Firstgas

Information disclosure for the gas distribution business

Year ending 30 September 2018



First Gas Limited 28 February 2019



Introduction

First Gas operates 2,500km of gas transmission pipelines (including the Maui pipeline), and more than 4,700km of gas distribution pipelines across the North Island. These gas infrastructure assets transport gas from Taranaki to major industrial gas users, electricity generators, businesses and homes, and transport around 20 percent of New Zealand's primary energy supply.

For further information on First Gas, please visit our website www.firstgas.co.nz.

Information disclosure

This document contains First Gas' annual information disclosure for the gas distribution business, for the year ending on 30 September 2018, as required by the *Gas Distribution Information Disclosure Determination (No.1) 2017* consolidating all amendments as of 14 June 2017 ("the Determination") issued by the Commerce Commission.

The following documents are provided with this information disclosure:

- Schedules 1 10: Financial and technical schedules
- Schedules 14 15: Mandatory and voluntary explanatory notes
- · Schedule 19: Director certification
- KPMG assurance report

This information disclosure was prepared on 28 February 2019.

Further information

For further information regarding this information disclosure, please contact:

Karen Collins
Regulatory Policy Manager
First Gas Limited
Karen.Collins@firstgas.co.nz
04 979 5368

Disclaimer

For presentation purposes, some numbers in the information disclosure schedules have been rounded. This may cause small discrepancies or rounding inconsistencies when aggregating some of the information presented in the information disclosure schedules. These discrepancies do not affect the overall compliance calculations which are based on the more detailed information.



GDB Information Disclosure Requirements Information Templates for Schedules 1–10

Company Name
Disclosure Date
Disclosure Year (year ended)

First Gas Limited (Distribution)
31 March 2019

30 September 2018

Templates for Schedules 1–10 excluding 5f–5g Template Version 4.1. Prepared 24 March 2015

Table of Contents

Schedule Description

- 1 <u>Analytical Ratios</u>
- 2 Report on Return on Investment
- 3 Report on Regulatory Profit
- 4 Report on Value of the Regulatory Asset Base (Rolled Forward)
- 5a Report on Regulatory Tax Allowance
- 5b Report on Related Party Transactions
- 5c Report on Term Credit Spread Differential Allowance
- 5d Report on Cost Allocations
- 5e Report on Asset Allocations
- 5h Report on Transitional Financial Information
- 6a Report on Capital Expenditure for the Disclosure Year
 6b Report on Operational Expenditure for the Disclosure Year
- 7 <u>Comparison of Forecasts to Actual Expenditure</u>
- 8 Report on Billed Quantities and Line Charge Revenues (by Price Component)
- 9a <u>Asset Register</u> 9b <u>Asset Age Profile</u>
- 9c Report on Pipeline Data
- 9d Report on Demand
- 10a Report on Network Reliability and Interruptions
- 10b Report on Network Integrity and Consumer Service

Company Name For Year Ended First Gas Limited (Distribution) 30 September 2018

SCHEDULE 1: ANALYTICAL RATIOS

S	CHEDULE 1: ANALYTICAL RATIOS					
	is schedule calculates expenditure, revenue and service ratios from the information disclosed. The o					
	mmerce Commission will publish a summary and analysis of information disclosed in accordance wi	ith the ID determination	on. This will include i	nformation disclosed	I in accordance with the	nis and other schedules, and
	formation disclosed under the other requirements of the determination. is information is part of audited disclosure information (as defined in section 1.4 of the ID determin:	ation) and so is subje	ct to the assurance re	anort required by sec	tion 2.8	
		ation, and so is subje	ct to the assurance it	port required by see		
re						
7	1(i): Expenditure Metrics					
	1(1). Experience interies			Ratio of		
		Expenditure per TJ		expenditure to	Expenditure per	
		energy delivered		maximum monthly		
		to ICPs	average no. of ICPs	load	supply	
8		(\$/TJ)	(\$/ICP)	(\$ per GJ/month)	(\$/km)	
9	Operational expenditure	1,122	158	9	2,119	
0	Network	436	61	4	823	
1	Non-network	686	97	6	1,296	
2	F	4.505	215	13	2.002	
3	Expenditure on assets	1,526		13	2,882	
!4 !5	Network Non-network	1,504 22	212	0	2,841 41	
16	Non-network		3	U	41	
17	1(ii): Revenue Metrics					
	-(-).					
		Revenue per TJ				
		energy delivered to ICPs	Revenue per			
8		(\$/TJ)	average no. of ICPs (\$/ICP)			
19	Total line charge revenue	2,640	372			
20	Standard consumer line charge revenue	4,913	363			
21	Non-standard consumer line charge revenue	142	37,561			
22	·					
23	1(iii): Service Intensity Measures					
24						
25	Demand density	228	Maximum month	ly load (GJ per monti	h) per system length	
6	Volume density	2	Quantity of gas d	elivered per km of sy	stem length (TJ/km)	
7	Connection point density	13	Average number	of ICPs in disclosure y	vear per system lengtl	'n
28	Energy intensity	141	Total GJ delivered	to ICPs per average	number of ICPs in disc	closure year
29						
0	1(iv): Composition of Revenue Requirement					
1		(\$000)	% of revenue			
2	Operational expenditure	9,996	42.50%			
3	Pass-through and recoverable costs excluding financial incentives and wash-ups		2.06%			
4	Total depreciation	5,970	25.38%			
35	Total revaluations	2,811	11.95%			
	Regulatory tax allowance	3,061	13.02%			
36	Regulatory profit/(loss) including financial incentives and wash-ups	6,819	28.99%			
37						
37 38	Total regulatory income	23,519				
37 38 39	Total regulatory income	23,519				
37 38 39 40		23,519				
37 38 39	Total regulatory income	23,519	Interruptions	100km of system len	ath	

