any purpose other than that for which it was prepared.

Independence and quality control

When carrying out the engagement, we complied with the Auditor-General's:

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

We also complied with the independent auditor requirements specified in the Determination.

In addition to this engagement, we have also performed and reported on the following legally required audit and assurance engagements for the company:

- the annual audit of the financial statements and performance information prepared under the Energy Companies Act 1992;
- the compliance statement prepared under the Electricity Distribution Services Default Price Quality Path Determination 2020; and
- the information disclosure prepared under the Electricity Distribution Information Disclosure Determination 2012 (as amended).

Other than this engagement and the engagements noted above, we have no relationship with, or interests in, the company.

Our conclusions

Our conclusions have been formed on the basis of, and subject to, the limitations described under the *Responsibilities of the Auditor* and *Inherent limitations* headings outlined in this independent assurance report.

Reasonable assurance conclusions

In our conclusion, as far as appears from an examination of them, the company has kept proper records to enable the complete and accurate compilation of information required by Part 5, Subpart 4 of the Determination.

In our conclusion, in the case of the historical financial information included in the CPP proposal dated 9 June 2026 relating to the current period:

- that actual financial information relating to the current period reported has been prepared in all material respects in accordance with the input methodologies set out in the Determination; and
- the quantitative historical information provided in spreadsheets is properly compiled on the basis of the underlying source information.

Limited assurance conclusions

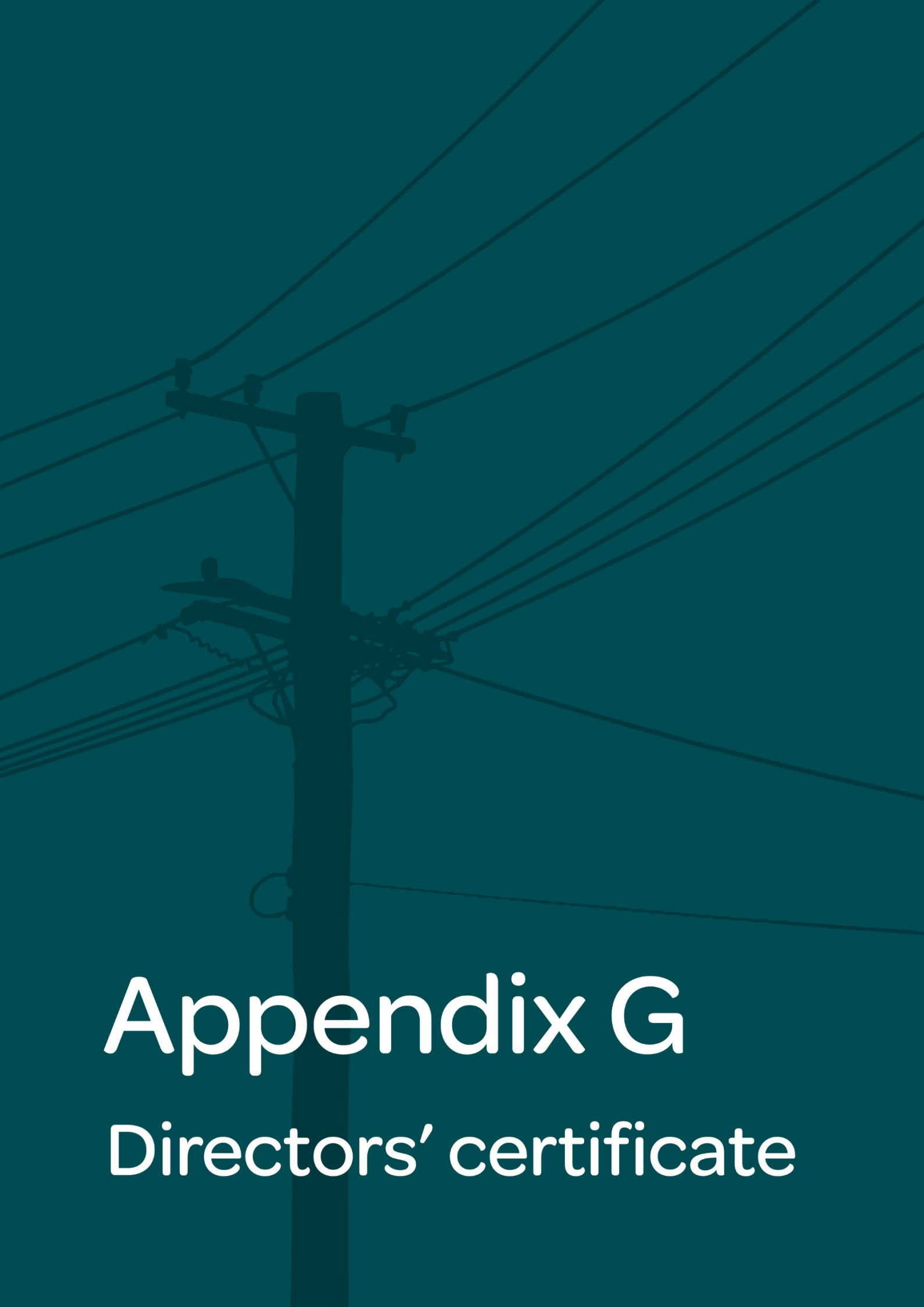
In our conclusion, in the case of the forecast financial information included in the CPP proposal dated 9 June 2026 relating to the next period:

- nothing has come to our attention to suggest that the forecast financial information relating to the next period has not been compiled in all material respects in accordance with the input methodologies as set out in the Determination;
- nothing has come to our attention to suggest that the quantitative forecast information provided in the CPP proposal spreadsheets has not been properly compiled in all material respects in accordance with the Determination on the basis of relevant and reasonable assumptions;
- nothing has come to our attention to suggest that the allocation of forecast operating costs not directly attributable for the next period has not been determined, in all material respects, in accordance with clause 5.3.5 of the Determination; and
- nothing has come to our attention to suggest that the forecast values of regulated service assets not directly attributable, including commissioned assets, for the next period have not been determined, in all material respects, in accordance with clauses 5.3.6(3)(b) and 5.3.11(2)(b) of the Determination.

Our engagement was completed on 9 June 2026, and our conclusions are expressed as at that date.



Dereck Ollsson
Audit New
Zealand
On behalf of the Auditor-General
Christchurch, New Zealand

The background is a solid teal color. Overlaid on this is a dark silhouette of a utility pole. Several power lines extend from the pole towards the top right corner of the frame, creating a sense of depth and perspective.

Appendix G

Directors' certificate

Directors' Certificate

In accordance with clause 5.5.4 of the Electricity Distribution Services Input Methodologies Determination 2012 (Determination), we, Paul Munro and Mike Sang, being directors of Orion New Zealand Limited (Orion), certify in respect of Orion's CPP proposal dated 9 June 2026:

Information of a quantitative nature

that, in the case of all information of a quantitative nature, other than forecast information, provided in accordance with Part 5 of the Determination, we believe that:

- a) the information was derived and is provided in accordance with the relevant requirements; and
- b) it properly represents the results of financial or non-financial operations as the case may be.

Information of a qualitative nature

that, in the case of all information of a qualitative nature, other than forecast information, provided in accordance with Part 5 of the Determination, we believe that:

- a) the information is provided in accordance with the relevant requirements; and
- b) it properly represents the events that occurred during the current period.

Forecast information

that, in the case of all forecast information provided in accordance with Part 5 of the Determination, we believe that:

- a) the information was derived and is provided in accordance with the relevant requirements; and
- b) the assumptions made are reasonable.

Verification and audit

that, to the best of our knowledge, the verifier was engaged by Orion in accordance with Schedule F of the Determination;

that, to the best of our knowledge, Orion provided the verifier with all the information specified in Part 5 of the Determination, including its schedules, relevant to Schedule F of the Determination;

that, to the best of our knowledge, the information described in clause 5.5.2(3)(e) of the Determination was provided to the verifier in advance of the verifier's selection of identified programmes;

that, to the best of our knowledge, the:

- a) matters the auditor was engaged to audit included the matters specified in clause 5.5.3 of the Determination; and
- b) auditor was instructed to report on at least the matters described in clause 5.1.4 of the Determination; and

that the:

- a) audit report provided pursuant to clause 5.1.4 of the Determination;
- b) verification report provided pursuant to clause 5.1.3 of the Determination; and
- c) other certifications required by this clause,

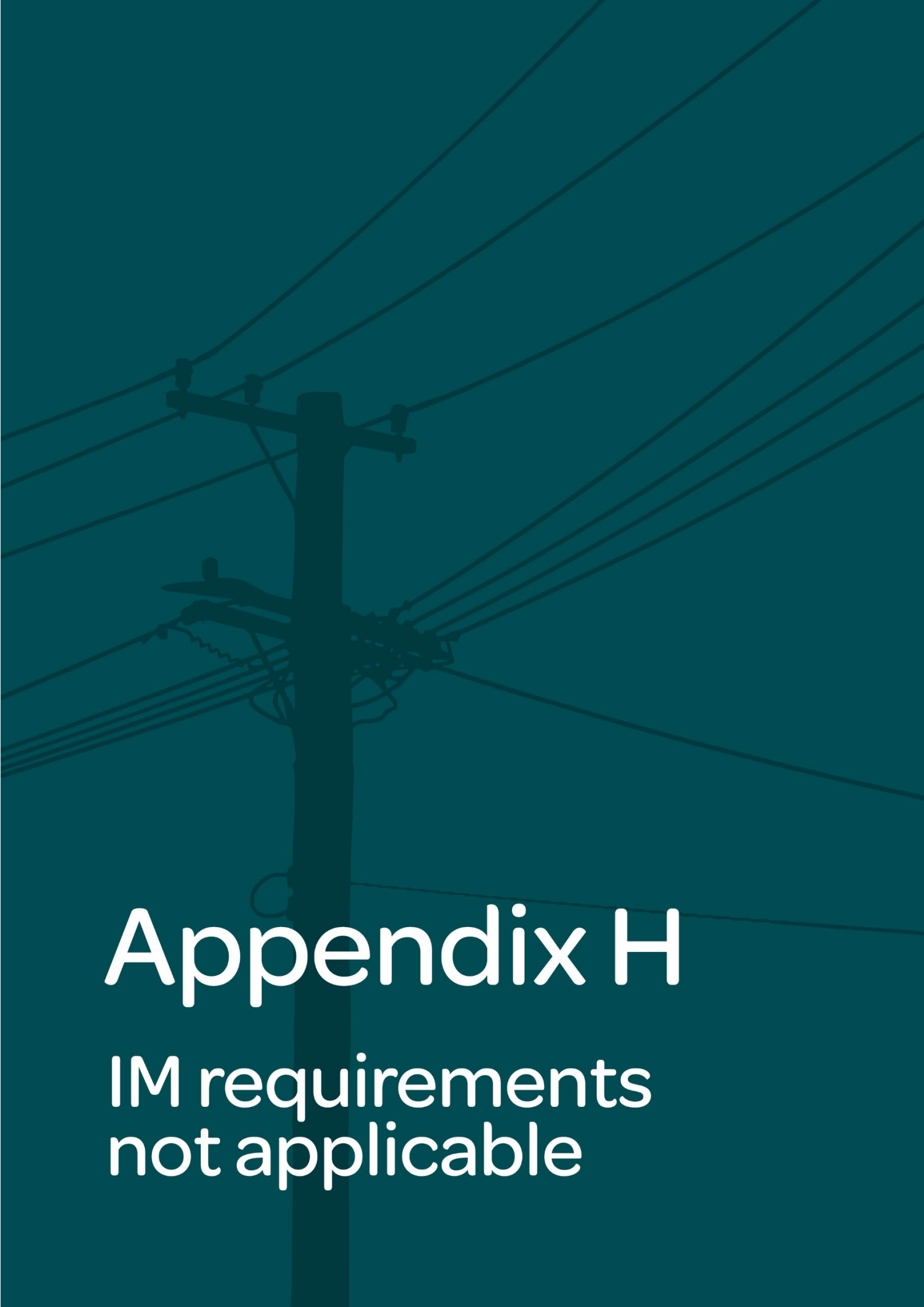
all relate to the same CPP proposal.



Paul Munro
Director



Mike Sang
Director

A teal background with a silhouette of a utility pole and power lines. The pole is in the center, with several power lines extending from it towards the top right corner of the image.

Appendix H

IM requirements
not applicable

Table 3, below, details IM requirements that do not apply to Orion's CPP proposal

Table 3: IM requirement not applicable

Relevant clause	Non-applicable requirement
5.1.4(2)	The audit report is intended to meet the requirements of clause 5.5.3 only.
5.1.4(4) & (5)	The audit report was not provided to the Verifier.
5.2.4(2) & (4)	No clawback is forecast.
5.3.5(2)	No sales of regulated assets are forecast.
5.3.6(4)	No sales of shared assets are forecast.
5.3.26	Alternative methodologies with equivalent effect have not been proposed.
5.4.1(2)	This CPP application is not made in response to a catastrophic event.
5.4.3	The Commission has exempted Orion from providing the prioritisation information required by this clause
5.4.4	It is not proposed that the CPP period be shorter than 5 years.
5.4.5	A quality standard variation is not proposed.
5.4.8(3)	An alternative X-factor has been proposed.
5.4.9(3)	Values are below the de minimis threshold
5.4.9(7)	The opex forecast does not include any shared opex.
5.4.10(1)	No arm's-length deduction has been applied.
5.4.10(2) & (3)	OVABAA has not been applied.
5.3.11(1)(e) & (f)	No assets are expected to be acquired from another regulated supplier in the forecast period
5.3.11(1)(i)	No vested assets included in capex forecast
5.3.11(1)(m)	Insurance or compensatory entitlements are not forecast
5.4.9(5) & (6)	Proxy allocators have not been used
5.4.10	Additional certification not required
5.4.12(1), (2) & (3)	Alternative depreciation methods have not been used.
5.4.12(4)	Different physical asset lives have not been used.
5.4.14(1)(c)(ii)	No asset transfers are forecast
5.4.14(1)(d)	Assets are not forecast to be acquired from another regulated supplier, and assets are not forecast to be transferred from other regulated services
5.14.14(2)(c)	Insurance or compensatory entitlements are not forecast
5.4.14(3)(a)	Assets are not forecast to be acquired from another regulated supplier, and assets are not forecast to be transferred from other regulated services

Relevant clause	Non-applicable requirement
5.4.14(4)	No assets are intended to be acquired from another regulated supplier or transferred from other regulated services.
5.4.15(1)(a)	Assets are not forecast to be sold to related parties or transferred to Orion's unregulated business.
5.4.31	No new pass-through costs are proposed.
5.4.33	Alternative methodologies with equivalent effect have not been proposed.
5.5.1(1)(d)	A quality standard variation is not proposed.
5.5.1(2)	Information was not restricted to hard copy only
5.5.4(5) & (6)	Clauses not relevant at the time of CPP submission
D8(1)(a), (d), (e) & (f)	The expenditure categories identified by these subclauses are not either of the largest two non-network fixed asset capex expenditure categories by dollar value
D11	No self-insurance allowance is proposed
D12(1), (2)(a) & (5)	The Commission has exempted Orion from providing the related party information required by these clauses.
D15	The contingent project, absent a trigger event, is forecast outside the CPP period and cannot be added to the regulatory templates.

The background is a solid teal color. Overlaid on this is a dark silhouette of a utility pole. Several power lines extend from the pole towards the top right corner of the frame, creating a series of diagonal lines across the upper half of the image.

Appendix I

IM variations
requested

In accordance with s53V(2)(c) of the Act, Orion seeks the Commission's agreement to the proposed IM variations set out in Table 4, below:

Table 4: IM variations requested

Variation #	Relevant clause	Variation requested
1	5.6.10	Reduction of the financial threshold for contingent projects
2	5.6.11	Reduction of the financial threshold for unforeseen projects
3	5.6.10A (new)	Creation of a new, listed project reopener (prospective)
4	5.6.11A (new)	Creation of a new, capacity event reopener (prospective)
5	5.6.11A (new)	Creation of a new, capacity event reopener (responsive)
6	3.1.3	A varied urgent project allowance to permit Orion's prudently incurred 'ramp-up' costs

Variation 1 - Amended threshold for contingent projects

Orion proposes an IM variation to reduce the financial threshold for the contingent project reopener to ensure that, should a contingent project's designated trigger event occur, appropriate investment can be made.

Currently, to list a project as a contingent project in a CPP, an EDB must show that the expenditure exceeds 10% of its annual revenue from the previous disclosure year and is prudent and efficient. For Orion, this is currently \$26.2 million, which means that the Lower Selwyn Growth Stage 1 project, which Orion considers should be categorised as contingent and which the Independent Verifier has verified (subject to the financial threshold being met), would not be eligible for inclusion as a contingent project.

Accordingly, the drafting in Box 1, below, lowers the financial threshold for the contingent project reopener to align more closely with reopeners under a DPP (e.g., the unforeseeable large project reopener), to enhance workability.

Box 1: Proposed variation to IM clause 5.6.10 (contingent project)

5.6.10	<u>Contingent project</u>
(1)	A 'contingent project' is a project or programme that has been listed as a 'contingent project' with an associated trigger event in a CPP determination .
(2)	A project or programme may be listed as a contingent project only if-
	...
(c)	the expenditure required for the project or programme would be likely-
(i)	to exceed 10% of the value of the EDB's annual revenue in the most recently completed disclosure year the lesser of 1% of the EDB's forecast net allowable revenue for the regulatory period and \$2.5 million ; and
(ii)	when forecast with reasonable certainty, to meet the expenditure objective .

The variation would also require a corresponding change to Schedule G, as shown in Box 2:

Box 2: Proposed variation to clause G10 of IM Schedule G (contingent projects)

SCHEDULE G TERMS OF REFERENCE FOR VERIFIERS

...

G10 Contingent projects

- (1) For each proposed contingent project, the verifier must provide an opinion as to whether that project or programme satisfies the following criteria:

...

- (c) the total of capex forecast and opex forecast in relation to the project or programme-
- (i) as disclosed in the CPP proposal exceeds ~~10% of the value of the CPP applicant's annual revenue in the most recently completed disclosure year in respect of an ID determination~~ **the lesser of 1% of the EDB's forecast net allowable revenue for the regulatory period and \$2.5 million;**

Variation 2 - Amended threshold for unforeseen projects

Orion proposes an IM variation to reduce the financial threshold for the unforeseen project reopener to ensure that, should an unforeseen project arise, appropriate investment can be made.

Currently, to reopen a CPP for an unforeseen project, an EDB must show that the expenditure exceeds 10% of its annual revenue from the previous disclosure year and is prudent and efficient. For Orion, this is currently \$26.2 million, which means that only exceptionally large projects would qualify and may unduly suppress demand for new and/or upgraded connections.

Accordingly, the drafting in Box 3, below, lowers the financial threshold for the unforeseen project reopener to align more closely with reopeners under a DPP (e.g., the unforeseeable large project reopener), to enhance workability.

Box 3: Proposed variation to IM clause 5.6.11 (unforeseen project)

5.6.11 Unforeseen project

- (1) An 'unforeseen project' is a **project or programme** to which the following apply,-
- (a) in respect of the services supplied by the **EDB** at the time that it submitted its **CPP proposal**, the **project or programme** would have been unforeseeable to a prudent **EDB**; and
- (b) the total **capex forecast** and **opex forecast** for the **project or programme** exceed ~~10% of the value of the EDB's annual revenue in the most recently completed disclosure year~~ to have ended before the **project or programme** was nominated as a ~~reopener event~~. **the lesser of the following thresholds:**
- (i) **1% of the EDB's forecast net allowable revenue for the regulatory period; and**
- (ii) **\$2.5 million.**

Variation 3 – A 'listed' project reopener

Orion considers that the two, existing CPP reopeners sit at opposite ends of the foreseeability spectrum, with nothing in between:

- The contingent project reopener addresses projects that are foreseeable in all respects, except for timing; and
- The unforeseen project reopener addresses projects that, at the time of CPP submission, are unforeseeable in all respects to a prudent EDB.

A ‘foreseeability gap’ occurs when an EDB understands that there is a likely investment need but has limited information to act on. An example is given by an industrial customer indicating that it may wish to upgrade its supply capacity in the next 2-to-3 years but has not formally requested the upgrade nor advised the magnitude of the supply increase. Clearly, the project is foreseeable and cannot be treated as an unforeseen project if a request is received and, until sufficient information is provided to develop an appropriate solution and forecast expenditure that would meet the expenditure objective, the project cannot be developed as a contingent project.

To bridge the ‘foreseeability gap’, we proposed a new, listed project reopener, as shown in Box 4.

Currently, under the IMs, contingent projects are listed in the relevant CPP determination. This proposal would, in effect, create a second list, the forecast expenditure for which is not subject to verification or assessment during the process of determining the CPP. At the point at which Orion has greater certainty regarding the timing and scope of the project, Orion would apply for the reopener. At that point Orion would be required to provide an independent engineer’s report and demonstrate that the forecast expenditure meets the expenditure objective. We have suggested calling this mechanism a “listed project” in line with the Transpower IMs, on which we have loosely based the below drafting.

Box 4: Proposed clause 5.6.10A - new ‘listed project’ reopener (prospective)

5.6.10A Listed project

- (1) A **listed project** is a **project** or **programme** that has been listed as a **listed project** in a **CPP determination**.**
- (2) A **project** or **programme** may be listed as a **listed project** only if:**
 - (a) the Commission considers that it-**
 - (i) would be likely to require expenditure in excess of the lesser of 1% of the EDB’s forecast net allowable revenue for the regulatory period and \$2.5 million; and**
 - (ii) is reasonably required by the **EDB**;**
 - (b) the **project** or **programme** is anticipated to commence within the **regulatory period** but the commencement date, scope, and cost of the **project** or **programme** cannot be forecast with an appropriate degree of specificity or accuracy.**
- (3) An **EDB** may apply for a reopener in respect of a **listed project** when the commencement date, scope and cost of the **listed project** can be forecast with an appropriate degree of specificity or accuracy by submitting a **listed project application**.**
- (4) A **listed project application** must-**
 - (a) provide-**
 - (i) **capex** and **opex forecasts** for each relevant **disclosure year** using the best available information to hand; and**
 - (ii) information confirming the project is likely to exceed the lesser of 1% of the EDB’s forecast net allowable revenue for the regulatory period and \$2.5 million; and**
 - (b) explain-**
 - (i) why the expenditure required for the **listed project** is likely to meet the **expenditure objective**; and**

- (ii) the methodology used to generate the **capex** and **opex** forecast for the **listed project**; and
- (c) include an **engineer's** report providing an opinion as to whether the **listed project** satisfies the following criteria:
 - (i) it is reasonably required of the **EDB** in meeting the **expenditure objective**; and
 - (ii) the total of **capex forecast** and **opex forecast** in relation to the **listed project** exceeds the lesser of 1% of the **EDB's** forecast net allowable revenue for the regulatory period and \$2.5 million in respect of an **ID determination**, is reasonable in dollar terms, and would be likely to meet the **expenditure objective**.
- (5) Where any **listed project** is likely to terminate after the end of the next period, in addition to the information required by subclause (4), provide any additional information relevant to forecast capex and forecast opex to the end of the **listed project**.

Orion anticipates that during the CPP period it may arrive at a point where it has sufficient certainty regarding the expenditure associated with a listed project that it could otherwise meet the requirements for a contingent project. Orion would like the option to reclassify listed projects as contingent projects in those circumstances, including specifying a trigger event, so that – when the trigger event occurs – it can avail itself of the more straightforward requirements of the contingent project reopener, rather than having to meet all the requirements of a listed project reopener under time pressure.

