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Firstlight Network Quality Standard Variation Application

Dear Ben

Firstlight Network Limited (Firstlight) submits this Quality Standard Variation (QSV) application under clause 4.5.5 of the Electricity Distribution Services Input Methodologies Determination 2012. This application seeks reconsideration of the unplanned SAIDI boundary value specified in the Default Price-Quality Path determination commencing 1 April 2025 (DPP4).

Firstlight's boundary value for DPP4 has been materially influenced by a small number of extreme weather events experienced during the reference period, specifically three events in 2022 and 2023. Historical records demonstrate that these events are properly classified as outliers. In its DPP4 decision reasons paper, the Commission notes that the purpose of identifying and normalising major events is to limit the impact of such events on the assessment of compliance with the quality standard. Due to the inclusion of these events for calculating Firstlight's boundary value, the opposite has occurred. Firstlight's DPP4 boundary value is much higher than would otherwise be set using long-term average reliability performance. As a result, the boundary value does not appropriately normalise interruptions that fall outside the normal frequency distribution, meaning compliance with the SAIDI limit is not realistically achievable through efficient and prudent investment during DPP4. Firstlight proposes that the boundary value be amended by excluding these three events from the dataset used to set the boundary value.

The quality standards are intended to ensure Electricity Distribution Businesses (EDBs) deliver a level of network investment that results in "no material deterioration" of network performance. The normalisation process has two benefits in terms of that objective.

First, by removing outlier events, normalisation gives a more representative picture of the 'underlying' reliability of the network, which is what the EDB can influence through investment and maintenance. If normalisation doesn't operate to remove statistical outliers, assessment against quality standards provides an inaccurate picture of network performance. We think the Commission should take this into account when considering which regulatory years this QSV should apply to. In our view, an annual compliance statement for RY26 that showed non-compliance due to normalisation not operating as intended would inaccurately represent network performance, undermining the role of quality standard disclosures in monitoring performance.

Second, normalisation incentivises EDBs to invest efficiently to deliver a level of reliability consistent with an expected or 'normal' operating environment in a given five-year period, rather than investing inefficiently to avoid the effects of high impact events that have a very low probability of recurring any time soon. If Firstlight invests to improve underlying network performance to account for a boundary value that is 44% higher than in DPP3 due to extreme and unprecedented weather events, this outcome:

- would not reflect our consumers' preferred price-quality trade-off,
- would require inefficient expenditure, and
- would not align with the purpose of Part 4 of the Commerce Act 1986.

It is also not realistic to expect an EDB to respond to a quality standard that has changed so substantially between DPP3 and DPP4. Strengthening the network to withstand events that fall outside the normal frequency distribution would involve long investment lead times. That investment cannot realistically be delivered quickly enough to avoid non-compliance, particularly at the start of the DPP period. Moreover, by the time such resilience investments are delivered, we would likely be in the next regulatory period, and the boundary value may have reduced, highlighting the material risk of over-investment and inefficient outcomes for consumers under the current quality standard.

The quality standard variation that we propose would ensure that the unplanned SAIDI quality standard more accurately reflects Firstlight's 'underlying' reliability and realistically achievable performance over the remainder of the DPP4 period, while maintaining appropriate incentives to deliver reliability outcomes consistent with consumer expectations. No changes are sought to any other quality standard parameters or incentive settings.

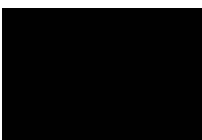
Firstlight has engaged with consumers through its annual customer survey, the results of which indicate that customers prioritise keeping electricity costs as low as possible and believe that Firstlight should be doing more to achieve affordable outcomes. While customers also see network reliability as an important part of the service we deliver, they view our performance on reliability more favourably. This feedback supports maintaining quality outcomes that broadly consistent with historical performance, rather than incurring additional costs to meet a higher boundary value. We welcome the Commission's input into the additional customer consultation that we propose to undertake (under IM clause 4.5.5(3), which provides that the Commission can seek additional information for a QSV application), including feedback on the draft consultation brief attached to this application.

To be clear, Firstlight does not regard this QSV application as an alternative to the work we are currently undertaking to strengthen network performance. As the Commission knows, we have a substantial programme of work underway to increase the reliability and resilience of the network to adverse weather and to renew key asset classes. We expect to continue that work regardless of the outcome of this application. Equally, the work we have done since acquiring the Eastland network in 2022 has, we think, been effective in improving reliability in RY26. The variation we are seeking to the boundary value shows that progress more clearly by removing the influence on normalisation of events that are unlikely to recur with the frequency implied by their inclusion in the historic reference period.

Contact details

Firstlight would welcome the opportunity to meet with the Commission to discuss any points made in this application. To arrange this meeting or if you have any questions, please contact me via email at [REDACTED].

Yours sincerely



Saba Malik
Regulatory & Policy Manager

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1 Quality standard variation application

This Quality Standard Variation (QSV) application seeks reconsideration of the unplanned SAIDI boundary value for Firstlight Network. Adjusting the boundary value is necessary to ensure the quality standards properly represent the ‘underlying’ reliability of the network, are realistically achievable and align with consumers’ long-term interests.

1.1 Background

The quality standards under DPP3 were based on customer-experienced reliability outcomes, measured using SAIDI (duration of outages) and SAIFI (frequency of outages), designed to capture aggregate network performance rather than isolated incidents.

To ensure that extreme outlier interruptions do not unduly distort underlying reliability performance, the Commission refined its approach to normalising major events. This included redefining major events using a rolling 24-hour assessment and basing boundary value on the 1104th highest rolled 24-hour period instead of the 23rd highest calendar day. The Commission tailored the approach by adjusting the boundary value for smaller networks which could expect fewer major events each year. The intent of normalisation was to limit the influence of extreme events while still retaining some variability linked to network performance.

The Commission explicitly recognised that distributors face trade-offs between the level of reliability they deliver and the costs incurred. It considered that distributors should have flexibility to adjust reliability levels over time to reflect changes in costs, technology, climate, and consumer expectations. The Commission noted¹,

“Even in a relatively stable industry environment, it would be important for distributors to consider price-quality trade-offs at the margins, and to have the ability to move towards a level of quality that better reflects consumers’ demands and the distributor’s cost to serve those consumers.”

For DPP4 (2025–2030), the Commerce Commission adopted a largely continuity-based approach to quality by retaining the core quality standards and incentive framework established under DPP3. The Commission considered the DPP3 settings generally delivered service quality that reflected consumer preferences and therefore saw no compelling evidence to justify a material shift in the overall level of quality required from electricity distribution businesses (EDBs).

The Commission’s approach to setting the boundary value using the 1104th highest 24-hour period, based on a statistical expectation of 2.3 MEDs per year ($2.3 \times 48 \text{ half-hours} \times 10 \text{ years}$) is derived from the Institute of Electrical and Electronics Engineers (IEEE) methodology for normalisation. This methodology is known as the “ 2.5β method”, as the 2.3 expectation is derived from a multiplier of 2.5, and a β is the standard deviation of the logarithms of SAIDI data used in the study.

It is important to note that,

“Beta Method process is used to identify Major Event Days (MED), **provided that the natural log transformation of the data results closely resembles a Gaussian (normal) distribution.**”²

In other words, the IEEE 1366 Beta Method is designed to work only if the natural-log-transformed daily SAIDI data:

- reasonably approximates a normal (Gaussian) distribution, and

¹ Paragraph 7.25 of *Default price-quality paths for electricity distribution businesses from 1 April 2020 – Final decision* available from [here](#)

² IEEE Std 1366-2022 IEEE Guide for Electric Power Distribution Reliability Indices

- reflects normal operating conditions, with major events being rare.

Under those conditions, the method:

- separates extreme events from day-to-day performance, and
- produces a MED threshold that limits the influence of outliers while preserving incentives.

If the data are not normally distributed after log transformation, the method can produce unreasonable boundary values as:

- (i) **Outliers inflate the parameters:** Extreme weather events materially increase the estimated mean (α) and standard deviation (β) of logged SAIDI.
- (ii) **Extreme events cease to be “exceptional”:** When multiple extreme events occur within the historical window, they begin to define the distribution itself, rather than sitting outside it. In other words, the normalisation calculation overestimates the probability that those extreme outlier events will recur within the next five years, and that distorts the boundary between ‘normal’ and ‘outlier’ events. This undermines the method’s purpose of isolating major events from normal performance.
- (iii) **Boundary values no longer reflect normal operating conditions:** The resulting threshold can implicitly assume that networks should be resilient to rare, high-impact events, even where those events:
 - a. are outside efficient control, and
 - b. cannot be mitigated through prudent investment.
- (iv) **Incentive properties are weakened:** An inflated boundary value can require:
 - a. aggressive, inefficient investment, or
 - b. performance improvements beyond historical and realistic levels. This weakens the incentive regime by setting a target that is not realistically achievable under normal operating conditions.
- (v) **Compliance with quality standards doesn’t accurately signal changes in network performance:** an EDB can fail to comply with the quality standards even if the underlying reliability of the network has improved because compliance is unduly influenced by outlier events that would otherwise be normalised.

Under IEEE’s methodology the extreme values remain in the data set used to calculate SAIDI boundary for 5 years but under the Commerce Commission’s methodology, the extreme values remain in the data set for 10 years and inflate boundary values.

IEEE identified a weakness in the standard that large catastrophic event can skew the distribution and suggested identification and processing of catastrophic events for reliability purposes on an individual company basis. The standard notes:

“When using daily SAIDI and the 2.5 β method, there is an assumption that the distribution of the natural log values will most likely resemble a Gaussian distribution, namely a bell-shaped curve. As companies have used this method, a certain number of them have experienced large-scale events (such as hurricanes or ice storms) that result in unusually sizable daily SAIDI values. The events that give rise to these particular days, considered “catastrophic events,” have a low probability of occurring. However, the extremely large daily SAIDI values may tend to skew the distribution of performance toward the right, causing a shift of the average of the data set and an increase in its standard deviation. Large daily SAIDI values caused by catastrophic events will exist in the data set for five years and could cause a relatively ‘minor’ upward shift in the resulting reliability metric trends. While significant study was undertaken to develop objective methods for identifying and processing catastrophic events (in order to eliminate the noted effect on the reliability trend), the methods that were developed, in order to be universally applied, caused for many utilities, catastrophic events to occur far too often to accept as being reasonable. In addition, the elimination of catastrophic events from the calculation of the major event threshold caused, in some utilities, a rather large increase of days identified as MEDs in the following five years. It is recommended that the identification and processing of catastrophic events for reliability purposes should be determined on an individual company basis by regulators and utilities

since no objective method has been devised that can be applied universally to achieve acceptable results.”

It is important to note that, under the IEEE’s methodology, the inclusion of catastrophic events is expected to result only in a minor upward shift in the resulting reliability metric. In Firstlight’s case the shift is substantial. Moreover, even with the expectation of only a minor upward shift, IEEE recognises that catastrophic events can distort normalisation and therefore recommends individual assessment. In the context of Part 4 regulation in New Zealand, the QSV process is the mechanism for that individual assessment.

1.2 DPP4 boundary value significantly higher than long term average

The Commission notes that³,

“The purpose of identifying and normalising major events is to limit the impact of such events on the assessment of compliance with the quality standard and QIS. Reducing the volatility of these measures allows a focus on material deterioration, avoiding false positives where significant weather events drive non-compliance, not deterioration, in the overall performance of the network.”

Normalisation is intended to separate day-to-day or ‘underlying’ reliability from the impact of outlier events so that:

1. an EDB’s quality standard performance is reflective of a network’s performance against the “no material deterioration” standard, and
2. EDBs are not incentivised to over-invest in their networks to account for extreme events that have a low probability of recurring.