3



Company Name First Gas Limited (Distribution) 30 September 2018 For Year Ended **SCHEDULE 2: REPORT ON RETURN ON INVESTMENT** This schedule requires information on the Return on Investment (ROI) for the GDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. GDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of the ID Determination or if they elect to. If a GDB makes this election, information supporting this calculation must be provided in 2(iii). GDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. sch ref 2(i): Return on Investment CY-2 CY-1 **Current Year CY** for year ended 30 Sep 16 30 Sep 17 30 Sep 18 ROI - comparable to a post tax WACC 10 Reflecting all revenue earned 7 89% 10.04% 4 23% 11 Excluding revenue earned from financial incentives 7.89% 10.04% 4.23% 12 Excluding revenue earned from financial incentives and wash-ups 10.04% 4.23% 13 Mid-point estimate of post tax WACC 6.02% 5.45% 5.18% 14 15 25th percentile estimate 5.21% 4 64% 4 47% 16 75th percentile estimate 6.83% 17 18 ROI - comparable to a vanilla WACC 19 20 Reflecting all revenue earned 8.52% 10.58% 4.75% 21 Excluding revenue earned from financial incentives 8.52% 10.589 4.75% 22 Excluding revenue earned from financial incentives and wash-ups 10.58 23

7.44%

6.65%

5.84%

7.46%

7.44%

5.99%

5.18%

6.80%

142 361

23.521

(\$000)

6.41%

5.71%

5.00%

2(ii): Information Supporting the ROI

25th percentile estimate

75th percentile estimate

WACC rate used to set regulatory price path

Mid-point estimate of vanilla WACC

Total opening RAB value 147,907

plus Opening deferred tax (5,546)

Opening RIV

Line charge revenue

24

25

26

27

28

29

30 31 32

33

34

35

44 45

51 52 53

54 55

56

57

58 59 Mid

id-year n	et cash flows		21,342
less	Other regulated income	(2)	
plus	Tax payments	2,302	
less	Asset disposals	2	
plus	Assets commissioned	8,561	
	Expenses cash outflow	10,480	

Term credit spread differential allowance

	Total closing RAB value	153,499	
less	Adjustment resulting from asset allocation	192	
less	Lost and found assets adjustment	-	
plus	Closing deferred tax	(6,306)	
Closing RIV			147,002

ROI – comparable to a vanilla WACC

Leverage (%)
Cost of debt assumption (%)
Corporate tax rate (%)

ROI – comparable to a post tax WACC

4.2%

4.2%

4.2%

4.2%

4.2%

4.2%

4.23%



4.75%

Company Name First Gas Limited (Distribution) 30 September 2018 For Year Ended **SCHEDULE 2: REPORT ON RETURN ON INVESTMENT** This schedule requires information on the Return on Investment (ROI) for the GDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. GDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of the ID Determination or if they elect to. If a GDB makes this election, information supporting this calculation must be provided in 2(iii). GDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. sch re 61 2(iii): Information Supporting the Monthly ROI 62 63 **Opening RIV** N/A 64 65 (\$000) Line charge **Expenses cash** Assets Asset disposals Other regulated Monthly net cash 66 commissioned revenue outflow income outflows 67 Month 1 Month 2 68 69 Month 3 70 Month 4 71 Month 5 72 Month 6 Month 7 73 74 Month 8 75 Month 9 Month 10 76 77 Month 11 78 Month 12 79 Total 80 81 Tax Payments N/A 82 83 Term credit spread differential allowance N/A 84 N/A Closing RIV 85 86 87 N/A 88 Monthly ROI – comparable to a vanilla WACC 89 Monthly ROI - comparable to a post tax WACC N/A 90 91 2(iv): Year-End ROI Rates for Comparison Purposes 92 93 94 4.65% Year-end ROI - comparable to a vanilla WACC 95 96 Year-end ROI – comparable to a post tax WACC 4.12% 97 * these year-end ROI values are comparable to the ROI reported in pre 2012 disclosures by GDBs and do not represent the Commission's current view on ROI. 98 99 2(v): Financial Incentives and Wash-Ups 100 101 102 Net recoverable costs allowed under incremental rolling incentive scheme 103 Other financial incentives 104 Financial incentives 105 Impact of financial incentives on ROI 106 107 108 Input methodology claw-back 109 Recoverable customised price-quality path costs 110 Wash-up costs 111 112 113 Impact of wash-up costs on ROIs

