



C O U N T I E S P O W E R

**Information Disclosure prepared in accordance with the
Electricity Distribution (Information Disclosure) Requirements 2008**

For the Year Ended 31 March 2012

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REPORT FS1: REGULATORY PROFIT STATEMENT

ref		Electricity Distribution Business: Counties Power Limited	
		For Year Ended	2012
5			
6	Income		
7			(\$000)
8	Net Line Charge Revenue Received	31,416	
9	plus Discretionary Discounts and Customer Rebates*	6,393	FS1a
10	Gross Line Charge Income		37,809
11			
12			
13	Capital Contributions	1,829	
14	plus Net Value of Vested Assets	-	
15	Total Capital Contributions and Vested Assets		1,829
16			
17	AC Loss Rental Rebates Received	842	
18	less AC Loss Rental Rebates Passed On	842	
19	Net AC loss rental income (deficit)		-
20			
21			
22	Other Income	287	
23			287
24			
25	Total regulatory income		39,925
26			
27			
28	Expenses		
29			
30	Transmission Charges - Payments to Transpower	8,307	
31	plus Avoided Transmission Charges - payments to parties other than Transpower		
32	Total Transmission Costs		8,307
33			
34	Operational Expenditure:		
35	General Management, Administration and Overheads	4,138	
36	System Management and Operations	1,779	
37	Routine and Preventative Maintenance	1,149	to AM1
38	Refurbishment and Renewal Maintenance	826	to AM1
39	Fault and Emergency Maintenance	1,495	to AM1
40	Pass-through Costs	346	
41	Other		
42	Total Operational Expenditure		9,733 to MP2
43			
44			
45	Operational earnings		21,885
46			
47			
48	Regulatory Depreciation of System Fixed Assets (incl. value of assets decommissioned)	6,800	from AV1
49	plus Depreciation of Non-System Fixed Assets (incl. value of assets decommissioned)	1,107	from AV1
50	Total Regulatory Depreciation		7,907 to FS3
51			
52			
53	Earnings before interest and tax (EBIT)		13,978 to FS3
54			
55	less Regulatory Tax Allowance		2,358 from FS3
56			
57	plus Indexed Revaluation (of System Fixed Assets)		2,562 from AV1
58	plus Revaluations of Non-System Fixed Assets		- from AV1
59			
60	Regulatory profit / loss (pre-financing and distributions)		14,182 to MP2

*Discretionary discounts have been included for the first time this year

REPORT FS1: REGULATORY PROFIT STATEMENT (cont)

Notes to Regulatory Profit Statement

69	FS1a: Discretionary Discounts: Customer Rebates and other line charge adjustments		(\$000)
70	Customer Rebates	6,393	
71	Line Charge Holidays and other Discretionary Discounts		
72	Total Discretionary Discounts and Customer Rebates		6,393

75	FS1b: Related party expenditure - summary		(\$000)
76	Avoided Transmission Charges		
77	Operational Expenditure	2,164	
78	Subvention Payment		
79	Other related party expenditure	4,086	
80	Total Related Party Expenditure		6,250

N.B.: The additional Related Party information that is required to be disclosed in accordance with Section 3 of the Information Disclosure Handbook is to be disclosed by way of a separate note to this Schedule and forms part of this Schedule.

87	FS1c: Operational Expenditure notes		(\$000)
88			
89	Merger and Acquisition Expenses		
90	Merger and Acquisition Expenses (not to be included in Operational Expenditure)		
91			
92	Material items (if greater than 10% of the Operational Expenditure line item)		
93	Material item amount 1	3,186	<i>Notes to be provided separately</i>
94	within expenditure category:		General Management, Administration a
95			
96	Material item amount 2		<i>Notes to be provided separately</i>
97	within expenditure category:		Select one
98			
99	Material item amount 3		<i>Notes to be provided separately</i>
100	within expenditure category:		Select one
101			
102			
103			<i>(further disclosures to be provided on separate page if required)</i>

106	FS1d: Vested Assets		(\$000)
107	Consideration Paid for Vested Assets		

110	FS1e: Reclassified items in Operational Expenditure		(\$000)
111	Value of items which have been reclassified since previous disclosure (if greater than 10% of any affected line item)		
112	Previous classification:	Select one	
113	New classification:	Select one	
114			
115			(\$000)
116	Value of items which have been reclassified since previous disclosure (if greater than 10% of any affected line item)		
117	Previous classification:	Select one	
118	New classification:	Select one	
119			
120			(\$000)
121	Value of items which have been reclassified since previous disclosure (if greater than 10% of any affected line item)		
122	Previous classification:	Select one	
123	New classification:	Select one	
124			

to be repeated as required for multiple reclassifications

REPORT FS2: REGULATORY ASSET AND FINANCING STATEMENT

ref	Electricity Distribution Business:	Counties Power Limited	
5		For Year Ended	2012
6			
7	Capital Expenditure on System Fixed Assets (by primary purpose)		(\$000)
8	Customer Connection	2,005	to AM1
9	System Growth	4,437	to AM1
10	Reliability, Safety and Environment	1,972	to AM1
11	Asset Replacement and Renewal	4,017	to AM1
12	Asset Relocations	171	to AM1
13	Total Capital Expenditure on System Fixed Assets	12,602	to AM1
14			
15			
16	Capital Expenditure on Non-System Fixed Assets	(6,719)	from AV1
17			
18			
19	Capital works roll-forward (for System Fixed Assets)		
20	Works Under Construction at Beginning of Year	57	
21	plus Total Capital Expenditure on System Fixed Assets	12,602	
22	less Assets Commissioned in Year	12,301	from AV1
23	Works under construction at year end	358	
24			
25			
26	Regulatory Investment Value calculation		
27	System Fixed Assets: regulatory value at end of Previous Year	163,107	from AV1
28	Non-System Fixed Assets: regulatory value at end of Previous Year	19,984	from AV1
29	Finance During Construction Allowance (on System Fixed assets)	3,996	2.45%
30	Total Regulatory Asset Base value at beginning of Current Financial Year	187,087	
31			
32	plus System Fixed Assets Commissioned in Year	12,301	from AV1
33	System Fixed Assets Acquired From (Sold to) a Non-EDB in Year	(492)	from AV1
34	Non-System Fixed Assets: Asset Additions	(6,719)	from AV1
35	Regulatory Asset Base investment in Current Financial Year - total	5,090	
36	Regulatory Asset Base investment in Current Financial Year - average	2,545	
37			
38	plus (minus) where a merger or acquisition has taken place within the year		
39	Adjustment for merger, acquisition or sale to another EDB	-	from AV4
40			
41	Regulatory Investment Value	189,632	to MP2