The 2024 default price quality path determination (DPP4) sets a boundary value for Firstlight that is significantly higher than the long-term average. There is a 44% upward shift in the boundary value compared with that for DPP3, whereas our SAIDI and SAIFI limits were capped at a 5% increase. This upward shift in the boundary value is principally attributable to outages caused by March 2023 rains, Cyclone Gabrielle, and June 2023 rains and slips. These three events are extreme events of much higher magnitude, and with much longer estimated return periods, than those events which have previously been used to set the boundary value.

Practically, that means that, inconsistent with the purpose of normalisation:

- the boundary value implicitly overestimates the frequency with which such events will recur, relative to a reasonable estimate of their return period;
- the boundary value therefore skews towards events that are more fairly described as catastrophic than simply outliers; and
- conversely, events that in DPP3, or for another EDB, would be regarded as outliers unrepresentative of underlying network performance are not normalised.

In short, Firstlight submits the normalisation calculation is not functioning as intended. This has a number of implications that are contrary to the intent of the quality standards and the purpose of Part 4.

First, the quality standards do not provide an accurate picture of Firstlight’s network performance and changes in network performance over time. For RY26, for example, we currently expect to disclose a further breach of the quality standards, but in circumstances where we think underlying reliability has actually improved as a consequence of the work we have done since taking over the Eastland network in 2023. At a minimum, the level of excess (normalised) SAIDI over the SAIDI limit

³ Paragraph E365 of Appendix E of *Default price-quality paths for electricity distribution businesses from 1 April 2025 – Final decision (Reasons paper)* available from [here](#)

is greater than would be the case if normalisation was functioning as intended. This serves to obscure Firstlight's underlying network performance but, more importantly, renders comparison with earlier breach years difficult as a measure of whether Firstlight's reliability trend. The Commission's objective for DPP quality standards is "no material deterioration", but that assumes that normalisation provides a (reasonably) accurate assessment of underlying reliability. Given that performance relative to quality standards, and the extent of any excess (normalised) SAIDI, are the primary signal to both the Commission and our community about changes in network performance over time, it is important that normalisation functions as intended.

Second, the change in the boundary value from DPP3 to DPP4 is so substantial that no EDB could realistically respond to that change through network investment or adjustments to its operating model in order quickly enough to achieve compliance. In terms of the purpose of quality standards and Part 4 regulation:

- the Input Methodologies providing for QSVs indicate that the intent is that quality standards should be 'realistically achievable'. We acknowledge that, where quality standards are no longer achievable because the EDB has allowed reliability to decline, the Commission might determine that a QSV is not an appropriate response. But where, as here, the standard is not realistically achievable at least in part because of a change in the standard from one regulatory period to the next, it is appropriate to address that via a QSV. Because Firstlight is not requesting a change to the unplanned SAIDI/SAIFI limits, the QSV is intended to address the impact from the change in normalisation while preserving the incentive to improve underlying network performance; and
- implicit in the concept of incentive regulation is that EDB is meaningfully able to respond to the incentives created by the price-quality path. Where, as here, it is not possible to adjust course in the very short term to respond to a substantial change in the boundary value, the incentive is not effective because the EDB cannot respond to it.

Third, responding to the change in boundary value will require a substantial investment in network performance, over and above that which would be required to bring the network back within the (normalised) SAIDI/SAIFI limits. That has several negative implications:

- annual consumer consultation shows that Firstlight consumers would be unwilling to support a significant increase in investment, and therefore in prices, in order to increase reliability. We are in any event investing in improved reliability, but have to balance that investment against the price-quality trade-off our consumers have told us they prefer;
- investing to accommodate the increase in the boundary value implies that we are building a network that is resilient to very high impact events that have very low probability of recurring in any given five year period. That level of investment is not consistent with the principles of the DPP quality standards, nor is it expected of other EDBs; and
- given the estimated return period of the major events driving the boundary value, there is a risk the boundary value at future resets would again drop down quite significantly. At that point, Firstlight will have built a network that is over-engineered relative to the requirements of the quality standards. Unless there is unambiguous evidence that consumers prefer that outcome, it is inefficient to do so.

1.3 Extreme weather events in the last 15 years (reference period used to set boundary values for DPP3 and DPP4)

This section provides a list of weather events in the last 15 years, which is the reference period used to set boundary values for DPP3 and DPP4. The purpose is to demonstrate that we are only requesting statistical outliers to be removed from the reference data that are sufficiently severe and extreme that we would not expect similarly severe events to occur with the frequency implied in the reference period (i.e., we are not requesting all extreme weather events be removed).

Table 1 outlines higher than the boundary value raw SAIDI associated with major events occurring over a 15-year period, which incorporates both the DPP3 and DPP4 reference periods. Raw SAIDI is the total SAIDI recorded for a specific event, representing raw SAIDI (the full customer outages duration before any regulatory adjustments or exclusions are applied).

Table 1: Weather events 1 April 2009 – 31 March 2024

Event date	Short description	Raw SAIDI
1 February- 3 February 2024	Adverse weather	36
25 November - 27 November 2023	Equipment failure and tree contact	28
1 September - 3 September 2023	Unlocated 50 kV overcurrent fault	13
21 June - 27 June 2023	Slips and vegetation damage	96
12 February - 16 February 2023	Cyclone Gabrielle	995
9 January- 11 January 2023	Cyclone Hale	94
12 April- 14 April 2022	Severe winds (April storm)	101
22 March- 29 March 2022	Heavy rain, slips and vegetation	116
08 August- 10 August 2021	Adverse weather – multiple faults	24
16 July- 18 July 2021	Severe storm causing conductor clashing	70
26 September- 28 September 2020	Regional adverse weather	18
18 December 2019	High winds	25
11 June 2018- 13 June 2018	Severe storm	111
20 July- 21 July 2017	Severe winds and tree strikes	32
14 July 2017	Storm-related outages	47
13 April 2017	Cyclone Cook	131
12 December 2016	Plane crash	1497
6 August- 7 August 2016	Severe storm	48
21 September 2015	Extreme rainfall	25
9 July- 10 July 2015	Severe snowstorm	97
16 March 2015	Adverse weather and vegetation	14
6 October 2014	Adverse weather and vegetation	17
22 September- 23 September 2014	Adverse weather and vegetation	18
11 October- 12 October 2013	Adverse weather and vegetation	16
11 September - 13 September 2013	Adverse weather and vegetation	56
13 October - 15 October 2012	Adverse weather and vegetation	32
03 March- 4 March 2012	Adverse weather and vegetation	27
1 November 2011	Tree contact on 33 kV line	14
9 July- 10 July 2011	Adverse weather and vegetation	16
26 April- 27 April 2011	Adverse weather and pole failure	29
11 October- 13 October 2010	Adverse weather and equipment faults	18
17 September- 18 September 2010	Adverse weather and cable fault	16
24 May 2010	Tree contact on 50 kV line	22
4 October- 6 October 2009	Adverse weather	26
23 July- 24 July 2009	Adverse weather	15

The Table provides a list of 35 events recorded between RY10 and RY24. Events are classified as “SAIDI major event” where the recorded SAIDI exceeds 13.1 (DPP2 and DPP3 boundary value) in a rolling 24-hour period. The “raw SAIDI” value in the Table represents the total raw SAIDI accumulated during that event that was normalised. It does not include SAIDI that was lower than the boundary value of DPP2 and DPP3.

We provide details of extreme weather events to demonstrate that three events in question are statistical outliers and distort the data.

March 2022 Rains

In March 2022, a series of severe weather events across the East Coast and northern Hawke's Bay region caused numerous power outages. The outages were primarily driven by high winds, heavy rainfall, and lightning storms, which brought down trees and poles and disrupted supply. Many incidents were classified as "Adverse Weather" (direct storm damage like wind-felled lines), or "Adverse Environment" (weather-induced landslips and flooding), along with several "Lightning"-related outages. Fallen trees were the most frequent cause – internal reports often note "trees came through line" during these faults. In some areas, landslips and washed-out roads toppled power poles, making repairs challenging.

Coastal and urban communities saw brief but wide-reaching outages, while rural inland areas experienced the longest delays. For example, on 22 March a lightning storm in the Wairoa area cut power to nearly 4,500 customers – a large outage, but one that was resolved within the hour. Similarly, on 25 March an East Coast feeder tripped when trees blew onto the lines, knocking out supply to about 5,500 customers; 3,200 of those were restored in minutes, with the remain restored within the hour. In contrast, remote communities like Tiniroto, Tauwhareparae, and Makarika suffered multi-day outages. There, torrential rain triggered landslides and floods that brought down poles and impacted access, leaving crews to carry out extensive repairs over several days.

In summary, the March 2022 weather event led to widespread outages across the region. High winds and lightning caused short-lived outages in populated areas, whereas prolonged outages were limited to a few isolated rural pockets where infrastructure was severely damaged. Overall, thousands of customers were affected throughout the month, yet the core network remained resilient – major outages were cleared within hours, and only the most hard-to-reach areas experienced extended losses of power.

MetService reported over 300mm of rain in Gisborne in March 2022. On 23 March, torrential rain caused flooding across the East Cape and Hawke's Bay. MetService issued a red weather warning, and Tairāwhiti Civil Defence declared a state of emergency. On 29 March, the state of emergency was extended, following 10 days of heavy rain. There was significant damage to network infrastructure, with many poles being washed away in flood water, and fallen trees damaging conductor. The resulting floods and slips caused the closure of nearly 50 local roads, which restricted access and delayed restoration. At the time, MetService called this "Gisborne's wettest March in almost 90 years".

Cyclone Gabrielle – February 2023

Cyclone Gabrielle brought over 200mm of rain to the Tairāwhiti region, with wind speeds exceeding 150 km/h. Considered the costliest tropical cyclone on record in the Southern Hemisphere, the total damages from Cyclone Gabrielle were estimated to be at least NZ\$13.5 billion. Gabrielle was also the deadliest cyclone and weather event felt in New Zealand since Cyclone Giselle in 1968.

Cyclone Gabrielle caused extensive damage to roading infrastructure across the region. 19 bridges were washed away and there were many more unsafe crossings, causing significant access issues.

Cyclone Gabrielle battered the East Coast and northern Hawke's Bay, toppling power lines, poles and trees and causing widespread electricity outages. At the height of the storm (13 February), all 26,000 customers across Gisborne and the East Coast lost power when high winds caused a region-wide line trip. The cyclone went on to trigger dozens of separate faults over the following days. The majority of outages were caused by extreme winds and storms (categorised as "Adverse Weather" in reports) that broke lines and cross-arms, or by fallen trees ("Vegetation" faults) knocking out lines. In

addition, landslides and flooding ("Adverse Environment") in steep areas brought down poles and blocked repair access.

Urban and coastal communities generally experienced short disruptions (anywhere from a few minutes to a few hours) as crews swiftly re-routed power and cleared faults. In contrast, the most affected areas were remote rural settlements in the hills, where infrastructure damage was severe and roads were impassable. Small communities like Whatatutu, Tiniroto, and Te Arai were without power for several days – in some cases over a week – until crews could replace multiple downed poles and lines. In these isolated pockets, emergency generators were deployed to provide interim relief while repairs were underway. Despite these prolonged outages in hard-hit locations, power to most customers was restored within 1–2 days of the cyclone's passage. Overall, Cyclone Gabrielle caused one of the most significant power disruption events in recent memory for the region, with widespread short-term outages and a handful of lengthy blackouts in areas most exposed to wind, falling trees, and landslips

June 2023 Rains and Slips

In late June 2023, the Tairāwhiti region (Gisborne and the East Coast) was hit by a major weather event that caused widespread power disruptions. MetService reported 370mm of rain in Gisborne in June 2023. The wet ground conditions throughout the year saturated the ground and caused major slips, road closures, and raised groundwater levels. In RY24, the network suffered from 46 slip Events. Saturated ground conditions also meant that poles and out-of-zone trees fell at lower windspeeds than in prior years.