5



First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended **SCHEDULE 3: REPORT ON REGULATORY PROFIT** This schedule requires information on the calculation of regulatory profit for the GDB for the disclosure year. GDBs must complete all sections and must provide explanatory comment on their regulatory profit in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. 3(i): Regulatory Profit (\$000) Income 23,521 Line charge revenue 10 Gains / (losses) on asset disposals Other regulated income (other than gains / (losses) on asset disposals) 12 23 519 13 Total regulatory income Operational expenditure 9,996 15 less 16 17 Pass-through and recoverable costs excluding financial incentives and wash-ups 484 13,039 19 Operating surplus / (deficit) 20 Total depreciation 5,970 22 23 plus Total revaluations 2,811 24 25 Regulatory profit / (loss) before tax 26 27 Term credit spread differential allowance 28 3,061 less Regulatory tax allowance 29 30 31 Regulatory profit/(loss) including financial incentives and wash-ups 6,819 32 3(ii): Pass-through and recoverable costs excluding financial incentives and wash-ups (\$000) 33 34 Pass through costs 362 35 Rates 36 Commerce Act levies 89 37 Industry Levies CPP specified pass through costs 38 39 Recoverable costs excluding financial incentives and wash-ups 40 Other recoverable costs excluding financial incentives and wash-ups Pass-through and recoverable costs excluding financial incentives and wash-ups 484 42 43 3(iii): Incremental Rolling Incentive Scheme 44 45 CY-1 CY 46 30 Sep 17 30 Sep 18 47 Allowed controllable opex 48 Actual controllable opex 49 50 Incremental change in year 51 Previous years' Previous years' incremental incremental change adjusted for inflation change 53 CY-5 30 Sep 13 CY-4 30 Sep 14 55 CY-3 30 Sep 15 56 CY-2 30 Sep 16 57 CY-1 30 Sep 17 58 Net incremental rolling incentive scheme 59 Net recoverable costs allowed under incremental rolling incentive scheme 60 61 62 3(iv): Merger and Acquisition Expenditure 63 (\$000) 64 Merger and acquisition expenditure 65 Provide commentary on the benefits of merger and acquisition expenditure to the gas distribution business, including required disclosures in accordance with section 2.7, in Schedule 14 (Mandatory Explanatory Notes) (\$000) 3(v): Other Disclosures 68 69 (\$000) Self-insurance allowance 70



First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD) This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. GDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. ch ref 4(i): Regulatory Asset Base Value (Rolled Forward) RAB RAB RΔR RAB RΔR for year ended 30 Jun 14 30 Jun 15 30 Jun 16 30 Sep 17 30 Sep 18 (\$000) (\$000) (\$000) Total opening RAB value 131,352 131,884 147,907 11 12 5,041 6,328 5,970 less Total depreciation 13 14 547 2,958 2,811 plus Total revaluations 15 16 plus Assets commissioned 5,820 19,132 8,561 17 18 24 less Asset disposals 19 20 plus Lost and found assets adjustment 21 22 plus Adjustment resulting from asset allocation (786) 285 192 23 24 131.884 147,907 153,499 Total closing RAB value 25 4(ii): Unallocated Regulatory Asset Base 27 Unallocated RAB * (\$000) (\$000) 28 (\$000) (\$000) 29 Total opening RAB value 156,441 147,907 30 31 7,903 5,970 Total depreciation 32 plus 33 2,973 2,811 Total revaluations 34 plus 35 152 Assets commissioned (other than below) 36 Assets acquired from a regulated supplier 37 8,409 Assets acquired from a related party 38 Assets commissioned 10,578 8,561 39 less 40 Asset disposals (other than below) 41 Asset disposals to a regulated supplier 42 Asset disposals to a related party 43 Asset disposals 44 45 plus Lost and found assets adjustment 46 47 192 plus Adjustment resulting from asset allocation 48 49 Total closing RAB value 162,062 153,499 * The 'unallocated RAB' is the total value of those assets used wholly or partially to provide gas distribution services without any allowance being made for the allocation of costs to services provided by the supplier that are not gas distribution services. The RAB value represents the value of these assets after applying this cost allocation. Neither value includes works under construction.

KPMG

First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD) This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. GDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. ch ref 51 4(iii): Calculation of Revaluation Rate and Revaluation of Assets 52 53 54 1,024 55 CPI₄-4 1.005 56 Revaluation rate (%) 1.90% 57 58 Unallocated RAB * RAB 59 (\$000) (\$000) (\$000) (\$000) 60 156,441 147.907 Total opening RAB value 61 77 Opening value of fully depreciated, disposed and lost assets 62 63 Total opening RAB value subject to revaluation 156,364 147,831 64 2,811 **Total revaluations** 2.973 65 4(iv): Roll Forward of Works Under Construction 66 Unallocated works under 67 construction Allocated works under construction 68 Works under construction—preceding disclosure year 2,110 69 14.855 11.463 Capital expenditure 70 10,578 8,561 71 Adjustment resulting from asset allocation 72 Works under construction - current disclosure year 6,386 3,882 73 74 Highest rate of capitalised finance applied 4.25% 75