REPORT FS3: REGULATORY TAX ALLOWANCE CALCULATION

ref		Electricity Distribution Business:	Counties Power	
5			For Year Ended	2012
6				
7				(\$000)
8		Earnings before interest and tax (EBIT)		13,978 <i>from FS1</i>
9				
10	<i>add</i>	Total Regulatory Depreciation	7,907	<i>from FS1</i>
11		Other Permanent Differences - not deductible	11	
12		Other Temporary Adjustments - Current Period	670	
13				8,588
14				
15	<i>less</i>	Non Taxable Capital Contributions and Vested Assets		
16		Tax Depreciation	8,991	
17		Deductible Discretionary Discounts and Customer Rebates		
18		Deductible Interest	4,415	<i>from row 53</i>
19		Other Permanent Differences - Non Taxable		
20		Other Temporary Adjustments - Prior Period	739	
21				14,144
22				
23		Regulatory taxable income for Year		8,421
24				
25	<i>less</i>	Tax Losses Available at Start of Year		
26		Net taxable income		8,421
27				
28		Statutory Tax Rate	28%	
29		Regulatory Tax Allowance		2,358 <i>to FS1</i>

Notes to Regulatory Tax Allowance Calculation

36	FS3a: Description of adjustments classified as "other"
37	
38	The Electricity Distribution Business is to provide descriptions of items recorded in the four "other" categories above (explanatory notes can be provided in a separate note if necessary).
39	
40	
41	Other permanent adjustments are for entertainment expenses; other temporary adjustments are for holiday pay, gratuity and sick leave and doubtful debts.
42	
43	
44	
45	

48	FS3b: Financing assumptions (for Deductible Interest and Interest Tax Shield calculation)		
49			
50	Standard Debt Leverage Assumption (debt/total assets)	40%	%
51			
52	Standard Cost of Debt Assumption	5.82%	%
53			
54	Deductible Interest	4,415	\$000 <i>to row 18</i>
55			
56	Interest Tax Shield Adjustment	1,236	\$000 <i>to MP2</i>

REPORT AV1: ANNUAL REGULATORY VALUATION ROLL-FORWARD REPORT

		Electricity Distribution Business: Counties Power Limited							
									For Year Ended: 2012
									Year of most recent ODV: 2004
									(\$000)
		ODV Year	ODV Year	ODV Year	ODV Year	ODV Year	ODV Year	ODV Year	ODV Year
		+ 1	+ 2	+ 3	+ 4	+ 5	+ 6	+ 7	+ 8
For Year Ending:		2005	2006	2007	2008	2009	2010	2011	2012
11	System Fixed Assets								
12	Regulatory Value at End of Previous Year*	109,276	113,176	123,757	135,033	143,722	145,263	152,242	163,107
13	plus								
14	Assets Commissioned	4,633	10,974	14,112	9,899	10,811	10,921	11,262	12,301
15	Gross Value of Vested Assets	-	-	-	-	-	-	-	-
16	Assets Acquired from (Sold to) a Non-EDB	(43)	58	252	218	(377)	(729)	(951)	(492)
17	Asset Additions	4,591	10,916	13,860	9,681	10,434	10,192	10,311	11,809
18	plus								
19	Indexed Revaluation	3,038	3,753	3,138	4,546	4,268	2,973	6,800	2,562
20	less								
21	Depreciation of System Fixed Assets	3,728	4,089	4,756	5,538	3,953	5,494	5,982	6,305
22	Regulatory Value of Assets Decommissioned	-	-	967	-	-	692	264	495
23	Regulatory Depreciation (incl. value of assets decommissioned)	3,728	4,089	5,723	5,538	3,953	6,186	6,246	6,800
24	plus (minus)								
25	Acquisition of System Fixed Assets from another EDB	-	-	-	-	-	-	-	-
26	less Sale of System Fixed Assets to another EDB	-	-	-	-	-	-	-	-
27	Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB	-	-	-	-	-	-	-	-
28	plus (minus)								
29	Net Increase (Decrease) Due to Changes in Asset Register Information					(9,208)			
30									
31	Regulatory Value of System Fixed Assets at Year End	113,176	123,757	135,033	143,722	145,263	152,242	163,107	170,677
32									
33	Non-System Fixed Assets #								
34	Regulatory value at end of previous year	4,684	4,767	5,300	9,906	17,653	20,070	20,931	19,984
35	plus								
36	Asset Additions	725	1,115	877	1,044	1,472	1,679	424	(6,719)
37	plus								
38	Revaluations			3,825	7,326	1,672	818	(476)	
39	less Depreciation (incl. value of assets decommissioned)	642	582	96	623	727		895	1,107
40	plus Net Acquisitions (Sales) of Non-System Fixed Assets from (to) an EDB								
41	Regulatory Value of Non-System Fixed Assets at Year end	4,767	5,300	9,906	17,653	20,070	20,931	19,984	12,158
42									
43									
44	Total Regulatory Asset Base Value (excluding FDC)	117,943	129,057	144,939	161,375	165,333	173,173	183,091	182,835
45									
46									
47	# Non system asset value has been adjusted in current year by \$7,717 to remove asset values included in both system assets and non-system assets								
48	* The commencing figure for completing this schedule is the most recent ODV value								
49	Note: Additional columns to be added if required								

Notes to Annual Regulatory Valuation Roll-forward Report

AV1a: Calculation of Revaluation Rate and Indexed Revaluation of System Fixed Assets									
CPI as at date of ODV		928							
For Year Ended		2005	2006	2007	2008	2009	2010	2011	2012
57	CPI at CPI reference date	953	985	1010	1044	1075	1097	1146	1164
58	Revaluation Rate	2.78%	3.32%	2.54%	3.37%	2.97%	2.05%	4.47%	1.57%
59									
60	System Fixed Assets: Regulatory Value at End of Previous Year	109,276	113,176	123,757	135,033	143,722	145,263	152,242	163,107
61	Indexed Revaluation of System Fixed Assets	3,038	3,753	3,138	4,546	4,268	2,973	6,800	2,562
62									
63									
64									
65									

AV1b: Input for prior year Acquisitions (Sales) of Assets to (from) another ELB		(\$000)							
For Year Ended		2005	2006	2007	2008	2009	2010	2011	2012
68	Acquisition of System Fixed Assets from another EDB								
69	Sale of System Fixed Assets to another EDB								
70	Net Acquisitions (Sales) of Non-System Fixed Assets from (to) an EDB								
71									
72									