We have therefore included a proposed clause 5.6.10B (refer Box 5, below), which would allow Orion to apply to reclassify a listed project as a contingent project by providing the information required for a listed project application (including an independent engineer's report) and specifying a trigger event. If the Commission agrees the requirements for a contingent project are met, the listed project would then be reclassified as a contingent project and, when the applicable trigger event occurs, Orion would apply for a contingent project reopener.

Box 5: Proposed clause 5.6.10B - reclassifying listed projects as contingent projects

- 5.6.10B** Re-classifying listed projects as contingent projects
- (1) An **EDB** may apply to amend the **CPP determination** to reclassify a **listed project** as a **contingent project**.
 - (2) An application to reclassify a **listed project** as a **contingent project** must:
 - (a) include the information specified in clause 5.6.10A(4); and
 - (b) specify a **trigger event**.
 - (3) A **listed project** may be reclassified as a **contingent project** only if the requirements in clause 5.6.10(2) are met.
 - (4) Without limiting clause 5.6.10(2), the **Commission** may-
 - (a) decline to reclassify a **listed project** as a **contingent project** even where the requirements of clause 5.6.10(2) are met; or
 - (b) specify a different **trigger event**, or a different description for a **trigger event**, for the **contingent project** than that proposed by the **EDB**.

Box 6: Proposed variation to IM clause 5.1.13 (reopening a CPP)

5.1.13	<u>Amending CPP after reconsideration</u>
...	
(7)	In the case of a contingent project , a listed project or an unforeseen project , the Commission will not amend the price path for any disclosure year before the disclosure year in which assets constructed as part of the contingent project , the listed project or the unforeseen project are forecast to be commissioned.
7A	The Commission may only amend the price path in respect of a listed project upon receiving a listed project application that complies with clause 5.6.10A(4).
7B	In assessing a listed project application, the Commission must consider whether the total of capex forecast and opex forecast in relation to the listed project would be likely to meet the expenditure objective .

Several consequential amendments would be required as shown in Box 7 to Box 10, below:

Box 7: Proposed variation to clause 1.1.4 (consequent to new 'listed project' reopener)

1.1.4	<u>Interpretation</u>
...	
listed project	has the meaning specified in clause 5.6.10A(1)
listed project application	means an application under clause 5.6.10A(3) in respect of a listed project

Box 8: Proposed variation to clause 3.1.3 (consequent to new 'listed project' reopener)

3.1.3	<u>Recoverable costs</u>
(1)	Subject to subclause (9), a recoverable cost is a cost that is-
...	
	(p) an innovation and non-traditional solutions allowance; or
	(q) a fee payable to an engineer for the purpose of meeting a requirement under clause 5.6.10A(4)(e), subject to subclause (7A).
...	
7A	For the purpose of subclause (1)(q), the amount that may be recovered by an EDB will be specified by the Commission in an amendment to the CPP determination .

Box 9: Proposed variation to clause 5.6.1 (consequent to new 'listed project' reopener)

5.6.1	<u>When a CPP may be amended</u>
...	
(3)	For the purpose of subclause (2), the types of events are:
...	
(b)	the following, each being a type of reopener event (prospective) :
	(i) a trigger event occurs in respect of a contingent project ; or
	(ii) an unforeseen project ; or
	(iii) the provision by an EDB of a listed project application that complies with clause 5.6.10A(4).

SCHEDULE D CAPITAL AND OPERATING EXPENDITURE INFORMATION

...

D16 Listed project information

- (1) For each proposed **listed project**-
 - (a) provide-
 - (i) an overall description including the aims and objectives of the **project**; and
 - (ii) information as to how the project satisfies the criteria specified in clause 5.6.10A(2).

Variation 4 – A 'capacity event' reopener (prospective)

Unforeseen general demand growth could have a material impact on several demand-driven expenditure categories, including consumer connection, 11kV reinforcement and LV reinforcement. To manage that risk, and ensure that services can continue to be provided to consumers, we propose a 'capacity event' reopener (prospective) be available if the demand for:

- consumer connection capex;
- system growth capex;
- asset relocations capex; or
- a combination of consumer connection capex and system growth capex;

requires Orion to undertake greater than \$2.5 million of additional investment.

The proposed new 'capacity event (prospective)' drafting, along with proposed consequential amendments to other clauses, is show in Box 11 to Box 13, below.

Box 11: Proposed clause 5.6.11A - new 'capacity event' reopener (prospective)

5.6.11A Capacity event

- (1) A 'capacity event' means an event for which an **EDB** demonstrates that—
 - (a) the **EDB's network** needs additional capacity to provide **electricity distribution services**;
 - (b) the additional capacity has the **primary driver** of meeting established or reasonably anticipated demand for—
 - (i) **connection capex**;
 - (ii) **system growth capex**;
 - (iii) **asset relocation capex**;
 - (iv) a combination of **connection capex** and **system growth capex**;
 - (c) when the **CPP** was determined, the need for the additional capacity—
 - (i) was not sufficiently certain; or
 - (ii) could not reasonably have been foreseen by a prudent **EDB**; and
 - (d) providing the additional capacity—
 - (i) would require the **EDB** to incur costs of the lesser of 1% of the EDB's forecast net allowable revenue for the regulatory period and \$2.5 million; and
 - (ii) meets the **expenditure objective**.

Box 12: Proposed variation to clause 1.1.4 (consequent to new 'capacity event' reopener)

1.1.4 Interpretation

...

Capacity event has the meaning specified in clause 5.6.11A

Box 13: Proposed variation to clause 5.6.1 (consequent to new 'capacity event (prospective)' reopener)

5.6.1 When a CPP may be amended

...

(3) For the purpose of subclause (2), the types of events are:

...

(b) the following, each being a type of **reopener event (prospective)**:

- (i) a **trigger event** occurs in respect of a **contingent project**; or
- (ii) an **unforeseen project**; or
- (iii) the provision by an EDB of a **listed project application** that the Commission is satisfied complies with clause 5.6.10A(4); or
- (iv) a **capacity event**.

Variation 5 – A 'capacity event' reopener (responsive)

While Orion considers that a prospective capacity event reopener is preferable, there are challenges with the timing of Orion's CPP period relative to the assessment of the incremental rolling incentive scheme (IRIS) for capex. If a sustained, unforeseen demand for capacity occurs in the period FY28 to FY30, it may not be feasible to reopen the CPP without some form of responsive consideration. If a sustained, unforeseen demand for capacity cannot be compensated, it would mean that the capex IRIS would penalise for forecast variance, rather than expenditure efficiency, as intended.

To accommodate such circumstances, we have requested a responsive version of the capacity event reopener. The proposed new 'capacity event (responsive)' drafting, along with proposed consequential amendments to other clauses, is shown in Box 14 to Box 16, below.

Box 14: Proposed clause 5.6.11A - new 'capacity event' reopener (responsive)

5.6.11A Capacity event

(1) A 'capacity event' means an event for which an **EDB** demonstrates that—

- (a) the **EDB's network** needs additional capacity to provide **electricity distribution services**;
- (b) the additional capacity has the **primary driver** of meeting established or reasonably anticipated demand for—
 - (i) **connection capex**;
 - (ii) **system growth capex**;
 - (iii) **asset relocation capex**;
 - (iv) a combination of **connection capex** and **system growth capex**;
- (c) when the **CPP** was determined, the need for the additional capacity—
 - (i) was not sufficiently certain; or
 - (ii) could not reasonably have been foreseen by a prudent **EDB**; and
- (d) providing the additional capacity—

- (i) would require the **EDB** to incur costs of the lesser of 1% of the EDB's forecast net allowable revenue for the regulatory period and \$2.5 million; and
- (ii) meets the **expenditure objective**.

Box 15: Proposed variation to clause 1.1.4 (consequent to new 'capacity event (responsive)' reopener)

1.1.4 Interpretation

...

Capacity event has the meaning specified in clause 5.6.11A

Box 16: Proposed variation to clause 5.6.1 (consequent to new 'capacity event (responsive)' reopener)

5.6.1 When a CPP may be amended

...

(3) For the purpose of subclause (2), the types of events are:

...

(b) the following, each being a type of **reopener event (responsive)**:

- (i) a **catastrophic event**;
- (ii) a **change event**;
- (iii) an **error event**;
- (iv) the discovery of **false or misleading information**;
- (v) a **major transaction event**;
- (vi) a **capacity event**;

...

Variation 6 – A varied 'urgent project' allowance

Orion is forecasting to exceed its DPP4 opex and commission assets allowances in the lead up to the CPP period, driven by a need to ramp up field work and ensure deliverability of our CPP.

As deliverability is consistent with the long-term interests of consumers, and the drivers of the allowance exceedances are consistent with the drivers of Orion's CPP, we consider that it is inappropriate to incur penalties under the incremental rolling incentive scheme. Accordingly, we have requested a variation to the urgent project allowance to allow Orion to recover its prudently incurred costs, above the DPP4 allowances, in the lead up to the CPP. The proposed variation is described in Box 17.

Box 17: Proposed variation to clause 3.1.3 – (urgent project allowance)

3.1.3 Recoverable costs

...

(8) 'Urgent project allowance' means the allowance determined by the **Commission** in a **CPP determination** in respect of additional net costs where these costs-

- (a) exceed those already provided for in a **DPP determination** or **CPP determination**;
- (b) will not otherwise be recovered by the **EDB**; and
- (c) will be prudently incurred by the **EDB** before commencement of the resulting **CPP regulatory period** in responding to an urgent project that occurred in the time between the ~~submission of a CPP proposal and determination of the resulting CPP determination by the Commission.~~ **start of the DPP regulatory**

period in which the **CPP application** is made and determination of the resulting **CPP determination** by the **Commission**.

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Appendix J

Compliance checklists

IM Clause	Description	Location	Section/Location	Sub-section	Note
PART 5 INPUT METHODOLOGIES FOR CUSTOMISED PRICE-QUALITY PATHS					
SUBPART 1 Contents of a CPP application					
5.1.1	Applying for a CPP				
5.1.1(1)	An EDB seeking a CPP in accordance with s 53Q of the Act must provide the Commission with a CPP application .	Application	Section 3		
5.1.1(2)	CPP application means an application containing, in all material respects, the information specified in-	Application	Sections 5 & 6		
5.1.1(2)(a)	this subpart; and				
5.1.1(2)(b)	Subpart 4.				
5.1.2	Evidence of consumer consultation				
5.1.2(1)	For the purpose of clause 5.1.1(2)(a), in respect of consumer consultation, the specified information is-	Application Main Proposal	Section 5.1 Chapter 3		Our responses to clause 5.1.2 addresses only the formal consultation phases of our engagement with consumers and stakeholders; however Orion's engagement on the proposed CPP investment was multi-staged, commencing in August 2024. Refer to the Engagement Report for further detail.
5.1.2(1)(a)	a description as to how the requirements of clause 5.5.1 were met;	Engagement Report	Chapter 6	Sections 3.2-3.3 Section 6.3	
5.1.2(1)(b)	a list of respondents to the consultation required by that clause;	Engagement Report	Appendix B SharePoint Data Room	CPP109	
5.1.2(1)(c)	a description of all issues raised by consumers in response to the CPP applicant's intended CPP proposal;	Engagement Report	Chapter 6	Section 6.6	
5.1.2(1)(d)	a summary of the arguments raised in respect of each issue described in accordance with paragraph (c); and	Engagement Report	Appendices M-P Chapter 6	Section 6.6	
5.1.2(1)(e)	in respect of the issues described in accordance with paragraph (c), an explanation as to whether its CPP proposal accommodates the arguments referred to in (d); and	Engagement Report	Appendices M-P Chapter 6	Section 6.7	
5.1.2(1)(e)(i)	if so, how; and				
5.1.2(1)(e)(ii)	if not, why not.				
5.1.3	Verification-related material				
5.1.3(1)	For the purpose of clause 5.1.1(2)(a), in respect of verification, the specified	Application	Section 5.2		
5.1.3(1)(a)	a verification report ;	IV Report	Appendix C		
5.1.3(1)(b)	any information relating to the CPP proposal , other than information required to be included in a CPP proposal by Subpart 4, provided to the verifier by or on behalf of the CPP applicant , pursuant to clauses 5.5.2(3)(a)-(c) and 5.5.2(3)(e);		Appendix D		
5.1.3(1)(c)	<i>Examples: instructions as to how to interpret information provided to the verifier; details as to the source of the information;</i>				
5.1.3(1)(d)	any other information relied upon by the verifier relating to the CPP proposal pursuant to clause 5.5.2(3)(d); and				
5.1.3(1)(d)	subject to subclause (2), a certificate signed by the verifier stating that the relevant parts of the CPP proposal were verified and verification report was prepared in accordance with Schedule G.				
5.1.3(2)	For the purpose of subclause (1)(d), the CPP applicant must ensure that the certificate described in subclause (1)(d) relates to verification of the relevant parts of the CPP proposal as submitted to the Commission .	Application	Section 5.2		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.1.4	Audit and assurance reports				
5.1.4(1)	For the purpose of clause 5.1.1(2)(a), in respect of audit or assurance, the specified information is a report written by an auditor and signed by that auditor (either in an individual's name or that of a firm) in respect of an audit or assurance engagement undertaken of the matters specified in clause 5.5.3, stating-	Application	Section 5.3 Appendix F		
5.1.4(1)(a)	the work done by the auditor ;				
5.1.4(1)(b)	the scope and limitations of the audit or assurance engagement;				
5.1.4(1)(c)	the existence of any relationships (other than that of auditor) which the auditor has with, or any interests which the auditor has in, the CPP applicant or any of its subsidiaries;				
5.1.4(1)(d)	whether the auditor obtained all information and explanations that he or she required to undertake the audit or assurance engagement, and, if not-				
5.1.4(1)(d)(i)	details of the information and explanations not obtained; and				
5.1.4(1)(d)(ii)	any reasons provided by the CPP applicant for its or their non-provision;				
5.1.4(1)(e)	the auditor's opinion of the matters in respect of which the audit or assurance engagement was undertaken.				
5.1.4(2)	A report in respect of an audit or assurance engagement undertaken other than expressly to meet the requirements of clause 5.5.3 may be considered to comply with subclause (1) to the extent that the report in respect of that other audit or assurance engagement fully or partially meets the requirements of clause 5.5.3.				N/A - the audit report is intended to meet the requirements of clause 5.5.3 only
5.1.4(3)	The CPP applicant must ensure that reports required by this clause relate to the CPP proposal as submitted to the Commission .	Application	Section 5.3		
5.1.4(4)	For the avoidance of doubt, the reports required by this clause need not be-				N/A - the audit report was not provided to the Verifier.
5.1.4(4)(a)	prepared in advance of the verifier undertaking verification of the CPP proposal ; nor				
5.1.4(4)(b)	provided to the verifier .				
5.1.4(5)	If, notwithstanding subclause (4), a report prepared in accordance with this clause is provided to the verifier , subclause (3) continues to apply.				N/A - the audit report was not provided to the Verifier.
5.1.5	Certification				
5.1.5(1)	For the purpose of clause 5.1.1(2)(a), in respect of certification, the specified information is the certificates recording the certifications specified in clause 5.5.4.	Application	Section 5.4 Appendix G		
5.1.5(2)	For the avoidance of doubt, one physical document may contain more than one of the certifications specified in clause 5.5.4.	Application	Appendix G		
5.1.6	Modification or exemption of CPP application requirements				
5.1.6(1)	The Commission may approve a modification to, or exemption from, any requirement set out in—				
5.1.6(1)(a)	this subpart;				
5.1.6(1)(b)	Subpart 4;				
5.1.6(1)(c)	Subpart 5; or				
5.1.6(1)(d)	schedules relating to subparts identified in paragraphs (a) to (c) above.				
5.1.6(2)	A modification or exemption may be approved where, in the Commission's opinion, the modification or exemption will not detract, to an extent that is more than minor,				
5.1.6(2)(a)	the Commission's evaluation of the CPP proposal ;				
5.1.6(2)(b)	the Commission's determination of a CPP ; and				
5.1.6(2)(c)	the ability of interested persons to consider and provide their views on the CPP				

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.1.6(3)	When considering whether a modification or exemption is likely to detract, to an extent that is more than minor, from the processes listed in subclauses (2)(a)-(c), the Commission may have regard to the size of the supplier's business.				
5.1.6(4)	A modification or exemption will only apply for the purposes of assessing compliance of a CPP application under s 53S(1) of the Act —				
5.1.6(4)(a)	if the Commission has previously approved a request by a CPP applicant for the modification or exemption in accordance with clause 5.1.7;				
5.1.6(4)(b)	in respect of the CPP applicant and the CPP application identified in the Commission's approval; and				
5.1.6(4)(c)	if the CPP applicant elects to apply the modification or exemption by:				
5.1.6(4)(c)(i)	meeting all conditions and requirements specified in the approval that relates to the modification or exemption; and				
5.1.6(4)(c)(ii)	providing the relevant information specified in clause 5.1.8 as part of its CPP application .				
5.1.7	Process for obtaining a modification or exemption				
5.1.7(1)	At any time prior to providing the Commission with a CPP application , a CPP applicant may request modifications or exemptions to the requirements listed in clause 5.1.6(1) as alternatives to those requirements.	Application	Section 5.5 Appendix B		
5.1.7(2)	A request by a CPP applicant must—				
5.1.7(2)(a)	be in writing;				
5.1.7(2)(b)	include the following information:				
5.1.7(2)(b)(i)	the CPP applicant's name and contact details;				
5.1.7(2)(b)(ii)	a brief description of the key features of its intended CPP proposal ;				
5.1.7(2)(b)(iii)	the date that the CPP applicant intends to submit the CPP application for which a modification or exemption is sought;				
5.1.7(2)(b)(iv)	a list of the specific modifications or exemptions sought;				
5.1.7(2)(b)(v)	an explanation of why the CPP applicant considers the requirements in clause 5.1.6(2) are met;				
5.1.7(2)(b)(vi)	evidence in support of the explanation provided under subparagraph (v); and				
5.1.7(2)(b)(vii)	identification of any information that is commercially sensitive.				
5.1.7(3)	Subparagraph (2)(b)(vi) may be satisfied by submitting a certificate, signed by a senior manager of the CPP applicant , setting out the factual basis on which he or she believes the requirements in subclause 5.1.6(2) are met.				
5.1.7(4)	In considering whether to approve a request for modification or exemptions, the Commission may seek, and have regard to—				
5.1.7(4)(a)	views of interested persons within any time frames and processes set by the Commission ; and				
5.1.7(4)(b)	views of any person the Commission considers has expertise on a relevant matter.				
5.1.7(5)	As soon as reasonably practicable after receipt of a request for modifications or exemptions the Commission will, by notice in writing, advise the CPP applicant as to				
5.1.7(5)(a)	any of the modifications or exemptions are approved; and				
5.1.7(5)(b)	the approval of any modification or exemption is subject to conditions or requirements that must be met by the CPP applicant .				

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.1.8	Information on modification or exemption of information requirements				
5.1.8(1)	Where a CPP applicant elects to apply a modification or exemption approved by the Commission in accordance with clause 5.1.7, it must include as part of its CPP application —	Application	Section 5.5		
5.1.8(1)(a)	a copy of the Commission's approval;	FM Information Report	Appendices B & C		
5.1.8(1)(b)	a list of the approved modifications or exemptions which the CPP applicant has elected to apply in its CPP application ;		Section 1.3		
5.1.8(1)(c)	evidence that any conditions or requirements of the approval have been met; and				
5.1.8(1)(d)	an indication, at the relevant locations within the document or documents comprising the CPP application , as to where the modifications or exemptions have				
SUBPART 2 Commission assessment of a customised price-quality path proposal					
5.2.1	Evaluation criteria				
5.2.1(1)	The Commission will use the following evaluation criteria to assess each CPP proposal :				
5.2.1(1)(a)	whether the CPP proposal is consistent with the input methodologies specified in Part 5;				
5.2.1(1)(b)	the extent to which a CPP in accordance with the CPP proposal would promote the purpose of Part 4 of the Act ;				
5.2.1(1)(c)	whether data, analysis, and assumptions underpinning the CPP proposal are fit for the purpose of the Commission determining a CPP under s 53V, including consideration as to the accuracy and reliability of data and the reasonableness of assumptions and other matters of judgement;				
5.2.1(1)(d)	whether proposed capital expenditure and operating expenditure meet the expenditure objective ;				
5.2.1(1)(e)	the extent to which any proposed quality standard variation provided in a CPP proposal better reflects the realistically achievable performance of the EDB over the CPP regulatory period , taking into account either or both-				
5.2.1(1)(e)(i)	statistical analysis of past SAIDI and SAIFI performance; and				
5.2.1(1)(e)(ii)	the level of investment provided for in proposed maximum allowable revenue before tax ,				
5.2.1(1)(f)	as the case may be; and				
5.2.1(1)(f)(i)	the extent to which-				
5.2.1(1)(f)(ii)	the CPP applicant has consulted with consumers on its CPP proposal ; and				
5.2.1(1)(f)(ii)	the CPP proposal is supported by consumers , where relevant.				
SUBPART 3 Determination of customised price-quality paths					
SECTION 1 Determination of annual allowable revenues					
5.3.1	Annual allowable revenues				
5.3.1(1)	Amounts for-	Financial Model	1. CPP Financial Model – General (Outputs)		
5.3.1(1)(a)	building blocks allowable revenue before tax for the next period ;		H15:N15, H17:N17,		
5.3.1(1)(b)	building blocks allowable revenue after tax for the next period ;		J19:N19, J21:N21		
5.3.1(1)(c)	maximum allowable revenue before tax for the CPP regulatory period ; and		Sections 3-4		
5.3.1(1)(d)	maximum allowable revenue after tax for the CPP regulatory period , will be determined.	FM Information Report			