First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD) This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. GDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. ch ref 4(v): Regulatory Depreciation Unallocated RAB ³ (\$000) (\$000) 78 (\$000) (\$000) 79 Depreciation - standard 5,188 80 Depreciation - no standard life assets 2.715 782 81 Depreciation - modified life assets 82 Depreciation - alternative depreciation in accordance with CPP 83 7.903 5.970 Total depreciation 84 (\$000 unless otherwise specified) 4(vi): Disclosure of Changes to Depreciation Profiles **Closing RAB value** Depreciation under 'non-Closing RAB value Asset or assets with changes to charge for the standard' under 'standard' depreciation Reason for non-standard depreciation (text entry) period (RAB) depreciation depreciation 87 88 89 90 91 92 93 94 95 * include additional rows if needed 4(vii): Disclosure by Asset Category 97 (\$000 unless otherwise specified) Intermediate Medium pressure Other network pressure main 98 pipelines main pipelines main pipelines Service pipe Stations Line valve Special crossings assets Total 1.417 99 **Total opening RAB value** 20.555 84,221 1,434 4,879 3 531 2,727 147,907 100 Total depreciation 34 168 34 717 5,970 101 1.601 27 93 27 67 55 Total revaluations 391 478 75 2.814 plus 102 830 192 152 8,561 Assets commissioned 103 less Asset disposals 104 plus Lost and found assets adjustment 105 plus Adjustment resulting from asset allocation 189 189 106 plus Asset category transfers 107 Total closing RAB value 21,517 87,175 1,452 26,432 5,634 1,490 3,462 3,935 2,404 153,499 108 109 Asset Life 110 45.2 35.2 47.0 34.3 29.7 53.4 27.9 24.1 20.4 Weighted average remaining asset life (years) 111 Weighted average expected total asset life (years) * Results may vary slightly to those in section 4(v1) as a result of the more disaggregated results in 4(viii) rounding to a slightly different value when added together.



FINAL GDB ID Sept 18 Schedules 1 to 10 9 S4.RAB Value (Rolled Forward)

Company Name **First Gas Limited (Distribution)** 30 September 2018 For Year Ended SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). GDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section sch ref 5a(i): Regulatory Tax Allowance (\$000) Regulatory profit / (loss) before tax 9,881 10 Income not included in regulatory profit / (loss) before tax but taxable Expenditure or loss in regulatory profit / (loss) before tax but not deductible 3 418 11 Amortisation of initial differences in asset values 12 1.683 13 Amortisation of revaluations 1,378 6,479 14 15 16 Total revaluations 2,811 Income included in regulatory profit / (loss) before tax but not taxable 17 Expenditure or loss deductible but not in regulatory profit / (loss) before tax 18 19 Notional deductible interest 2,615 20 5,426 21 10,934 22 Regulatory taxable income 23 Utilised tax losses 24 less 25 Regulatory net taxable income 10,934 26 27 Corporate tax rate (%) 28 Regulatory tax allowance 3,061 29 * Workings to be provided in Schedule 14 30 31 5a(ii): Disclosure of Permanent Differences 32 33 In Schedule 14, Box 5, provide descriptions and workings of items recorded in the asterisked categories in Schedule 5a(i). 5a(iii): Amortisation of Initial Difference in Asset Values (\$000) 34 35 Opening unamortised initial differences in asset values 58,892 36 37 Amortisation of initial differences in asset values less 38 plus Adjustment for unamortised initial differences in assets acquired 39 less Adjustment for unamortised initial differences in assets disposed 40 Closing unamortised initial differences in asset values 57,209 41 42 Opening weighted average remaining useful life of relevant assets (years) 35



43

Company Name **First Gas Limited (Distribution)** 30 September 2018 For Year Ended SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). GDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section sch ref 5a(iv): Amortisation of Revaluations (\$000) 45 Opening sum of RAB values without revaluations 144,100 46 47 48 Adjusted depreciation 4.592 5 970 49 Total depreciation 50 Amortisation of revaluations 1,378 51 5a(v): Reconciliation of Tax Losses (\$000) 52 53 54 Opening tax losses 55 plus Current period tax losses Utilised tax losses 56 less 57 Closing tax losses (\$000) 5a(vi): Calculation of Deferred Tax Balance 58 59 (5,546) 60 Opening deferred tax 61 1,286 62 plus Tax effect of adjusted depreciation 63 1,830 Tax effect of tax depreciation 64 less 65 (18) 66 plus Tax effect of other temporary differences* 67 471 68 Tax effect of amortisation of initial differences in asset values less 69 70 plus Deferred tax balance relating to assets acquired in the disclosure year 71 72 Deferred tax balance relating to assets disposed in the disclosure year 73 74 Deferred tax cost allocation adjustment 274 plus 75 Closing deferred tax (6,306) 76 77 5a(vii): Disclosure of Temporary Differences 78 In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Schedule 5a(vi) (Tax effect of other temporary 79 differences). 80 5a(viii): Regulatory Tax Asset Base Roll-Forward 81 (\$000) 82 Opening sum of regulatory tax asset values 56,225 83 84 Tax depreciation 6,535 8.552 85 plus Regulatory tax asset value of assets commissioned 86 Regulatory tax asset value of asset disposals 0 less 87 Lost and found assets adjustment plus plus 1 169 88 Adjustments resulting from asset allocation 89 Other adjustments to the RAB tax value plus 90 Closing sum of regulatory tax asset values 59,411