REPORT AV2: REGULATORY VALUATION DISCLOSURE BY ASSET CLASS
(for System Fixed Assets)

Electricity Distribution Business: **Counties Power**
 For Year Ended: **2012**

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 18
 19
 20
 21

Subtotals by Asset Class (for System Fixed Assets)

(\$000)

	Subtransmission	Zone Substations	Distribution & LV Lines	Distribution & LV Cables	Distribution Substations and Transformers	Distribution Switchgear	Other System Fixed Assets	Total for System Fixed Assets (per AV1)
System Fixed Assets								
Regulatory Value of System Fixed Assets (as per most recent ODV)	4,832	8,574	43,693	24,553	18,688	7,545	1,391	109,276
Cumulative roll-forward since most recent ODV:								
Asset Additions								81,794
Indexed Revaluation (of System Fixed Assets)								31,077
less Regulatory Depreciation (of System Fixed Assets)								42,262
Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB								-
Net Increase (Decrease) Due to Changes in Asset Register Information								(9,208)
Regulatory Value of System Fixed Assets at Year End								170,677

from AV1

from AV1

from AV1

from AV1

from AV1

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REPORT AV3: SYSTEM FIXED ASSETS REPLACEMENT COST ROLL-FORWARD REPORT

ref		Electricity Distribution Business: Counties Power Limited	
		For Year Ended:	2012
5			
6	System Fixed Assets - Replacement Cost		
7		(\$000)	
8	Replacement cost at end of previous year	274,931	
9			
10	Asset Additions	11,809	AV3a
11	Indexed Revaluation (of System Fixed Assets)	4,318	
12	less Replacement Cost of Assets Decommissioned	651	
13	Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB	-	from AV4
14	Net Increase (Decrease) Due to Changes in Asset Register Information		
15	Replacement cost of System Fixed Assets at year end	290,407	
16			
17			
18	System Fixed Assets - Depreciated Replacement Cost		
19			
20	Depreciated Replacement Cost at end of previous year	161,967	
21			
22	Asset Additions	11,809	AV3a
23	Indexed Revaluation (of System Fixed Assets)	2,544	
24	less Depreciation of Replacement Cost	6,314	
25	less Depreciated Replacement Cost of Assets Decommissioned	563	
26	Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB	-	from AV4
27	Net Increase (Decrease) Due to Changes in Asset Register Information		
28	Depreciated replacement cost of System Fixed Assets at year end	169,443	

REPORT AV3: SYSTEM FIXED ASSETS REPLACEMENT COST ROLL-FORWARD REPORT (cont)

Notes to Price and Quality Measures

36	AV3a: New Asset Additions		
37			
38	Asset Additions - Depreciated Replacement Cost	11,809	from AV1
39	plus Difference in Replacement Cost and Depreciated Replacement Cost values of Asset Additions		
40			
41	Asset Additions - Replacement Cost	11,809	
42			

REPORT AV4: BUSINESS MERGER, ACQUISITION OR SALE - REGULATORY ASSET BASE DISCLOSURE

Electricity Distribution Business: Counties Power Limited

6 Disclosure required? (YES or NIL DISCLOSURE): NO DISCLOSURE REQUIRED

As at (date):

Proportion of year following transfer of assets: 0%

PART 1: Most recent ODV valuation of System Fixed Assets transferred

(\$000)

	Subtransmission	Zone substations	Distribution & LV Lines	Distribution & LV Cables	Distribution substations and transform	Distribution switchgear	Other System Fixed Assets	Total for System Fixed Assets
Replacement Cost (RC)								-
less Depreciation								-
Depreciated Replacement Cost (DRC)	-	-	-	-	-	-	-	-
less Optimisation adjustment								-
Optimised Depreciated Replacement Cost (ODRC)	-	-	-	-	-	-	-	-
less Economic Value Adjustment (EVA)								-
Most recent ODV value	-	-	-	-	-	-	-	-

PART 2: Valuation disclosure for transferred assets by Asset Class (at transfer date)

(\$000)

	Total for System Fixed Assets	Non-System Fixed Assets	Total RAB value (excl. FDC)
Regulatory Value of System Fixed Assets (as per most recent ODV)	-		
Cumulative roll-forward since most recent ODV:			
Asset Additions			
Indexed Revaluation (of System Fixed Assets)			
less Regulatory Depreciation (of System Fixed Assets)			
Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB			
Net Increase (Decrease) due to Changes in Asset Register Information			
RAB Value of Transferred Assets at Transfer Date	-		-
Acquisition of Assets from Another EDB	-	-	to AV1
Sale of Assets to Another EDB	-	-	to AV1
RAB Value of Transferred Assets at Transfer Date	-		
"p" factor (proportion of year following transfer of assets)	0%		
Adjustment for merger, acquisition or sale to another EDB	-		to FS2

PART 3: Rolled-forward Replacement Cost values for System Fixed Assets transferred

(\$000)

	RC & DRC values of System Fixed Assets at transfer date	RAB value of acquired/(sold) assets
Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB - RC		-
Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB - DRC		-

Signed by: Selling Entity

Acquiring Entity

REPORT AV4: BUSINESS MERGER, ACQUISITION OR SALE - REGULATORY ASSET BASE DISCLOSURE

Electricity Distribution Business: **Counties Power Limited**

6 Disclosure required? (YES or NIL DISCLOSURE): **NO DISCLOSURE REQUIRED**

7

8

9 As at (date):

10 Proportion of year following transfer of assets: **0%**

11

PART 1: Most recent ODV valuation of System Fixed Assets transferred

(\$000)

	Subtransmission	Zone substations	Distribution & LV Lines	Distribution & LV Cables	Distribution substations and transform	Distribution switchgear	Other System Fixed Assets	Total for System Fixed Assets
13 Replacement Cost (RC)								-
14								
15 less Depreciation								-
16 Depreciated Replacement Cost (DRC)	-	-	-	-	-	-	-	-
17								
18 less Optimisation adjustment								-
19 Optimised Depreciated Replacement Cost (ODRC)	-	-	-	-	-	-	-	-
20								
21 less Economic Value Adjustment (EVA)								-
22 Most recent ODV Value	-	-	-	-	-	-	-	-
23								
24								
25								

PART 2: Valuation disclosure for transferred assets by Asset Class (at transfer date)

(\$000)