A combination of torrential rain and gale-force winds over 21–27 June triggered at least 46 landslides across the East Coast, resulting in numerous line faults as poles and wires were swept away by slips. The rainstorm's effects – recorded as "Adverse Environment" in outage logs – included flooded rivers and unstable ground that physically toppled power poles and broke lines in multiple rural locations. At the same time, severe wind gusts ("Adverse Weather") and falling trees (vegetation-related damage) downed additional lines. (Civil authorities declared a local state of emergency in Gisborne during the deluge, underscoring the severity of the storm.)

Despite the challenging conditions, most higher-volume outages were resolved swiftly, limiting the impact on townships. On 23 June, for instance, a wind-driven tree fall at Kopuaroa knocked out power to roughly 740 customers by tripping a sub transmission line, but power was re-routed and restored within half an hour. Likewise, late on 24 June a 50 kV pole failure cut supply to over 1000 customers in the Ruatoria and Te Araroa area, yet almost all were re-energised in under 30 minutes through network reconfiguration.

Slips bringing down power lines affected over 2600 customers and access restrictions meant restoration times were longer than usual. Repair teams frequently had to wait for floodwaters to recede and roads to be cleared before being able to reach these damaged sites. As a result, a handful of customers in these isolated spots were without power for several days. In one extreme case, a landslide on Bushy Knoll Road in Gisborne's hinterland brought down entire power poles and left a dozen customers in the dark for nearly 12 days until the lines could be rebuilt. Similarly, in the Tauwhareparae area, recurring slips kept about 14 customers off-supply for over a week.

During these extended outages, crews often installed portable generators or isolated smaller fault segments to restore supply to as many people as possible while repairs were ongoing. By 27 June, the vast majority of affected customers had their power back on, with only the most hard-hit pockets (requiring intensive reconstruction) remaining on temporary solutions as the weather improved.

1.3.1

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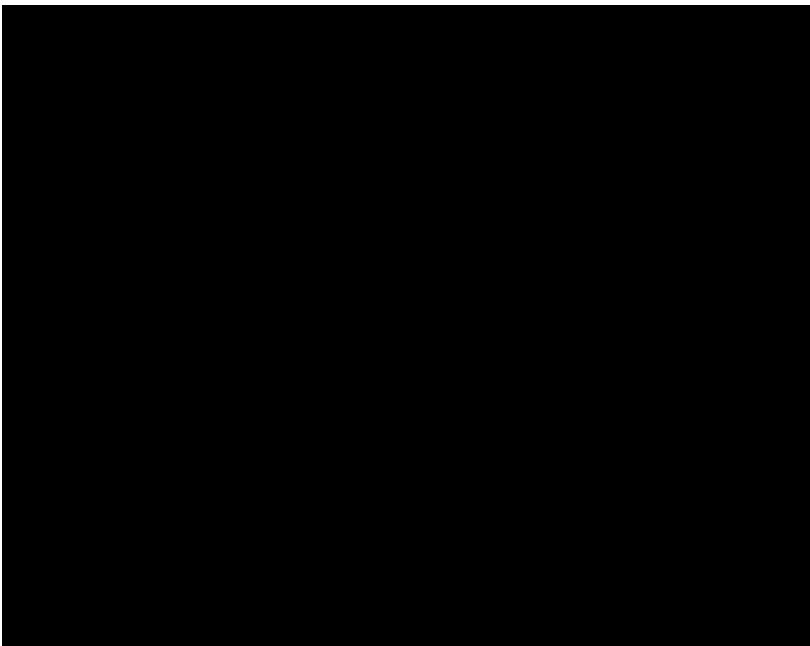
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1.4 Quality breaches in DPP3 and actions taken to improve reliability

We want to emphasise that we do not view this QSV application as an alternative to the investments in the network required to improve reliability to respond to our recent quality standard breaches. The QSV does not seek to retrospectively remedy those breaches in DPP3, nor to accommodate declining reliability in DPP4; rather, it addresses a separate issue with how the DPP4 unplanned SAIDI boundary value has been set due to a small number of extreme events in the reference period. The Commission should therefore assess this quality standard variation application and the specific issue it identifies independently of Firstlight's historical DPP3 breaches.

Firstlight has demonstrated ongoing commitment to improving network reliability through sustained and targeted investment. Firstlight has consistently implemented initiatives to address the key drivers of unplanned interruptions and to strengthen network performance for the benefit of its customers.

Since the change of ownership, Firstlight/Clarus has developed and progressed improvement initiatives across the network with a view to rapidly responding to the non-compliance position. Firstlight/Clarus has also developed and implemented a Strategic Reliability Management Plan (SRMP) to consolidate and coordinate, through a structured framework, improvement through the wider business. The SRMP addresses wider system and stakeholder process improvement to return to and maintain compliance, by recognising the ongoing need to renew assets and enhance systems and data management, with actions aimed at improving reliability and the overall asset management system. We have formed a new Board subcommittee that provides governance for the SRMP, evaluating progress against plans and whether any adjustments to the plan are needed to achieve our objectives.

Analysis of raw unplanned interruptions across RY23 to RY25 shows that failures associated with pole and pole-top hardware, conductor condition, and vegetation account for a significant proportion of reliability outcomes.⁴ Those metrics informed our priority areas of focus.

While our reliability response covers a broad range of initiatives and actions, our primary focus has been:

- **Vegetation management:** Proactively identify and remove vegetation before it becomes a risk to reliability.

⁴ The below SAIDI and SAIFI metrics are the average over RY23 to RY25 (raw unplanned):

- Pole and pole top hardware is 50% SAIDI and 40% of the SAIFI attributed to defective equipment
- Conductor related failure is 29% SAIDI and 22% of the SAIFI attributed to defective equipment
- Vegetation is 38% SAIDI and 17% of SAIFI of the total SAIDI and SAIFI.

- **Contractor management:** Develop and invest in our local contractor to scale and improve response, establish KPIs for performance management.
- **Wooden poles:** This has been a major focus area to ensure we minimise age and condition related failures and includes the replacement of crossarms, insulators, conductor bindings, and where installed, overhead transformers.
- **110kV security:** Reviewing and updating previous load capacity work and N-1 constraints of the supply into Gisborne to proactively plan future investments.
- **Conductor condition and renewal:** Improve the understanding the condition of our conductor to inform future investments and mitigate current reliability risk.
- **Increasing automation on the network:** To reduce customers affected, decrease fault finding time and surveillance, and reduce the restoration time to reinstate customers.
- **Improving maintenance systems:** Ensuring systems and processes for planned maintenance activities, data capture and creating a defect backlog ensures appropriate prioritisation of contractors and managing reliability risk.

We include as Attachment 3 a summary of the improvement initiatives that Firstlight has been progressing over the last three regulatory years.

1.5 Long-term interest of consumers

The steps noted in attachment 3 are undertaken to ensure we can deliver network quality outcomes at the same levels previously experienced by consumers. This improvement is in the long-term interest of consumers and aligned with the purpose of Part 4.

The DPP4 boundary value however would require Firstlight to upgrade the performance of the network to a standard above what customers have previously experienced in normal expected weather conditions. This would go beyond the principle on which quality standards are based, which is that EDBs should maintain the levels of quality in network performance that they have provided historically (i.e, “no material deterioration”).⁵

Even if this level of network improvement was achievable within investment lead times, it would not be in the long-term interest of consumers because:

- the effective quality standards do not reflect consumer demands,
- standards that are not realistically achievable are not an incentive, and
- it provides a misleading impression of performance between periods.

1.6 Proposed Quality Standard Variation

Firstlight is seeking a variation to the unplanned SAIDI boundary value from 18.80 to 12.03.

Reconsideration of the unplanned SAIDI boundary value will ensure the DPP4 quality standard is more realistically achievable than the current boundary level and better reflects performance under normal operating conditions.

We acknowledge that the proposed boundary value is lower than that which applied during DPP3, and that boundary values for most EDBs have increased between DPP3 and DPP4. However, Firstlight’s DPP4 boundary value has been materially and artificially inflated by a small number of extreme and unprecedented weather events that are not likely to recur with the same frequency in the next regulatory period. The proposed boundary value does not seek to reverse appropriate increases in quality standards across the sector, but rather to address the disproportionate impact

⁵ Paragraph E7 of Appendix E of *Default price-quality paths for electricity distribution businesses from 1 April 2025 – Final decision (Reasons paper)* available from [here](#)

of the cluster of outlier events on Firstlight's boundary value. In this context, the proposed boundary better reflects underlying network performance and preserves the intended incentive properties of the DPP framework.

Table 3: QSV application

QSV application	DPP4	QSV
Unplanned SAIDI boundary value	18.80	12.03

The adjusted value is determined by excluding the three unprecedented weather events discussed in section 1.3 from the DPP4 determination of the unplanned SAIDI boundary value. Attachment 4 sets out the calculation.

The boundary values for SAIDI/SAIFI major events were determined for DPP4 by identifying the 1104th highest rolling 24-hour period for SAIDI value from a ten-year dataset of half-hourly reliability data.

Using the 1104th value provides a clear and consistent cut-off point. Any day where reliability performance exceeds this threshold is classified as a "SAIDI/SAIFI major event" and is excluded from normalised performance assessments. This approach helps ensure that EDBs are not unfairly penalised for rare, high-impact events that are not within the reasonable control of the network, such as severe storms or natural disasters .

The major rainstorm in March 2022, Cyclone Gabrielle in February 2023, and the June 2023 storm triggered multiple landslips and flooding, making it difficult to access network. Each of these events caused widespread damage across our service area, accessibility issues increased restoration time and resulted in unusually high SAIDI values. As a result, they fall within the highest SAIDI values used to determine the 1104th threshold under the Commerce Commission's normalisation methodology.

The inclusion of these extreme events has elevated our boundary value to 18.8 SAIDI, such that only substantially larger interruption events would now qualify for normalisation. This outcome is inconsistent with the intent of major-event normalisation to limit the impact of the most substantial interruptions on underlying reliability data, and instead allows those events to unduly influence measured performance under normal operating conditions. We therefore propose excluding these events from the boundary value calculation on the basis that they are statistical outliers. When these events are removed, the recalculated 1104th highest rolling 24-hour SAIDI value lowers the boundary value to 12.03 SAIDI. Although the proposed boundary value is lower than the boundary value set for DPP3 for Firstlight it is not unusual for boundary value to be lower than the previous periods as the boundary value set for EDBs are based on a base set of data and has increased and decreased across non-exempt EDBs. It is not seen as a material deterioration to the quality standard.

1.7 Boundary values have previously been adjusted

The DPP4 decision applied the 1104th value in determining boundary values for most non-exempt EDBs. There were however instances where an alternate value has been applied.

Alternate values have been applied to Electricity Invercargill and Nelson Electricity through DPP3 and DPP4. The DPP4 decision notes that Electricity Invercargill and Nelson Electricity have significantly fewer interruptions than any other non-exempt EDB. This is largely because they are much smaller networks, with a comparatively higher level of underground cables compared to overhead lines. Consequently, without modification:

- a high proportion of the interruptions that take place would be considered a major event, and
- a significant proportion of unplanned interruptions (particularly SAIDI) would be normalised out.⁶

1.8 Other parameters

Firstlight is not seeking changes to any other parameters.