		Company Name	First Ga	s Limited (Distribution)
		For Year Ended	30	September 2018
S	CHEDULE 5b: REPORT ON RELATED P			
Th	is schedule provides information on the valuation of relate	d party transactions, in accordance with section 2.3.6 and 2.	3.7 of the ID determination.	
Th	is information is part of audited disclosure information (as $% \left\{ 1\right\} =\left\{ 1\right$	defined in section 1.4 of the ID determination), and so is sub	ject to the assurance report require	d by section 2.8.
sch re	f			
7	5b(i): Summary—Related Party Transa	ctions	(\$000)	
8	Total regulatory income		-	
9	Operational expenditure		5,024	
10	Capital expenditure		13,399	
11	Market value of asset disposals		-	
12	Other related party transactions			
13	5b(ii): Entities Involved in Related Part	y Transactions		
14	Name of related party		Related party relations	hip
15	Gas Services (Joint Venture)	Gas Services Joint Venture and First G		•
16				
17				
18				
19	* in all and additional agency if a condent			
	* include additional rows if needed			
19	* include additional rows if needed 5b(iii): Related Party Transactions			
19 20	•			
19 20	•	Related party transaction	Value of transaction	
19 20	•	Related party transaction type Description of transa	transaction	Basis for determining value
19 20 21	5b(iii): Related Party Transactions	transaction	transaction	Basis for determining value ID clause 2.3.6(2)(b)
19 20 21 21 22 23 24	5b(iii): Related Party Transactions Name of related party	transaction Description of transa	transaction (\$000)	
19 20 21 22 23 24 25	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
19 20 21 22 23 24 25 26	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
19 20 21 22 23 24 25 26 27	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
19 20 21 22 23 24 25 26	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
19 20 21 22 23 24 25 26 27 28	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
22 23 24 25 26 27 28 29 30 31	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
22 23 24 25 26 27 28 29 30 31 32	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
22 23 24 25 26 27 28 29 30 31 32 33	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
22 23 24 25 26 27 28 29 30 31 32 33 34	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)
22 23 24 25 26 27 28 29 30 31 32 33 34	5b(iii): Related Party Transactions Name of related party Gas Services (Joint Venture)	transaction type Description of transaction Opex Gas Contracting Services	transaction (\$000) 5,024	ID clause 2.3.6(2)(b)



Th	is schedule is sclosure infor	E Sc: REPORT ON TERM CREDIT SPREAD DIFFERENT CONTROL OF THE PROPERTY OF THE PR	statements, the weig	thted average origin		portfolio (both qualifyin		Company Name For Year Ended lifying debt) is greate	30	s Limited (Distri	18
7 8 9		Qualifying Debt (may be Commission only)			Original tenor (in		Book value at	Book value at date of financial	Term Credit	Cost of executing an interest rate	Debt issue cost
10		Issuing party	Issue date	Pricing date	years)	Coupon rate (%)	issue date (NZD)	statements (NZD)		swap	readjustment
11											
12											
13											
14											
15											
16		* include additional rows if needed						-	-	-	-
17											
18	Sc(ii):	Attribution of Term Credit Spread Differential									
19	30().	teribution of remi dream opredu binereman									
20	G	ross term credit spread differential									
21	,	1035 term create spread univerential									
		Total book value of interest bearing debt	İ		1						
22 23		Leverage		42%							
24		Average opening and closing RAB values		4270							
25 26	A	ttribution Rate (%)			-						
27	Т	erm credit spread differential allowance			-						



First Gas Limited (Distribution) Company Name For Year Ended 30 September 2018 **SCHEDULE 5d: REPORT ON COST ALLOCATIONS** This schedule provides information on the allocation of operational costs. GDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassifications. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. 5d(i): Operating Cost Allocations Value allocated (\$000s) Non-gas Arm's length Gas distribution distribution **OVABAA** allocation deduction services services Total increase (\$000s) 10 Service interruptions, incidents and emergencies 11 Directly attributable 2,384 12 Not directly attributable 13 Total attributable to regulated service 2,384 14 Routine and corrective maintenance and inspection 15 Directly attributable 1.500 16 Not directly attributable 17 Total attributable to regulated service 1,500 18 Asset replacement and renewal 19 Directly attributable 20 Not directly attributable 21 Total attributable to regulated service 22 System operations and network support 23 Directly attributable 1,140 24 Not directly attributable 25 Total attributable to regulated service 1,140 26 **Business support** 27 3,546 Directly attributable 28 15,555 14,130 Not directly attributable 29 Total attributable to regulated service 4,971 30 31 Operating costs directly attributable 8,570 32 33 Operating costs not directly attributable 1,425 14,130 15,555