	Total for System Fixed Assets	Non-System Fixed Assets	Total RAB value (excl. FDC)
27 Regulatory Value of System Fixed Assets (as per most recent ODV)	-		
28			
29 Cumulative roll-forward since most recent ODV:			
30 Asset Additions			
31 Indexed Revaluation (of System Fixed Assets)			
32 less Regulatory Depreciation (of System Fixed Assets)			
33 Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB			
34 Net Increase (Decrease) Due to Changes in Asset Register Information			
35 RAB Value of Transferred Assets at Transfer Date	-		-
36			
37 Acquisition of Assets from Another EDB	-	-	to AV1
38 Sale of Assets to Another EDB	-	-	to AV1
39			
40			
41 RAB Value of Transferred Assets at Transfer Date	-		
42 "p" factor (proportion of year following transfer of assets)	0%		
43 Adjustment for merger, acquisition or sale to another EDB		-	to FS2
44			
45			
46			

PART 3: Rolled-forward Replacement Cost values for System Fixed Assets transferred

(\$000)

	RC & DRC values of System Fixed Assets at transfer date	RAB value of acquired/(sold) assets
48 Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB - RC		-
49 Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB - DRC		-
50		to AV3
51		
52		

53 Signed by: Selling Entity

54

55 Acquiring Entity

56

57

REPORT AV4: BUSINESS MERGER, ACQUISITION OR SALE - REGULATORY ASSET BASE DISCLOSURE

Electricity Distribution Business: Counties Power Limited

6 **Disclosure required? (YES or NIL DISCLOSURE):** NO DISCLOSURE REQUIRED

7

8

9 As at (date):

10 Proportion of year following transfer of assets: 0%

11

12 **PART 1: Most recent ODV valuation of System Fixed Assets transferred** (\$000)

	Subtransmission	Zone substations	Distribution & LV Lines	Distribution & LV Cables	Distribution substations and transform	Distribution switchgear	Other System Fixed Assets	Total for System Fixed Assets
13 Replacement Cost (RC)								-
14 less Depreciation								-
15 Depreciated Replacement Cost (DRC)	-	-	-	-	-	-	-	-
16 less Optimisation adjustment								-
17 Optimised Depreciated Replacement Cost (ODRC)	-	-	-	-	-	-	-	-
18 less Economic Value Adjustment (EVA)								-
19 Most recent ODV Value	-	-	-	-	-	-	-	-

26 **PART 2: Valuation disclosure for transferred assets by Asset Class (at transfer date)** (\$000)

	Total for System Fixed Assets	Non-System Fixed Assets	Total RAB value (excl. FDC)
27 Regulatory Value of System Fixed Assets (as per most recent ODV)	-		
28 Cumulative roll-forward since most recent ODV:			
29 Asset Additions			
30 Indexed Revaluation (of System Fixed Assets)			
31 less Regulatory Depreciation (of System Fixed Assets)			
32 Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB			
33 Net Increase (Decrease) Due to Changes in Asset Register Information			
34 RAB Value of Transferred Assets at Transfer Date	-		-
35 Acquisition of Assets from another EDB	-	-	to AV1
36 Sale of Assets to another EDB	-	-	to AV1
37 RAB Value of Transferred Assets at Transfer Date	-		
38 "p" factor (proportion of year following transfer of assets)	0%		
39 Adjustment for merger, acquisition or sale to another EDB		-	to FS2

47 **PART 3: Rolled-forward Replacement Cost values for System Fixed Assets transferred** (\$000)

	RC & DRC values of System Fixed Assets at transfer date	RAB value of acquired/(sold) assets	
48 Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB - RC	-	-	to AV3
49 Net Acquisitions (Sales) of System Fixed Assets from (to) an EDB - DRC	-	-	to AV3
50			
51			
52 Signed by:	Selling Entity		
53			
54			
55			
56	Acquiring Entity		
57			

REPORT MP1: NETWORK INFORMATION

(Separate report required for each Non-Contiguous Network)

ref	Electricity Distribution Business:	Counties Power Limited	
6		For Year Ended:	2012
7	Network Name:	Counties Power Limited <small>(enter "Total Business" or name of network)</small>	
	Disclosure:	Annual Disclosure - Requirement 6(1)	
9	Circuit Length by Operating Line Voltage (at year end)		
10		Overhead (km)	Underground (km)
11			Total (km)
12	> 66kV	44	-
13	50kV & 66kV	-	-
14	33kV	107	2
15	SWER (all SWER voltages)	-	-
16	22kV (other than SWER)	395	47
17	6.6kV to 11kV (inclusive - other than SWER)	1,076	110
18	Low Voltage (< 1kV)	790	484
19	Total circuit length (for Supply)	2,412	643
			3,055 <small>to MP2</small>
20	Dedicated Street Lighting Circuit Length		
21		-	6
22			6
23	Overhead Circuit Length by Terrain (at year end)		
24		(km)	(%)
25	Urban (only)	69	3%
26	Rural (only)	2,269	94%
27	Remote (only)	-	0%
28	Rugged (only)	74	3%
29	Rural & rugged (only)	-	0%
30	Remote & rugged (only)	-	0%
31	Unallocated overhead lines	-	0%
32	Total overhead length	2,412	100%
33		<small>Error (Row19)</small>	
34	Transformer capacity (at year end)		
35	Distribution Transformer Capacity (EDB Owned)	282 MVA	277 <small>Previous Year</small>
36	Distribution Transformer Capacity (Non-EDB Owned, Estimated)	29 MVA	27
37	Total Distribution Transformer Capacity	311 MVA (to MP2)	304
38			
39	Zone Substation Transformer Capacity	178 MVA	178
40			
41	System Fixed Assets age (at year end)		
42	Average Age of System Fixed Assets	21 Years	
43	Average Expected Total Life of System Fixed Assets	51 Years	
44	Average Age as a Proportion of Average Expected Total Life	40%	
45			
46	Estimated Proportion of Assets (by Replacement Cost) within 10 years of Total Life	13%	
47			
48			
49			
50			
51	Electricity demand		
52		Maximum coincident system demand (MW)	Non-coincident Sum of maximum demands (MW)
53	GXP Demand	94	103
54	plus Embedded Generation Output at HV and Above	4	
55	Maximum System Demand	98	
56	less Net Transfers to (from) Other EDBs at HV and Above		
57	Demand on system for supply to customers' Connection Points	98	
58	less Subtransmission Customers' Connection Point Demand		
59	Maximum Distribution Transformer Demand	98	
60			<small>to MP2</small>
61	GXP Demand not Supplied at Subtransmission Level		
62	Embedded Generation Output - Connected to Subtransmission System		
63	Net Transfers to (from) Other EDBs at Subtransmission Level Only		
64			
65	Estimated Controlled Load Shed at Time of Maximum System Demand (MW)	11	
66			
67	Five-Year System Maximum Demand Growth Forecast	1.7	% p.a.
68			
69	Electricity volumes carried		
70		(GWh)	
71	Electricity Supplied from GXPs	480	
72	less Electricity Exports to GXPs		
73	plus Electricity Supplied from Embedded Generators	40	
74	less Net Electricity Supplied to (from) Other EDBs		
75	Electricity entering system for supply to customers' Connection Points	520	
76	less Electricity Supplied to Customers' Connection Points	490	
77	Electricity Losses (loss ratio)	30	5.9% <small>to MP2</small>
78			
79	Electricity Supplied to Customers' Connection Points	490	
80	less Electricity Supplied to Largest 5 Connection Points	50	
81	Electricity supplied other than to Largest 5 Connection Points	439	90% <small>to MP2</small>
82			
83	Load Factor	61%	%
84			
85	Number of Connection Points (at year end)	37,222	ICPs <small>to MP2</small>
86			
87	Intensity of service requirements		
88	Demand Density (Maximum Distribution Transformer Demand / Total circuit length)	32	kW/km
89	Volume Density (Electricity Supplied to Customers' Connection Points / Total circuit length)	160	MWh/km
90	Connection Point Density (ICPs / Total circuit length)	12	ICP/km
91	Energy Intensity (Electricity Supplied to Customers' Connection Points / ICP)	13,152	kWh/ICP