The proposed amendment of the boundary value based on the removal of the 3 extreme events would not alter the Unplanned SAIDI target and limit for Firstlight. The application of the +-5% cap on the existing limit from DPP3 levels overrides the adjusted parameters. The adjustment factor applied also takes into account the 5% cap, therefore the Unplanned SAIDI target would also not be affected.

We believe that with the completed and ongoing network improvements projects, we are on the right track to improving network reliability and performance. We only seek changes to the boundary value, which is heavily distorted by extreme, outlier weather events. As a result, normalisation does not perform as intended and inaccurately represents network performance, undermining the Commission's ability to accurately assess performance through annual disclosures. Workings provided in Attachment 5 support the calculation of the boundary value amendment.

2 Comparison to DPP4 Determination

This QSV application proposes a variation to the unplanned SAIDI boundary value parameter. It does not propose a change in any other parameters. Table 4 sets out the parameters as currently provided for in DPP4 including the requested change in boundary value.

Table 4: Parameters relating to unplanned quality standards

Parameter	DPP4	Quality Standard Variation	Difference
Unplanned SAIDI			
Limit	230.43	230.43	0
Boundary value	18.80	12.03	-6.77
Unplanned SAIFI			
Limit	3.3101	3.3101	0
Boundary value	0.1807	0.1807	0
Extreme event standard limit			
SAIDI value	120	120	0
Customer interruption minutes (million)	6	6	0

This QSV application does not request different values for the parameters relating to planned quality standards.

⁶ Paragraph E431 of Appendix E of *Default price-quality paths for electricity distribution businesses from 1 April 2025 – Final decision (Reasons paper)* available from [here](#)

No change is proposed to the parameters relating to incentives. It is noted however that the proposed variation to the SAIDI boundary value parameter also impacts the assessment of quality of supply in determining unplanned SAIDI incentives.

2.1 Demonstrated estimated effect

IM clause 4.5.5(d) requires the QSV application to demonstrate the estimated effect of the proposed quality standard variation by use of historic data and by contrast with the quality standards specified in the applicable DPP determination.

Tables 5 and 6 sets out the estimated effect of the QSV using DPP3 data.

Table 5: Demonstrated estimated effect on unplanned SAIDI quality standard assessment

DPP4 Quality Standard Outcome applying DPP3 data						
DPP3 actual	Boundary value applied	2021	2022	2023	2024	2025
DPP3 Normalised SAIDI applying DPP3 parameters	13.10	180.86	214.72	295.44	314.65	261.36
DPP3 SAIDI limit		219.46	219.46	219.46	219.46	219.46
DPP3 outcome (Breach/ No Breach)		No breach	No breach	breach	breach	breach
DPP3 outcomes applying DPP4 parameters	Boundary value applied	2021	2022	2023	2024	2025
DPP4 SAIDI limit		230.43	230.43	230.43	230.43	230.43
Normalised SAIDI applying DPP4 parameters	18.80	195.87	222.24	310.17	346.26	282.73
Normalised SAIDI applying QSV parameters	12.03	180.62	213.34	293.92	305.89	259.60
Estimated Breach/ No Breach Applying DPP4 standard		No breach	No breach	breach	breach	breach
Impact of QSV on estimated normalised unplanned SAIDI		7.8%	4.0%	5.2%	11.7%	8.2%

The first section of Table 5 shows previously disclosed DPP3 assessments of unplanned SAIDI against the DPP3 limit.⁷ It shows that that limit was breached in 2023, 2024 and 2025. The second section of table 5 shows the DPP4 parameters and QSV parameters applied to the same DPP3 data and compared to the DPP4 limit. This shows that the unplanned SAIDI limit would still have been breached in RY23, RY24, and RY25 after applying the QSV parameters (applying 12.03 boundary value) therefore, there is no impact on the quality incentive outcomes in those years RY23 - RY25.

Table 5 also shows that there is an estimated 4.0-11.7% reduction in the assessment of normalised SAIDI if the QSV is applied, making the quality standard realistically achievable.

As set out in Table 6, applying the DPP4 Quality Incentive framework to DPP3 data indicates that the quality incentive outcome is only marginally sensitive to changes in the boundary value. Using the DPP3 boundary value of 13.1 as a baseline, substituting the QSV boundary value of 12.03 results in a relatively small change in incentive outcomes over the assessment period. While there are some year-to-year movements, most notably in 2021 and 2022, the overall effect is limited, with a total incentive impact of approximately \$37k. This suggests that moving from the DPP3 boundary value to the QSV boundary value would lead to only a slight adjustment in quality incentives rather than a material change in outcomes.

⁷ Firstlight Default Price-Quality Path Annual Compliance Statement available from [here](#)

Table 6: Demonstrated estimated effect on unplanned SAIDI quality incentive assessment

DPP4 Quality incentive Outcome applying DPP3 data								
	Boundary value applied	Unplanned SAIDI target	2021	2022	2023	2024	2025	Total
Actual DPP3 incentive	13.10	173.85	(16,556)	(163,881)	(172,097)	(144,539)	(192,444)	(689,517)
Incentive applying DPP4 parameters	18.80	182.54	(35,752)	(160,316)	(179,025)	(151,467)	(199,372)	(725,932)
Incentive applying QSV parameters	12.03	182.54	10,587	(133,273)	(179,025)	(151,467)	(199,372)	(652,550)
Estimated effect on incentives			(27,143)	(30,608)	-	-	-	(36,967)

3 Regulatory Requirements

Clauses 4.5.6 and 4.5.7 of the IMs set out when price-quality paths may be reconsidered and what is to be considered.

Table 8 in Appendix A sets out the regulatory requirements in full and presents a brief assessment against those requirements including references to supporting material.

The remainder of this section sets out specific matters the Commission is to consider as specified in the IMs, discusses the Part 4 purpose, outlines consumer consultation we have and intend to undertake and discusses the timing of the application.

3.1 Considerations specified in the Input Methodologies

Clause 4.5.5(4) of the IMs specifies the matters the Commission is to consider when assessing a quality standard variation proposal.

Figure 3: Considerations specified in the Input methodology

(4) In assessing a quality standard variation proposal, the Commission will consider the extent to which- (a) the proposed quality standard variation better reflects the realistically achievable performance of the EDB over the remainder of the regulatory period; (b) the EDB has consulted with consumers on its proposed quality standard variation; and (c) the proposed quality standard variation is supported by consumers.

Section 1.2 sets out how the DPP4 quality standards are not realistically achievable with the current boundary levels. Section 1.6 proposes an alternative value that would ensure the quality standard is not only realistically achievable but aligns our quality requirements with quality levels expected by our consumers.

Section 3.3 discusses the consumer consultation we have undertaken and propose to undertake on the quality standard variation.

3.2 Part 4 purpose

In exercising its powers under Part 4 of the Commerce Act 1986, the Commission is also required to consider the Part 4 purpose.

Figure 4: Commerce Act 1986 Part 4 purpose

52A Purpose of Part

- (1) The purpose of this Part is to promote the long-term benefit of consumers in markets referred to in [section 52](#) by promoting outcomes that are consistent with outcomes produced in competitive markets such that suppliers of regulated goods or services—
- (a) have incentives to innovate and to invest, including in replacement, upgraded, and new assets; and
 - (b) have incentives to improve efficiency and provide services at a quality that reflects consumer demands; and
 - (c) share with consumers the benefits of efficiency gains in the supply of the regulated goods or services, including through lower prices; and
 - (d) are limited in their ability to extract excessive profits.

The aspects of the Part 4 that are relevant to QSV applications are:

- The promotion of outcomes produced in competitive markets
- Suppliers of regulated services have incentives to provide services at a quality that reflects consumer demands.

Approval of this QSV application will allow us to be assessed and incentivised to deliver quality at levels currently experienced by customers. If the DPP4 boundary levels remained unchanged, we would be assessed and therefore incentivised to invest, on behalf of our consumers, in substantial improvements in the underlying performance of the network.

Adjusting the unplanned SAIDI boundary level as proposed will ensure our incentives remain aligned with our customer expectations, which is an outcome consistent with competitive markets.

3.3 Consumer consultation

IM clause 4.5.5(2) and the assessment factors in clause 4.5.5(4) require the Commission to consider any specific consumer consultation undertaken on the proposed quality standard variation.

Firstlight has not undertaken specific consumer consultation on the proposed quality standard variation at the time of this application. Given the technical nature of the normalisation mechanism, obtaining customer input on a proposed variation to boundary value is challenging. However:

- our annual survey results support the view that our customers do not support the price/quality trade-off that would be required to sustain the level of network performance improvement needed to comply with the DPP4 boundary value, as their highest priority focus area for Firstlight is to keep electricity prices as low as possible,
- we propose to conduct further customer engagement if the Commission believes this would be worthwhile and would support its decision-making in assessing this application. We have prepared a consumer consultation brief and intend to carry out further consultation while the Commission is assessing this application.

We have attached a copy of consumer consultation brief to this application. We welcome the Commission's input into whether additional consultation should be undertaken under IM clause 4.5.5(3), which provides that the Commission can seek additional information for a QSV application. We are ready and available to proceed with the consultation.

We also recognise the importance of ensuring the community is engaged with the Commission's consultation on this proposal (particularly if the Commission agrees with our view that specific customer engagement is unlikely to be worthwhile). For example, we can share the Commission's consultation via our usual customer engagement channels, including via our website, social media and newspaper advertising.

Annual survey results

Firstlight has sought consumer feedback on our performance through an annual survey. The survey provides important insight into consumer expectations which we use to inform our operational priorities and investment decisions.

The annual consumer consultation feedback is clear that consumers highest priority is to keep electricity costs as low as possible. Most consumers agree or strongly agree that we respond quickly during outages or emergencies, and we provide a reliable supply of electricity with very few customers disagreeing. Other relevant feedback includes a concern around electricity costs, with a notable portion of customers disagreeing or strongly disagreeing that we keep electricity costs as low as possible.

This feedback provides evidence that our consumers prefer for quality to remain as has been previously experienced rather for Firstlight to incur additional cost on behalf of consumers to improve underlying quality. We consider that the consumer consultation we have carried out supports our application to vary the boundary value set in the unplaced SAIDI quality standard.

Figure 5: Annual consumer consultation results⁸

What our consumers expressed through the annual consumer survey

For residential consumers:

- 85% of consumers strongly agree or agree (3% disagree) that we respond quickly during outages or emergencies
- 83% of consumers strongly agree or agree (5% disagree) that we provide a reliable supply of electricity
- 28% of consumers strongly disagree or disagree (35% strongly agree or agree) that we keep electricity costs as low as possible

For business consumers:

- 92% of consumers strongly agree or agree (0% disagree) that we respond quickly during outages or emergencies
- 86% of consumers strongly agree or agree (6% disagree) that we provide a reliable supply of electricity
- 21% of consumers strongly disagree or disagree (41% strongly agree or agree) that we keep electricity costs as low as possible

3.4 Regulatory years for which the QSV is sought

While conducting a detailed analysis of the quality standards in the early months of DPP4, Firstlight identified a potentially unintended consequence of the quality standard framework, precisely, the inclusion of extreme outliers into reference dataset used to set boundary values. Firstlight raised it with the Commission in a letter in November 2025 and has been in communication with the Commission since then.

⁸ Section 3 of Firstlight's *Pricing Methodology for the year commencing 1 April 2026* available from [here](#)

We are submitting this QSV application in March 2026 seeking adjustment to the boundary value from RY2026 onwards. That assumes the Commission is able to make a decision prior to 31 August 2026, when our annual compliance statement is due.