Operational expenditure

9,996

First Gas Limited (Distribution) Company Name For Year Ended 30 September 2018 SCHEDULE 5d: REPORT ON COST ALLOCATIONS This schedule provides information on the allocation of operational costs. GDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassifications. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. 5d(ii): Other Cost Allocations Value allocated (\$000s) Non-gas **OVABAA** allocation Pass through and recoverable costs deduction services Total increase (\$000s) 37 Pass through costs 38 Directly attributable 39 Not directly attributable 40 484 Total attributable to regulated service 41 Recoverable costs 42 Directly attributable 43 Not directly attributable 44 Total attributable to regulated service 5d(iii): Changes in Cost Allocations* † 45 46 (\$000) 47 Change in cost allocation 1 CY-1 Current Year (CY) 48 , General Expenses Original allocation Cost category 49 162 Original allocator or line items New allocation 50 New allocator or line items Headcount Difference 51 More appropriate to allocate based on headcount as people are the driver of the expense categories, e.g. IT Hardware and Software expenses would 52 Rationale for change increase in line with headcount. General Expenses are mainly staff related e.g. office supplies, non-entertainment catering 53 54 55 (\$000) 56 Current Year (CY) Change in cost allocation 2 CY-1 57 dvertising - People & Performance Cost category Original allocation 58 Original allocator or line items New allocation 59 New allocator or line items Headcount Difference 60 61 Rationale for change Specific advertising costs relating to recruitment 62 63 64 (\$000) 65 Change in cost allocation 3 CY-1 Current Year (CY) 66 Cost category Original allocation RAB & Headcount 67 Original allocator or line items New allocation 68 New allocator or line items 100% directly attributable Difference 69 Business Support employees who are employed specifically for either GTB or GDB 70 Rationale for change 71 72 64 (\$000) 65 Change in cost allocation 4 CY-1 Current Year (CY) 66 Cost category Original allocation 67 Original allocator or line items New allocation



			Company Name	First Gas Limited (Distribution)
			For Year Ended	30 September 2018
S	CHEDULE 5d: REPORT ON COST ALLO	CATIONS	· ·	
	is schedule provides information on the allocation of operati is information is part of audited disclosure information (as de		nt on their cost allocation in Schedule 14 (Mandatory Explanatory Not to is subject to the assurance report required by section 2.8.	es), including on the impact of any reclassifications.
sch re	ef New allocator or line items	Headcount/100% Attributable	Difference	127 112
69	New allocator or line items	rieadcount/100% Attributable	Difference	127 113
70 71	Rationale for change	Scada costs are directly allocated to Transmiss	ion, other Telephone costs to Headcount as this is a prople driven exp	pense
73	* a change in cost allocation must be completed for eac	h cost allocator change that has occurred in the disc	closure year. A movement in an allocator metric is not a change in allo	ocator or component.
74	† include additional rows if needed			



Company Name First Gas Limited (Distribution) For Year Ended **SCHEDULE 5e: REPORT ON ASSET ALLOCATIONS** This schedule requires information on the allocation of asset values. This information supports the calculation of the RAB value in Schedule 4. GDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any changes in asset allocations. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. 5e(i): Regulated Service Asset Values Value allocated (\$000s) Gas distribution services 10 Main pipe 11 Directly attributable 110,143 12 Not directly attributable Total attributable to regulated service 110.143 13 14 Service pipe 15 Directly attributable 26.432 16 Not directly attributable 17 Total attributable to regulated service Stations 18 19 Directly attributable 20 Not directly attributable 21 Total attributable to regulated service 22 Line valve 23 Directly attributable 24 Not directly attributable 25 Total attributable to regulated service 1 490 26 Special crossings 27 Directly attributable 3,462 28 Not directly attributable 29 Total attributable to regulated service 3,462 30 Other network assets 31 Directly attributable 3,935 32 Not directly attributable 33 Total attributable to regulated service Non-network assets 34 35 Directly attributable 1,759 36 Not directly attributable 37 38 Total attributable to regulated service 2.404 39 Regulated service asset value directly attributable 40 Regulated service asset value not directly attributable 41 Total closing RAB value 5e(ii): Changes in Asset Allocations* † 43 44 45 Change in asset value allocation 1 (\$000) 46 Current Year (CY) CY-1 47 Original allocation 48 Original allocator or line items New allocation Difference 49 New allocator or line items 51 Rationale for change 52 53 Change in asset value allocation 2 55 Original allocation 56 Asset category New allocation 57 Original allocator or line items Difference 58 New allocator or line items 59 60 Rationale for change 61 62 63 64 (\$000) Change in asset value allocation 3 Current Year (CY) Original allocation 65 Asset category 66 Original allocator or line items New allocation Difference 67 New allocator or line items 68 69 Rationale for change 70 71 72 component. 7.3 + include additional rows if needed