REPORT MP2: PERFORMANCE MEASURES

Electricity Distribution Business: **Counties Power Limited**
 For Year Ended: **2012**

Performance comparators

	Previous Years:			Current Financial Year		
	Current Yr - 3	Current Yr - 2	Current Yr - 1			
Operational expenditure ratio						
<i>Total Operational Expenditure</i>	10	10	10	10	\$m	from FS1
<i>Replacement Cost of System Fixed Assets (at year end*)</i>	242	255	275	290	\$m	from AV3
Ratio (%)	4.04%	3.77%	3.58%	3.35%		
Capital expenditure ratio						
<i>Total Capital Expenditure on System Fixed Assets</i>	11	11	11	13	\$m	from FS2
<i>Replacement Cost of System Fixed Assets (at year end*)</i>	242	255	275	290	\$m	from AV3
Ratio (%)	4.41%	4.27%	3.98%	4.34%		
Capital expenditure growth ratio						
<i>Capital Expenditure: Customer Connection and System Growth</i>	6	5	5	6	\$m	from FS2
<i>Change in Total Distribution Transformer Capacity</i>	14	21	7	7	MVA	from MP1
\$/kVA	445	258	647	928	\$/kVA	
Renewal expenditure ratio						
<i>Capital & Operational Expenditure: Asset Replacement, Refurbishment and Renewal</i>	3	5	5	5	\$m	from FS1 & 2
<i>Regulatory Depreciation of System Fixed Assets</i>	4	6	6	7	\$m	from AV1
Ratio (%)	70%	77%	86%	71%		
Distribution Transformer Capacity Utilisation						
<i>Maximum Distribution Transformer Demand</i>	94	96	99	98	MW	from MP1
<i>Total Distribution Transformer Capacity (at year end*)</i>	276	297	304	311	kVA	from MP1
Ratio (%)	34.1%	32.3%	32.5%	31.4%		
Return on Investment						
<i>Regulatory Profit / Loss (pre-financing and distributions)</i>	14	9	12	14	\$m	from FS1
<i>less Interest Tax Shield Adjustment</i>	2	1	1	1	\$m	from FS3
<i>Adjusted Regulatory Profit</i>	12	8	11	13	\$m	
<i>Regulatory Investment Value</i>	171	175	182	190	\$m	from FS2
Ratio (%)	7.29%	4.52%	6.05%	6.83%		

* If a Merger or Asset Transfer with another EDB was entered into during the year, the denominators are calculated as time-weighted averages.

Expenditure comparison table

	Expenditure metrics (\$ per):				
	Total circuit length (for Supply) (\$/km)	Electricity Supplied to Customers' Connection Points (\$/MWh)	Maximum coincident system demand (\$/MW)	Connection Point (\$/ICP)	Distribution Transformer Capacity (EDB-Owned) (\$/MVA)
Capital Expenditure (\$) per #	1,926	12	60,262	158	20,875
Operational Expenditure (\$) per	3,186	20	99,695	261	34,535
Capital Expenditure (\$) per without adjustment is	4,452	28	139,307	365	48,258

#The adjustment to Non system asset value in current year to remove asset values included in both system assets and non-system assets; impacts performance measures.

REPORT MP3: PRICE & QUALITY MEASURES
 (Separate report required for each Non-contiguous Network)

Electricity Distribution Business: **Counties Power Limited**
 For Year Ended: **2012**

Network Name: **Counties Power Limited**
 Disclosure: **Annual Disclosure - Requirement 6(1)**

QUALITY

Interruptions

Interruptions by class

Class A	-	planned interruptions by Transpower:
Class B	140	planned interruptions on the network
Class C	147	unplanned interruptions on the network
Class D	-	unplanned interruptions by Transpower
Class E	-	unplanned interruptions of network owned generation
Class F	-	unplanned interruptions of generation (non-network)
Class G	-	unplanned interruptions caused by other electricity industry participant
Class H	-	planned interruptions caused by other electricity industry participant
Total	287	Total of above

Interruption targets for Forecast Year

	2013	Current Financial Year +1
Class B	90	planned interruptions on the network
Class C	100	unplanned interruptions on the network

Average interruption targets for 5 Forecast Years

	2013-2017	Current Financial Year +1 to +5
Class B	90	planned interruptions on the network
Class C	100	unplanned interruptions on the network

Class C interruptions restored within

	≤3Hrs	>3hrs
	103	44

Faults

Faults per 100 circuit kilometres

The total number of faults for Current Financial Year	4.81	in year	2012
The total number of faults forecast for the Forecast Year	3.27	in year	2013
The average annual number of faults forecast for the 5 Forecast Years	3.27	average over years	2013-2017