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.2	Building blocks allowable revenue before tax				
5.3.2(1)	‘Building blocks allowable revenue before tax’ for each disclosure year of the next period is determined in accordance with the formula- $\frac{(\text{regulatory investment value} \times \text{cost of capital} + \text{total value of commissioned assets} \times (TF_{VCA} - 1) + \text{term credit spread differential allowance} \times TF - \text{total revaluation}) \div (TF_{rev} - \text{corporate tax rate} \times TF) + (\text{total depreciation} \times (1 - \text{corporate tax rate} \times TF) + \text{forecast operating expenditure} \times TF \times (1 - \text{corporate tax rate}) + (\text{closing deferred tax} - \text{opening deferred tax}) \times (TF - 1) + (\text{permanent differences} + \text{regulatory tax adjustments} - \text{utilised tax losses}) \times \text{corporate tax rate} \times TF) \div (TF_{rev} - \text{corporate tax rate} \times TF)}{TF_{rev} - \text{corporate tax rate} \times TF}$	Financial Model	1. CPP Financial Model – BBARx (Calculations) H37:N37		
5.3.2(2)	‘Regulatory investment value’ means the amount obtained in accordance with the total opening RAB value + opening deferred tax .	Financial Model FM Information Report	1. CPP Financial Model – BBARx (Calculations) H49:N49 Section 4.1.1		
5.3.2(3)	For the purpose of subclause (1) ‘total value of commissioned assets’ means, in relation to a disclosure year , the sum of closing RAB values for all commissioned assets calculated in accordance with clause 5.3.6(3)(b).	Financial Model FM Information Report	2. Supporting Model - Other – RAB (Calculations) M26:S26 Section 6.4		
5.3.2(4) 5.3.2(4)(a) 5.3.2(4)(b) 5.3.2(4)(c) 5.3.2(4)(d)	For the purpose of subclause (1) – ‘TF’ is determined in accordance with the formula- $(1 + \text{cost of capital})^{182/365};$ ‘TFrev’ is determined in accordance with the formula- $(1 + \text{cost of capital})^{148/365};$ ‘TF _{VCA} ’ is determined in accordance with the formula- $PV_{VCA} \times (1 + \text{cost of capital}) \div \text{total value of commissioned assets};$ and ‘PV _{VCA} ’ means the sum of the present value of closing RAB values for commissioned assets calculated in accordance with clause 5.3.6(3)(b), where each present value is determined by discounting each closing RAB value by the <i>cost of capital</i> from the relevant commissioning date to the commencement of the relevant disclosure year .	Financial Model FM Information Report	1. CPP Financial Model – General (Inputs) H28:N28, H30:N30 1. CPP Financial Model – RABx (Calculations) H30:N30, H33:N33 Section 9.2		
5.3.2(5)	For the purpose of this clause, ‘cost of capital’ has the meaning specified in clause 5.3.22.	Financial Model FM Information Report	1. CPP Financial Model – General (Inputs) H20:N20		
5.3.2(6) 5.3.2(6)(a) 5.3.2(6)(b)	‘Forecast operating expenditure’ means, in relation to a CPP proposal - that has not been assessed by the Commission , the amount of operating expenditure for the relevant disclosure year included by the CPP applicant in its opex forecast ; or undergoing assessment by the Commission , the amount of operating expenditure determined for the relevant disclosure year by the Commission after assessment of the amount in paragraph (a) against the expenditure objective .	Financial Model FM Information Report	1. CPP Financial Model – General (Inputs) H32:N32 Section 7		
5.3.2(7)	For the purpose of this clause, all values and amounts are expressed in nominal terms unless otherwise specified.	Financial Model	1. CPP Financial Model		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.3	Building blocks allowable revenue after tax				
5.3.3(1)	'Building blocks allowable revenue after tax' is building blocks allowable revenue before tax less forecast regulatory tax allowance .	Financial Model	1. CPP Financial Model – BBARx (Calculations) H43:N43		
5.3.3(2)	For the purpose of this clause, all values and amounts are expressed in nominal terms.	Financial Model	1. CPP Financial Model – BBARx (Calculations)		
5.3.4	Price path				
5.3.4(1)	The present value of the series of values of maximum allowable revenue after tax must equal the present value of the series of building blocks allowable revenue after tax , adjusted for any shifted revenue and the present value of any claw-back for the CPP regulatory period , where present values are determined in accordance with	Financial Model	1. CPP Financial Model – MARx (Calculations) J68		
5.3.4(2) 5.3.4(2)(a) 5.3.4(2)(a)(i) 5.3.4(2)(a)(ii) 5.3.4(2)(a)(iii) 5.3.4(2)(b)	In subclause (1)- the reference to claw-back is a reference to claw-back, determined by the Commission pursuant to s 53V(2)(b), in the case of a CPP determination made- after deferral of the relevant CPP proposal in accordance with s 53Z(2) of the Act ; in response to a CPP proposal made in accordance with provisions in a DPP determination relating to the submission of CPP proposals in response to a catastrophic event ; or as a result of an amendment of the CPP under clause 5.6.13; and each reference to a series of values is a reference to the value determined in respect of each disclosure year of the CPP regulatory period .	Financial Model	1. CPP Financial Model – MARx (Calculations) D43		N/A - no clawback is forecast
5.3.4(3)	For the purpose of subclause (1), the present value of each series must be determined using the cost of capital as specified in clause 5.3.22.	Financial Model FM Information Report	1. CPP Financial Model – MARx (Calculations) J58:N58, J63:N63 Section 3.1		
5.3.4(4) 5.3.4(4)(a) 5.3.4(4)(b)	For the avoidance of doubt, where claw-back is determined where- subclause (2)(a)(i) applies, it will only be determined in respect of the period between the date when the CPP would have taken effect had deferral not occurred and the date the CPP determination will come into effect; and subclause (2)(a)(ii) applies, it will only be determined in respect of the period between the date of the catastrophic event and the date the CPP determination will come into effect.	Financial Model	1. CPP Financial Model – MARx (Calculations) D42		N/A - no clawback is forecast
5.3.4(5)	For the purpose of this subpart, the 'maximum allowable revenue before tax' for the first disclosure year of the CPP regulatory period is the amount of maximum allowable revenue before tax in the first disclosure year of the CPP regulatory period required for subclause (1) to be satisfied.	Financial Model	1. CPP Financial Model – MARx (Calculations) J20, J27		
5.3.4(6)	For the purpose of this subpart, the 'maximum allowable revenue before tax' for each disclosure year of the CPP regulatory period except the first must equal- $MAR_{y-1} \times (1 + \Delta CPI) \times (1 - X)$, where- MAR_{y-1} is the maximum allowable revenue before tax in the preceding disclosure year ; ΔCPI is the CPP inflation rate ; and X is any X factor applying to the EDB .	Financial Model	1. CPP Financial Model – MARx (Calculations) J20:N20, J27:N27		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.4(7)	'Maximum allowable revenue after tax' is maximum allowable revenue before tax less forecast regulatory tax allowance.	Financial Model FM Information Report	1. CPP Financial Model – MARx (Calculations) J35:N35 Section 3		
5.3.4(8) 5.3.4(8)(a) 5.3.4(8)(b)	For the purpose of subclause (7), 'forecast regulatory tax allowance' means- where opening tax losses are nil in every disclosure year of the next period , forecast regulatory tax allowance ; and in all other cases, the amount calculated in accordance with clause 5.3.13 with the modification that the reference in clause 5.3.13(4) to 'building blocks allowable revenue before tax' is substituted with ' maximum allowable revenue before tax '.	Financial Model	1. CPP Financial Model – TAXx (Calculations) J17:N17		
5.3.4(9)	'CPP Inflation rate' means the amount determined in accordance with the formula- $[(CPI_1 + CPI_2 + CPI_3 + CPI_4) \div (CPI_1^{-4} + CPI_2^{-4} + CPI_3^{-4} + CPI_4^{-4})] - 1,$ where- CPI_n means forecast CPI for the nth quarter of the disclosure year in question; and CPI_n^{-4} means forecast CPI for the equivalent quarter in the preceding disclosure	Financial Model FM Information Report	1. CPP Financial Model – General (Inputs) J22:N22 Section 3.2.1		
SECTION 2 Cost allocation and asset valuation					
5.3.5	Allocating forecast values of operating costs not directly attributable				
5.3.5(1) 5.3.5(1)(a) 5.3.5(1)(b)	Operating costs forecast in each disclosure year of the next period must, in the case of an operating cost for which disclosure pursuant to an ID determination has- been made for the last disclosure year of the current period , be consistent with the operating costs allocated to electricity distribution services in that disclosure; and not been so made, be consistent with an allocation of operating costs to electricity distribution services carried out in respect of the most recent disclosure made for the current period in accordance with clause 2.1.1.	FM Information Report	Section 7.2		N/A - the opex forecast does not include any shared opex.
5.3.5(2) 5.3.5(2)(a) 5.3.5(2)(b) 5.3.5(2)(c) 5.3.5(2)(d)	Where a sale of the assets used to supply electricity distribution services and either or both- an other regulated service ; and an unregulated service , is completed between the start of the assessment period and the time the CPP application is made; or highly probable , operating costs attributable to electricity distribution services , in respect of each operating cost not directly attributable affected by the sale, is determined as the value allocated to electricity distribution services as a result of applying clause 2.1.1 in respect of the last disclosure year of the assessment period .	FM Information Report	Section 7.2		N/A - the opex forecast does not include any shared opex.

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.6	RAB roll forward				
5.3.6(1) 5.3.6(1)(a) 5.3.6(1)(b) 5.3.6(1)(b)(i) 5.3.6(1)(b)(ii) 5.3.6(1)(b)(iii)	The opening RAB value of an asset in relation to- the disclosure year 2010, is the initial RAB value ; and a disclosure year thereafter, is, where the disclosure year - follows a disclosure year in respect of which disclosure pursuant to an ID determination relating to that asset has been made, that asset's disclosed closing is the first disclosure year of the next period for which disclosure pursuant to an ID determination relating to that asset for the preceding disclosure year has not been made, determined in accordance with subclause (2); or is any other disclosure year , the closing RAB value for the preceding disclosure year .	Financial Model	1. CPP Financial Model – RABx (Calculations) H13:N13		
5.3.6(2)	For the purpose of subclause (1)(b)(ii), the opening RAB value of an asset to which this subclause applies is determined as the value allocated to electricity distribution services as a result of applying clause 2.1.1 to its unallocated closing RAB value for the preceding disclosure year .	FM Information Report	Section 6.1.1		
5.3.6(3) 5.3.6(3)(a) 5.3.6(3)(b) 5.3.6(3)(b)(i) 5.3.6(3)(b)(ii) 5.3.6(3)(c) 5.3.6(3)(d)	Closing RAB value means, subject to subclause (4), for an asset- with an opening RAB value , the value determined in accordance with the formula- opening RAB value - depreciation + revaluation; having or forecast to have a commissioning date in that disclosure year , where the asset- has been commissioned by the date the CPP application is made, its value of commissioned asset ; or has not been commissioned by the date the CPP application is made, its forecast value of commissioned asset , but only to the extent that the value would be included in the closing RAB value consistent with application of clause 2.1.1; that is or is forecast to be a disposed asset , nil; or that is used, or forecast to be used, in providing electricity distribution services under a large connection contract , nil.	Financial Model Financial Model Financial Model FM Information Report	1. CPP Financial Model – RABx (Calculations) H18:N18 1. CPP Financial Model – RABx (Calculations) H17:N17 1. CPP Financial Model – RABx (Calculations) H15:N15 Section 6.5		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.6(4) 5.3.6(4)(a) 5.3.6(4)(b) 5.3.6(4)(c) 5.3.6(4)(d)	For the purpose of subclause (3), where a sale of the assets used to supply electricity distribution services and either or both- an other regulated service ; and an unregulated service , is completed between the start of the assessment period and the time the CPP application is made; or highly probable , closing RAB value in respect of each asset not directly attributable affected by the sale is determined as the value allocated to electricity distribution services as a result of applying clause 2.1.1 in respect of its unallocated closing RAB value of the last disclosure year of the assessment period .	FM Information Report	Section 6.1.1		N/A -No sales of shared assets are forecast
5.3.6(5) 5.3.6(5)(a) 5.3.6(5)(b) 5.3.6(5)(b)(i) 5.3.6(5)(b)(ii)	The unallocated opening RAB value of any asset in relation to- the disclosure year 2010, is the unallocated initial RAB value ; a disclosure year thereafter, is, where the disclosure year - follows a disclosure year in respect of which disclosure pursuant to an ID determination relating to that asset has been made, that asset's disclosed unallocated closing RAB value ; and is any other disclosure year , its unallocated closing RAB value in the preceding disclosure year .	Financial Model FM Information Report	2. Supporting Model - Other – RAB (Calculations) Section 6.1.1		
5.3.6(6) 5.3.6(6)(a) 5.3.6(6)(b) 5.3.6(6)(c) 5.3.6(6)(c)(i) 5.3.6(6)(c)(ii)	Unallocated closing RAB value means, in relation to- an asset that is or is forecast to be a disposed asset , nil; any other asset with an unallocated opening RAB value , the value determined in accordance with the formula- unallocated opening RAB value - unallocated depreciation + unallocated revaluation ; and any other asset- that has a commissioning date between the commencement of the disclosure year in which the CPP application is made and the application's submission, its value of commissioned asset ; or forecast to have a commissioning date thereafter, its forecast value of commissioned asset .	Financial Model FM Information Report	2. Supporting Model - Other – RAB (Calculations) Section 6.1.1		
5.3.6(7) 5.3.6(7)(a) 5.3.6(7)(b)	The total opening RAB value in relation to- the disclosure year 2010, is the sum of all initial RAB values ; and any disclosure year thereafter, is the total closing RAB value in the preceding disclosure year .	Financial Model	1. CPP Financial Model – RABx (Calculations) H13:N13		
5.3.6(8)	For the purpose of subclause (7), 'total closing RAB value' means, in relation to a disclosure year , the sum of closing RAB values for all assets.	Financial Model	1. CPP Financial Model – RABx (Calculations) H18:N18		
5.3.7	Depreciation				
5.3.7(1)	Total depreciation means the sum of depreciation calculated for existing CPP assets under subclause (2)(a) and for additional CPP assets under subclause (2)(b).	Financial Model	2. Supporting Model - Other – RAB (Calculations) O36-S36		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.7(2) 5.3.7(2)(a)	For the purpose of subclause (1)- 'depreciation', in the case of existing CPP assets with an opening RAB value , is determined, subject to subclause (3) and clauses 5.3.6 and 5.3.8, in accordance with the formula- [1 ÷ remaining asset life for existing CPP assets] × opening RAB value .	Financial Model	1. CPP Financial Model – RABx (Calculations) H52:N52		
5.3.7(2)(b)	'depreciation', in the case of additional CPP assets with an opening RAB value , is determined, subject to subclause (3) and clauses 5.3.6 and 5.3.8, in accordance with the formula- [1 ÷ <i>remaining asset life for additional assets</i>] × opening RAB value for additional CPP assets .	Financial Model	1. CPP Financial Model – RABx (Calculations) H52:N52		
5.3.7(3) 5.3.7(3)(a) 5.3.7(3)(a)(i) 5.3.7(3)(a)(ii) 5.3.7(3)(a)(iii) 5.3.7(3)(b) 5.3.7(3)(b)(i) 5.3.7(3)(b)(ii)	For the purposes of subclauses (1) and (2)- depreciation is nil in the case of- land ; and an easement other than a fixed life easement ; and network spare in respect of the period before which depreciation for the network spare in question commences under GAAP ; and in all other cases, where the asset's physical asset life at the end of the disclosure year is nil- unallocated depreciation is the asset's unallocated opening RAB value ; and depreciation is the asset's opening RAB value .	Financial Model	2. Supporting Model - Other – RAB (Calculations) RAB model Year Ended 31.03.2025 – Summary (Outputs)		
5.3.7(4) 5.3.7(4)(a) 5.3.7(4)(b)	For the purpose of subclause (2)- 'remaining asset life for existing CPP assets' means, for each asset, the value determined in accordance with the formula- opening RAB value ÷ depreciation for the last year of the current period , less the number of disclosure years from the last year of the current period to the disclosure year in question; and 'remaining asset life for additional assets' means the asset life for CPP commissioned assets for an asset category less the number of disclosure years from the disclosure year in which the additional assets are forecast to be	Financial Model	2. Supporting Model - Other – RAB (Calculations)H162-S162 2. Supporting Model - Other – RAB (Calculations) M851-S851		
5.3.8	Depreciation - alternative depreciation method				
5.3.8(1)	Depreciation and, subject to clause 5.3.9, unallocated depreciation may be determined in respect of a CPP regulatory period using an alternative depreciation method , provided the Commission is satisfied that the result of applying the alternative depreciation method would better promote the purpose of Part 4 than the result of applying the standard depreciation method .	FM Information Report	Section 6.3		No alternative depreciation methodologies have been applied.
5.3.8(2)	For the avoidance of doubt, subclause (1) does not apply to the determination of depreciation or unallocated depreciation in the assessment period .				
5.3.9	Unallocated depreciation constraint				
5.3.9(1) 5.3.9(1)(a) 5.3.9(1)(b) 5.3.9(1)(b)(i) 5.3.9(1)(b)(ii)	For the purposes of clauses 5.3.7 and 5.3.8, the sum of unallocated depreciation of an asset calculated over its asset life may not exceed the sum of- all unallocated revaluations applying to that asset in all disclosure years ; and in the case of an asset- in the initial RAB , its unallocated initial RAB value ; and not in the initial RAB , its value of commissioned asset or forecast value of commissioned asset , as the case may be.	Financial Model	RAB model Year Ended 31.03.2025 – Summary (Outputs)		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.10	Revaluation				
5.3.10(1)	Unallocated revaluation, subject to subclause (3), is determined in accordance with the formula- unallocated opening RAB value × revaluation rate.	Financial Model FM Information Report	2. Supporting Model - Other – RAB (Calculations) Section 6.2]		The Financial Model calculates revaluations for allocated RAB and ‘assets not directly attributed’. These revaluations are aggregated to calculate unallocated
5.3.10(2)	Revaluation, subject to subclause (3), is determined in accordance with the formula- opening RAB value × revaluation rate.	Financial Model	1. CPP Financial Model – RABx (Calculations)		
5.3.10(3) 5.3.10(3)(a) 5.3.10(3)(b) 5.3.10(3)(b)(i) 5.3.10(3)(b)(ii)	For the purposes of subclauses (1) and (2), where- the asset's physical asset life at the end of the disclosure year is nil; or the asset is a- disposed asset ; or lost asset , unallocated revaluation and revaluation are nil.	Financial Model	1. CPP Financial Model – RABx (Calculations) H42:N42		
5.3.10(4)	Revaluation rate means, in respect of a disclosure year , the amount determined in accordance with the formula- $(CPI_4 \div CPI_4^{-4}) - 1$, where- CPI_4 means forecast CPI for CPP revaluation for the quarter that coincides with the end of the disclosure year ; and CPI_4^{-4} means forecast CPI for CPP revaluation for the quarter that coincides with the end of the preceding disclosure year .	Financial Model	1. CPP Financial Model – General (Inputs) H76:N76		
5.3.10(5) 5.3.10(5)(a) 5.3.10(5)(b) 5.3.10(5)(c)	Forecast CPI for CPP revaluation means, for the purpose of subclause (4), when calculating the revaluation rate - in the CPP regulatory period and up to the end of the DPP regulatory period , as for forecast CPI for DPP revaluation in accordance with clause 4.2.3(4)(a); and for each later quarter for which a forecast of the change in headline CPI has been included in the Monetary Policy Statement last issued by the Reserve Bank of New Zealand prior to the date for which the vanilla WACC applicable to the relevant DPP regulatory period was determined, the CPI last applying under paragraph (a) in respect of later quarters, the forecast last applying under paragraph (b), adjusted such that an equal increment or decrement made to that forecast for each of the following three years results in the forecast for the last of those years being equal to the target midpoint for the change in headline CPI set out in the Monetary Policy Statement referred to in paragraph (b).	Financial Model Financial Model Financial Model	1. CPP Financial Model – General (Inputs) J22:N22 General (Inputs) J22:N22 H76:N76 1. CPP Financial Model – General (Inputs) J22:N22 H76:N76		
5.3.11	Forecast value of commissioned assets				
5.3.11(1) 5.3.11(1)(a) 5.3.11(1)(a)(i) 5.3.11(1)(a)(ii)	‘Forecast value of commissioned asset’, in relation to an asset for which capital expenditure is included in forecast capital expenditure (including an asset in respect of which capital contributions are or are forecast to be received, or a vested asset) means the forecast cost of the asset to an EDB determined by applying GAAP to the asset as on its forecast commissioning date , except that, subject to subclauses (2) and an intangible asset, unless it is- a finance lease ; or an identifiable non-monetary asset , is nil;	FM Information Report Financial Model	Section 6.4 3. Supporting Model - Expenditure – Forecast Capex (Inputs)		Right of use assets are capitalised in accordance with GAAP.

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.11(1)(b)	an easement , is limited to its forecast market value as on its forecast commissioning date as determined by a valuer ;	FM Information Report	Section 6.3.2		
5.3.11(1)(c)	easement land is nil;	FM Information Report	Section 6.3.2		
5.3.11(1)(d)	a network spare-	FM Information Report	Section 6.3.3		
5.3.11(1)(d)(i)	which is not required, in light of the historical reliability and number of the assets it is held to replace; or				
5.3.11(1)(d)(ii)	whose cost is not treated as the cost of an asset under GAAP , whether wholly or is nil;				
5.3.11(1)(e)	an asset-				
5.3.11(1)(e)(i)	to be acquired from another regulated supplier ; and				
5.3.11(1)(e)(ii)	used by that regulated supplier in the supply of regulated goods or services , is its value determined in accordance with input methodologies applicable to the services supplied by that other regulated supplier as on the forecast commissioning date ;				N/A -No assets are expected to be acquired from another regulated supplier in the forecast period.
5.3.11(1)(f)	an asset that was previously used by an EDB in its supply of other regulated services is limited to its value determined in accordance with input methodologies applicable to those other regulated services as on the day before the forecast commissioning date ;				No assets are expected to be acquired from another regulated supplier in the forecast period
5.3.11(1)(g)	an asset or assets, or components of assets, forecast to be acquired in a related party transaction , and forecast to be commissioned during any disclosure year of the CPP regulatory period other than assets to which paragraphs (e) or (f) apply, is the forecast cost specified in subclause (7);	FM Information Report	Section 6.4.10		
5.3.11(1)(h)	an asset in respect of which capital contributions are or are forecast to be received where such contributions are not taken into account when applying GAAP , is the cost of the asset by applying GAAP reduced by the amount of the capital contributions ;	Financial Model	3. Supporting Model - Expenditure – Forecast Capex (Inputs)		
5.3.11(1)(i)	a vested asset in respect of which its fair value is or would be treated as its cost under GAAP , must exclude any amount of the fair value of the asset determined under GAAP that exceeds the amount of consideration provided or forecast to be for the purpose of paragraph (a)(i), a finance lease excludes the value of any asset for which an amount payable is a pass-through cost under clause 3.1.2(2)(d);	FM Information Report	Section 6.4.2		N/A - No vested assets included in capex forecast
5.3.11(1)(j)		Financial Model	3. Supporting Model - Expenditure – Forecast Capex (Inputs)		
5.3.11(1)(k)	an asset, part or all of the cost of which an EDB has recovered or forecast to recover under an innovation and non-traditional solutions allowance , is the cost or the forecast cost of the asset by applying GAAP , reduced by the amount of capex recovered or forecast to be recovered under that innovation and non-traditional solutions allowance ; and	Financial Model	3. Supporting Model - Expenditure – Forecast Capex (Inputs)		
5.3.11(1)(l)	an asset forecast to be used in providing electricity distribution services under a large connection contract is nil; and				