Company Name First Gas Limited (Distribution) 30 September 2018 For Year Ended SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs. GDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory notes to templates). This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. sch ref 6a(i): Expenditure on Assets (\$000) (\$000) 8 Consumer connection 7,126 9 System growth 2,018 10 Asset replacement and renewal 2,066 11 Asset relocations 2,146 12 Reliability, safety and environment: 13 Quality of supply 14 Legislative and regulatory 15 Other reliability, safety and environment 16 Total reliability, safety and environment 13.399 17 **Expenditure on network assets** 18 Expenditure on non-network assets 19 20 **Expenditure on assets** 13,593 21 plus Cost of financing Value of capital contributions 22 less 2,142 23 plus Value of vested assets 24 11,463 25 Capital expenditure 6a(ii): Subcomponents of Expenditure on Assets (where known) (\$000) 26 27 Research and development 6a(iii): Consumer Connection 28 (\$000) (\$000) 29 Consumer types defined by GDB* Mains Extensions/Subdivisions 30 2.113 31 Service Connections - Residential 3,616 Service Connections - Commercial 1,397 32 33 34 * include additional rows if needed 35 36 37 Consumer connection expenditure 7,126 38 Capital contributions funding consumer connection expenditure less 39 Consumer connection less capital contributions



Company Name For Year Ended First Gas Limited (Distribution)

30 September 2018

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

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs.

GDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory notes to templates).

This ii	information is part of audited disclosure information (a	as defined in section 1.4 of the ID determination), and so is subject to the assurance report required	by section 2.8.
sch ref				
40				
41 42	6a(iv): System Growth and Asset Re	placement and Renewal	System Growth	Asset Replacement and Renewal
43	lakanna diaka masanna		(\$000)	(\$000)
44 45	Intermediate pressure		202	234
46	Main pipe Service pipe		292	- 123
47	Stations			123
48	Line valve			
49	Special crossings			- 158
50	Intermediate pressure -total		292	
51 52	Medium pressure		1,740	682
53	Main pipe		1,740	- 2
54	Service pipe Stations			2
55	Line valve			
56	Special crossings			
57	Medium pressure - total		1,740	684
			2,7 10	001
58	Low pressure		/2	, I
59	Main pipe		(3	-
60	Service pipe			
61	Line valve			
62 63	Special crossings		(3	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
03	Low pressure - total		(3) [
64	Other network assets			
65	Monitoring and control systems		6	
66	Cathodic protection systems			- 121
67	Other assets (other than above)		(16	
68	Other network assets - total		(10	868
69				
70	System growth and asset replacement an		2,018	2,066
71		owth and asset replacement and renewal	2.010	2.000
72	System growth and asset replacement an	d renewal less capital contributions	2,018	2,066
73	6a(v): Asset Relocations			
74	Project or programme*		(\$000)	(\$000)
75 75	Waikato Expressway, Matangi-Hamilto	on Section	108	
76	Mt Maunganui - NZTA (DX) B2B Road F		1,658	
77	Wit Waufigarius - NZTA (DX) BZB Koau P	Relocation	1,036	
78				
,,,				
79				
80	* include additional rows if needed			_
81	All other projects or programmes - asse	et relocations	380	
82	Asset relocations expenditure			2,146
83	less Capital contributions funding asset relocati	ions	1,816	
84	Asset relocations less capital contributions			330



Company Name First Gas Limited (Distribution) 30 September 2018 For Year Ended SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs. GDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory notes to templates) This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. sch ref 6a(vi): Quality of Supply 85 86 Project or programme (\$000) (\$000) Nil 87 88 89 90 91 * include additional rows if needed 92 All other projects or programmes - quality of supply 93 94 Quality of supply expenditure 95 Capital contributions funding quality of supply 96 Quality of supply less capital contributions 97 6a(vii): Legislative and Regulatory 98 Project or programme* (\$000) 99 (\$000) 100 Nil 101 102 103 104 * include additional rows if needed 105 106 All other projects or programmes - legislative and regulatory 107 Legislative and regulatory expenditure 108 less Capital contributions funding legislative and regulatory 109 Legislative and regulatory less capital contributions 110 6a(viii): Other Reliability, Safety and Environment 111 112 Project or programme* (\$000) (\$000) 113 114 115 116 117 118 * include additional rows if needed 119 All other projects or programmes - other reliability, safety and environment Other reliability, safety and environment expenditure 120 121 Capital contributions funding other reliability, safety and environment 122 Other reliability, safety and environment less capital contributions 6a(ix): Non-Network Assets 123 Routine expenditure 124 (\$000) 125 Project or programme (\$000) 126 117 127 Vehicles 35 128 **Building Refurbishment** 129 130 * include additional rows if needed 131 All other projects or programmes - routine expenditure 132 133 Routine expenditure 194 134 Atypical expenditure (\$000) (\$000) Project or programme* 135 136 137 138 139 140 include additional rows if needed 141 142 All other projects or programmes - atypical expenditure 143 **Atypical expenditure** 144 145 **Expenditure on non-network assets** 194