Fault Information per 100 circuit kilometres by Voltage and Type

	6.6kV & 11kV non-SW		22kV non-SW	SW	33kV	50kV & 66kV	>66kV
	Yes	Yes	No	Yes	No	Yes	
Is this voltage part of the EDB system?							
Current Financial Year	9.95	5.21		5.50		-	
Forecast Year	6.32	4.76		3.66		-	
Average annual for 5 Forecast Years	6.32	4.76		3.66		-	

Fault Information per 100 circuit kilometres by Voltage and Type

	6.6kV & 11kV non-SW		22kV non-SW	SW	33kV	50kV & 66kV	>66kV
	Underground	Overhead					
Underground	0.91	-		-		-	
Overhead	10.87	5.83		5.62		-	

Reliability

Overall reliability

	SAIDI	SAIFI	CAIDI
Based on the total number of interruptions	88.02	2.34	37.62

Reliability by interruption class

	SAIDI	SAIFI	CAIDI
Class B	20.01	0.14	147.47
Class C	68.00	2.20	30.85

Targets for Forecast Year

	SAIDI	SAIFI	CAIDI
Class B	15.00	0.15	100.00
Class C	70.00	2.30	30.43

Average targets for 5 Forecast Years

	SAIDI	SAIFI	CAIDI
Class B	15.00	0.15	100.00
Class C	70.00	2.30	30.43

PRICES

Price information by Connection Point Class

	Connection Point Class				Total	
	Small Connection Points	Medium Connection Points	Large Connection Points	Largest 5 Connection Points		
Gross line charge income (\$000)	13,824	16,096	6,235	1,654	37,809	from FS1
Electricity Supplied to Customers' Connection Points (MWh)	138,600	206,245	94,222	50,463	489,530	from MP1
Number of Connection Points (ICPs) at year end	26,718	10,328	171	5	37,222	from MP1
Unit Price (cents/kWh)	10.0	7.8	6.6	3.3	7.7	
Relative Unit Price Index	1.00	0.78	0.66	0.33	0.77	

REPORT MP3: PRICE AND QUALITY (cont)

Notes to Price and Quality Measures

89	MP3a: Connection Point Class breakpoints	
90		
91	Connection Point Class breakpoints methodology	Metering installation category based breakpoints
92		
93	kVA based breakpoints - additional disclosure	
94	Breakpoint between small and medium classes	_____ kVA
95	Breakpoint between large and medium classes	_____ kVA
96		

REPORT AM1: EXPENDITURE FORECASTS AND RECONCILIATION

ref		Electricity Distribution Business:	Counties Power				
5			For Year Ended 2012				
6	A) Five year forecasts of expenditure		(\$000)				
7	<i>From most recent Asset Management Plan</i>						
			Forecast Years				
		Actual for Current Financial Year	year 1	year 2	year 3	year 4	year 5
8			2012	2013	2014	2015	2016
9		<i>for year ended</i>					
10	Capital Expenditure: Customer Connection	2,005	2,259	1,942	1,989	2,204	2,254
11	Capital Expenditure: System Growth	4,437	5,713	8,758	11,031	4,794	3,394
12	Capital Expenditure: Reliability, Safety and Environment	1,972	1,359	1,356	2,868	1,311	1,341
13	Capital Expenditure: Asset Replacement and Renewal	4,017	3,482	3,128	2,305	3,576	4,137
14	Capital Expenditure: Asset Relocations	171	230	236	241	247	252
15	Subtotal - Capital Expenditure on asset management	12,602	13,043	15,420	18,434	12,132	11,378
16							
17	Operational Expenditure: Routine and Preventative Maintenance	1,149	1,437	1,509	1,582	1,658	1,735
18	Operational Expenditure: Refurbishment and Renewal Maintenance	826	886	930	975	1,022	1,069
19	Operational Expenditure: Fault and Emergency Maintenance	1,495	1,328	1,394	1,462	1,532	1,603
20	Subtotal - Operational Expenditure on asset management	3,470	3,651	3,833	4,019	4,212	4,407
21							
22	Total direct expenditure on distribution network	16,072	16,694	19,253	22,453	16,344	15,785
23							
24	Overhead to Underground Conversion Expenditure	2,035	1,293	157	842	165	168
26	<i>The Electricity Distribution Business is to provide the amount of Overhead to Underground Conversion Expenditure included in each of the above Expenditure Categories (explanatory notes can be provided in a separate note if necessary).</i>						
27							
28							
30							

The Counties Power policy for Overhead to Underground conversion is stated in the Counties Power trust 2013 Statement of Corporate Intent 6.2(i): 1. Counties Power will generally only underground lines when, in Counties Power's opinion, there are sound technical, safety or financial reasons to do so and where it is not possible or practicable to relocate or reconstruct an existing overhead line.

30	B) Variance between Previous Forecast for the Current Financial Year, and Actual Expenditure				
		Actual for Current Financial Year (a)	Previous forecast for Current Financial Year (b)	% Variance (a)/(b)-1	
32					
33					
34	Capital Expenditure: Customer Connection	2,005	1,360	47.5%	<i>from row 10</i>
35	Capital Expenditure: System Growth	4,437	5,620	-21.0%	<i>from row 11</i>
36	Capital Expenditure: Reliability, Safety and Environment	1,972	1,930	2.2%	<i>from row 12</i>
37	Capital Expenditure: Asset Replacement and Renewal	4,017	3,872	3.8%	<i>from row 13</i>
38	Capital Expenditure: Asset Relocations	171	300	-43.2%	<i>from row 14</i>
39	Subtotal - Capital Expenditure on asset management	12,602	13,082	-3.7%	
40					
41	Operational Expenditure: Routine and Preventative Maintenance	1,149	1,434	-19.9%	<i>from row 17</i>
42	Operational Expenditure: Refurbishment and Renewal Maintenance	826	839	-1.5%	<i>from row 18</i>
43	Operational Expenditure: Fault and Emergency Maintenance	1,495	1,299	15.1%	<i>from row 19</i>
44	Subtotal - Operational Expenditure on asset management	3,470	3,572	-2.9%	
45					
46	Total direct expenditure on distribution network	16,072	16,654	-3.5%	
47					
48					

Explanation of variances
Distribution Business must provide a brief explanation for any line item variance of more than 10%

Explanatory notes (can be provided in a separate note if necessary): Customer Connection variance of 48% was due to higher quantity of new connections than forecast, forecast was based on average of previous years and adjusted to reflect impacts of the economic outlook. System Growth variance of negative 21% due to deferral of planning expenditure against the Tuakau 110kV line route (-\$400K) and the Pukekohe East conversion project (-\$600K). Asset Relocations variance of negative 43% reflects lower than expected requests from Auckland Transport and Waikato District Council (possibly due to reformatting council boundaries). Routine and Preventative Maintenance was 20% below forecast due to reclassification of corrective inspection work to Refurbishment and Renewal, Fault and Emergency was overspent by 15% due to unrecoverable costs of third party damages and impacts from weather related faults.