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.11(1)(m) 5.3.11(1)(m)(i) 5.3.11(1)(m)(ii)	an asset in respect of which- an insurance entitlement or compensatory entitlement is forecast to be received or receivable; and such an insurance entitlement or compensatory entitlement does not reduce the cost of the asset when applying GAAP , is the cost of the asset by applying GAAP , reduced (at the EDB's choice) by the amount of the insurance entitlement or compensatory entitlement that is forecast to be received or receivable.				N/A - insurance or compensatory entitlements are not forecast
5.3.11(2) 5.3.11(2)(a) 5.3.11(2)(b)	Where an asset forecast to be commissioned is forecast to be used to supply either or both an other regulated service and an unregulated service , its regulated service asset value borne by regulated services , in aggregate- may not exceed the total value of the asset that would be allocated to regulated services , in aggregate, using ACAM ; and must be based only on forecast changes in the EDB's business of supplying electricity distribution services .	FM Information Report	Section 6.4.5		
5.3.11(3) 5.3.11(3)(a) 5.3.11(3)(a)(i) 5.3.11(3)(a)(ii) 5.3.11(3)(b) 5.3.11(3)(b)(i) 5.3.11(3)(b)(ii)	When applying GAAP for the purposes of subclause (1), - the cost of financing is- applicable only in respect of the period commencing on the date the asset becomes or is forecast to become a works under construction and terminating on its commissioning date or forecast commissioning date , as the case may be; and calculated using a rate not greater than the EDB's forecast weighted average of borrowing costs for each applicable disclosure year ; and the value of a commissioned asset that, before its forecast commissioning date , the EDB is forecast to acquire from another regulated supplier as works under construction , is limited to the sum of: the cost incurred (or forecast to be incurred) by the other regulated supplier in constructing those works; and any additional costs of the EDB forecast to be incurred in completing the construction of those works (excluding any amount forecast to be paid to the other regulated supplier).	Financial Model FM Information Report	3. Supporting Model - Expenditure – Capex Summary (Calculations) M53:S53 Sections 6.4.3 & 6.4.6		
5.3.11(4) 5.3.11(4)(a) 5.3.11(4)(b) 5.3.11(4)(b)(i) 5.3.11(4)(b)(ii) 5.3.11(4)(c)	For the purposes of subclause (3)(a)(ii), the 'forecast weighted average of borrowing costs' is calculated for a disclosure year using principles set out in GAAP , taking into the cost of financing rate is the forecast weighted average of the costs applicable to borrowings in respect of capex that are forecast to be outstanding during the disclosure year ; the total costs applicable to borrowings outstanding as used in calculating the weighted average must include costs of borrowings made or forecast to be made specifically for the purpose of any particular – capex projects ; or capex programmes ; and the amount of borrowing costs forecast to be capitalised during the disclosure year must not exceed the amount of borrowing costs forecast to be incurred during the disclosure year ;	Financial Model	3. Supporting Model - Expenditure – Capex Summary (Calculations)		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.11(4)(d) 5.3.11(4)(e) 5.3.11(4)(f) 5.3.11(4)(g) 5.3.11(4)(h) 5.3.11(4)(i) 5.3.11(4)(i)(i) 5.3.11(4)(i)(ii)	where a capital contribution is received by an EDB , the relevant asset will become works under construction for the purposes of calculating the cost of financing; subject to paragraph (i), a capital contribution will reduce the cost of works under construction for the purpose of the calculation of the finance cost, even if the resulting value of works under construction is negative; subject to paragraph (g), where the value of works under construction will be negative in accordance with paragraph (e), the cost of financing for the period ending on the forecast commissioning date will be negative; where the cost of financing an asset which is works under construction is negative under paragraph (f), it will reduce the forecast value of the relevant asset or assets by that negative amount where such a reduction is not otherwise made under GAAP ; for the purpose of paragraph (d), works under construction includes assets that are forecast to be enhanced or acquired; and where the cost of financing is forecast to be derived as income in relation to works under construction and is- negative; and included in regulatory income under an ID determination , it will not reduce the forecast value of the relevant asset or assets where such reduction would not otherwise be made under GAAP .				
5.3.11(5) 5.3.11(5)(a) 5.3.11(5)(b)	For the avoidance of doubt- revenue derived or forecast to be derived in relation to works under construction that is not included in regulatory income under an ID determination reduces the cost of an asset by the amount of the revenue where such reduction is not otherwise made under GAAP ; and where expenditure on an asset which forms or is forecast to form part of the cost of that asset under GAAP is incurred or forecast to be incurred by an EDB after that asset is commissioned or forecast to be commissioned , such expenditure is treated as relating to a separate asset.	Financial Model	3. Supporting Model - Expenditure – Capex Summary (Calculations)		
5.3.11(6) 5.3.11(6)(a) 5.3.11(6)(b)	In this clause, 'forecast capital expenditure' means, in relation to a CPP proposal - that has not been assessed by the Commission , the amount of capital expenditure for the relevant disclosure year of the next period included by the CPP applicant in its capex forecast ; and undergoing assessment by the Commission , the amount of capital expenditure determined for the relevant disclosure year of the next period by the Commission after assessment of the amount in paragraph (a) against the expenditure objective .	Financial Model	3. Supporting Model - Expenditure – Capex Summary (Calculations) M56:S56		
5.3.11(7) 5.3.11(7)(a) 5.3.11(7)(a)(i) 5.3.11(7)(a)(ii) 5.3.11(7)(b)	For the purpose of subclause (1)(g), the forecast cost of any commissioned assets, or components of assets, forecast to be acquired in a related party transaction , must be set on the basis that- the forecast cost is not greater than either of the following amounts determined under GAAP : the value that would apply if that transaction were an arm's-length transaction ; or the amount forecast to be charged to the EDB by the related party ; and for the purpose of paragraph (a)(i), an objective and independent measure must be used in determining the terms of an arm's-length transaction .	FM Information Report	Section 6.4.10		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.11(8)	For the purpose of subclause (7)(a), a related party transaction will be treated as if it had the terms of an arm's-length transaction if the commissioned asset, or the component of the commissioned asset, forecast to be acquired from a related party is valued at the forecast cost expected to be incurred by the related party , provided that	FM Information Report	Section 6.4.10		
5.3.11(8)(a)	be fair and reasonable to the EDB ; and				
5.3.11(8)(b)	be substantially the same as any such forecast cost expected to be incurred by the related party in providing the same type of asset to third parties.				
5.3.12	Works under construction	FM Information Report	Sections 6.4.5-6.4.8		
5.3.12(1)	Opening works under construction means, in respect of-				
5.3.12(1)(a)	the first disclosure year of the next period where that year is consecutive to a disclosure year in respect of which disclosure pursuant to an ID determination -	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M18		
5.3.12(1)(a)(i)	has not been made, initial works under construction; and				
5.3.12(1)(a)(ii)	has been made, the value of works under construction last disclosed in accordance with the ID determination to the extent that it is intended to be included in a closing RAB value ; and				
5.3.12(1)(b)	any year other than the first disclosure year of the next period , closing works under construction of the preceding disclosure year .	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) N18:S18		
5.3.12(2)	For the purpose of subclause (1)(a)(i), 'initial works under construction' means expenditure incurred on works under construction as of the first day of the disclosure year in question, calculated in accordance with clause 5.3.11, modified in that references in that clause to "forecast commissioning date " are substituted with "forecast date that expenditure is incurred".				
5.3.12(3)	Closing works under construction is the amount determined in accordance with the opening works under construction + sum of capital expenditure - (sum of value of commissioned assets + sum of forecast value of commissioned assets) , where-	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M21:S21		
5.3.12(3)(a)	the sum of value of commissioned assets only includes values to the extent that they are included in closing RAB values disclosed pursuant to an ID determination ;				
5.3.12(3)(b)	the sum of forecast value of commissioned assets only includes values to the extent that they are included in the sum of closing RAB values provided pursuant to clause 5.4.11(b)(ii).				
SECTION 3 Treatment of taxation					
5.3.13	Forecast regulatory tax allowance				
5.3.13(1)	Forecast regulatory tax allowance is, where forecast regulatory net taxable income is-	Financial Model	1. CPP Financial Model – TAXx (Calculations) H17:N17		
5.3.13(1)(a)	nil or a positive number, the tax effect of forecast regulatory net taxable income ;				
5.3.13(1)(b)	and a negative number, nil.	FM Information Report	Section 8		
5.3.13(2)	Regulatory net taxable income means regulatory taxable income less utilised tax losses .	Financial Model	1. CPP Financial Model – TAXx (Calculations) H15:N15		
5.3.13(3)	Regulatory taxable income is determined in accordance with the formula- regulatory profit / (loss) before tax + permanent differences + regulatory tax adjustments .	Financial Model	1. CPP Financial Model – TAXx (Calculations) H24:N24		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.13(4)	Regulatory profit / (loss) before tax means the value determined in accordance with the formula- building blocks allowable revenue before tax - operating expenditure - total depreciation.	Financial Model	1. CPP Financial Model – TAXx (Calculations) H31:N31		
5.3.14	Tax losses				
5.3.14(1)	Utilised tax losses means opening tax losses , subject to subclause (2).	Financial Model FM Information Report	1. CPP Financial Model – TAXx (Calculations) H37:N37 Section 8.4		
5.3.14(2)	For the purpose of subclause (1), utilised tax losses may not exceed regulatory taxable income.	Financial Model	1. CPP Financial Model – TAXx (Calculations) H37:N37		
5.3.14(3) 5.3.14(3)(a) 5.3.14(3)(b)	Opening tax losses in relation to- the first disclosure year of the next period , is nil, subject to subclause (4); and subsequent disclosure years of the next period , is closing tax losses for the preceding disclosure year.	Financial Model	1. CPP Financial Model – TAXx (Calculations) H35:N35		
5.3.14(4)	For the purpose of subclause (3)(a), if the Commission is satisfied that an EDB will incur forecast tax losses, opening tax losses is the amount of losses in respect of which the Commission is satisfied.				
5.3.14(5)	For the purpose of subclause (3)(b), 'closing tax losses' means the amount determined in accordance with the following formula, in which each term is an absolute value: opening tax losses + current period tax losses - utilised tax losses.	Financial Model	1. CPP Financial Model – TAXx (Calculations) H38:N38		
5.3.14(6) 5.3.14(6)(a) 5.3.14(6)(b)	In this clause, 'current period tax losses' is, where regulatory taxable income is- nil or a positive number, nil; and a negative number, regulatory taxable income.	Financial Model	1. CPP Financial Model – TAXx (Calculations) H36:N36		
5.3.15	Permanent differences				
5.3.15(1)	Permanent differences is the amount determined in accordance with the formula- <i>positive permanent differences - discretionary discounts and customer rebates - negative permanent differences .</i>	Financial Model FM Information Report	1. CPP Financial Model – TAXx (Calculations) H45:N45 Section 8.2		
5.3.15(2) 5.3.15(2)(a) 5.3.15(2)(a)(i) 5.3.15(2)(a)(ii) 5.3.15(2)(b) 5.3.15(2)(b)(i) 5.3.15(2)(b)(ii) 5.3.15(2)(c)	For the purpose of subclause (1), 'positive permanent differences' means, subject to subclause (3), the sum of- all amounts of income- treated as taxable were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services ; and not included as amounts of income in determining regulatory profit / (loss) before tax ; and all amounts of expenditure or loss- included as amounts of expenditure or loss in determining regulatory profit / (loss) before tax ; and not treated as deductions were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services , if the difference in treatment of amounts of- income under paragraph (a)(i) and paragraph (a)(ii); or	Financial Model	2. Supporting Model - Other – Regulatory tax (Calculations) M25:S42		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.15(2)(d)	expenditure or loss under paragraph (b)(i) and paragraph (b)(ii), is a difference that is not -				
5.3.15(2)(e)	a reversal or partial reversal of a difference for a prior disclosure year ; and				
5.3.15(2)(f)	forecast to reverse in a subsequent disclosure year .				
5.3.15(3)	For the purpose of subclause (2), positive permanent differences excludes any amounts that are-	Financial Model	2. Supporting Model - Other – Regulatory tax (Calculations) M25:S42		
5.3.15(3)(a)	amortisation of initial differences in asset values ; or				
5.3.15(3)(b)	amortisation of revaluations .				
5.3.15(4)	For the purpose of subclause (1), 'negative permanent differences' means, subject to subclause (5), the sum of-	Financial Model	2. Supporting Model - Other – Regulatory tax (Calculations) M55:S55		
5.3.15(4)(a)	all amounts of income-				
5.3.15(4)(a)(i)	included as amounts of income in determining regulatory profit / (loss) before tax ; and				
5.3.15(4)(a)(ii)	not treated as taxable were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services ; and				
5.3.15(4)(b)	all amounts of expenditure or loss-				
5.3.15(4)(b)(i)	treated as deductions were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services ; and				
5.3.15(4)(b)(ii)	not included as amounts of expenditure or loss in determining regulatory profit / (loss) before tax ,				
5.3.15(4)(c)	if there are differences between the values in-				
5.3.15(4)(d)	paragraph (a)(i) and paragraph (a)(ii); and paragraph (b)(i) and paragraph (b)(ii),				
5.3.15(4)(e)	and such differences are not-				
5.3.15(4)(f)	the reversal of a difference in a prior disclosure year ; and forecast to reverse in a subsequent disclosure year .				
5.3.15(5)	For the purpose of subclause (4), negative permanent differences excludes any amounts that are-	Financial Model	2. Supporting Model - Other – Regulatory tax (Calculations) M44:S55		
5.3.15(5)(a)	discretionary discounts and customer rebates ;				
5.3.15(5)(b)	expenditure or loss determined in accordance with the tax rules that is-				
5.3.15(5)(b)(i)	interest; or				
5.3.15(5)(b)(ii)	forecast to be incurred in borrowing money; and				
5.3.15(5)(c)	any-				
5.3.15(5)(c)(i)	tax losses; and				
5.3.15(5)(c)(ii)	subvention payment made or received by an EDB .				
5.3.16	Regulatory tax adjustments				
5.3.16(1)	Regulatory tax adjustments are determined in accordance with the formula- amortisation of initial differences in asset values + amortisation of revaluations - notional deductible interest .	Financial Model FM Information Report	1. CPP Financial Model – TAXx (Calculations) H67:N67 Section 8.3		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.16(2)	For the purpose of subclause (1), 'notional deductible interest' means the amount determined in accordance with the formula— $\frac{(((\text{regulatory investment value} + \text{RAB proportionate investment}) \times \text{leverage} \times \text{cost of debt}) + \text{term credit spread differential allowance})}{\sqrt{1 + \text{cost of debt}}}$	Financial Model	1. CPP Financial Model – TAXx (Calculations) H65:N65		
5.3.16(3)	For the purpose of subclause (2), 'RAB proportionate investment' means the sum of the <i>proportionate value</i> of each asset forecast to be commissioned less the sum of the <i>proportionate value</i> of each disposed asset .	Financial Model	2. Supporting Model - Other – Other (Calculations) M28:S28		
5.3.16(4) 5.3.16(4)(a)	For the purpose of subclause (3), 'proportionate value' means for- an asset forecast to be commissioned , its forecast value of commissioned asset multiplied by the proportion of that disclosure year in question from the forecast commissioning date to the end of that disclosure year out of the whole disclosure year ; and	Financial Model	2. Supporting Model - Other – Other (Calculations) M26:S26		
5.3.16(4)(b)	a disposed asset , its opening RAB value multiplied by the proportion of that disclosure year from the date of sale or transfer to the end of that disclosure year out of the whole disclosure year .	Financial Model	2. Supporting Model - Other – Other (Calculations) M27:S27		
5.3.17	Amortisation of initial differences in asset values				
5.3.17(1)	Amortisation of initial differences in asset values is, subject to subclause (5), determined in accordance with the formula- $\text{opening unamortised initial differences in asset values} \div \text{opening weighted average remaining useful life of relevant assets}$	Financial Model FM Information Report	1. CPP Financial Model – TAXx (Calculations) H72:N72 Section 8.3.1		
5.3.17(2) 5.3.17(2)(a) 5.3.17(2)(b)	For the purpose of this clause, 'opening unamortised initial differences in asset values' means, in respect of- the disclosure year 2010, initial differences in asset values; and each disclosure year thereafter, subject to subclause (5), closing unamortised initial difference in asset values for the preceding disclosure year .	Financial Model	1. CPP Financial Model – TAXx (Calculations) H71:N71		
5.3.17(3)	For the purpose of subclause (2)(a), 'initial differences in asset values' means, subject to subclause (5), the sum of initial RAB values less the sum of regulatory tax asset values on the first day of the disclosure year 2010.	Financial Model	2. Supporting Model - Other – Other (Inputs)		2026 Opening value is sourced from Orion's 2025 Information Disclosure.
5.3.17(4)	For the purpose of subclause (1), 'opening weighted average remaining useful life of relevant assets' means- $q = a - b$ where: a = the 2010 weighted average remaining asset life of assets included in the initial RAB calculated by using initial RAB values as weightings b = disclosure year less 2010.	Financial Model	2. Supporting Model - Other – CPP Financial Model (Outputs) M41:S41		
5.3.17(5) 5.3.17(5)(a) 5.3.17(5)(b)	For the purpose of subclauses (1) and (2)- no account may be taken of unamortised initial differences in asset values of sold assets from the date of sale; and account must be taken of unamortised initial differences in asset values of acquired assets from the date of acquisition.	Financial Model	1. CPP Financial Model – TAXx (Calculations) H72:N72		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.17(6)	For the purpose of subclause (2)(b), 'closing unamortised initial difference in asset values' is determined in accordance with the formula- <i>Opening unamortised initial differences in asset values - amortisation of initial difference in asset values</i>	Financial Model	1. CPP Financial Model – TAXx (Calculations) H74:N74		
5.3.18	Amortisation of revaluations				
5.3.18(1)	Amortisation of revaluations in relation to an EDB for a disclosure year is calculated in accordance with the formula total depreciation - adjusted depreciation.	Financial Model FM Information Report	1. CPP Financial Model – TAXx (Calculations) H54:N54 Section 8.3.2		
5.3.19	Deferred tax				
5.3.19(1) 5.3.19(1)(a) 5.3.19(1)(b) 5.3.19(1)(c)	Opening deferred tax means - in respect of the disclosure year 2010, nil; and subject to paragraph (c), in respect of each disclosure year thereafter, closing deferred tax for the preceding disclosure year ; and in respect of each disclosure year after the disclosure year 2010, for assets for which there is no regulatory tax asset value , the opening deferred tax balance under GAAP for those assets at the date when those assets are forecast to be	Financial Model FM Information Report	1. CPP Financial Model – DTAXx (Calculations) H14:N14 Section 8.6		
5.3.19(2)	For the purpose of subclause (1)(b), 'closing deferred tax' is determined in accordance with the formula- opening deferred tax + tax effect of temporary differences - tax effect of amortisation of initial difference in asset values + deferred tax balance relating to assets acquired in the disclosure year in question – deferred tax balance relating to assets disposed of in the disclosure year in question + cost allocation adjustment .	Financial Model	1. CPP Financial Model – DTAXx (Calculations) H30:N30		
5.3.19(3)	For the purpose of subclause (2), 'deferred tax balance relating to assets acquired in the disclosure year in question' means the amount of deferred tax associated with the assets acquired by the EDB from another regulated supplier , excluding the reversal of temporary adjustments arising as a consequence of the sale, as determined in accordance with input methodologies applicable to the regulated services that the assets in question were used to supply .	Financial Model FM Information Report	1. CPP Financial Model – DTAXx (Calculations) H27:N27		No assets expected to be acquired from another regulated supplier in the forecast period.
5.3.19(4) 5.3.19(4)(a) 5.3.19(4)(b)	For the avoidance of doubt, the amount referred to in subclause (3) must include proportionate adjustments for- the tax effect of temporary differences ; and the amortisation of initial differences in asset values , up to the date the assets in question were acquired.				
5.3.19(5) 5.3.19(5)(a) 5.3.19(5)(b)	For the purpose of subclause (2), 'cost allocation adjustment' means the tax effect of the dollar value difference between the change in the sum of regulatory tax asset values on the last day of the disclosure year and the change in the sum of closing RAB values as a result only of applying- the result of asset allocation ratios to the tax asset value in accordance with clause 5.3.21(1); and Clause 2.1.1 to the unallocated closing RAB value , where either or both clauses 5.3.6(1)(b)(ii) and 5.3.6(3) apply.	Financial Model	1. CPP Financial Model – DTAXx (Calculations) H28:N28		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.19(6)	For the purpose of subclause (2), 'deferred tax balance relating to assets disposed of in the disclosure year in question' means the amount of deferred tax associated with the assets disposed of by the EDB and, where that deferred tax balance is a deferred tax liability, it must have a negative value.	Financial Model	1. CPP Financial Model – DTAXx (Calculations) H18:N18		
5.3.20	Temporary differences				
5.3.20(1)	Temporary differences is the amount determined in accordance with the formula- <i>depreciation temporary differences + positive temporary differences - negative temporary differences</i> .	Financial Model FM Information Report	1. CPP Financial Model – DTAXx (Calculations) H26:N26 Section 8.6.1		
5.3.20(2)	For the purpose of this clause, 'depreciation temporary differences' is adjusted depreciation less tax depreciation.	Financial Model FM Information Report	1. CPP Financial Model – DTAXx (Calculations) H23:N23 Section 8.6.3		
5.3.20(3)	For the purpose of subclause (2) 'tax depreciation' is the sum of the amounts determined for all assets by application of the tax depreciation rules to the regulatory tax asset value of each asset.	Financial Model	1. CPP Financial Model – DTAXx (Calculations) H22:N22 2. Supporting Model - Other – RTAV (Calculations) M34:S34		
5.3.20(4) 5.3.20(4)(a) 5.3.20(4)(a)(i) 5.3.20(4)(a)(ii) 5.3.20(4)(b) 5.3.20(4)(b)(i) 5.3.20(4)(b)(ii) 5.3.20(4)(c) 5.3.20(4)(d) 5.3.20(4)(e) 5.3.20(4)(f)	For the purpose of subclause (1), 'positive temporary differences' means the sum of- all amounts of income- treated as taxable if the tax rules were applied to determine income tax payable in respect of the EDB's supply of electricity distribution services ; and not included as amounts of income in determining regulatory profit / (loss) before tax ; and all amounts of expenditure or loss- included as amounts of expenditure or loss in determining regulatory profit / (loss) before tax ; and not treated as deductions were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services , less any amount that is depreciation temporary differences , if there are differences between the values in- paragraph (a)(i) and paragraph (a)(ii); and paragraph (b)(i) and paragraph (b)(ii), and such differences- are the reversal of a difference in a prior disclosure year ; or are forecast to reverse in a subsequent disclosure year .	Financial Model FM Information Report	2. Supporting Model - Other – Regulatory tax (Calculations) M96:S96 Section 8.6.1		
5.3.20(5) 5.3.20(5)(a) 5.3.20(5)(a)(i) 5.3.20(5)(a)(ii)	For the purpose of subclause (1), 'negative temporary differences' means the sum of- all amounts of income- included as amounts of income in determining regulatory profit / (loss) before tax ; and not treated as taxable were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services ; and	Financial Model FM Information Report	2. Supporting Model - Other – Regulatory tax (Calculations) M126:S126 Section 8.6.1		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.20(5)(b) 5.3.20(5)(b)(i) 5.3.20(5)(b)(ii) 5.3.20(5)(c) 5.3.20(5)(d) 5.3.20(5)(e) 5.3.20(5)(f)	all amounts of expenditure or loss- treated as deductions were the tax rules applied to determine income tax payable in respect of the EDB's supply of electricity distribution services ; and not included as amounts of expenditure or loss in determining regulatory profit / (loss) before tax , less any amount that is depreciation temporary differences , if there are differences between the values in- paragraph (a)(i) and paragraph (a)(ii); and paragraph (b)(i) and paragraph (b)(ii), and such differences- are the reversal of a difference in a prior disclosure year ; or are forecast to reverse in a subsequent disclosure year .				
5.3.21	Regulatory tax asset value				
5.3.21(1)	Regulatory tax asset value, in relation to an asset, means the value determined in accordance with the formula- tax asset value x <i>result of asset allocation ratio</i> .	Financial Model FM Information Report	2. Supporting Model - Other – RTAV (Calculations)		
5.3.21(2) 5.3.21(2)(a) 5.3.21(2)(a)(i) 5.3.21(2)(a)(ii) 5.3.21(2)(a)(iii) 5.3.21(2)(b)	Tax asset value means, in respect of- an asset- in the initial RAB where, in the disclosure year 2010 , the sum of unallocated initial RAB values is less than the sum of the adjusted tax values of all assets in the initial RAB ; acquired from a regulated supplier who used it to supply regulated goods or services ; or acquired or transferred from a related party , the value of the asset determined by applying the tax depreciation rules to its notional tax asset value; and any other asset, its forecast adjusted tax value .	Financial Model	2. Supporting Model - Other – RTAV (Calculations)		
5.3.21(3) 5.3.21(3)(a) 5.3.21(3)(a)(i) 5.3.21(3)(a)(ii) 5.3.21(3)(b)	'Notional tax asset value' means, for the purpose of- subclause (2)(a)(i), adjusted tax value of the asset in the disclosure year 2010 adjusted to account proportionately for the difference between the- sum of the unallocated initial RAB values ; and sum of the adjusted tax values , of all assets in the initial RAB ; subclause (2)(a)(ii), value after applying the tax depreciation rules to the tax asset value (as 'tax asset value' is defined in the input methodologies applying to the regulated goods or services in question) in respect of the disclosure year in which the asset was acquired; and	Financial Model	2. Supporting Model - Other – RTAV (Calculations)		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.21(3)(c) 5.3.21(3)(c)(i) 5.3.21(3)(c)(ii)	subclause (2)(a)(iii), value in respect of the disclosure year in which the asset was acquired or transferred that is- consistent with the tax rules ; and limited to its value of commissioned asset plus the sum of an insurance entitlements and compensatory entitlements applied to reduce the value of a commissioned asset under clause 5.3.11(1)(m), or, if relevant capital contributions are treated for tax purposes in accordance with section CG 8 of the Income Tax Act 2007 (or subsequent equivalent provisions), limited to the value of commissioned asset plus any taxed capital contributions applicable to the asset plus the sum of any insurance entitlements and compensatory entitlements applied to reduce the value of a commissioned asset under clause 5.3.11(1)(m).				
5.3.21(4) 5.3.21(4)(a) 5.3.21(4)(b)	For the purpose of subclause (1), 'result of asset allocation ratio' means, where an asset or group of assets maintained under the tax rules - has a matching asset or group of assets maintained for the purpose of Part 2 Subpart 2, the value obtained in accordance with the formula- opening RAB value or <i>sum of opening RAB values, as the case may be</i> ÷ unallocated opening RAB value or <i>sum of unallocated opening RAB values</i> , as the case may be, applying the formula in respect of the asset or smallest group of assets maintained for the purpose of Part 2 Subpart 2 that has a matching asset or group of assets maintained under the tax rules ; and does not have a matching asset or group of assets maintained for the purpose of Part 2 Subpart 2, the value of the asset allocated to the supply of electricity distribution services were clause 2.1.1 to apply to the asset or group of assets.	Financial Model	2. Supporting Model - Other – RAB (Calculations) M58:S58		
SECTION 4 Cost of Capital					
5.3.22	Methodology for estimating the weighted average cost of capital				
5.3.22(1)	Where the Commission takes into account the cost of capital in making a CPP determination , the Commission will use the estimate of WACC that was used for the DPP applying at the start of the CPP regulatory period in accordance with clause 4.4.7(1).	Financial Model FM Information Report	2. Supporting Model - Other – Cost of capital (Calculations) M45:S45 Section 5.1		
5.3.22(2)	Where there has been a WACC change event , the cost of capital for the CPP is the DPP WACC referenced in clause 5.6.6(1)(a), which has effect in the remaining years of the CPP regulatory period .	FM Information Report	Section 5		DPP5 WACC yet to be determined.
5.3.23	Methodology for estimating term credit spread differential	FM Information Report	Section 9.1		
5.3.23(1) 5.3.23(1)(a) 5.3.23(1)(b) 5.3.23(1)(c)	'Term credit spread differential' is the amount determined for a qualifying supplier in accordance with the formula- $(A \div B) \times C \times D$, where- A' is the sum of the term credit spread difference and debt issuance cost re-adjustment; B' is the book value of the qualifying supplier's total interest-bearing debt as at the balance date of the supplier's financial statements audited and published in the disclosure year in question relate; C' is leverage ; and	Financial Model	2. Supporting Model - Other – Other (Calculations) M96:S119		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.3.23(1)(d) 5.3.23(1)(d)(i) 5.3.23(1)(d)(ii)	D' is, in relation to the qualifying supplier , the average of- the sum of opening RAB values ; and the sum of closing RAB values .				
5.3.23(2)	For the purpose of subclause (1)(a), 'debt issuance cost re-adjustment' is the amount determined in accordance with the formula- $(0.01 \div \text{original tenor of the qualifying debt} - 0.002) \times \text{book value in New Zealand dollars of the qualifying debt at its date of issue}$, which amount, for the avoidance of doubt, will be a negative number.	Financial Model	2. Supporting Model - Other – Other (Calculations) M82:S94		
5.3.24	Term credit spread difference	FM Information Report	Section 9.1		
5.3.24(1) 5.3.24(1)(a) 5.3.24(1)(b)	'Term credit spread difference' is determined in accordance with the formula- $T \times U$, where- 'T' is the amount determined in accordance with the formula- $0.00085 \times (\text{original tenor of the qualifying debt} - 5)$; U' is the book value in New Zealand dollars of the qualifying debt at its date of issue.	Financial Model	2. Supporting Model - Other – Other (Calculations) M68:S80		
5.3.24(2) 5.3.24(2)(a) 5.3.24(2)(b)	For the purpose of this clause, where the qualifying debt is issued to a related party , 'original tenor of the qualifying debt ' means the- tenor of the qualifying debt ; or period from the qualifying debt's date of issue to the earliest date on which its repayment is or may be required, whichever is the shorter.	Financial Model	2. Supporting Model - Other – Other (Calculations) M39:S50		
5.3.25	Interpretation of terms relating to term credit spread differential				
5.3.25(1) 5.3.25(1)(a) 5.3.25(1)(b)	'Qualifying debt' means a line of debt- with an original tenor greater than 5 years; and issued by a qualifying supplier .	FM Information Report	Section 9.1		
5.3.25(2)	'Qualifying supplier' means a regulated supplier whose debt portfolio, as at the date of that supplier's most recently published audited financial statements, has a weighted average original tenor greater than 5 years.	Financial Model	2. Supporting Model - Other – Other (Calculations)		
SECTION 5 Alternative methodologies with equivalent effect					
5.3.26	Alternative methodologies with equivalent effect				
5.3.26(1) 5.3.26(1)(a) 5.3.26(1)(b) 5.3.26(1)(c)	A CPP applicant , in making a CPP application , may apply an alternative methodology to that specified for— cost allocation and asset valuation in Section 2; treatment of taxation in Section 3; or the estimation of term credit spread differentials in Section 4.				N/A - Orion has not proposed alternative methodologies with equivalent effect
5.3.26(2)	The Commission , in evaluating a CPP proposal and in determining a CPP for an EDB , may apply the alternative methodology elected by the CPP applicant .				N/A - Orion has not proposed alternative methodologies with equivalent effect
5.3.26(3) 5.3.26(3)(a) 5.3.26(3)(b)	An alternative methodology applied by either an EDB or the Commission in accordance with this clause must: produce an equivalent effect within the CPP regulatory period to the methodology that would otherwise apply; and not detract from the promotion of the purpose of Part 4 of the Act .				N/A - Orion has not proposed alternative methodologies with equivalent effect