We understand the Commission, assuming it determines to grant the QSV, will have to consider when it should take effect. In our view, it is open to the Commission, and consistent with the regulatory framework, to give effect to the QSV for RY2026. This timing is consistent with the Commission's QSV decision for Aurora in 2020, which recognised that Aurora could submit its quality standard variation proposal part way through the regulatory year and have it take effect in that year.⁹

We have submitted this application as quickly as was reasonably possible under the circumstances, having regard to:

- the time required to identifying the issue,
- completing our annual customer engagement exercise,
- preparing an application containing the necessary analysis, and
- obtaining the required engineer's report.

We considered deferring the application until the open investigation into Firstlight's historical DPP3 quality breaches is closed. With there being no specific end date for this investigation, we have chosen to submit the application now so that the application has been submitted before the end of the 2026 regulatory year and can be considered in respect of that regulatory year. Submitting the application in March 2026 allows for the Commission to consider the application alongside or after the investigation.

In summary, we think it is consistent with the regulatory framework to give effect to the QSV from RY2026 onwards for the following reasons:

- The Commission's power to amend a price-quality determination is in s 52Q of the Commerce Act, which allows the Commission to amend a s 52P determination in a material way after consultation.
- The Commission's power of amendment is also constrained by the Input Methodologies, which provide for the circumstances in which the Commission may 'reopen' a price-quality path by amendment under s 52Q.
- There is no express limitation in the Input Methodologies that would prevent the Commission from making an amendment that takes effect in respect of RY2026.
- Moreover, the Commission has previously expressed the view, with which we agree, that an amendment to the price-quality path in respect of a given regulatory year may be made any time up to the date the annual compliance statement is due (here 31 August 2026) on the basis that the filing of the annual compliance statement 'closes' the regulatory year. That is to say, to the extent the Commission considers it is unable to make a retrospective change to a price-quality path, a change is only retrospective if it is made after the regulatory year has closed, which occurs on 31 August. This is consistent with the approach the Commission has taken to amending FNAR/ANAR in price paths in the course of other reopeners (as detailed in the table below).
- We acknowledge that whether the Commission *should*, as a matter of regulatory policy, amend a price-quality path after the relevant expenditure has occurred, or the relevant SAIDI minutes have accrued, is a separate question to the Commission's legal power to do so. That is not a matter of whether the change is prospective or retrospective, but whether the relevant price-quality requirement is strictly ex ante or can appropriately be adjusted ex post.

⁹ Paragraph 37.4 of *Quality Standard Variation (QSV) to Aurora's default price quality path – Final decision* available from [here](#)

- In the context of Aurora's QSV, the Commission apparently determined that it was appropriate to make an amendment ex post, albeit the application was filed earlier in the relevant regulatory year.
- But, without expressing a view as to whether adjustments to SAIDI/SAIFI limits can be made on an ex post basis, an adjustment to the boundary value raises different issues. That is because the boundary value is primarily intended to normalise outlier events in order to give an accurate picture of the EDB's underlying reliability for purposes of assessing compliance.
- Given compliance is assessed at the end of the regulatory year, as part of annual compliance statements, we do not regard an adjustment to the boundary value as an ex post adjustment in the way that an adjustment to SAIDI/SAIFI limits might be regarded as an ex post adjustment.
- Put another way, it is reasonable for the Commission to make the adjustment in respect of RY2026 in order to enable Firstlight to submit an annual compliance statement that more accurately represents the performance of the network in RY2026, and changes in network performance over time.

We also consider that submitting the application during the year the application applies is consistent with the Commission's past reopener ex-ante decisions. Table X sets out past applications and their timing.

Table 7: Previous ex-ante reopener decisions¹⁰

Reopener	First year application applied to	Application date	Final Decision
Aurora's quality standard variation proposal 2020	Year ended 31 March 2021	30 June 2020	22 December 2020
Unison unforeseeable large project reopener 2021	Year ended 31 March 2022	29 June 2021	04 March 2022
Wellington Electricity's unforeseeable capex reopener 2024	Year ended 31 March 2025	16 February 2024	08 August 2024
Unison Networks unforeseeable major capex reopener 2024	Year ended 31 March 2025	14 May 2024	19 September 2024

4 Concluding comments

Thank you for the opportunity to submit this QSV application. We look forward to working with the Commission to ensure quality standards for Firstlight remain realistically achievable and in the long-term interest of consumers.

5 Attachments

Attachment 1 Earth Science New Zealand report (Pdf)
Attachment 2 Engineer's report (Pdf)
Attachment 3 FNL reliability improvement work-in-progress summary (Pdf)
Attachment 4 Consumer consultation brief (Pdf)
Attachment 5 FNL Boundary value calculation model (Xls)

¹⁰ [DPP4 and DPP3 Reopeners | Commerce Commission](#)

6 Appendix A: Input methodology QSV requirements

Table 8: Assessment against QSV criteria requirements

Ref	Criteria	Assessment	Supporting evidence
4.5.5 Proposal of a quality standard variation			
(1)	An EDB may propose a quality standard variation by submitting a quality standard variation proposal to the Commission in writing.	Criteria met: QSV application submitted	Application
(2)	The quality standard variation proposal must contain the following information- (a) the different values of either or both of- (i) the parameters relating to the quality standards, including any boundary value;	Criteria met: Section 1.6 sets out the proposed variation to the unplanned SAIDI boundary value. Section 2.0 sets out the other parameters relating to the unplanned quality standard, noting that no change is proposed for any other quality standard parameter.	Sections 1.6 and 2.0 Tables 3 and 4
(2)	(ii) 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;	Criteria met: no change is proposed to the parameters relating to incentives. It is noted however that the proposed variation to the quality standard boundary value parameter also impacts the assessment of quality of supply in determining incentives.	Section 2.0 Tables 3 and 4
(2)	(b) an explanation of the reasons for the proposed quality standard variation;	Criteria met: the impact of the Firstlight DPP4 unplanned SAIDI boundary value on the assessment of reliability makes the unplanned SAIDI standard not realistically achievable.	Section 1.0
(2)	(c) an engineer's report on the extent to which the quality standard variation better reflects the realistically achievable performance of the EDB over the DPP regulatory period, based on either or both of- (i) statistical analysis of past SAIDI and SAIFI performance; and (ii) the level of investment provided for in the forecast allowable revenue in the DPP determination;	Criteria met: Engineer's report is based on a detailed proportionate review of Firstlight historical performance, review and verification of major event analysis undertaken by Firstlight and a proportionate statistical analysis to assess the realistically achievable level of reliability performance with the DPP4 expenditure allowances.	Engineer's report (attachment 2)

Ref	Criteria	Assessment	Supporting evidence
(2)	(d) demonstration of the estimated effect of the proposed quality standard variation by use of historic data and by contrast with the quality standards specified in the applicable DPP determination; and	Criteria met: the estimated effect, using DPP3 data, is that assessed unplanned SAIDI under the DPP would be some 4-11.7% less than under the current Firstlight DPP4 unplanned SAIDI boundary value.	Section 2.1 Tables 5 and 6
(2)	(e) demonstration of any consumer consultation undertaken by the EDB in respect of the proposed quality standard variation, and the results of that consultation.	Criteria met: Firstlight has not undertaken specific consultation for this QSV application. The application does however reference annual consumer consultation feedback that is clear that consumers highest priority is to keep electricity costs as low as possible rather than improve quality. Firstlight is willing to undertake additional consumer consultation and is ready to proceed with it if required by the Commission	Section 3.3
(3)	Where the Commission considers that, for the purpose of making a decision on the quality standard variation proposal described in subclause (1), it requires further information from the EDB in addition to the proposal, the Commission may request this from the EDB by a date specified by the Commission such that it is reasonable for the EDB to comply.	Noted. Firstlight welcomes the Commission's input into proposed additional consultation.	Section 3.3

Ref	Criteria	Assessment	Supporting evidence
(4)	In assessing a quality standard variation proposal, the Commission will consider the extent to which- (a) the proposed quality standard variation better reflects the realistically achievable performance of the EDB over the remainder of the regulatory period;	The QSV application explains the proposed variation better reflects Firstlight's realistically achievable performance over the rest of DPP4 because the current unplanned SAIDI boundary value has been materially distorted by three extreme weather events that are not likely to recur with the same frequency in the next regulatory period. The result is a 44% increase in the DPP4 boundary value to 18.80. As a result, normalisation does not perform as intended and inaccurately represents network performance, undermining the Commission's ability to accurately assess performance through annual disclosures. A revised boundary value of 12.03 would better reflect the network's underlying reliability while preserving incentives to improve performance. Firstlight is continuing to invest in reliability and resilience improvements but cannot reasonably be expected to strengthen the network quickly enough, or at efficient cost, to meet a boundary value inflated by a small number of extreme events. The proposed variation would align the quality standard with performance that is both achievable and consistent with the long-term interests and price-quality preferences of consumers.	Section 1
	(b) the EDB has consulted with consumers on its proposed quality standard variation; and	Firstlight has not undertaken specific consultation for this QSV application. Firstlight welcomes the Commission's input into proposed additional consultation.	Section 3.3 Consumer consultation brief is included as attachment 4.

Ref	Criteria	Assessment	Supporting evidence
	(c) the proposed quality standard variation is supported by consumers.	Feedback received from consumers through Firstlight's annual consumer consultation is clear that consumers highest priority is to keep electricity costs as low as possible. This is more consistent with the price-quality trade-offs in the QSV application than the current DPP4 settings.	Section 3.3 Section 2.3 of the Firstlight AMP26 update ¹¹
4.5.6 When price-quality paths may be reconsidered			
(2)	the Commission receives a quality standard variation proposal from an EDB and is satisfied that it complies with clause 4.5.5(2).	Criteria met: This table demonstrates how the application complies with clause 4.5.5(2).	Application This Appendix A
4.5.7 Amending price-quality path after reconsideration			
(1)	Where, after reconsidering a DPP, the Commission determines that the DPP should be amended, the Commission may amend either or both of the price path or the quality standards and quality incentive measures specified in the DPP determination, subject to subclauses (2)-(4).	Criteria met: The DPP quality standards should be amended as the Firstlight DPP4 quality standards are not realistically achievable. The proposal has not requested a change to the quality incentive measures or the price path. It is noted however that the proposed variation to the quality standard boundary value parameter also impacts the assessment of quality of supply in determining incentives.	Sections 1 and 2.
(2)	The Commission will not amend the- (a) price path more than is reasonably necessary to mitigate the effect of- (i) the catastrophic event; (ii) the change event; (iii) the error event; (iv) the major transaction; or (v) the provision of false or misleading information, on price; or	n/a – the application is not for a catastrophic event, change event, error event, major transaction or provision for false or misleading information	n/a

¹¹ Available from [here](#)

Ref	Criteria	Assessment	Supporting evidence
(3)	The Commission will not amend the price path in respect of an unforeseeable major capex project or a foreseeable major capex project by more than an amount that reflects the efficient costs that a prudent non-exempt EDB would incur in undertaking that project.	n/a – the application is not an unforeseeable major capex project or a foreseeable major capex project	n/a
(4)	The Commission will not amend the quality standards or quality incentive measures more than are reasonably necessary to reflect the Commission's decision on a quality standard variation	The proposed amendment is limited to a single parameter, being the unplanned SAIDI boundary value. Firstlight does not seek any change to any other quality standard settings. The proposed amendment is therefore no more than is reasonably necessary to address the distortion caused by the inclusion of three extreme outlier weather events in the boundary value calculation, resulting in a 44% increase from DPP3 to DPP4..	Sections 1.6, 1.8 and 2.0.