TRANSITIONAL PROVISIONS

	2012	2011	2010	2009	2008	2007
Transformer Capacity (kVA) See note below	281,826	276,750	270,040	262,571	261,760	258,878

	2012	2011	2010	2009	2008	2007
Direct line Costs per Kilometre	1,782	1,868	1,718	1,795	1,593	1,440
Indirect Line Costs per ICP	110	104	111	103	104	93

	Nominal Voltage	2012	2011	2010	2009	2008	2007
System Length (km's)	110kV	44.03	44.03	44.03	44.03	44.03	43.27
	33kV	109.16	108.94	108.94	108.86	108.35	108.35
	22kV	441.56	343.56	330.20	272.53	265.91	264.61
	11kV	1185.98	1277.59	1,280.98	1,317.85	1,303.81	1,321.69
	230/400V	1274.22	1258.71	1,258.34	1,265.73	1,252.99	1,225.00
	Total		3054.95	3032.82	3,022.49	3,009.01	2,975.08
Overhead Lines (km's)	110kV	44.03	44.03	44.03	44.03	44.03	43.27
	33kV	106.79	106.77	106.78	107.11	106.66	106.66
	22kV	394.69	305.54	296.70	246.97	239.67	238.53
	11kV	1076.00	1165.23	1,177.21	1,218.29	1,209.01	1,210.35
	230/400V	790.44	797.99	813.60	829.86	830.52	852.85
	Total		2411.94	2419.55	2,438.31	2,446.25	2,429.88
Underground Cables (km's)	110kV	0.00	0.00	0.00	0.00	0.00	0.00
	33kV	2.37	2.17	2.17	1.75	1.69	1.69
	22kV	46.87	38.02	33.50	25.56	26.24	26.08
	11kV	109.98	112.37	103.77	99.57	94.80	111.34
	230/400V	483.78	460.72	444.74	435.87	422.47	372.15
	Total		643.01	613.27	584.18	562.75	545.20

Note: EDB Owned

3. RELATED PARTY NOTE

a) The Lines business enters into transactions with the “Other” Business. The relationship is managed on an arms length basis, with significant contracts generally awarded by the Lines business on a competitive tendering basis.

b) & c) The services provided by the “Other” Business generally include normal electrical construction, maintenance and fault response services related to the Lines business electrical network.

d) Services provided were in the following categories and at total prices as indicated in \$000:

	31 March 2012 \$000
Construction of subtransmission assets	0
Construction of zone substations	-
Construction of distribution lines and cables	3,194
Construction of medium voltage switch gear	-
Construction of distribution transformers	185
Construction of distribution substations	52
Construction of low voltage reticulation	642
Construction of other system fixed assets	13
Maintenance of assets	2,164

e) Services were provided throughout the financial year.

f) There were no outstanding trade balances owing at year-end for services performed by the other business for the Lines business, as payment is effected by way of accounting entry at the end of each month. Loan funding was provided by the Other business to the Lines Business, as disclosed in Note 8. As the Lines and Other Businesses operate as a single legal entity no formal loan documentation is prepared in respect of loans between them. The loan has been treated in the Lines Business financial statements as being on-call.

g) No debts arising from related party transactions have been written off or forgiven during the year.

h) No transactions were undertaken at a nil or nominal value, other than minor items as would occur in a normal arms length relationship.

FORM 1 – CERTIFICATE FOR DISCLOSED INFORMATION

Pursuant to Requirement 11(1)

We, Peter William Fitzsimmons and Paul Corbett Brown, directors of Counties Power Limited certify that, having made all reasonable enquiry, to the best of our knowledge, the following attached audited information of Counties Power Limited prepared for the purposes of requirement 3, 4, 6 and 7(5) of the Commerce Commission's Electricity Distribution (Information Disclosure) Requirements 2008 complies with those Requirements –

- (i) Report FS1: Regulatory Profit Report;
- (ii) Report FS2: Regulatory Asset and Financing Report;
- (iii) Report FS3: Regulatory Tax Allowance Report;
- (iv) Report AV1: Annual Regulatory Valuation Roll-Forward Report;
- (v) Report AV2: Valuation Disclosure by Asset Class (for System Fixed Assets);
- (vi) Report AV3: System Fixed Assets Replacement Cost Roll-Forward Report;
- (vii) Report AV4: Merger or Acquisition Regulatory Asset Base Disclosure;
- (viii) Report MP1 Network Information Report;
- (ix) Report MP2: Performance Measures Report;
- (x) Report MP3: Price and Quality Report; and
- (xi) Report AM1: Expenditure Forecasts and Reconciliation.



Peter W Fitzsimmons (Director)



Paul C Brown (Director)

19 December 2012



Auditor's Independent Assurance Report

To the Readers of Counties Power Limited's
Report for the Financial Year Ended 31 March 2012 regarding Counties Power
Limited's Compliance with the Electricity Distribution (Information Disclosure)
Requirements 2008

The Auditor-General is the auditor of Counties Power Limited (the company). The Auditor-General has appointed me, Pip Cameron, using the staff and resources of PricewaterhouseCoopers, to provide an opinion, on her behalf, on the company's report for the financial year ended 31 March 2012 on pages 1 to 17 regarding compliance with the Commerce Commission's Electricity Distribution (Information Disclosure) Requirements 2008 (the Requirements). In this independent assurance report we refer to the company's report as the 'disclosure information'. The disclosure information comprises both historical and prospective financial and non-financial information.

Respective responsibilities

The Board of Directors is responsible for preparing disclosure information that complies with the Requirements.

Clause 10 of the Requirements requires the Auditor-General to provide an opinion on whether the disclosure information prepared by the company complies with and is presented in all material respects in accordance with the Requirements.

Limitations and use of this independent assurance report

This independent assurance report has been prepared solely to discharge the Auditor-General's responsibilities under the Requirements for the financial year ended 31 March 2012. This independent assurance report is not intended to be used for any purposes, other than that for which it was prepared.

Because of the inherent limitations in evidence gathering procedures, it is possible that fraud, error or non-compliance may occur and not be detected. As the procedures performed for this engagement are not performed continuously throughout the financial year and the procedures performed in respect of the company's compliance with the Requirements 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 Requirements. Our opinion has been formed on the above basis.