IM Clause	Description	Location	Section/Location	Sub-section	Note
SUBPART 4 INFORMATION REQUIRED IN A CPP PROPOSAL					
SECTION 1 General Matters					
5.4.1	Application of this subpart				
5.4.1(1)	Subject to subclause (2), a CPP proposal must contain, in all material respects, the information specified in this subpart.	Application SharePoint Data Room	Section 6 Appendix J Governance	CPP117	
5.4.1(2)	For the purpose of subclause (1), where a CPP proposal is made in accordance with provisions in a DPP determination relating to the submission of CPP proposals in response to a catastrophic event , the information specified in clause 5.4.3 is not				N/A - Orion's CPP proposal is not in response to a catastrophic event.
5.4.2	Reasons for the proposal				
5.4.2 (a) 5.4.2 (b)	A CPP proposal must contain a- detailed description of the CPP applicant's rationale for seeking a CPP ; and summary of the key evidence in the proposal supporting that rationale.	Main Proposal	Chapter 2		
5.4.3	Information regarding priority of proposal				
5.4.3(1)	A CPP proposal must contain an explanation as to why the proposal deserves to be prioritised for assessment before other CPP proposals , were the Commission to exercise its prioritisation powers under s 53Z of the Act .	Application	Appendices B & C		N/A - the Commission has approved an exemption from the requirement to provide prioritisation information
5.4.3(2) 5.4.3(2)(a) 5.4.3(2)(b)	For the purpose of subclause (1), a CPP applicant must address the prioritisation criteria specified in paragraphs (b) and (c) of s 53Z(3) of the Act , namely,- urgency of any proposed additional investment (compared to historic rates of investment) required to meet consumer requirements on quality, in accordance with subclause (3); and materiality of the proposal relative to the size and revenues of the applicant in accordance with subclause (4).	Application	Appendices B & C		N/A - the Commission has approved an exemption from the requirement to provide prioritisation information
5.4.3(3) 5.4.3(3)(a) 5.4.3(3)(a)(i) 5.4.3(3)(a)(ii) 5.4.3(3)(b)	For the purpose of subclause (2)(a), the CPP applicant must explain- how any proposed investment- compares with historic rates of investment; and relates to meeting consumer requirements on quality; and the optimal timing of any proposed investment, including any timeframes that would apply to the process of undertaking that proposed investment.	Application	Appendices B & C		N/A - the Commission has approved an exemption from the requirement to provide prioritisation information
5.4.3(4) 5.4.3(4)(a) 5.4.3(4)(b)	For the purpose of subclause (2)(b), the CPP applicant must- explain the current size of its business and how the proposed CPP would affect the size of its business ; and describe its revenue under the DPP and explain how its revenue under the proposed CPP would differ, if at all, from that revenue.	Application	Appendices B & C		N/A - the Commission has approved an exemption from the requirement to provide prioritisation information
5.4.4	Duration of regulatory period				
5.4.4(a) 5.4.4(b)	Where a CPP applicant seeks a CPP of 3 years' or 4 years' duration- the duration of the CPP sought must be stated in the CPP proposal ; and the CPP proposal must contain an explanation as to why that duration better meets the purpose of Part 4 of the Act than 5 years.				N/A - Orion proposes a 5-year CPP

IM Clause	Description	Location	Section/Location	Sub-section	Note
SECTION 2 Information regarding quality					
5.4.5	Information on proposed quality standard variation				
5.4.5(a) 5.4.5(a)(i) 5.4.5(a)(ii) 5.4.5(b) 5.4.5(c) 5.4.5(c)(i) 5.4.5(c)(ii) 5.4.5(d)	Where a CPP applicant seeks a quality standard variation as part of a CPP proposal, the CPP proposal must contain the following information: the different values of either or both of- the parameters relating quality standards, including any boundary value; the parameters relating to any incentives for the EDB to maintain or improve its quality of supply; to those which would be determined in accordance with the methodology as specified in the DPP determination; an explanation of the reasons for the proposed quality standard variation; demonstration of the extent to which the quality standard variation better reflects the realistically achievable performance of the EDB over the CPP regulatory period based on either or both of- statistical analysis of past SAIDI and SAIFI performance; and the level of investment provided for in proposed maximum allowable revenue before tax; and demonstration of the estimated effect of the proposed quality standard variation by use of historic data, by contrast with the quality standards specified in the DPP determination.				N/A - Orion is not proposing a quality standard variation
SECTION 3 Price path information					
5.4.6	Interpretation				
5.4.6(1)	In this section, the meanings of defined terms that are values or amounts to be determined by the Commission when making a CPP determination are modified to mean the values or amounts proposed by the CPP applicant , subject to any other				
5.4.6(2)	Any values and amounts used by a CPP applicant to determine the quantum of allowances, amounts, sums or values required by this section must be consistent with other information provided in accordance with this part.				
5.4.7	Proposed building blocks allowable revenue				
5.4.7(1) 5.4.7(1)(a) 5.4.7(1)(b)	A CPP proposal must contain amounts for- building blocks allowable revenue before tax for each disclosure year of the next period; and building blocks allowable revenue after tax for each disclosure year of the next period.	Application FM Information Report Financial Model Financial Model	Section 6.2 Section 4 1. CPP Financial Model – General (Outputs) 1. CPP Financial Model – General (Outputs)		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.7(2)	Subject to subclause (4), a CPP proposal must contain all data, information, calculations and assumptions used to determine the amounts required by subclause (1), including but not limited to-				
5.4.7(2)(a)	forecasts of-				
5.4.7(2)(a)(i)	regulatory investment value;	Financial Model	1. CPP Financial Model – BBARx (Calculations) H49:N49		
5.4.7(2)(a)(ii)	<i>total value of commissioned assets</i> determined in accordance with clause 5.3.2(3);	Financial Model	2. Supporting Model -		
5.4.7(2)(a)(iii)	total depreciation; and	Financial Model	1. CPP Financial Model – RABx (Calculations) H52:N52		
5.4.7(2)(a)(iv)	total revaluation;	Financial Model	1. CPP Financial Model – RABx (Calculations) H46:N46		
5.4.7(2)(b)	all data, information, calculations and assumptions used to derive amounts or forecasts of TF_{VCA} , PV_{VCA} , TF , and TF_{rev} determined in accordance with clause	Financial Model	1. CPP Financial Model – General (Inputs)		
5.4.7(2)(c)	forecast operating expenditure; and	Financial Model	2. Supporting Model - Other – Other (Inputs) M30:S30		
5.4.7(2)(d)	any proposed term credit spread differential allowance.	Financial Model	2. Supporting Model - Other – Other (Calculations) M119:S119		
5.4.7(3)	All calculations, values and amounts required by this clause must be presented in a spreadsheet which -				
5.4.7(3)(a)	clearly demonstrates how building blocks allowable revenue before tax and building blocks allowable revenue after tax for each disclosure year of the next period have been derived using the formulae specified in clauses 5.3.2 and 5.3.3;	Financial Model	1. CPP Financial Model – BBARx (Calculations)		
5.4.7(3)(b)	where data has been computed or derived from other values on the spreadsheet through the use of formulae, makes the underlying formulae accessible.				All formulas within the financial model have been made accessible.
5.4.7(4)	Where the information specified in subclause (2) is included in a CPP proposal in a spreadsheet format-				
5.4.7(4)(a)	the information must be cross-referenced in the text of the CPP proposal document; and	Application FM Information Report	Section 6.2 Section 4		
5.4.7(4)(b)	the spreadsheet(s) must-				
5.4.7(4)(b)(i)	provide cross-references to any CPP information requirement input methodology that the spreadsheet satisfies;				Included within models 1 and 2 of the model suite.
5.4.7(4)(b)(ii)	use terms and labels, consistent with the terminology in the input methodologies ;				Included within all models
5.4.7(4)(b)(iii)	identify and explain the source inputs, and outputs, of each spreadsheet;				Included within all models
5.4.7(4)(b)(iv)	produce all of the intermediate outputs, as set out in Part 5, Subpart 3 and Part 5, Subpart 4; and				Included within all models
5.4.7(4)(b)(v)	demonstrate links and interdependencies between source inputs, intermediate calculations and outputs.				Included within all models

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.8	Maximum Allowable Revenues	FM Information Report	Section 3		
5.4.8(1)	A CPP proposal must contain amounts for- maximum allowable revenue before tax for each disclosure year of the CPP regulatory period ; and maximum allowable revenue after tax for each disclosure year of the CPP regulatory period .	Financial Model	1. CPP Financial Model – General (Outputs)		
5.4.8(1)(a)		Financial Model	1. CPP Financial Model – General (Outputs)		
5.4.8(1)(b)					
5.4.8(2)	For the purpose of subclauses (1)(a) and (1)(b), the CPP applicant must - apply an X factor; and state the value of the X factor.	Application Financial Model	Section 6.3 1. CPP Financial Model – MARx (Calculations) K19:N19, K26:N26		
5.4.8(2)(a)		Financial Model	1. CPP Financial Model – MARx (Calculations) D19, D26		
5.4.8(2)(b)					
5.4.8(3)	For the purpose of subclause (2) the X factor is that defined in the CPP applicant's DPP determination , subject to subclause (4).	Financial Model	1. CPP Financial Model – General (Inputs) D16		N/A - an alternative X-factor is proposed
5.4.8(4)	For the purpose of subclause (3), a different X factor or factors may be used, provided that the CPP proposal contains an explanation and supporting evidence as to why that would better meet the purpose of Part 4 of the Act .	Application Financial Model	Section 6.3 1. CPP Financial Model – General (Inputs) D14		
		FM Information Report	Section 3.2.2		
5.4.8(5)	All calculations and values required by this clause must be presented in a spreadsheet format which clearly demonstrates how maximum allowable revenue before tax and maximum allowable revenue after tax for each disclosure year of the CPP regulatory period have been derived from building blocks allowable revenue after tax and the variables in clause 5.4.7.	Financial Model	1. CPP Financial Model – MARx (Calculations)		
5.4.8(6)	For the purpose of subclause (5), the spreadsheet must be provided in a format that- shows clearly how the values required by subclause (1) were derived in accordance with the formulae specified in clauses 5.3.2 to 5.3.4; and where data has been computed or derived from other values on the spreadsheet through the use of formulae, makes the underlying formulae accessible.	Financial Model	1. CPP Financial Model – MARx (Calculations)		All formulas within the financial model have been made accessible.
5.4.8(6)(a)					
5.4.8(6)(b)					
SECTION 4 Cost allocation information					
5.4.9	Cost allocation information				
5.4.9(1)	Where a CPP applicant - makes allocations of operating costs not directly attributable pursuant to clause 5.3.5(1); or determines opening RAB values pursuant to clause 5.3.6(1)(b)(ii), the CPP proposal must contain the information specified in subclause (2).	Application	Section 6.4		The opex forecast does not include any shared opex.
5.4.9(1)(a)		FM Information Report	Appendix D Section 7.2		
5.4.9(1)(b)					
5.4.9(2)	For the purpose of subclause (1), the information is that specified in the applicable tables in Schedule B, subject to subclause (4), which tables comprise- <i>Table 1: Allocation of asset values;</i>	Application	Section 6.4		
5.4.9(2)(i)		Application Financial Model	Appendix D 2. Supporting Model - Other – Sch B table 1 (Outputs)		
5.4.9(2)(ii)	<i>Table 2: Report supporting allocations of asset values (non-public);</i>	Financial Model	2. Supporting Model - Other – Sch B table 2 (Outputs)		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.9(2)(iii)	<i>Table 3: Allocation of operating costs;</i>	Application Financial Model	Appendix D 2. Supporting Model - Other – Sch B table 3 (Outputs)		
5.4.9(2)(iv)	<i>Table 4: Report supporting allocation of operating costs (non-public); and</i>	Financial Model	2. Supporting Model - Other – Sch B table 4 (Outputs)		
5.4.9(2)(v)	<i>Table 5: Rationale for selecting proxy allocator.</i>	Application Financial Model	Appendix D 2. Supporting Model - Other – Sch B table 5 (Outputs)		
5.4.9(3) 5.4.9(3)(a) 5.4.9(3)(b) 5.4.9(3)(c) 5.4.9(3)(d) 5.4.9(3)(e) 5.4.9(3)(f) 5.4.9(3)(g)	Subject to subclause (7), in respect of- operating costs not directly attributable allocated to electricity distribution services in accordance with clause 5.3.5(2); or closing RAB values determined in accordance with clause 5.3.6(4), the CPP proposal must contain the information specified in Schedule C, subject to subclause (4), which tables comprise- <i>Table 1: Revised allocation of regulated asset values;</i> <i>Table 2: Report supporting revised allocations of asset values (non-public);</i> <i>Table 3: Revised allocation of operating costs; and</i> <i>Table 4: Report supporting revised allocation of operating costs (non-public); and</i> <i>Table 5: Rationale for selecting proxy allocator.</i>				N/A - Values are below the de minimis threshold
5.4.9(4) 5.4.9(4)(a) 5.4.9(4)(b) 5.4.9(4)(c) 5.4.9(4)(d) 5.4.9(4)(d)(i) 5.4.9(4)(d)(ii)	For the purpose of this clause- the information specified in the tables of the schedules referred to must be provided on spreadsheets; where data has been computed or derived from other values on the spreadsheet through the use of formulae, all underlying formulae must be accessible; the information specified in Table 2 and Table 4 of Schedule B and Table 2 and Table 4 of Schedule C may be provided by way of non-public disclosure to the the information in Schedule B must be provided- for the disclosure year prior to submitting the CPP proposal if it has not been disclosed in accordance with an ID determination ; and for the next period where a value in units in an allocator metric has been changed by at least 5% from the value used in the disclosure year referred to in	Financial Model Application	2. Supporting Model - Other – Schedule B tables 3. Supporting Model - Expenditure – Sch E tables (Outputs) Section 6.4 Appendix D		
5.4.9(5) 5.4.9(5)(a) 5.4.9(5)(b)	Where the CPP applicant has used a proxy cost allocator to provide the information specified in subclauses (2) or (3), the CPP applicant must explain in the CPP proposal , for each proxy cost allocator used- why a causal relationship cannot be established; and the rationale for using that proxy cost allocator .				N/A - proxy allocators have not been used.
5.4.9(6) 5.4.9(6)(a) 5.4.9(6)(b)	Where the CPP applicant has used a proxy asset allocator to provide the information specified in subclauses (2) or (3), the CPP applicant must explain in the CPP proposal , for each proxy asset allocator used- why a causal relationship cannot be established; and the rationale for using that proxy asset allocator .				N/A - proxy allocators have not been used.

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.9(7)	The information in Schedule C is not required where the value of the assets to be sold as specified in clause 5.3.6(4) is less than 5% of the unallocated closing RAB value for the last disclosure year of the assessment period .				N/A - The opex forecast does not include any shared opex.
5.4.10	Certification requirements				
5.4.10(1)	Where any arm's-length deduction was applied for the purpose of this Section, the CPP proposal must contain certification by no fewer than 2 of the EDB's directors in the following terms, where words in bold bear the meanings specified in this <i>"I, [insert name], director of [insert name of Supplier of services regulated under Part 4 of the Commerce Act] certify that, having made all reasonable enquiry, my belief is that having had regard to the attached information [information required by clause 5.4.9(2)] for the purpose of the supplier's CPP proposal, it was appropriate to make the arm's-length deductions the amount and nature of which are detailed in the Table 4 of Schedule B / Table 5 of Schedule B / Table 3 of Schedule C / Table 4 of Schedule C [delete as appropriate]."</i>				N/A - no arm's-length deduction has been applied.
5.4.10(2)	Where, in relation to regulated service asset values , OVABAA was applied for the purpose of this clause in accordance with Subpart 3 Section 2, the CPP proposal must contain certification by no fewer than 2 of the EDB's directors in respect of its application in the following terms, where words in bold bear the meanings specified in this determination: <i>"I, [insert name], director of [insert name of Supplier of services regulated under Part 4 of the Commerce Act] certify that, having made all reasonable enquiry, my belief is that having had regard to the attached information (being information required by clause 5.4.9(2)) for the purpose of the supplier's CPP proposal-</i> (a) the attached information is accurate; (b) the OVABAA was applicable in accordance with clause 2.1.2; and (c) the following unregulated services would be unduly deterred had adjustments to allocations of regulated service asset values (in accordance with clause 2.1.4) not been made: <i>[list relevant unregulated services]."</i>				N/A - OVABAA has not been applied.
5.4.10(3)	Where, in relation to operating costs provided in a CPP proposal in accordance with subclause 5.4.8(1) and Schedule C, the OVABAA was applied, the CPP proposal must contain certification by no fewer than 2 of the EDB's directors in respect of application of the OVABAA in the following terms: <i>"I, [insert name], director of [insert name of Supplier of services regulated under Part 4 of the Commerce Act] certify that, having made all reasonable enquiry, my belief is that having had regard to the attached information (being information required by clause 5.4.9(2)) for the purpose of the supplier's CPP proposal-</i> (a) the attached information is accurate; (b) the OVABAA was applicable in accordance with clause 2.1.2; and (c) the following unregulated services would be unduly deterred had adjustments to allocations of operating costs (in accordance with clause 2.1.4) not been made: <i>[list relevant unregulated services]."</i>				N/A - OVABAA has not been applied.