7 Appendix B: Media coverage and photographs of the three weather events

This appendix includes media coverage of three weather events, March 2022 rains, cyclone Gabrielle, and June 2023 rain and slips. The photographs are included to show the extent of the damage and accessibility to the assets

7.1 March 2022 Rains

East Coast flooding: 'It's extremely tough' - PM

7:31 pm on 27 March 2022

Share this



Repairing roads and supporting Gisborne locals with insurance issues will be priorities as the Tairāwhiti region cleans up from the week's flooding, the prime minister says.



Prime Minister Jacinda Ardern and East Coast MP and Minister for Emergency Management Kiri Allan assess damage caused by severe weather on the East Coast. Photo: FACEBOOK/ Jacinda Ardern

Jacinda Ardern has been talking to locals in Tokomaru Bay this afternoon and looking at some of the worst affected streets and buildings.

In an instagram post, she said this was the second time in less than a year that they had been hit by a severe weather event - "everyone agrees this time it was worse".

"On top of the pandemic really hitting Tairāwhiti right now - it's extremely tough. Another reason to keep working together as much as we can."

The government and council will be working closely with the area's residents, she said.



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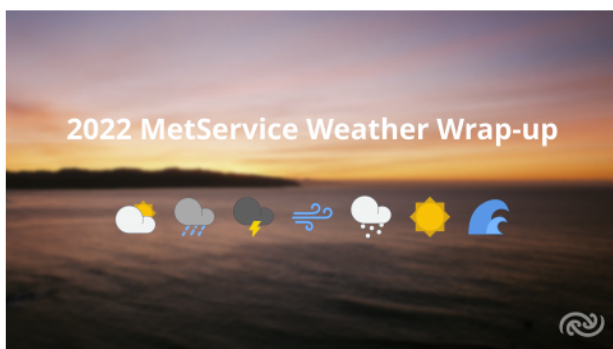
26,624 likes

jacindaardern

Some devastating scenes here on the East Coast today. In Tokomaru Bay this is the second time in less than a year that they've been hit by a severe weather event - everyone agrees this time it was worse. Massive effort is going into getting SH35 reinstated as quickly as possible. Mayoral relief funding has also been made available to support the clean up. But this on top of the pandemic really hitting Tairāwhiti right now - it's extremely tough. Another reason to keep working together as much as we can.

[East Coast flooding: 'It's extremely tough' - PM | RNZ News](#)

2022 is one for the record books



With 2022 coming to an end, we thought it'd be timely to look back at the year of weather. Two words come to mind, wet and warm. Low pressure systems from the northern Tasman Sea were frequent around Aotearoa and brought a rise in both the temperature and the amount of rain that fell. Read on to find out more about MetService's notable weather of 2022.

Severe Weather

Firstly, we had 53 Severe Weather Events this year and issued 182 Severe Weather Warnings, that is about an average amount, but we had several events which were far from average. We introduced our colour coded warning system in May 2019 and have issued eight Red Warnings since, four of those were this year.

The beginning of February saw incredibly heavy rain impact Westland, Buller, and Taranaki. 500-800mm of rain fell in 72 hours around parts of Westland. Evacuations were required in Buller and a state of emergency was declared. When the rain made it to Taranaki it was very intense with a station near Cape Egmont receiving a month's worth of rain in just four hours. In the last week of March, the flooding rain took aim at Gisborne with extensive damage sustained across the region including the Tokomaru Bay bridge being washed out, isolating communities. Gisborne Airport recorded a month's worth of rain in seven hours and parts of the region ticked up 200-300mm over the event. A state of emergency was declared for the Tairāwhiti region.

A few weeks later Cyclone Fifi approached New Zealand and we issued another Red Warning for Gisborne. While this event may not have been a Red Warning on its own – for a region in recovery mode we knew significant impacts would come around more readily. 150-200mm of rain fell in 24 hours and there were power outages, toppled trees, flooding, and more communities isolated.

[2022 is one for the record books](#)

'It was like the gods were angry': East Coast hit hard by flooding

4:57 pm on 23 March 2022

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Matthew Rosenberg, Local Democracy Reporter
✉ matthew.rosenberg@odt.co.nz

Civil defence in Tolaga Bay, north of Gisborne, has described rainfall overnight as "unrelenting" as Tairāwhiti enters a state of emergency caused by severe flooding.



An IRB helping with evacuations in the Mangatuna area on Wednesday. Photo: Supplied / Uawa Live via LDR

Images of State Highway 35 north of Tolaga Bay show a total washout this morning, while half an hour up the road in Tokomaru Bay, the Mangahauini Bridge was split in two.

Over 700 people in the region were without power this morning and more heavy rain is expected tonight.



The Mangahauini Bridge in Tokomaru Bay was washed out by the flooding. Photo: Supplied / Destiny Maxwell Collins via LDR



Heavy flooding led to evacuations in the Mangatuna area near Tolaga Bay. Photo: Supplied / Uawa Live via LDR

['It was like the gods were angry': East Coast hit hard by flooding | RNZ News](#)

Wednesday, 23 March 2022

State of emergency in Gisborne area, more rain on way



News > National



Photos: Supplied / Civil Defence

More rain is expected tonight in the Gisborne region, which is already in a state of emergency after torrential rain caused flooding, rescues and evacuations in East Cape overnight.

- **First published by RNZ**

Tairāwhiti Civil Defence declared a state of emergency after the deluge forced evacuations and trapped people in floodwaters in the Tolaga Bay and Tokomaru Bay areas.

Emergency Management Minister and East Coast MP Kiritapu Allan said 150 people had been evacuated and 750 homes were without power, and the Hikuwai River had risen rapidly to more than 12 metres.

Gisborne Civil Defence manager Ben Green said the rainfall was a lot heavier and had come in sooner than expected. "I'd almost describe it as biblical," he said.

State Highway 35 from Gisborne around East Cape to Potaka was closed because of flooding, slips and washouts. However, Tairāwhiti residents have been given a four-hour window to travel between Gisborne and Tolaga Bay and from Potaka and Ruatoria before the road shuts again.

[State of emergency in Gisborne area, more rain on way](#)

Weather: Gisborne remains cut off after heavy rain, slips, floods

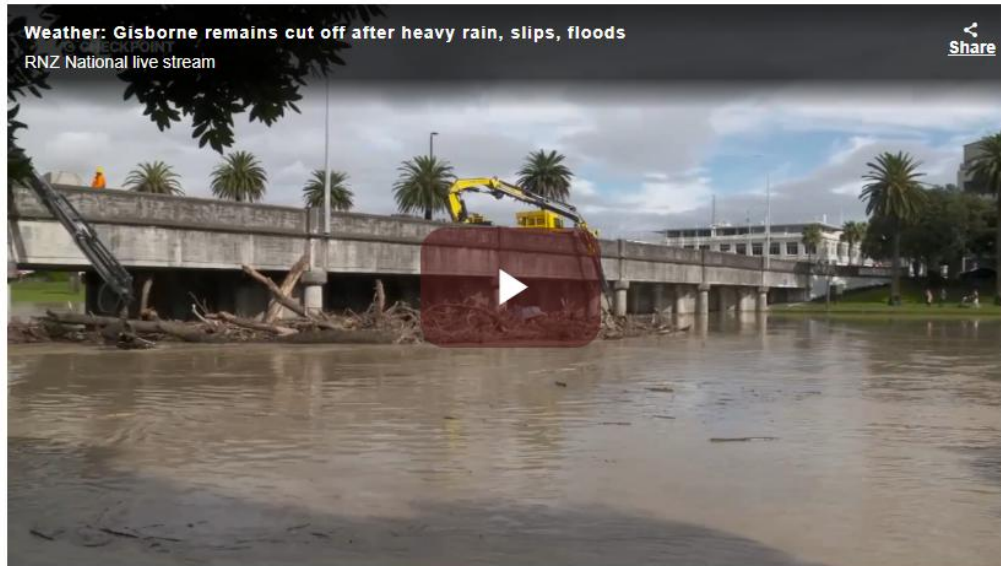
From **Checkpoint**, 5:14 pm on 24 March 2022

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Tom Kitchin, Hawke's Bay / Tairāwhiti Reporter
@inkitchnz | tom.kitchin@rnz.co.nz

Gisborne remains cut off this evening, with roads closed all around it after heavy rain battered the region, causing slips and widespread flooding.



Checkpoint 24 March 2022

Weather: Gisborne remains cut off after heavy rain, slips, floods



+ Queue



The sun was shining for most of the day, but slip after slip still covered the roads all over Tairāwhiti. Residents are now bracing for even more downpours.

Bridges are washed out - some totally destroyed - and key transport routes in and out of this area are gone.

Farms have been flooded, rivers burst through here turning them into lakes and stock have been forced to shelter on top of hills.

A river has breached and marched its way across the land and sits on the edge of some tennis courts near Tokomaru Bay.

More flooding in Wairoa leads to residents being evacuated

5:07 pm on 29 March 2022

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Flooding is occurring again around Wairoa and some residents in the northern Hawke's Bay town have now been evacuated.



There has been more flooding in Wairoa after further heavy rain. Photo: Wairoa District Council / Screenshot

Wairoa District Mayor Craig Little says while its rivers levels are stable, some residential roads are covered in water.

He said some areas got more than 170 millimetres of rain last night, adding to the downpours the district has already had and the further rain "is just causing havoc".

"Our concern first time around was that river flooding and flooding out our main street of the town.

"This second lot the river's well down but it's just surface flooding now that needs just to have a time to get down, to be drained and that back to the river."

[More flooding in Wairoa leads to residents being evacuated](#)



A section of the bridge in Tokomaru Bay has been wiped out by flood water, bisecting the town alongside State Highway 35 Photo: RNZ / Angus Dreaver



Mangahauini River eats away at State Highway 35 near Tokomaru Bay Photo: RNZ / Angus Dreaver



Slips cover the road along State Highway 35 Photo: RNZ / Angus Dreaver



Trees through line and access road blocked, Brownlie Rd, Frasertown feeder – March 2022



Waimata Road – March 2022

7.2 Cyclone Gabrielle- February 2023

Cyclone Gabrielle: Gisborne right in firing line

From **Morning Report**, 6:53 am on 14 February 2023

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Morning Report 14 February 2023

Cyclone Gabrielle: Gisborne right in firing line



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Gisborne was right in the firing line of ex-tropical cyclone Gabrielle on Monday night.

Rain fell in the city overnight, with rivers overflowing throughout the Tairāwhiti region, and forestry waste, slash, re-emerging as a result.

Residents in Riverside Road and Graham Road in Gisborne had to evacuate because the Waimata river was rising fast.

People were also asked to restrict non-essential water use because the city's main water supply pipe is broken.