Basis of opinion

The company's financial statements for the year ended 31 March 2012 have been subject to audit. The audit opinion on the financial statements of the company and group for the year ended 31 March 2012 was unqualified and dated 27 June 2012. Our audit opinion on the statement of service performance was qualified in respect of non-financial performance targets pertaining to outage statistics (SAIDI and SAIFI) because of lack of independent evidence available to support the completeness and accuracy of SAIDI and SAIFI.

Our work has been planned and performed to obtain all the information and explanations we considered necessary in order to obtain reasonable assurance that the disclosure information complies with and has been presented in all material respects in accordance with the Requirements. We also included an assessment of the significant estimates and judgements, if any, made by the company in the preparation of the disclosure information.



A matter is material if it would affect readers' overall understanding of the disclosure information prepared by the company.

Historical financial and non-financial information

Our work on the historical financial and non-financial information has been carried out in accordance with the Standard on Assurance Engagements (New Zealand) 3100: *Compliance Engagements* and ISAE (NZ) 3000: *Assurance Engagements Other than Audits or Reviews of Historical Financial Information* issued by the New Zealand Institute of Chartered Accountants.

Our work in respect of amounts and disclosures that were audited under the financial statement audit was limited to agreeing the amounts and disclosures to the underlying records, and, where possible, to the audited financial statements of the company, and that the information has been presented in all material respects in accordance with the Requirements.

Our work in respect of amounts and disclosures that were not audited under the financial statement audit has been planned and performed to obtain all the information and explanations we considered necessary in order to obtain reasonable assurance that the disclosure information has been presented in all material respects in accordance with the Requirements.

Prospective financial and non-financial information

Our work on the prospective financial and non-financial information has been limited to assessing whether the information has been presented on a basis consistent with the regulatory accounting or technical measurement requirements used for disclosures for the financial year ended 31 March 2012 and the immediately preceding financial year, and that the information has been calculated based on source data provided by the company. We have not performed audit procedures on the source data and therefore do not provide any assurance on this data.

We acknowledge that it is likely that actual results will vary from those forecasted, since anticipated events frequently do not occur as expected (and those variations may be significant).

Independence

When carrying out the engagement we followed the independence requirements of the Auditor-General, which incorporate the independence requirements of the New Zealand Institute of Chartered Accountants. We also complied with the Independent auditor provisions on independence, as specified in clause 2(1) of the Requirements.

In addition to the engagement, we have performed other audit assignments for the company. This involved issuing an independent assurance opinion on the annual financial statements, on behalf of the Auditor-General pursuant to Section 15 of the Public Audit Act 2001, Section 45(1) of the Energy Companies Act 1992 and the Financial Reporting Act 1993. We have also provided regulatory compliance advice and other advisory services to the company. These assignments were compatible with the Auditor-General's independence requirements. Other than these assignments, we have no relationship with or interests in the company or any of its subsidiaries.



Opinions

Qualified Opinion

Report MP3: price and quality measures

The scope of our engagement was subject to the following limitations as described in our qualified audit opinion on the company's statement of service performance for the year ended 31 March 2012:

- There is no independent evidence available to support the completeness and accuracy of recorded faults; and
- Control over the completeness and accuracy of interconnection point ('ICP') data included in the SAIDI and SAIFI calculations is limited throughout the period.

There are no practical audit procedures that we could adopt to confirm independently that all the outage and ICP data was properly recorded for the purposes of inclusion in the amounts relating to quality measures (SAIDI and SAIFI) set out in lines 10 – 22, lines 35 – 44, lines 48 – 67 and line 78 of report MP3: Price and Quality Measures.

Because of the potential effect of the limitations described above, we are unable to form an opinion as to whether the company has kept proper records to support the amounts or details set out in the quality measures in lines 10 – 22, lines 35 – 44, lines 41 – 67 and line 78 of report MP3: Price and Quality Measures.

In these respects alone we have not obtained all the information and explanations that we have required.

Unqualified Opinions

Report MP3: Price and Quality Measures

In our opinion, the company has:

- kept proper records to enable the complete and accurate compilation of gross line charge income, electricity supplied to customers' connection points and unit prices included in report MP3 in all material respects, as far as appears from our examination of those records;
- prepared disclosure information in report MP3 for the financial year ended 31 March 2012 that complies with the Requirements, in all material respects;
- presented the historical financial information included in report MP3 for the financial year ended 31 March 2012 in accordance with the Requirements, in all material respects;
- compiled the historical non-financial information included in report MP3 in accordance with the guidance issued pursuant to the Requirements, and has calculated the historical non-financial information based on unaudited source data provided by the company; and
- presented the prospective financial and non-financial information in report MP3 on a basis consistent with the regulatory accounting or technical measurement requirements used for disclosures for the financial year ended 31 March 2012 and the immediately preceding financial year, and has calculated the prospective financial and non-financial information based on unaudited source data provided by the company.



Reports FS1, FS2, FS3, AV1, AV2, AV3, AV4, MP1, MP2 and AM1

In our opinion:

- the company has kept proper records to enable the complete and accurate compilation of required information, in all material respects, as far as appears from our examination of those records; and
- the disclosure information prepared by the company for the financial year ended 31 March 2012 complies with the Requirements, in all material respects.

Historical Financial and Non-Financial Information

Reports FS1, FS2, FS3, AV1, AV2, AV3, AV4, MP1, MP2 and AM1

In our opinion, the company has:

- presented the historical financial information in reports FS1, FS2, FS3, AV1, AV2, AV3, AV4, MP2 and AM1 for the financial year ended 31 March 2012 in compliance with the Requirements in all material respects, and
- compiled the historical non-financial information included in reports MP1 and MP2 in accordance with the guidance (if any) issued pursuant to the Requirements, and has calculated the historical non-financial information based on un-audited source data provided by the company.

Prospective Financial and Non-Financial Information

Report AM1

In our opinion, the company has:

- presented the prospective financial and non-financial information in report AM1 on a basis consistent with the regulatory accounting or technical measurement requirements used for disclosures for the financial year ended 31 March 2012 and the immediately preceding financial year; and
- calculated the prospective financial and non-financial information based on source data provided by the company.

A handwritten signature in blue ink, appearing to read 'Pip Cameron'.

Pip Cameron
On behalf of the Auditor-General
Auckland, New Zealand

A handwritten signature in black ink, appearing to read 'PricewaterhouseCoopers'.

PricewaterhouseCoopers

21 December 2012