IM Clause	Description	Location	Section/Location	Sub-section	Note
SECTION 5 Asset valuation information					
5.4.11	RAB roll forward information				
5.4.11(a)	For each disclosure year , after the last disclosure made under an ID determination , until the last disclosure year of the next period , provide values, in accordance with Subpart 3 Section 2, for the- total opening RAB value ; and	FM Information Report	Section 6		
5.4.11(b)	sum of each of the following things:	Financial Model	1. CPP Financial Model – RABx (Calculations) H13:N13		
5.4.11(b)(i)	forecast value of commissioned assets ; and	Financial Model	1. CPP Financial Model – RABx (Calculations) H17:N17		
5.4.11(b)(ii)	closing RAB values .	Financial Model	1. CPP Financial Model – RABx (Calculations) H18:N18		
5.4.12	Depreciation information				
5.4.12(1)	In respect of each disclosure year of the CPP regulatory period , the CPP applicant must provide the information specified in this clause.	Application FM Information Report SharePoint Data Room	Section 6 Appendix J Section 6.3 Governance	CPP117	
5.4.12(2)	The sum of depreciation	Financial Model	2. Supporting Model - Other – RAB		N/A - alternative depreciation methods have not been used
5.4.12(2)(a)	by either asset category or each type of asset for which the proposed method of determining depreciation is the standard depreciation method ; and				
5.4.12(2)(b)	for each type of asset where the proposed method of determining depreciation is an alternative depreciation method .				
5.4.12(3)	For each type of asset to which subclause (2)(b) applies-				N/A - alternative depreciation methods have not been used
5.4.12(3)(a)	a description of the type of asset;				
5.4.12(3)(b)	a description of the proposed depreciation method;				
5.4.12(3)(c)	where the proposed asset life is different to the physical asset life , the proposed asset life for the type of asset;				
5.4.12(3)(d)	where the proposed asset life for the type of asset is different to the physical asset life , the proposed remaining asset life ;				
5.4.12(3)(e)	forecast depreciation over the asset life for the type of asset, including details of all assumptions made;				
5.4.12(3)(f)	forecast depreciation over the asset life for the type of asset determined in accordance with the standard depreciation method ;				
5.4.12(3)(g)	evidence to demonstrate that the proposed depreciation method including, where applicable, any proposed asset life different to the physical asset life , better meets the purpose of Part 4 of the Act than the standard depreciation method ; and				
5.4.12(3)(h)	a description of any consultation undertaken with consumers on the proposed depreciation method, including-				
5.4.12(3)(h)(i)	the extent of any consumer disagreement; and				
5.4.12(3)(h)(ii)	the EDB's view in response.				

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.12(4)	For each asset or type of asset for which a different physical asset life to the standard physical asset life is proposed-				N/A - different physical asset lives are not proposed.
5.4.12(4)(a)	a description of the assets or types of asset;				
5.4.12(4)(b)	to which clauses 2.2.8(1)(c) and 2.2.8(1)(i)(v) apply, an engineer's report addressing the suitability of the proposed physical asset life ; and				
5.4.12(4)(c)	any other evidence to demonstrate that the requirements of clause 2.2.8 in respect of the particular type of asset are met.				
5.4.13	Revaluation information				
5.4.13(1)	For each disclosure year , after the last disclosure made under an ID determination , until the last disclosure year of the next period , provide the following:	FM Information Report	Section 6.2		
5.4.13(1)(a)	sum of opening RAB values ;	Financial Model	2. Supporting Model - Other – RAB (Calculations) M35:S35		
5.4.13(1)(b)	forecast CPI for CPP revaluation for the last quarter of the disclosure year ;	Financial Model	2. Supporting Model - Other – Other (Inputs) M14:S14		
5.4.13(1)(c)	forecast CPI for CPP revaluation for the last quarter of the preceding disclosure year ; and	Financial Model	2. Supporting Model - Other – Other (Inputs) L14:R14		
5.4.13(1)(d)	revaluation rate .	Financial Model	2. Supporting Model - Other – Other (Inputs) M13:S13		
5.4.14	Commissioned assets information	FM Information Report	Section 6.4		
5.4.14(1)	For each disclosure year , after the last disclosure made under an ID determination , until the last disclosure year of the next period , provide the-	Financial Model	3. Supporting Model - Expenditure – Commissioned assets summary (Calculations)		N/A - No asset transfers are forecast N/A - Assets are not forecast to be acquired from another regulated supplier N/A - No asset transfers are forecast
5.4.14(1)(a)	sum of value of commissioned assets ; and				
5.4.14(1)(b)	sum of forecast value of commissioned assets , in respect of each of the following groups of assets:				
5.4.14(1)(c)	assets-				
5.4.14(1)(c)(i)	acquired or intended to be acquired from a related party ; or	FM Information Report	Section 6.4.10		
5.4.14(1)(c)(ii)	transferred from a part of the EDB that supplies unregulated services ;				
5.4.14(1)(d)	assets-				
5.4.14(1)(d)(i)	acquired or intended to be acquired from another regulated supplier and used by that regulated supplier in the supply of regulated services ; or				
5.4.14(1)(d)(ii)	transferred or intended to be transferred from a part of the EDB that supplies other regulated services ;				
5.4.14(1)(e)	network spares ; and	Financial Model	3. Supporting Model - Expenditure – Forecast capex		
5.4.14(1)(f)	all other assets having a commissioning date or forecast to have a commissioning date in that period.	Financial Model	3. Supporting Model - Expenditure – Commissioned assets summary		
		FM Information Report	Section 6.4		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.14(2) 5.4.14(2)(a)	In respect of each value provided in accordance with subclause (1) provide- all data, information, calculations and assumptions used to derive it from relevant data provided in the capex forecast ; and	Main Proposal 2026 AMP SharePoint Data Room	Chapter 5 Chapter 16 Renewals Capex System Growth Capex Other NW Capex	Section 5.3 Section 16.2.1 CPP001, CPP003, CPP005- 006, CPP010- 012, CPP014, CPP016, CPP- 020, CPP023-025, CPP049-051, CPP053-056, CPP058-063, CPP066-072, CPP084-085 CPP004, CPP007- 009, CPP017, CPP026, CPP073-074 CPP064-065, CPP075	
5.4.14(2)(b) 5.4.14(2)(b)(i) 5.4.14(2)(b)(ii)	where capital contributions are taken into account in any value disclosed pursuant to subclause (1)- the amount of such capital contributions , with respect to asset types and quantities; and policies relevant to such capital contributions ; and	Financial Model	3. Supporting Model - Expenditure – Commissioned assets summary (Calculations)		
5.4.14(2)(c) 5.4.14(2)(c)(i) 5.4.14(2)(c)(ii) 5.4.14(2)(c)(iii)	where insurance entitlements or compensatory entitlements are taken into account in any value disclosed pursuant to subclause (1)- the amount of such insurance entitlements , with respect to asset types and a description of the insurance contracts relevant to such insurance entitlements ; a description of the nature and amounts, with respect to asset types and quantities, of compensatory entitlements .				N/A - insurance or compensatory entitlements are not forecast
5.4.14(3) 5.4.14(3)(a)	In respect of each asset to which subclause (1)(c) applies, provide— the name of the relevant person or other part of the EDB , as the case may be; and				N/A - Assets are not forecast to be acquired from another regulated supplier, and assets are not forecast to be transferred from other regulated services
5.4.14(3)(b)	where the acquisition was or is intended to be from a related party , a description of the relationship between the EDB and that person .	FM Information Report	Section 6.4.10		
5.4.14(4) 5.4.14(4)(a) 5.4.14(4)(b) 5.4.14(4)(c)	In respect of the likely vendor of each asset to which subclause (1)(d) applies, the name of the vendor; a description of each asset likely to be acquired from that vendor; and the forecast closing RAB value of each asset in the vendor's regulatory asset base for the disclosure year in which the acquisition is intended.				N/A - no assets are intended to be acquired from another regulated supplier or transferred from other regulated services

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.15	Asset disposals information				
5.4.15(1)	For each disclosure year , after the last disclosure made under an ID determination , until the last disclosure year of the next period , in respect of each of the following groups of assets:	FM Information Report	Section 6.5		N/A - Assets are not forecast to be sold to related parties or transferred to Orion’s unregulated business.
5.4.15(1)(a)	assets likely to be-				
5.4.15(1)(a)(i)	sold to a related party ; or				
5.4.15(1)(a)(ii)	transferred to another part of the EDB ; and				
5.4.15(1)(b)	all other disposed assets ,	FM Information Report	Section 6.5		
	provide the-	Financial Model	2. Supporting Model - Other – RAB (Calculations)		
5.4.15(1)(c)	sum of unallocated opening RAB values ; and				
5.4.15(1)(d)	sum of opening RAB values .				
5.4.15(2)	In respect of each asset to which the values provided pursuant to subclause (1) relate, provide—				Assets are not forecast to be sold to related parties or transferred to Orion’s
5.4.15(2)(a)	the name of the relevant person or other part of the EDB , as the case may be; and				
5.4.15(2)(b)	where the disposal is proposed to be to a related party , a description of the relationship between the EDB and that person .				
5.4.16	Works under construction information				
5.4.16(a)	For each disclosure year , after the last disclosure made under an ID determination , until the last disclosure year of the next period , provide- opening works under construction ;	FM Information Report	Sections 6.4.5-6.4.7		
		Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M18:S18		
5.4.16(b)	sum of capital expenditure ;	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M19:S19		
5.4.16(c)	sum of value of commissioned assets but only to the extent that values are included in closing RAB values disclosed pursuant to an ID determination ;	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M20:S20		
5.4.16(d)	sum of forecast value of commissioned assets but only to the extent that values are included in the sum of closing RAB values provided pursuant to clause 5.4.11(b)(ii); and	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M20:S20		
5.4.16(e)	sum of closing works under construction .	Financial Model	3. Supporting Model - Expenditure – Works under construction (Calculations) M21:S21		

IM Clause	Description	Location	Section/Location	Sub-section	Note
SECTION 6 Tax information					
5.4.17	Interpretation				
	In this section, a term that is not emboldened but is defined for the purpose of a specific clause in Subpart 3 Section 3 bears the same meaning as it does in the clause of Subpart 3 Section 3 in which it is defined.				
5.4.18	Period in respect of which tax information to be provided				
	A CPP proposal must contain the information specified in this section for each disclosure year , after the last disclosure made under an ID determination , until the last disclosure year of the next period , in accordance with Subpart 3 Section 3.	FM Information Report	Section 8		
5.4.19	Regulatory tax allowance information	FM Information Report	Section 8		
5.4.19(1)	forecast regulatory tax allowance and particulars of how it was calculated	Financial Model	1. CPP Financial Model – TAXx (Calculations) H17:N17		
5.4.19(2)	other regulated income				N/A
5.4.19(3)	sum of discretionary discounts and customer rebates ;	Financial Model	2. Supporting Model - Other – Regulatory tax (Calculations) M60:S60		No discretionary discounts or customer rebates apply.
5.4.19(4)	notional deductible interest and the cost of debt assumptions relied upon in its calculation	Financial Model	1. CPP Financial Model – TAXx (Calculations) H62:N62, H63:N63		
5.4.20	Tax losses information				
5.4.20(1)	amount of opening tax losses (if any) and particulars of how it was calculated	Financial Model FM Information Report	2. Supporting Model - Other – Regulatory tax (Inputs) M15 Section 8.4		Orion has no opening tax losses.
5.4.20(2)	information describing the nature and amounts of significant items giving rise to any opening tax losses	FM Information Report	Section 8.4		
5.4.20(3)	information demonstrating that any opening tax losses arose from the supply of electricity distribution services	FM Information Report	Section 8.4		
5.4.21	Permanent differences information				
5.4.21(1)	sum of positive permanent differences	Financial Model FM Information Report	2. Supporting Model - Other – Regulatory tax (Calculations) M96:S96 Section 8.2		
5.4.21(2)	sum of negative permanent differences	Financial Model FM Information Report	2. Supporting Model - Other – Regulatory tax (Calculations) M126:S126 Section 8.2		
5.4.21(3) 5.4.21(3)(a) 5.4.21(3)(b)	amounts and nature of items used to determine- positive permanent differences ; and negative permanent differences	FM Information Report	Section 8.2		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.22	Amortisation of initial differences in asset values information				
5.4.22(1)	opening unamortised balance of the initial differences in asset values by asset	FM Information Report	Section 8.3.1		
5.4.22(2)	amortisation in respect of the disclosure year	Financial Model	2. Supporting Model - Other – Other (Inputs) H49:L49		
5.4.22(3)	average weighted remaining useful life of the assets relevant to calculation of the initial regulatory tax asset value	Financial Model	1. CPP Financial Model – General (Inputs) H52:N52		
5.4.23	Amortisation of revaluations information	FM Information Report	Section 8.3.2		
5.4.23(1)	unamortised balance of revaluations to date	Financial Model			This is not explicitly modelled. Instead the models show depreciation and adjusted depreciation, consistent with the calculation specified in IM 5.3.18.
5.4.23(2)	adjusted depreciation	Financial Model	1. CPP Financial Model – RABx (Calculations) H58:N58		
5.4.23(3)	average weighted remaining useful life of the assets used to determine the amortisation of revaluations	Financial Model	1. CPP Financial Model – RABx (Calculations) H57:N57		
5.4.23(4)	particulars of how the average weighted remaining useful life was calculated	FM Information Report	Section 8.3.2		
5.4.24	Deferred tax information	FM Information Report	Section 8.6		
5.4.24(1)	opening deferred tax	Financial Model	1. CPP Financial Model – DTAXx (Calculations) H14:N14		
5.4.24(2)	analysis of temporary differences and other adjustments by nature that give rise to opening deferred tax value	Financial Model FM Information Report	1. CPP Financial Model – DTAXx (Calculations) Section 8.6.1		
5.4.24(3)	closing deferred tax	Financial Model	1. CPP Financial Model – DTAXx (Calculations) H30:N30		
5.4.24(4)	reconciliation of opening deferred tax to closing deferred tax by nature of temporary differences and other adjustments	Financial Model	1. CPP Financial Model – DTAXx (Calculations)		
5.4.25	Temporary differences information	FM Information Report	Section 8.6.1		
5.4.25(1)	description of the methodology and depreciation rates by asset category used to determine the forecast tax depreciation	Financial Model	2. Supporting Model - Other – RTAV		
5.4.25(2)	amounts and nature of other forecast temporary differences	FM Information Report	Section 8.6.1		
5.4.25(3)	particulars of the calculation of the tax effect of temporary differences showing tax rates used	Financial Model	2. Supporting Model - Other – Regulatory tax (Calculations)		
5.4.26	Regulatory tax asset value information	FM Information Report	8.6.2		
5.4.26(1)	sum of tax asset values at the start of the disclosure year	Financial Model	2. Supporting Model - Other – RTAV (Calculations) M44:S44		
5.4.26(2)	sum of regulatory tax asset values at the start of the disclosure year	Financial Model	2. Supporting Model - Other – RTAV (Calculations) M33:S33		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.26(3)	weighted average remaining tax life of assets employed	Financial Model	2. Supporting Model - Other – RTAV		
5.4.26(4)	tax depreciation methodology employed	Financial Model	2. Supporting Model - Other – RTAV		
5.4.26(5)	particulars of the calculation used to derive the regulatory tax asset values at the start of the disclosure year from the tax asset values at the start of the disclosure year	Financial Model	2. Supporting Model - Other – RTAV		
5.4.26(6)	sum of regulatory tax asset values at the end of the disclosure year	Financial Model	2. Supporting Model - Other – RTAV (Calculations) M37:S37		
5.4.26(7)	reconciliation between the sum of regulatory tax asset values at the start of the disclosure year in accordance with subclause (2) and the sum of regulatory tax asset values at the end of the disclosure year in accordance with subclause (6) showing the values of capital additions, disposals, tax depreciation and other asset adjustments including cost allocation adjustments.	Financial Model	2. Supporting Model - Other – RTAV (Calculations) M33:S37		
SECTION 7 Cost of capital information					
5.4.27	Information regarding WACC and TCSD allowance	FM Information Report	Sections 5.1 & 9.1		
5.4.27(1)	A CPP proposal must, subject to subclause (2), identify the 65th percentile estimate of WACC used for the purpose of clause 5.4.7(1).	Financial Model	2. Supporting Model - Other – Cost of capital (Calculations)		
5.4.27(2)	For the purpose of subclause (1), the identified 65th percentile estimate of WACC is the applicable cost of capital specified in clause 5.3.22.	Financial Model	2. Supporting Model - Other – Cost of capital (Calculations) M45:S45		
5.4.27(3)	Where a term credit spread differential allowance is proposed, a CPP proposal must contain all data, information, calculations, and assumptions used to determine any proposed term credit spread differential .	Financial Model	2. Supporting Model - Other – Other (Calculations)		
Section 8 Expenditure information					
5.4.28	Capex, opex, demand and network qualitative information				
5.4.28(a)	The information specified in Schedule D must be- contained in a CPP proposal ; and	Application	Section 6.5 Appendix J		
5.4.28(b)	provided in accordance with the requirements of that schedule.	ShrePoint Data Room	Governance	CPP117	
5.4.29	Capex, opex, demand and network quantitative information				
5.4.29(1)	A CPP proposal must contain the information specified in the regulatory templates and that information must be-	Application	Appendix E		
5.4.29(1)(a)	in spreadsheet format whereby each item of data is linked between all cells to which it is relevant, irrespective of whether such cells are on the same or different tabs;	Financial Model	3. Supporting Model - Expenditure		
5.4.29(1)(b)	provided in accordance with the instructions specified in clause 5.4.30.				
5.4.29(2)	'Regulatory templates' means the tables included in Schedule E named-	Application	Section 6.6 Appendix E		
5.4.29(2)(a)	<i>Table 1: Projects and programmes;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(b)	<i>Table 2: Capex summary;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.29(2)(c)	<i>Table 3: Opex summary;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(d)	<i>Table 4: Capex projects and programmes;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(e)	<i>Table 5: Capex by asset categories;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(f)	<i>Table 6: Opex projects and programmes;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(g)	<i>Table 7: Non-network opex;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(h)	<i>Table 8: Aggregate forecast commissioned assets by asset categories;</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(i)	<i>Table 9: Cost escalation factors; and</i>	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.29(2)(j)	<i>Table 10: Network demand forecasts.</i>	Application SharePoint Data Room	Schedule E Other Material	CPP113	
5.4.29(3)	Where data provided in accordance with subclause (1) has been computed or derived from other amounts or values on the spreadsheet through the use of formulae, the underlying formulae for the cells containing the data must be accessible.				The underlying formulae for the cells containing the data are accessible
5.4.29(4)	For the purpose of subclause (1), terms used in the regulatory templates must be interpreted in the same way as those terms are defined for the purpose of Schedule D.				
5.4.30	Instructions for completion of the regulatory templates				
5.4.30(1)	Provide the information specified in <i>Table 1: Projects and programmes</i> of the regulatory templates for all projects or programmes that form part of the CPP proposal .	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.30(2)	Provide the information specified in <i>Table 2: Capex summary</i> of the regulatory templates using the information provided in <i>Table 4: Capex projects and programmes</i> of the regulatory templates , where-	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.30(2)(a)	the values in <i>Table 2: Capex summary</i> must reconcile with the total values in <i>Table 4: Capex projects and programmes</i> and <i>Table 8: Aggregate forecast commissioned assets by asset categories</i> of the regulatory templates ; and		table 2 3. Supporting Model - Expenditure – Sch E		
5.4.30(2)(b)	the total forecast value of capex resulting in commissioned assets in Table 2c of Schedule E must reconcile with the total value of commissioned assets in Table 2d		table 4		
5.4.30(3)	Provide the information in <i>Table 3: Opex summary</i> of the regulatory templates using the information provided in <i>Table 6: Opex projects and programmes</i> of the regulatory templates .	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.30(4)	Provide the information specified in <i>Table 4: Capex projects and programmes</i> and <i>Table 6: Opex projects and programmes</i> of the regulatory templates for each project and for each programme .	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E table 4 3. Supporting Model -		
5.4.30(5)	Provide the information specified in <i>Table 5: Capex by asset categories</i> of the regulatory templates .	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.30(6)	Provide the information specified in <i>Table 7: Non-network opex</i> of the regulatory templates in respect of system operation and network support opex and business support opex .	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.30(7)	Provide the information specified in <i>Table 8: Aggregate forecast commissioned assets by asset categories</i> of the regulatory templates .	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.30(8)	Provide the information specified in <i>Table 9: Cost escalation factors</i> of the regulatory templates for each of the cost escalators used to convert real prices to nominal prices.	Application Financial Model	Appendix E 3. Supporting Model - Expenditure – Sch E		
5.4.30(9)	Provide the information specified in <i>Table 10: Network demand forecasts</i> of the regulatory templates .	Application SharePoint Data Room	Schedule E Other Material	CPP113	
5.4.30(10)	For the purpose of specifying the relevant capex category or opex category in accordance with subclause (4), where expenditure within each project or programme is relevant to more than one capex category or opex category -	Financial Model	3. Supporting Model - Expenditure – Sch E table 4 3. Supporting Model - Expenditure – Sch E table 6		
5.4.30(10)(a)	select the capex category or opex category that is most relevant based on the nature of the expenditure; or				
5.4.30(10)(b)	redefine the project or programme into two or more new projects or programmes and reallocate the expenditure so as to resolve the overlap.				
SECTION 9 Information relevant to prices					
5.4.31	Information on proposed new pass-through costs				
5.4.31(a) 5.4.31(b) 5.4.31(c) 5.4.31(d) 5.4.31(e)	A CPP proposal must contain details of any cost not specified in clause 3.1.2(2) that is sought to be specified as a new pass-through cost in accordance with clause 3.1.2(1)(b), including information on- how the cost is likely to arise; who the cost would be payable to; how the cost would be calculated; any good or service the EDB would receive in exchange; and how the cost meets the criteria specified in clause 3.1.2(3).	FM Information Report	Section 11.2.1		N/A - no new pass-through costs are proposed

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.4.32	Information on proposed recoverable costs relating to costs of making CPP application				
5.4.32(a)	Where a CPP applicant seeks specification in the CPP determination of a recoverable cost to which clause 3.1.3(1)(f), 3.1.3(1)(g), or 3.1.3(1)(h) applies, it must provide, in relation to each auditor, verifier or engineer who was engaged to provide an opinion on some aspect of the CPP proposal in accordance with a requirement of this Part- any document making a public or limited circulation request for proposals to carry out the work;	Application FM Information report Sharepoint Data Room	Sections 5.2 & 5.3. Section 11.2.2 Recoverable Cost Support	CPP002, CPP013, CPP015, CPP057, CPP094-101, CPP114-116	
5.4.32(b)	the terms of reference for the work;				
5.4.32(c)	invoices for services undertaken in respect of the work; and				
5.4.32(d)	receipts for payment by the CPP applicant .				
SECTION 10 Information relevant to alternative methodologies					
5.4.33	Demonstration that alternative methodologies have equivalent effect				
5.4.33(1)	Where a CPP applicant applies alternative methodologies in accordance with clause 5.3.26, it must provide:				N/A - Orion has not proposed alternative methodologies with equivalent effect
5.4.33(1)(a)	a list and description of each alternative methodology applied;				
5.4.33(1)(b)	an indication, at the relevant locations within the CPP application , as to where the alternative methodologies have been applied;				
5.4.33(1)(c)	reasons why each of the alternative methodologies have been applied; and				
5.4.33(1)(d)	evidence demonstrating that each alternative methodology complies with clause				N/A - Orion has not proposed alternative methodologies with equivalent effect
5.4.33(2)	Paragraph (1)(d) may be satisfied by submitting a certificate signed by an senior manager of the CPP applicant setting out the factual basis on which he or she believes each alternative methodology complies with clause 5.3.26(3).				
SUBPART 5 Consumer consultation, verification, audit and certification					
5.5.1	Consumer consultation				
5.5.1(1)	By no later than 40 working days prior to submission of the CPP proposal , the CPP applicant must have adequately notified its consumers -	Application Main Proposal Engagement Report	Section 5.1 Chapter 3 Chapter 6 Appendix K	Sections 3.2-3.3 Section 6.3	N/A - Orion is not proposing a quality standard variation.
5.5.1(1)(a)	that it intends to make a CPP proposal ;				
5.5.1(1)(b)	of the expected effect on the revenue and quality of its electricity distribution services were the Commission to determine a CPP entirely in accordance with the intended CPP proposal ;				
5.5.1(1)(c)	of the price versus quality trade-offs made in the expenditure alternatives considered in the intended CPP proposal , where these are directly associated with the rationale for seeking the CPP proposal , which are required to be disclosed under				
5.5.1(1)(d)	if it intends to propose to include a quality standard variation under clause 5.4.5, why the proposed quality standard variation has been chosen over alternative quality standards;				
5.5.1(1)(e)	where and how further information in respect of the intended CPP proposal may be obtained;				
5.5.1(1)(f)	of the process for making submissions to the EDB in respect of the intended CPP proposal ; and				
5.5.1(1)(g)	of their opportunity to participate in the consultation process required of the Commission by s 53T of the Act after any CPP proposal is received and considered compliant by the Commission .				