[Cyclone Gabrielle: Gisborne right in firing line](#)

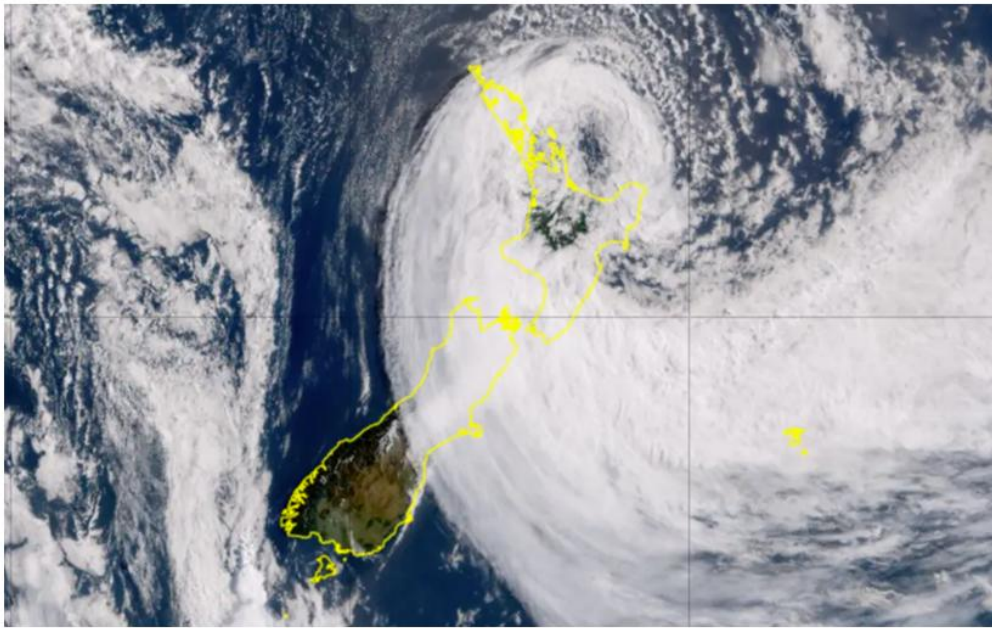
Cyclone Gabrielle the 'new benchmark' for future storms in New Zealand - researcher

12:25 pm on 10 September 2024

Share this



Bill Hickman, Journalist
✉ Bill.Hickman@rnz.co.nz



Satellite imagery of Cyclone Gabrielle. Photo: JMA

- A NIWA study shows climate change led to 10 percent more rain during Cyclone Gabrielle than would have in pre-global warming conditions.
- Nearly a quarter of the rain expected in a year fell on northeastern parts of the country in February 2023.
- The storm claimed 11 lives and caused nearly \$13.5b worth of damage.

[Cyclone Gabrielle the 'new benchmark' for future storms in New Zealand - researcher](#)

In Gisborne's blackout, the Māori response shone brightly



Tommy de Silva
Guest writer

[Share Story](#)



Flooding at Tolaga Bay in the northern Gisborne region. (Image: Gisborne District Council)

Gisborne has been brutally hit by Cyclone Gabrielle, but the response by both its officials and tangata whenua has been admirable.

Tairāwhiti has been ravaged by a natural disaster once again. As well as feeling the full force of Cyclone Gabrielle, a magnitude 4.4 earthquake shook the region on Monday night. But the cyclone has done most of the damage. Speaking to RNZ, MetService's Lisa Murray said Cyclone Gabrielle pelted Gisborne with 400mm of rain in 24 hours. The Gisborne District Council (GDC) puts that figure even higher, at 450mm. Gisborne's average rainfall for the entire month of February is usually just 64.51mm.



Flooding on a Gisborne road. (Image: GDC)

[In Gisborne's blackout, the Māori response shone brightly](#)

Cyclone Gabrielle: Power and limited water restored to Gisborne but 'still so much to be done' - Mayor

11:54 am on 18 February 2023

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Locals cleaning up around Gisborne. Photo: RNZ/Nathan McKinnon

Gisborne is slowly getting back on its feet with power and limited water access restored to the region.

People in the region were told to stop using water immediately [on Friday morning after the city's backup water treatment plant failed](#).

But Civil Defence is still asking the people of Tairāwhiti to conserve as much water as possible.

[Cyclone Gabrielle: Power and limited water restored to Gisborne but 'still so much to be done' - Mayor](#)

Cyclone Gabrielle: Gisborne cut off - latest details

From **Checkpoint**, 5:51 pm on 15 February 2023

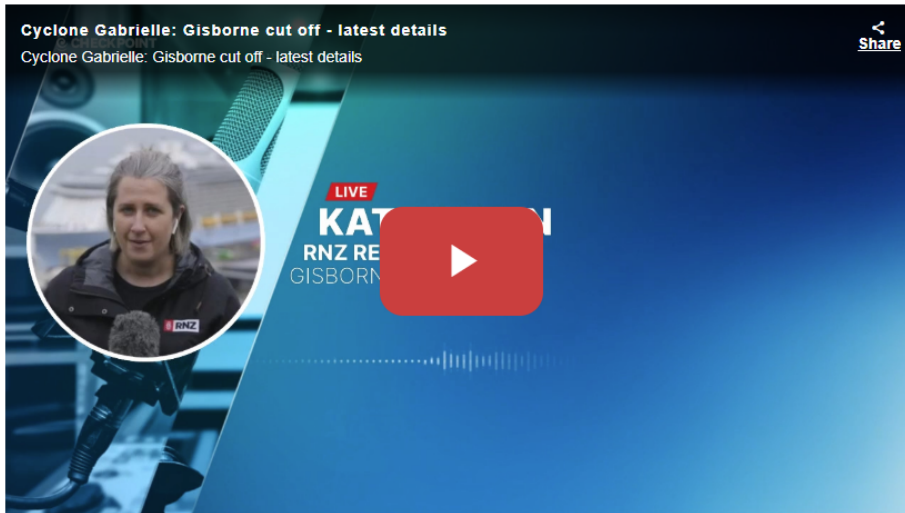
Share this



Checkpoint 15 February 2023
Cyclone Gabrielle: Gisborne cut off - latest details



+ Queue



RNZ reporter Kate Green is in Gisborne and joins Lisa Owen with the latest details.

Help is coming from the Defence Force for Tairāwhiti and northern Hawke's Bay.

The HMNZS Manawanui is sailing from Auckland with supplies destined for Tairāwhiti, and will deliver water supplies to small communities on its way.

It's expected to arrive at first light in Gisborne.

The HMNZS Te Mana will sail tomorrow to Napier, supplying Wairoa with water and other essential supplies.

A member of the national emergency team has been on the ground in Wairoa today to help establish communications.

[Cyclone Gabrielle: Gisborne cut off - latest details](#)

Photograph 6: Main street of Wairoa township



Photograph 7: Roading impacted in Tairāwhiti



Photograph 8: The town of Wairoa is completely cut off by flood waters







From H722 to
H-Pole other side
of Waiau Rd

Waipau Road- flooding and slips



Waiapu Road- flooding and slips



Ihungia road- tree through lines after flooding and slips



Ihungia road- tree through lines after flooding and slips



Ihungia road- tree through lines after flooding and slips



Waiapu road



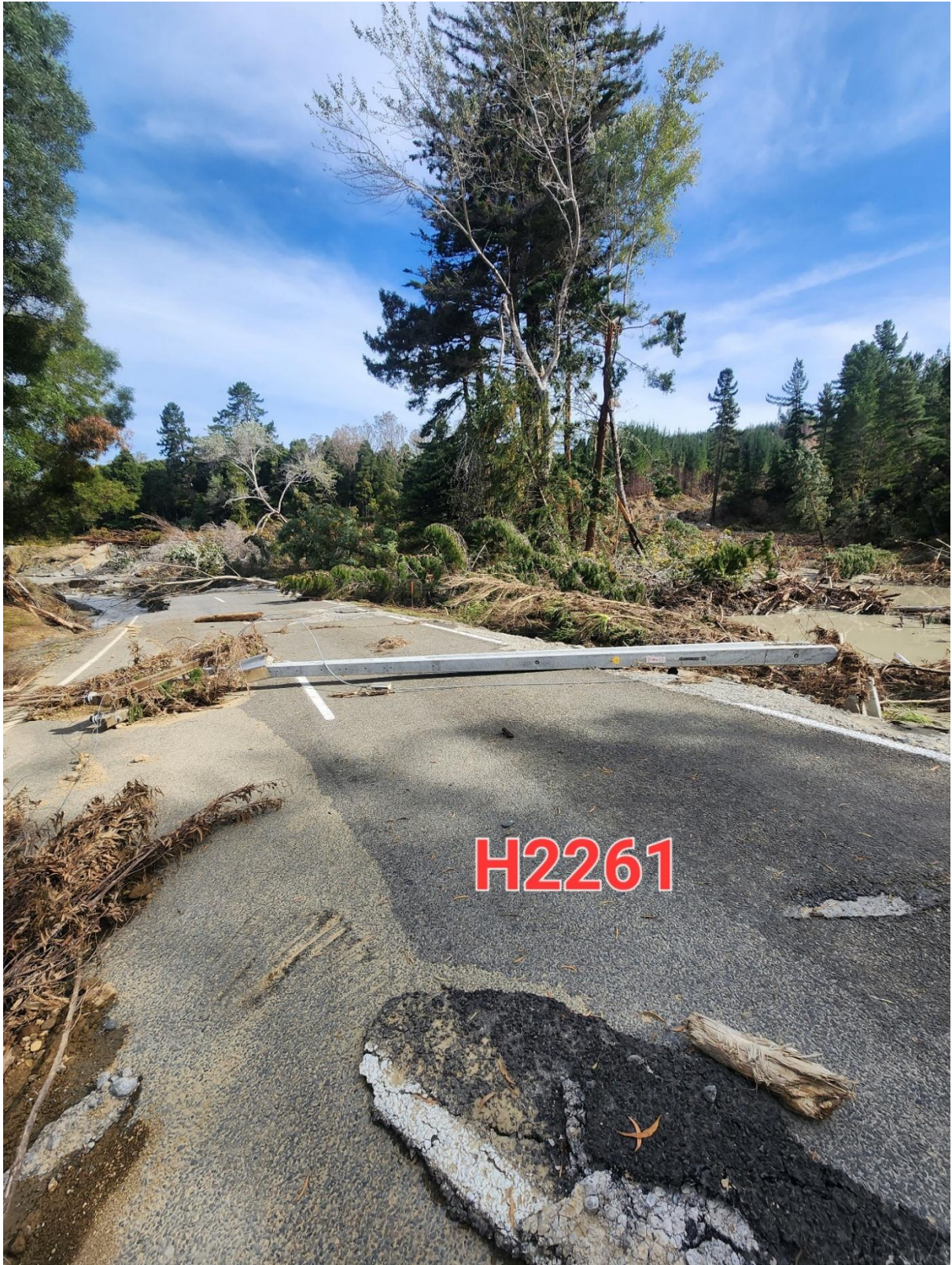
Mangahauini Gorge- Major flooding, landslides causing trees fall through the lines



Mangahauini Gorge- Major flooding, landslides causing trees fall through the lines



Mangahauini Gorge- Major flooding, landslides causing trees fall through the lines.



Mangahauini Gorge- Major flooding, landslides causing trees fall through the lines



Hikuwai Bridge No.1 on SH35 isolated access to the coast



Large landslide North of Tokomaru Bay caused pole to fall over.

7.3 June 2023 Rain and Slips

A State Of Emergency Declared In Tairāwhiti

Thursday, 22 June 2023, 5:50 pm

Press Release: **Gisborne District Council**

Gisborne Mayor Rehette Stoltz has declared a State of Emergency as rivers rise and rain continues to fall across an already sodden region.

“This gives our whānau and community a chance to self-evacuate and make preparations to ensure they are self-sufficient for at least the next three days,” says Mayor Stoltz.

The declaration gives Tairāwhiti Civil Defence emergency powers for the coordination of the emergency response given we have a significant amount of rain still to come.

People have already been self-evacuating from low-lying and flood-prone areas.

A State Of Emergency Declared In Tairāwhiti

Tairāwhiti local State of Emergency ends, district under orange rain warning

NEWS NATIONAL

NZ Herald, Sun, 25 Jun 2023, 2:00pm



The temporary bridge on Bushy Knoll Rd, Tairāwhiti, is impassable - but hanging on - after heavy rain. Photo / Supplied

The local State of Emergency in Tairāwhiti Gisborne has ended after torrential rain wreaked havoc on the district, leaving roads damaged and residents exhausted.

Gisborne Mayor Rehette Stoltz lifted the state of emergency this afternoon effective immediately.



Waitangi Rd, Tairāwhiti, damaged in heavy rain. Photo / Supplied

Tairāwhiti local State of Emergency ends, district under orange rain warning

MetService Red Rain Warning issued for Tairāwhiti/Gisborne

Thursday, 22 June 2023, 5:43 pm

Press Release: **MetService**

At 3.26pm today, MetService has upgraded its Heavy Rain Warning from Orange to Red for the Tairāwhiti/Gisborne in consultation with the regional council.

A MetService **Red Warning** is the highest severe weather warning and indicates that people must take immediate action to protect people, animals and property from the impact of the weather. People should also be prepared to follow the advice of official authorities and emergency services.

The **Red Warning for Heavy Rain** is in force over a long time period, from today through to Sunday morning, with the heaviest rain expected today and again from Friday evening to Sunday.

MetService Red Rain Warning issued for Tairāwhiti/Gisborne

Tai Rāwhiti's state of emergency lifted following latest downpour

1:20 pm on 25 June 2023

Share this



Slip site at Otoko, northwest of Gisborne. Photo: Kate Green / RNZ

Tai Rāwhiti's state of emergency has been lifted, effective immediately, following a few days of heavy rain.

Locals are relieved the rain was not quite as heavy as forecast, but what did fall still wreaked "havoc" on a region that has had more than its average annual rainfall in less than six months.

The state of emergency was declared at 4.45pm on Thursday. Mayor Rehette Stoltz lifted it shortly after midday on Sunday.

Heavy rain was recorded at stations at Raparapaririki (565mm), Fernside Station (494mm), Mangapoike (410mm), Waerenga-o-Kuri (235mm), Waipaoa Station (227mm) and Gisborne Airport (185mm).



Slip site at Otoko, northwest of Gisborne. Photo: Kate Green / RNZ



Slip site at Otoko, northwest of Gisborne. Photo: Kate Green / RNZ



Heavy rain caused a slip on State Highway 35 north of Tologa Bay Photo: Supplied / Dion Milner

Tai Rāwhiti's state of emergency lifted following latest downpour

Te Karaka cut off as torrential rain hits Gisborne again, state of emergency in place

9:00 pm on 23 June 2023

Share this



Surface flooding on the Poverty Bay flats. Photo: Gisborne District Council

The region is under a state of emergency until Sunday.

More than 100 people have evacuated their homes around 14 families are cut off by floodwaters in the Tolaga Bay region.

After three weather-related emergencies this year alone, Civil Defence spokesman Greg Shelton said everything is in order.

"Got everything under control, got welfare centres ready to go, teams ready to go, radios on, generators ready to go, so, we're well versed in this."

Shelton is urging people to stay at home overnight.

Te Karaka cut off as torrential rain hits Gisborne again, state of emergency in place

Movement of land following severe weather sees Gisborne homes evacuated

4:18 pm on 26 June 2023

Share this



Flooding signs out to warn drivers in Tai Rāwhiti. Photo: RNZ/ Kate Green

Two homes in the Gisborne region have had to be evacuated this morning because land movement is causing them to shift.

Tai Rāwhiti has had days of persistent rain. A state of emergency was declared - but [ended on Sunday](#).

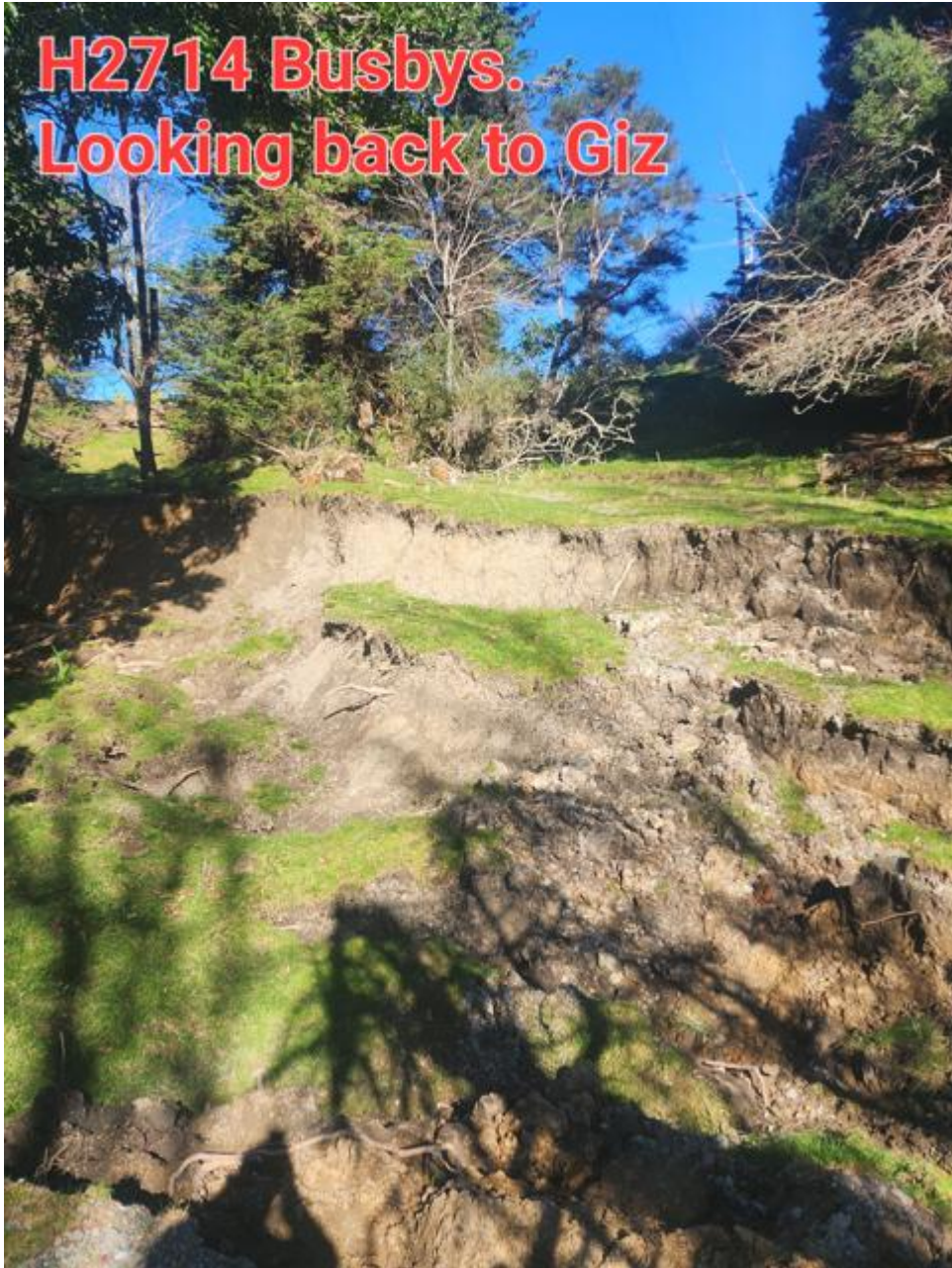
Gisborne Civil Defence manager Ben Green told *Midday Report* houses in a couple of areas are physically moving, to the point doors cannot open or there are gaps in the structure.

Movement of land following severe weather sees Gisborne homes evacuated



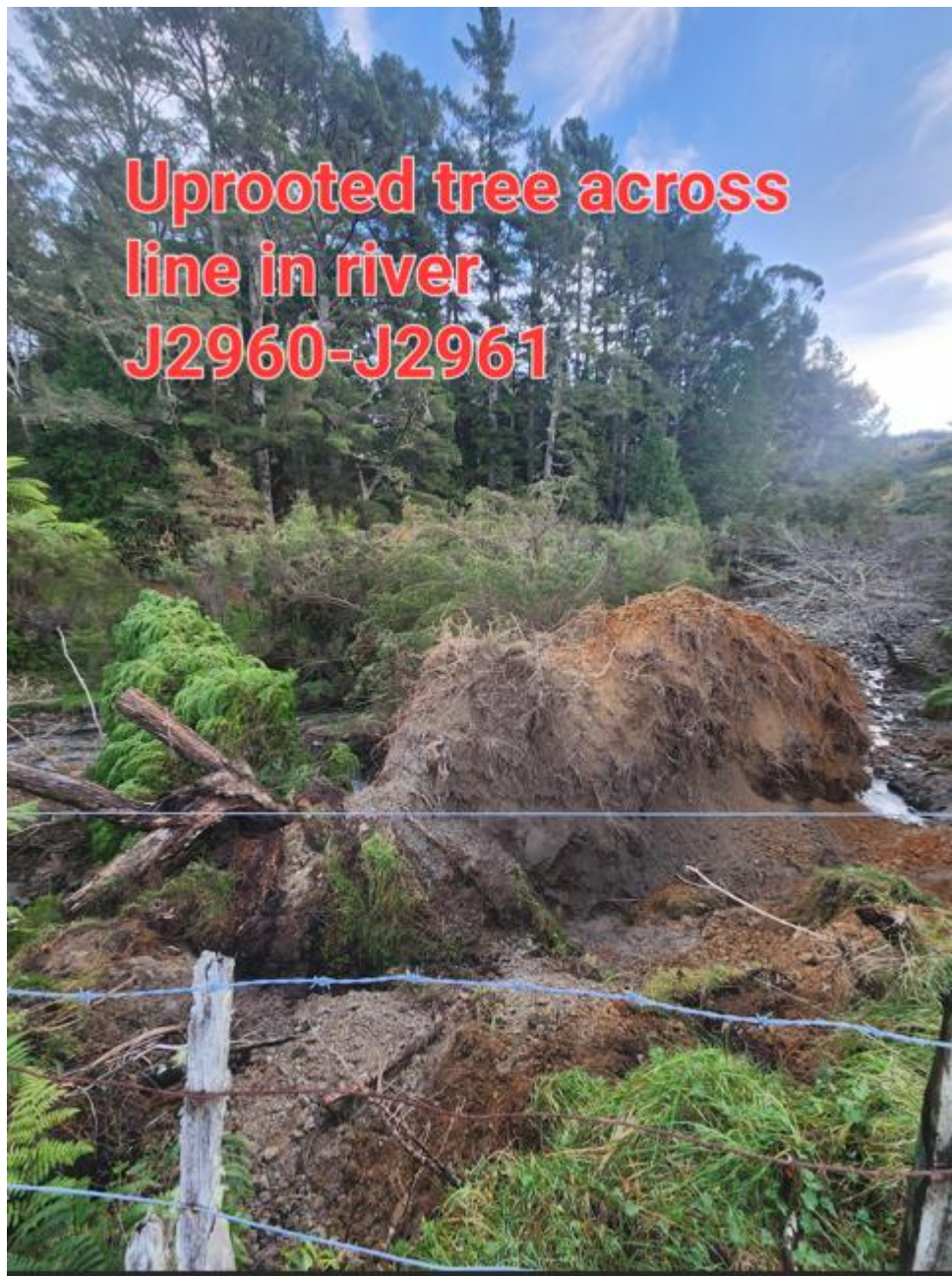
Slip on Tauwhareparae Road, June 2023

**H2714 Busbys.
Looking back to Giz**





Slip on Mata Rd – June 2023



Mangaoporo Rd, Tikitiki feeder - June 2023



Waiomatatini Rd, Tikitiki feeder – June 2023



Waiomatini Rd, Tikitiki feeder – June 2023



H795 Tree across line Mata Rd – June 2023