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.5.1(2)	For the purpose of subclause (1)(e), where further information is available in hard copy only, the applicant must have ensured that any further information was readily available for inspection at the stated location.				N/A - information was not restricted to hard copy only.
5.5.1(3) 5.5.1(3)(a) 5.5.1(3)(b) 5.5.1(3)(c) 5.5.1(3)(d) 5.5.1(3)(d)(i) 5.5.1(3)(d)(ii) 5.5.1(3)(d)(iii) 5.5.1(3)(d)(iv)	For the purpose of subclause (1), the CPP applicant must- provide all relevant information; provide information in a manner that promotes consumer engagement; make best endeavours to express information clearly, including by use of plain language and the avoidance of jargon; and provide consumers with (or notified them where to obtain) the information through a medium or media appropriate to the natures of the consumer base. <i>Examples:</i> <i>by placing the information on the EDB's website;</i> <i>by providing the information to groups or organisations that represent the consumers' relevant interests;</i> <i>by including the information in consumers' or electricity retailers' bills; and/or</i> <i>by placing advertisements in local newspapers.</i>				
5.5.2	Verification				
5.5.2(1)	A CPP proposal must be verified by a verifier .	IV Report	Appendices B & C		
5.5.2(2)	The verifier must be engaged in accordance with Schedule F.	SharePoint Data Room	Governance	CPP090-093 CPP110-112	
5.5.2(3) 5.5.2(3)(a) 5.5.2(3)(a)(i) 5.5.2(3)(a)(ii) 5.5.2(3)(b) 5.5.2(3)(c) 5.5.2(3)(d) 5.5.2(3)(e)	The CPP applicant must provide the verifier with- the materials- required by the verifier to verify the CPP proposal in accordance with the terms of his, her or its engagement and Schedule G; and that it intends to submit to the Commission as a CPP proposal; subject to paragraph (c), the materials referred to in paragraph (a) prior to the verifier commencing verification in accordance with Schedule G; upon the verifier's request, the information described in clause D10 pertaining to identified programmes after the verifier has notified the CPP applicant of its selection of identified programmes; any information requested by the verifier pursuant to the verifier's right to ask for such information pursuant to his, her or its deed of engagement, as specified in clause F6(2)(d); and in advance of the verifier's selection of identified programmes, summary information on the forecast projects and programmes, in the format specified in <i>Table 1: Projects and programmes</i> of the regulatory templates.	IV Report	Chapters 1, 2, & 8 Appendices D & E		

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.5.3	Audit and assurance				
5.5.3(1)	A CPP application must include a report by an auditor that states whether or not: as far as appears from an examination of them, proper records to enable the compilation of information required by Subpart 4 have been kept by the CPP in the case of actual financial information relating to the current period , that information has been prepared in all material respects in accordance with the input methodologies set out in this determination, and that it has been audited in accordance with applicable auditing standards issued by the External Reporting Board in accordance with its functions under the Financial Reporting Act 2013 or any equivalent standards that replace these standards; in the case of forecast financial information relating to the next period , that information has been compiled in all material respects in accordance with the input methodologies set out in this determination, and that it has been examined in accordance with applicable assurance engagement standards issued by the External Reporting Board in accordance with its functions under the Financial Reporting Act 2013 or any equivalent standards that replace these standards or other appropriate in the case of quantitative historical information provided in spreadsheets, the information is properly compiled on the basis of the relevant underlying source in the case of quantitative forecast information provided in spreadsheets, the information is properly compiled on the basis of relevant and reasonable disclosed	Application	Appendix F		
5.5.3(1)(a)					
5.5.3(1)(b)					
5.5.3(1)(c)					
5.5.3(1)(d)					
5.5.3(1)(e)					
5.5.3(2)	For the avoidance of doubt, the auditor must provide an opinion as to whether- in respect of operating costs not directly attributable , the opex forecast was provided by the CPP applicant as specified in clause 5.3.5; and in respect of regulated service asset values not directly attributable , the forecast value of commissioned assets were provided by the CPP applicant in accordance with clause 5.3.6(3)(b) and as specified in clause 5.3.11(2)(b).	Application	Appendix F		
5.5.3(2)(a)					
5.5.3(2)(b)					
5.5.4	Certification				
5.5.4(1)	In the case of all information of a quantitative nature, other than forecast information, provided in accordance with this Part, no fewer than 2 directors of the CPP applicant must certify in writing his or her belief that- the information was derived and is provided in accordance with the relevant requirements; and it properly represents the results of financial or non-financial operations as the case may be.	Application	Appendix G		
5.5.4(1)(a)					
5.5.4(1)(b)					
5.5.4(2)	In the case of all information of a qualitative nature, other than forecast information, provided in accordance with this Part, no fewer than 2 directors of the CPP applicant must certify in writing his or her belief that- the information is provided in accordance with the relevant requirements; and it properly represents the events that occurred during the current period .	Application	Appendix G		
5.5.4(2)(a)					
5.5.4(2)(b)					
5.5.4(3)	In the case of all forecast information provided in accordance with this Part, no fewer than 2 directors of the CPP applicant must certify in writing his or her belief that- the information was derived and is provided in accordance with the relevant requirements; and the assumptions made are reasonable.	Application	Appendix G		
5.5.4(3)(a)					
5.5.4(3)(b)					

IM Clause	Description	Location	Section/Location	Sub-section	Note
5.5.4(4) 5.5.4(4)(a) 5.5.4(4)(b) 5.5.4(4)(c) 5.5.4(4)(d) 5.5.4(4)(e) 5.5.4(4)(f) 5.5.4(4)(f)(i) 5.5.4(4)(f)(ii) 5.5.4(4)(g) 5.5.4(4)(g)(i) 5.5.4(4)(g)(ii) 5.5.4(4)(g)(iii)	No fewer than 2 directors of the CPP applicant must certify in writing- that, to the best of his or her knowledge, the verifier was engaged by the CPP applicant in accordance with Schedule F; that, to the best of his or her knowledge, the CPP applicant provided the verifier with all the information specified in Part 5, including its schedules, relevant to that, to the best of his or her knowledge, the information described in clause 5.5.2(3)(e) was provided to the verifier in advance of the verifier's selection of identified programmes ; a description of any information not provided to the verifier following the verifier's request; reasons, which, in his or her opinion, justified any non-provision of such information; that, to the best of his or her knowledge, the- matters the auditor was engaged to audit included the matters specified in clause 5.5.3; and auditor was instructed to report on at least the matters described in clause 5.1.4; that the- audit report provided pursuant to clause 5.1.4; verification report ; and other certifications required by this clause, all relate to the same CPP proposal .	Application	Appendix G		
5.5.4(5) 5.5.4(5)(a) 5.5.4(5)(b)	Where- a director has certified a matter of opinion in accordance with this clause; and his or her opinion has changed before the Commission's determination of the CPP in question, that director must notify the Commission as soon as reasonably practicable.				Not relevant at the time of application
5.5.4(6) 5.5.4(6)(a) 5.5.4(6)(b) 5.5.4(6)(b)(i) 5.5.4(6)(b)(ii)	Where- a director has certified a matter of fact in accordance with this clause; and before the Commission's determination of the CPP in question he or she- becomes aware that the fact is untrue; or has significant cause to doubt the accuracy of that fact, that director must notify the Commission as soon as reasonably practicable.				Not relevant at the time of application
5.5.4(7)	For the avoidance of doubt, the certifications required by the different subclauses of this clause may be made by the same or different directors .				

IM Clause	Description	Location	Section/Folder	Sub-section	Note
SCHEDULE D CAPITAL AND OPERATING EXPENDITURE INFORMATION					
D1	Interpretation				
D2	Instructions relating to provision of information				
D2(1) D2(1)(a) D2(1)(a)(i) D2(1)(a)(ii) D2(1)(b) D2(1)(b)(i) D2(1)(b)(ii)	A CPP proposal must- include all information required in- Attachment A of the ID determination or any successor to that Attachment A, except where limited by subclause (5); and this schedule; unless the Commission has approved a modification or exemption from the CPP application requirements under clause 5.1.6 and has included the relevant information related to the exemption or modification as set out in clause 5.1.8; contain a table that, in respect of each clause of this schedule- provides a reference to the place where, in the CPP proposal , a response is provided; and gives the title and page reference to any separate document identified in response, including in the case where the document in question is provided in the	Application 2026 AMP SharePoint Data Room	Section 5.5 Appendices B, C & J Appendix C Governance	CPP117	
D2(2) D2(2)(a) D2(2)(b)	Where information provided in accordance with these requirements differs from the most recent information provided by the EDB to the Commission in accordance with any obligation under Part 4 of the Act , a CPP proposal must- identify the differences; and give reasons for such differences.	2026 AMP	Chapter 16 Chapter 18	Section 16.1 Section 18.1	Section 16.1 discusses performance against the FY25 forecast and section 18.1 discusses recent improvements to our asset management system.
D2(3)	Where information required by this schedule is omitted from a CPP proposal , the CPP proposal must contain an explanation for each such omission.	Application	Appendix H		IM Requirements not applicable.
D2(4) D2(4)(a) D2(4)(b)	A CPP applicant may comply with subclause (1) by- reproducing and providing its asset management plan with the additional material required by this schedule included; or providing the information required by this schedule separately from its asset management plan .	Application SharePoint Data Room	Appendix J Governance	CPP117	Orion has chosen to comply with Schedule D requirements in a variety of CPP-related documents, including the 2026 AMP. The compliance location is noted in this table.
D2(5) D2(5)(a) D2(5)(b) D2(5)(c)	For the purpose of subclause 3.4 of Attachment A of the ID determination , additional information required to be included in the CPP proposal need only apply to the- current period ; assessment period ; and next period .				Note that Orion applied for a modification to IM clause 1.1.4 affecting the definition of current period and assessment period.
D2(6) D2(6)(a) D2(6)(b)	Detailed information described in clause D10 in relation to identified programmes - need only be provided to the verifier upon the verifier's request; and where provided under (a), must be included in the CPP proposal as provided to the Commission in the CPP application .	IV Report SharePoint Data Room	Chapter 8 Appendix D IV Relied-upon Material (Governance)		All documents provided to the Independent Verifier are located in the SharePoint Data Room. The documents are listed in Appendix D of the Independent Verifier's report.
D3	Governance, organisation structure and business processes				
D3(1) D3(1)(a) D3(1)(b)	In addition to the information required by clause 3.7 of Attachment A of the ID determination , provide- the current organisational structure of the EDB and a description of any separate organisation used to manage capex and opex ; the number of full time equivalent employees, employed by the applicant, broken down by business units;	Application Main Proposal 2026 AMP SharePoint Data Room	Appendices A & D Chapter 13 Chapter 8 Non-network Opex	Section 13.4 Section 8.2 CPP086	No separate organisations are used to manage capex or opex. There are no planned structural changes during the next period. There are additional employees

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D3(4)(c)	a statement of how the approval process treats the risks on cost estimates and timing of projects due to deviations of forecast assumptions.	Main Proposal 2026 AMP	Chapter 3 Chapter 5 Chapter 16	Sections 3.2.3 -3.2.4 Sections 5.7 Sections 16.6-16.8	
D4	Network asset information				
D4(a)	In relation to the information required by clause 4 of Attachment A of the ID determination - where information is based on estimates, this must be explicitly stated; and	2026 AMP	Chapter 14 Chapter 16	Sections 14.2-14.8 Section 16.6	
D4(b)	quantities of assets must be presented in a way that clearly describes the size and scope of regulated assets, but need not include detailed lists or schedules as would be included in a complete asset register or inventory.	2026 AMP	Chapter 14 Chapter 15	Sections 14.2-14.8 Section 15.4	
D5	Service Levels				
D5(a)	Where not included in information provided in respect of clause 5 of Attachment A of the ID determination , provide-				
D5(a)(i)	a description as to how each performance indicator and performance target described in accordance with clause 5 of Attachment A of the ID determination - relates to the EDB's relevant policies ; and	Main Proposal 2026 AMP SharePoint Data Room	Chapter 15 Chapter 5 Other materials	Sections 15.1-15.2 Section 5.1 CPP103	Appendix 5
D5(a)(ii)	reflects the expenditure objective ;	Main Proposal SharePoint Data Room	Chapter 15 Other materials	Section 15.2 CPP103	Section 2.6
D5(b)	for each performance indicator identified and defined in accordance with subclause				
D5(b)(i)	the measured performance for each year of the current period ; and	SharePoint Data Room Main Proposal	Other materials Chapter 15	CPP103 Section 15.1	Appendix 4
D5(b)(ii)	the target performance for each year of the next period ;	2026 AMP SharePoint Data Room	Chapter 5 Other materials	Section 5.1 CPP103	Section 2.6
D5(c)	a comparison and evaluation of each actual service level achieved for the disclosure years in the current period against each relevant performance target, including explanations for all significant variances.	SharePoint Data Room	Other materials	CPP103	Appendix 4
D6	Network development planning				
D6(1)	The description of network development plans required in clause 11 of Attachment A of the ID determination must include the additional information specified in this	SharePoint Data Room	Other NW Capex	CPP102	Connection capex
D6(2)	For system growth capex , connection capex , asset relocation capex and reliability, safety and environment capex -		Other Material	CPP118	General
D6(2)(a)	identify all relevant documents, policies and consultants' reports that were taken into account in preparing these capex forecasts ; and		IV Relied-upon Material (Governance)	D167, D211, D216	General
D6(2)(b)	where appropriate, identify their relevance to each category of capex .		IV Relied-upon Material (AM Framework) IV Relied-upon Material (System Growth Capex)	D060, D063, D064, D091, D147 D105, D142, D145, D148, D213, D281	General, System growth System growth

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D6(3)	In addition to the information required by clauses 11.1-11.6 of Attachment A of the ID determination , provide the rationale for the planning criteria and other key drivers and assumptions for network development for system growth capex, connection capex, asset relocation capex and reliability, safety and environment capex .	Main Proposal	Chapter 7 Chapter 8	Sections 7.2-7.3 Sections 8.1-8.5	
D6(4)	In addition to the information required by clause 11.7 of Attachment A of the ID determination , provide the rationale for the prioritisation process and criteria.	2026 AMP	Chapter 16	Section 16.8	
D6(5)	In addition to the information on demand forecasts required by clause 11.8 of Attachment A of the ID determination -				
D6(5)(a)	describe and explain the methodology used to prepare the relevant forecasts, including-	2026 AMP	Chapter 10	Sections 10.2- 10.5	
			System Growth Capex	CPP203, CPP229, CPP247- 248, CPP253-256, CPP282, CPP288-292	
			IV Relied-upon Material (System Growth Capex)	M008, M012, M015-017, M058-068, M070-072, M074-082, M107-137, M146, M159-M202	
D6(5)(a)(i)	any sensitivity analysis undertaken;				
D6(5)(a)(ii)	any weather normalisation methodology used and how weather data has been used; and				
D6(5)(a)(iii)	the models used (including each model's key inputs and assumptions); and				
D6(5)(b)	provide-				
D6(5)(b)(i)	an outline of the treatment of very large loads, uncertain loads and significant loads transferred, or expected to be transferred, between different parts of the network (e.g. between zone substations and/or between feeders);	Main Proposal 2026 AMP	Chapter 7 Chapter 11	Sections 7.4 & 7.5 Section 11.2	
D6(5)(b)(ii)	details of the location, types and aggregate levels of any distributed generation and assumptions relating to the impact they may have on network forecasts; and	2026 AMP	Chapter 11	Section 11.2.5	
D6(5)(b)(iii)	details of the effect that any demand management systems or initiatives and any other new or emerging technologies may have on the network forecasts and the extent that they have been included in the forecasts in the CPP proposal .	Main Proposal 2026 AMP SharePoint Data Room	Chapter 7 Chapter 9, Chapter 10 IV Relied-upon Material (Network Transformation)	Section 7.2-7.7 Sections 9.3-9.4 Section 10.4 D278	
D6(6)	For the forecasts of consumer connections, embedded generation and electricity volumes provided in the relevant templates in Schedule E-				
D6(6)(a)	describe and explain the methodology used to prepare the relevant forecasts				
D6(6)(a)(i)	any sensitivity analysis undertaken;	Main Proposal 2026 AMP SharePoint Data Room	Chapter 7 Chapter 8 Chapter 10 Chapter 11 Other NW Capex IV Relied Upon Material (System Growth Capex)	Section 7.2-7.3 Section 8.3 Section 10.2 Section 11.2 CPP075 D105, D145, D148	

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D6(6)(a)(ii)	any weather normalisation methodology used and how weather data has been used; and	Main Proposal 2026 AMP	Chapter 7 Chapter 8 Chapter 10 Chapter 11	Section 7.2-7.3 Section 8.3 Section 10.2 Section 11.2	
D6(6)(a)(iii)	the models used (including each model's key inputs and assumptions);	SharePoint Data Room	IV Relied Upon Material (System Growth Capex)	D105, D148	
		SharePoint Data Room	Other NW Capex IV Relied Upon Material (System Growth Capex)	CPP231 M006-008, M012, M015-017, M058- 68, M070-072, M076-078, M080- 082, M107-137,	
D6(7)	In addition to the information required by clause 11.9 of Attachment A of the ID determination, provide-				
D6(7)(a)	for system growth capex , a description of, and the rationale for, the planning standards , and key assumptions relied on by the EDB in determining the need to augment its network;	Main Proposal 2026 AMP, SharePoint Data Room	Chapter 7 Chapter 10 IV Relied-upon Material (AM Framework) IV Relied-upon Material (System Growth Capex)	Sections 7.2-7.3 Sections 10.1-10.4 D035,D060, D063, D091 D105, D145, D148, D213, D281	
D6(7)(b)	for reliability, safety and environment capex , a description of any models developed by or for the EDB to determine the reliability, safety and environment capex including the rationale for all key input assumptions; and	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 8, Chapter 12 Other Network Capex	Sections 8.1-8.2 & 8.5 Section 12.7 CPP065, CPP227	
D6(7)(c)	for connection capex and asset relocation capex -				
D6(7)(c)(i)	key assumptions and a list of policies relevant to apportioning costs, where costs are not fully recovered from a capital contribution ;	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 8, Chapter 12 Other Network Capex	Sections 8.1-8.4 Sections 12.1, 12.5- 12.6 CPP064, CPP075, CPP102, CPP226, CPP231	
D6(7)(c)(ii)	the rationale and basis for determining the forecast amount, including a description of any modelling used; and	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 8, Chapter 12 Other Network Capex	Sections 8.2, 8.4-8.5 Sections 12.1, 12.5- 12.6 CPP064, CPP075, CPP102, CPP226, CPP231	
D6(7)(c)(iii)	provide this information separately for connection capex and for asset relocation capex .	Main Proposal, 2026 AMP	Chapter 8, Chapter 12	Sections 8.4-8.5 Sections 12.5-12.6	

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D6(8)	In addition to the information required in clause 11.10 of Attachment A of the ID determination , for each system growth capex project and programme included in the capex forecast provide				
D6(8)(a)	a description of the project or programme , including the assumed number and ratings of significant new assets and, where appropriate, a single-line diagram showing how it is assumed that the assets will be integrated into the existing network;	Main Proposal 2026 AMP SharePoint Data Room	Chapter 7 Chapter 12 Appendix D System Growth Capex	Sections 7.1-7.8 Sections 12.2-12.7 CPP004, CPP007-009, CPP017, CPP026, CPP073-074, CPP076	
D6(8)(b)	the estimated cost of the project or programme , disaggregated by disclosure year , including costs already incurred in the current period ; and	Application SharePoint Data Room	Appendix E - Sch. E Governance	Table 4b CPP201	
D6(8)(c)	details of the effect any new or emerging technologies may have and the extent that they have been considered.	Main Proposal 2026 AMP	Chapter 7 Chapter 10	Sections 7.2, 7.4-7.7 Sections 10.4 & 10.5	
D6(9)	In addition to the information required in clause 11.10 of Attachment A of the ID determination , for each reliability, safety and environment capex project and programme included in the capex forecast provide-				
D6(9)(a)	a description of the project or programme including the assumed number and ratings of significant new assets;	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 8, Chapter 12 Other Network Capex	Section 8.5 Section 12.7 CPP065, CPP227	
D6(9)(b)	a discussion of key assumptions and the rationale for making those assumptions;	Main Proposal, 2026 AMP SharePoint Data Room	Chapter 8, Chapter 12 Chapter 16 Other Network Capex	Section 8.5 Section 12.7 Section 16.6.2 CPP065, CPP227	
D6(9)(c)	a description of models used and key input assumptions and data sources, including a discussion of relevant data systems and any limitations in the data;	SharePoint Data Room SharePoint Data Room	Other Network Capex Other Network Capex	CPP065, CPP227 CPP065, CPP227	
D6(9)(d)	an indication of the project's or programme's current status in the planning process; and	SharePoint Data Room	Other Network Capex	CPP065, CPP227	
D6(9)(e)	the estimated cost of the project or programme , disaggregated by disclosure year , including costs already incurred in the current period .	Application SharePoint Data Room	Appendix E - Sch. E Governance	Table 4e CPP201	
D6(10)	In addition to the information required in clause 11.10 of Attachment A of the ID determination , for any connection capex and asset relocation capex project and programme , provide a description and the estimated costs of any specific project or programme included in the forecast.	Application	Appendix E - Sch. E	Tables 4a & 4d	
D6(11)	In addition to the information required by clause 11.12 of Attachment A of the ID determination , and, where not provided in response to subclause (2), identify the EDB's policies regarding the application of new or emerging technologies.	Main Proposal 2026 AMP, SharePoint Data Room	Chapter 10 Chapter 9, IV Relied-upon Material (AM Framework) IV Relied-upon Material (Network Transformation)	Sections 10.2-10.3, 10.5 Sections 9.2-9.5 D060 D278	

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D7	Lifecycle asset management planning (maintenance and renewal)				
D7(1)	The description of Lifecycle Asset Management Planning required in clause 12 of Attachment A of the ID determination must include the additional information				
D7(2)	In addition to information required by clauses 3.13 and 3.14 of Attachment A of the ID determination , describe the organisation that the EDB uses to manage network maintenance and associated expenditure, including the physical arrangements for undertaking these activities and the extent that these functions are centralised and outsourced.	Main Proposal 2026 AMP SharePoint Data Room	Chapter 4 Chapter 6 Chapter 17 Other material Network Opex	Section 4.1-4.4 Section 6.4 Section 17.1 CPP106 CPP079-082	
D7(3)	In addition to the information required by clauses 12.1 and 12.2 of Attachment A of the ID determination , for each of service interruptions and emergencies opex , vegetation management opex and routine and corrective maintenance and inspection opex describe the approach used to prepare the expenditure forecast and provide-				
D7(3)(a)	details and a rationale for each relevant key assumption ;	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 12 Chapter 13 Network Opex	Sections 12.2-12.7 Section 13.1-13.6 CPP079-082	
D7(3)(b)	a description of any models used;	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 12 Chapter 13 Network Opex	Sections 12.2-12.7 Section 13.1-13.6 CPP079-082, CPP233-236	
D7(3)(c)	a description of any new expenditure or forecast changes to the level of expenditure on existing network opex programmes over the course of the next period that will have a material effect on the network opex forecast , including-	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 12 Chapter 13 Network Opex	Sections 12.2-12.7 Section 13.1-13.6 CPP079-082	
D7(3)(c)(i)	the rationale for and timing of these changes;	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 12 Chapter 13 Network Opex	Sections 12.2-12.7 Section 13.1-13.6 CPP079-082	
D7(3)(c)(ii)	an assessment of the impact of these changes on the service levels provided by the EDB ; and	Main Proposal 2026 AMP SharePoint Data Room	Chapter 12 Chapter 15 Chapter 5 Chapter 13 Network Opex	Sections 12.2-12.7 Sections 15.1-15.2 Section 5.1 Section 13.1-13.6 CPP079-082	
D7(3)(c)(iii)	the impact of these changes on the opex forecast .	Main Proposal, 2026 AMP, SharePoint Data Room	Other materials Chapter 12 Chapter 13 Network Opex	CPP103 Sections 12.2-12.7 Section 13.1-13.6 CPP079-082	
D7(4)	Identify all relevant documents, policies and consultants' reports that were taken into account in preparing the forecasts of service interruptions and emergencies opex , vegetation management opex and routine and corrective maintenance and inspection opex ;	Main Proposal, 2026 AMP, SharePoint Data Room	Chapter 12 Chapter 13 Network Opex	Sections 12.2-12.7 Section 13.1-13.6 CPP079-082	
D7(5)	In addition to the information required by clause 12.3 of Attachment A of the ID determination , for asset replacement and renewal capex and asset replacement and renewal opex provide-				
D7(5)(a)	a description of the criteria used to determine whether the expenditure is capex or opex ; and	SharePoint Data Room	IV Relied-upon Material (Governance)	D216	
D7(5)(b)	a description of the prioritisation methodology adopted for asset replacement projects and programmes .	2026 AMP	Chapter 7 Chapter 16	Section 7.1-7.3 Section 16.8	

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D7(6)	Identify all relevant documents, policies and consultants' reports that were taken into account in preparing the forecasts of asset replacement and renewal capex or asset replacement and renewal opex ;	Main Proposal 2026 AMP SharePoint Data Room	Chapter 6 Chapter 6 Chapter 14 Renewals Capex	Sections 6.2-6.3 & 6.11 Section 6.1-6.3 Section 14.1 CPP001, CPP003, CPP005-006, CPP010-012, CPP014, CPP016, CPP018-020, CPP023-025, CPP049-051, CPP053-056, CPP058-063,	
D7(7)	In addition to the information required by subclauses 12.3.3 – 12.3.5 of Attachment A of the ID determination , for each asset replacement and renewal capex or asset replacement and renewal opex project and programme provide-				
D7(7)(a)	a description of and the rationale for the projects and programmes ;	Main Proposal 2026 AMP SharePoint Data Room	Chapter 6 Chapter 14 Renewals Capex	Sections 6.1-6.11 Section 14.1-14.8 CPP001, CPP003, CPP005-006, CPP010-012, CPP014, CPP016, CPP018-020, CPP023-025, CPP049-051, CPP053-056, CPP058-063, CPP066-072, CPP084-085	
D7(7)(b)	where relevant, an overview of any network and non-network alternatives considered and the basis for selecting the preferred solution;	Main Proposal	Chapter 6	Section 6.3.2.2. Box 6.5	Also refer to the documents listed (SharePoint Data Room/Renewals Capex) in D7(7)(a) above for specific project/programme options analysis
D7(7)(c)	an indication of the project's or programme's current status in the planning process;	Main Proposal 2026 AMP	Chapter 6 Chapter 14 Appendix E	Sections 6.1-6.11 Section 14.1-14.8 Table E.1	
D7(7)(d)	the actual and forecast expenditure on each project or programme described in subclause (a) disaggregated by regulatory year in both the current period and the next period ; and	Application SharePoint Data Room	Appendix E Governance	Schedule E, Table 4c CPP201	

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D7(7)(e)	a description of the methodology used by the EDB to determine the forecast expenditure over the next period on the projects or programmes described in subclause (a) including where applicable-				
D7(7)(e)(i)	the key assumptions and the rationale for the key assumptions and policies ;	Main Proposal	Chapter 5	Sections 5.7.2-5.7.3	Also refer to the documents listed (SharePoint Data Room/Renewals Capex) in D7(7)(a) above for specific project/programme assumptions
		2026 AMP	Chapter 6	Section 6.2-6.3	
D7(7)(e)(ii)	any relevant modelling and the rationale for material model input assumptions; and	SharePoint Data Room	Chapter 14	Section 14.1-14.9	
			Chapter 16	Section 16.6	
D7(7)(e)(iii)	a commentary on the source of the unit costs or components of cost, the accuracy of the cost estimates and the treatment of cost uncertainty where there are not explicitly stated elsewhere.	Main Proposal	Renewals Capex	CPP202, CPP204-206, CPP208, CPP212-213, CPP215, CPP217-225, CPP230, CPP232, CPP237-244, CPP250, CPP274-275, CPP277-279, CPP281, CPP283-287	
		2026 AMP		Sections 5.5, 5.7	
		SharePoint Data Room	IV Relied-upon Material (Other Material)	Sections 16.4, 16.6 & 16.7	
D7(8)	For an asset replacement and renewal capex project provide-				
D7(8)(a)	assumed number and ratings of significant new assets; and	2026 AMP	Chapter14	Sections 14.2-14.8	
		SharePoint Data Room	Renewals Capex	CPP001, CPP003, CPP005-006, CPP010-012, CPP014, CPP016, CPP018-020, CPP023-025, CPP049-051, CPP053-056, CPP058-063, CPP066-072, CPP084-085	
D7(8)(b)	a single-line diagram showing how the project will be integrated into the existing network for projects involving a redesign of asset layout.	SharePoint Data Room	Renewals Capex	CPP001, CPP010, CPP023-CPP024	
D7(9)	Explain how any anticipated system growth associated with the replacement of assets before the end of their asset life has been taken into account in the asset replacement and renewal capex forecast for the next period .	2026 AMP	Chapter 10	Sections 10.3.3	
D8	Non-system fixed assets capital expenditure information				
D8(1)	In addition to the information required by clause 13 of Attachment A of the ID determination , for non-network fixed assets capex in the capex forecast provide the rationale and the basis for determining the forecast amount, including a description of any modelling used for the expenditure in the largest two of the following expenditure categories by dollar value-				
D8(1)(a)	asset management systems;				N/A - not 1st or 2nd largest category

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D8(1)(b)	information and technology systems;	Main Proposal 2026 AMP SharePoint Data Room	Chapter 11 Chapter 8 ICT	Sections 11.2-11.3, 11.6 Section 8.4-8.6 CPP027-030, CPP032-035, CPP037, CPP040-044, CPP046, CPP048, CPP076, CPP257-263, CPP265-273	N/A - not 1st or 2nd largest category N/A - not 1st or 2nd largest category N/A - not 1st or 2nd largest category
D8(1)(c)	motor vehicles;	Main Proposal 2026 AMP SharePoint Data Room	Chapter 9 Chapter 15 Non-network Capex	Section 9.4 Section 15.4 CPP078	
D8(1)(d)	office buildings, depots and workshops;				
D8(1)(e)	office furniture and equipment; and				
D8(1)(f)	tools, plant and machinery.				
D8(2)	The information required by subclause (1) need not be provided if the total non-network assets capex forecast is less than 5% of the total capex forecast .				
D9	Business support, system operations and network support operating expenditure				
D9(1)	Provide sufficient details of the extent that business support and system operations and network support costs have been included in the capex forecast for each disclosure year of both the current period and next period .	IV Report SharePoint Data Room	Chapter 10 Chapter 11 Non NW Opex IV Relied-upon Material	Section 10.7.2.1 Section 11.3.1.13 CPP087 (Appendix B.3)	
D9(2)	Identify all relevant documents, policies and consultants' reports that were taken into account in preparing these opex forecasts .	Main Proposal 2026 AMP SharePoint Data Room	Chapter 13 Chapter 8 Non-network Opex	Sections 13.2-13.6 Sections 8.2-8.3 CPP022, CPP083, CPP086-088	
D9(3)	Describe any anticipated material changes to the information provided in subclause (1) over the course of the next period and discuss-				No material changes to the capitalisation policy are anticipated over the CPP period.
D9(3)(a)	the rationale for and timing of the changes; and				
D9(3)(b)	the impact of the changes on the opex forecast .				
D9(4)	Describe the approach used to prepare the relevant opex forecast including-	Main Proposal 2026 AMP SharePoint Data Room	Chapter 13 Chapter 8 Non-network Opex	Sections 13.2-13.6 Sections 8.2-8.3 CPP022, CPP083, CPP086-088, CPP251-252, CPP293	
D9(4)(a)	each relevant key assumption including the rationale for the assumption;				
D9(4)(b)	any models used; and				
D9(4)(c)	the rationale for any new expenditure or step change from current levels of expenditure over the next period .				
D9(5)	Where appropriate, the information required by this clause should be provided separately for business support opex and for system operations and network support opex .				Modelling and associated documentation addresses SONS & BS separately

IM Clause	Description	Location	Section/Folder	Sub-section	Note	
D10	Identified programmes					
D10(1)	Where not already required to be disclosed by Attachment A of the ID determination, for each identified programme provide-	2026 AMP	Chapter 16 Chapter 17	Section 16.8 Section17.1.2	Additionally, all documents provided to the Independed Verifier are identified in Appendix D of the Independent Verifier's report.	
D10(1)(a)	a description of the project or programme including-	Independent Verifier's Report SharePoint Data Room	System Growth Capex	CPP017, CPP026, CPP073-074, CPP203, CPP229, CPP247-248, CPP253-254, CPP256, CPP282, CPP291		
D10(1)(a)(i)	what the project or programme will accomplish;					
D10(1)(a)(ii)	the location of the project or, if relevant, the location of the programme ;					
D10(1)(a)(iii)	assumed quantities and ratings of major assets, including the rationale for these assumptions;					
D10(1)(a)(iv)	where relevant, a high-level single-line diagram showing the assumed layout of the project and interfaces with the existing network; and					
D10(1)(a)(v)	any other information consistent with the nature of the project or programme that is necessary to fully describe the scope of the project and what is involved in its implementation;		Renewals Capex	CPP023-024, CPP066, CPP069-072, CPP084-085, CPP230		
D10(1)(b)	a description of the rationale for the project or programme including-		Network Capex - Other ICT	CPP237-244, CPP279		
D10(1)(b)(i)	the extent that the project or programme meets the expenditure objective ; and					
D10(1)(b)(ii)	the impact of not progressing within the CPP regulatory period ;					
D10(1)(c)	a statement as to the project's or programme's current status in the planning					CPP027-029, CPP032-035, CPP037, CPP040-044, CPP046, CPP048, CPP076, CPP257-263, CPP265-273
D10(1)(d)	an overview of potential alternatives, including non-network alternatives, and the basis for selecting the preferred option with the information provided to be commensurate with the project's or programme's current status in the planning		Network Transformation	CPP031, CPP036, CPP038-039, CPP045, CPP047, CPP077, CPP245-246, CPP264		
D10(1)(e)	the rationale for the proposed timing of the project or, where relevant, the rationale for the proposed timing of the programme ;					
D10(1)(f)	where applicable, an assessment of the impact of the project or programme on the service levels provided by the EDB ;		Network Opex	CPP079-080, CPP082, CPP233-235, CPP021, CPP078, CPP022, CPP083, CPP086-088, CPP251-252, CPP293		
D10(1)(g)	if a programme is a continuation or extension of an existing programme , the rationale for any material changes in the forecast expenditure from the level of expenditure on the programme during the current period ;					
D10(1)(h)	a detailed breakdown of the estimate of the project or programme costs, disaggregated by disclosure year , including a similar breakdown of any project or programme costs incurred during the current period ;		Non-network Capex Non-network Opex			
D10(1)(i)	in addition to the breakdown provided in response to subclause (f)-					
D10(1)(i)(i)	a description of the methodology used to prepare the estimate;					
D10(1)(i)(ii)	where applicable, the quantities provided for in the project or programme cost;					
D10(1)(i)(iii)	identification of scope or cost uncertainties and an explanation of how such uncertainties have been taken into account in the estimate;					
D10(1)(j)	details of how the EDB proposes to measure and manage the efficiency of the implementation of the project or programme ; and					
D10(1)(k)	a description of any cost benefit analyses relevant to the project or programme undertaken by or for the EDB .					

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D11	Risk management				
D11(1)	In addition to the information required by clause 14.3 of Attachment A of the ID				N/A - No self-insurance allowance is proposed
D11(1)(a)	determination , for any proposed self-insurance allowance- provide-				
D11(1)(a)(i)	a description of the uncertainties covered by the allowance;				
D11(1)(a)(ii)	the methodology used to calculate the self-insurance risk premium (e.g. probability multiplied by consequence);				
D11(1)(a)(iii)	a report on the calculation of each self-insurance risk premium from an actuary who is qualified to provide such advice; and				
D11(1)(a)(iv)	any quotes obtained from external insurers; and				
D11(1)(b)	explain why compensation should be provided for the uncertainty.				
D11(2)	In respect of each quote provided in accordance with subclause (1)(a)(iv)-				N/A - No self-insurance allowance is proposed
D11(2)(a)	state-				
D11(2)(a)(i)	the amount insured for which the quote related (if not included in the quote itself);				
D11(2)(a)(ii)	the annual premium payable or paid by the EDB ;				
D11(2)(a)(iii)	the size of any deductible;				
D11(2)(a)(iv)	the terms and conditions of the insurance; and				
D11(2)(a)(v)	why it is not considered suitable.				
D11(3)	Explain whether and, if so, how the costs of remediating the effects of each uncertainty for which the allowance is sought may be recovered through any other				N/A - No self-insurance allowance is proposed
D12	Related Parties				
D12(1)	Identify and describe all related parties in respect of whom costs are disclosed for the last disclosure year of the current period , and relationships with those related parties .				N/A - exempted by approved modifications and exemptions
D12(2)	Describe, at an aggregate level, the-				N/A - exempted by approved modifications and exemptions
D12(2)(a)	nature of the services undertaken by all related parties in the last year of the current period ; and				
D12(2)(b)	processes for procuring services undertaken by related parties , or by anticipated related parties , during the last year of the current period and the assessment period .	FM Information Report	Section 6.4.10		
D12(3)	For services identified in subclause (2), describe-				
D12(3)(a)	whether similar services are expected to be provided by related parties , or by anticipated related parties , during the next period ;	FM Information Report	Section 6.4.10		
D12(3)(b)	whether any additional services are expected to be provided by related parties , or by anticipated related parties , during the CPP regulatory period ; and	FM Information Report	Section 6.4.10		
D12(3)(c)	the basis for establishing the related party transaction values for the purpose of the capex forecast and the opex forecast .	FM Information Report	Section 6.4.10		
D12(4)	Describe the nature of the contract for any periodic services , including the duration of any such contract.	FM Information Report	Section 6.4.10		
D12(5)	For each service identified in accordance with subclause (2), provide an example of-				N/A - exempted by approved modifications and exemptions request
D12(5)(a)	any tendering process used to procure the service ;				
D12(5)(b)	relevant documents used to tender for the provision of the service , including, but not limited to, requests for tender, and tender submissions;				

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D12(5)(c) D12(5)(c)(i) D12(5)(c)(ii) D12(5)(d)	explain- whether the service procured are provided under a discrete contract or provided as part of a broader operational contract (or similar); and whether the service was procured on a genuinely competitive basis and if not, why not; and methodologies, consultants' reports, or key assumptions used to determine components of the costs included in the contract price.				
D13	Deliverability				
D13(1)	In addition to clauses 14 and 16 of Attachment A of the ID determination provide an overview of, and description of outputs from, any deliverability risk assessment that the EDB has completed for part or all of the capex forecast and the opex forecast .	Main Proposal 2026 AMP SharePoint Data Room	Chapter 4 Chapter 17 Other material	Sections 4.1-4-4 Sections 17.1-17.3 CPP106, CPP276	
D13(2) D13(2)(a) D13(2)(b) D13(2)(c) D13(2)(d) D13(2)(d)(i) D13(2)(d)(ii) D13(2)(d)(iii) D13(2)(e)	Where it has not been provided in risk assessment information under subclause (1), provide an overview of the EDB plans to ensure the deliverability of the activities provided for in the capex forecast and the opex forecast , with particular reference to- a description of the prioritisation or other methodologies used to optimise delivery; how consenting processes are managed to optimise delivery; the extent that the activities provided for in the capex forecast and the opex forecast will be undertaken internally or outsourced; the EDB's ability to implement any planned step change from historical levels of expenditure and workload, including- the ability of contractors available to the EDB to deliver any proposed increase in workload; the current level of skilled personnel, including engineering and project management personnel, available to the EDB compared to the anticipated requirement over the next period ; and the measures the EDB plans to take to source and secure required additional personnel; and how the EDB aligns resource schedules where shared resources are used for different opex-related and capex-related tasks.	2026 AMP 2026 AMP Main Proposal 2026 AMP SharePoint Data Room Main Proposal 2026 AMP SharePoint Data Room Main Proposal 2026 AMP SharePoint Data Room Main Proposal 2026 AMP SharePoint Data Room	Chapter 16 Chapter 17 Chapter 17 Chapter 4 Chapter 17 Other material Chapter 4 Chapter 17 Other material Chapter 4 Chapter 17 Other material Chapter 4 Chapter 17 Other material	Section 16.8 Section 17.1.2 Section 17.1.3 Sections 4.1-4-4 Sections 17.1-17.2 CPP106, CPP276 Sections 4.1-4-4 Sections 17.1-17.3 CPP106 Sections 4.1-4-4 Sections 17.1-17.3 CPP106 Sections 4.1-4-4 Sections 17.1-17.3 CPP106 Sections 4.1-4-4 Sections 17.1-17.3 CPP106	
D14	Unit costs and expenditure escalators				
D14(1)	Explain the methodologies applied to convert constant price capex forecast and opex forecast to the nominal price capex forecast and opex forecast .	2026 AMP Financial Information Report	Chapter 16 Chapter 6 IV Relied-upon Material	Section 16.3 Section 6.4.4 Section 7.1 D285, D286, D287	
D14(2)	Explain why the methodologies applied, each key assumption , and the resulting quantum are reasonable.	SharePoint Data Room	IV Relied-upon Material	D285, D286, D287	

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D14(3) D14(3)(a) D14(3)(a)(i) D14(3)(a)(ii) D14(3)(a)(iii) D14(3)(b) D14(3)(b)(i) D14(3)(b)(ii) D14(3)(b)(iii)	For each key assumption , including unit rates, indexes, weightings, and contingency identify- the key assumption ; source material from which it was derived; and the components of expenditure to which it applies; and explain- how it has been applied in the capex forecast and opex forecast ; the quantum of costs in the capex forecast and opex forecast resulting from the application of the key assumption ; and whether, and if so, how the key assumption relates to capex and opex incurred during the current period .	2026 AMP IV Report SharePoint Data Room Application 2026 AMP SharePoint Data Room	Chapter 16 Chapter 5 Other Material IV Relied-upon Material (Other Material) Appendix E Appendix B Other Material IV Relied-upon Material (Other Material)	Section 16.4 Sections 5.2.2-5.2.3 CPP118 D064, D285, D286, D287 Table 9 Schedules 11a & 11b CPP118 D064, D126a, D285, D286, D287	Explicit contingency factors are not added The approach taken for the CPP proposal generally applies to the current period although simpler escalation approaches were applied (refer FY21 to FY26 AMP disclosures, Schedules 11a(i) and 11b.
D15	Contingent project information				
D15(1) D15(1)(a) D15(1)(a)(i) D15(1)(a)(ii) D15(1)(a)(iii) D15(1)(b) D15(1)(c) D15(1)(c)(i) D15(1)(c)(ii) D15(1)(c)(iii) D15(1)(d) D15(1)(d)(i) D15(1)(d)(ii)	For each proposed contingent project - provide- an overall description including the aims and objectives of the project ; completed regulatory templates for capex and opex forecasts using the best available information to hand; and information as to how the project satisfies the criteria specified in clause 5.6.10(2); propose a trigger event and explain how the event meets the requirements of clause 5.6.10(3); provide- all relevant documents (including policies and consultants' reports) that were taken into account in preparing the capex forecast and opex forecast for the contingent project , including those that relate to its deliverability ; each relevant key assumption ; and each relevant obligation ; explain- all departures from any conclusions and recommendations contained in each consultant's report identified in accordance with subclause (c)(i); and the methodology used to generate the capex and opex forecast for the proposed contingent project ;	Main Proposal IV Report SharePoint Data Room N/A Application 2026 AMP Main Proposal IV Report SharePoint Data Room Main Proposal SharePoint Data Room Main Proposal SharePoint Data Room SharePoint Data Room	Chapter 7 Chapter 12 System Growth Capex N/A Appendix I Chapter 12 Chapter 7 Chapter 12 System Growth Capex Chapter 7 System Growth Capex Chapter 4 Chapter 7 System Growth Capex Other material System Growth Capex	Section 7.5 CPP026 N/A Section 12.2.2 Section 7.5 CPP026 Section 7.5 Sections 4.1-4.4 Sections 7.2-7.3, 7.5 CPP026 CPP106 CPP026, CPP291	Not applicable. The contingent project is currently planned outside the CPP period and therefore cannot be entered into the CPP regulatory templates. If the nominated trigger event occurs, the project will be brought forward into the CPP period. Orion has requested a variation to IM clause 5.6.10(2)(c)(i) to reduce the financial threshold to \$2.5 million

IM Clause	Description	Location	Section/Folder	Sub-section	Note
D15(1)(e)	explain for each policy identified in response to subclause (c)(i)- how it was taken into account and complied with; and how the relevant planning standards were incorporated; and describe for each key assumption identified in accordance with subclause (c)(ii)- the method and information used to develop the assumption; and how it has been applied and its effect on the capex and opex .	SharePoint Data Room	System Growth Capex	CPP026	
D15(1)(e)(i)					
D15(1)(e)(ii)					
D15(1)(f)		SharePoint Data Room	System Growth Capex	CPP026	
D15(1)(f)(i)					
D15(1)(f)(ii)					
D15(2)	Where any proposed contingent project is likely to terminate after the end of the next period , in addition to the information required by subclause (1), provide any additional information relevant to forecast capex and forecast opex to the end of the contingent project .	SharePoint Data Room	System Growth Capex	CPP026	
D15	Listed project information				
D15(1)	<i>For each proposed listed project- provide- an overall description including the aims and objectives of the project; and information as to how the project satisfies the criteria specified in clause</i>	Application	Section 4.5		These additional requirements reflect an IM variation. Refer Application document, Appendix I, Box 10.
D15(1)(a)			Appendices B & I		
D15(1)(a)(i)		Main Proposal	Chapter 7	Section 7.5	
D15(1)(a)(ii)					