First Gas Limited (Distribution) Company Name For Year Ended 30 September 2018 SCHEDULE 6b: REPORT ON OPERATIONAL EXPENDITURE FOR THE DISCLOSURE YEAR This schedule requires a breakdown of operational expenditure incurred in the current disclosure year. GDBs must provide explanatory comment on their operational expenditure in Schedule 14 (Explanatory notes to templates). This includes explanatory comment on any atypical operational expenditure and assets replaced or renewed as part of asset replacement and renewal operational expenditure, and additional information on insurance. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. sch ref 6b(i): Operational Expenditure (\$000) (\$000) 8 Service interruptions, incidents and emergencies 2,384 Routine and corrective maintenance and inspection 1.500 10 Asset replacement and renewal 3,884 11 Network opex 12 System operations and network support 1,140 4,971 13 **Business support** Non-network opex 6.112 14 15 16 **Operational expenditure** 9,996 6b(ii): Subcomponents of Operational Expenditure (where known) 17 Research and development 18 N/A 19 Insurance 314



Company Name

First Gas Limited (Distribution)

For Year Ended

30 September 2018

SCHEDULE 7: COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE

This schedule compares actual revenue and expenditure to the previous forecasts that were made for the disclosure year. Accordingly, this schedule requires the forecast revenue and expenditure information from previous disclosures to be inserted.

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

ch r	еу			
8	7(i): Revenue	Target (\$000) 1	Actual (\$000)	% variance
9	Line charge revenue	21,727	23,521	8%
			·	
10	7(ii): Expenditure on Assets	Forecast (\$000) ²	Actual (\$000)	% variance
11	Consumer connection	4,369	7,126	63%
2	System growth	5,687	2,018	-65%
3	Asset replacement and renewal	3,632	2,066	-43%
4	Asset relocations	2,304	2,146	-7%
5	Reliability, safety and environment:			
6	Quality of supply	-	-	0%
7	Legislative and regulatory	-	-	0%
8	Other reliability, safety and environment	-	43	0%
9	Total reliability, safety and environment	-	43	0%
	Expenditure on network assets	15,992	13,399	-16%
1	Expenditure on non-network assets	456	194	-58%
2	Expenditure on assets	16,448	13,593	-17%
23	7(iii): Operational Expenditure			
4	Service interruptions, incidents and emergencies	2,972	2,384	-20%
5	Routine and corrective maintenance and inspection	1,877	1,500	-20%
6	Asset replacement and renewal	-	-	0%
7	Network opex	4,849	3,884	-20%
8	System operations and network support	1,585	1,140	-28%
9	Business support	1,730	4,971	187%
0	Non-network opex	3,315	6,112	84%
1	Operational expenditure	8,164	9,996	22%
2	7(iv): Subcomponents of Expenditure on Assets (where known)			
3	Research and development		-	-
14	7(v): Subcomponents of Operational Expenditure (where known	n)		
5	Research and development	-	N/A	-
6	Insurance	-	314	-
37	1 From the nominal dollar target revenue for the pricing year disclosed under clause 2.4.3(3 From the CY+1 nominal dollar expenditure forecasts disclosed in accordance with clause 2			beginning of the



disclosure year (the second to last disclosure of Schedules 11a and 11b)

Company Name First Gas Limited (Distribution) 30 September 2018 For Year Ended Network / Sub-Network Name **North Island Network SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES** This schedule requires the billed quantities and associated line charge revenues for the disclosure year for each consumer group or price category code used by the GDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs. 8(i): Billed quantities by price component Add extra columns Billed quantities by price component for additional billed quantities by price Price component Fixed Variable component as 10 necessary Unit charging basis kWh Days (eg, days, GJ, etc.) Consumer group name or price Consumer type or types (eg, residential, Standard or non-standard Average no. of ICPs in Quantity of gas commercial, etc.) delivered (TJ) category code consumer group (specify) disclosure year 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 59,042 1,307 21,485,154 363,086,381 2,090 184 762,384 51,142,997 1,431 481 522,447 133,578,487 GN03 505 931 184,370 258,541,325 GN04 66 757 24,025 210,278,322 mmercial/Industrial 1,005 3,254 279,193,331 Non-Standard (NG60) 16 4,243 5,111 1,178,717,212 arge Industrial lon-standard Add extra rows for additional consumer groups or price category codes as necessary 63,143 4,665 22,981,634 1,295,820,843 Standard consumer totals 4,243 1,178,717,212 Non-standard consumer totals 5,111 8,908 Total for all consumers 63,159 22,986,745 2,474,538,055

Company Name First Gas Limited (Distribution) 30 September 2018 For Year Ended Network / Sub-Network Name **North Island Network SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES** This schedule requires the billed quantities and associated line charge revenues for the disclosure year for each consumer group or price category code used by the GDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs. 8(ii): Line charge revenues (\$000) by price component 32 Line charge revenues (\$000) by price component Add extra columns for additional line charge revenues Price component Fixed Variable by price 33 component as necessary Notional revenue Total line charge Rate (eg, \$ per \$/kWh foregone from posted \$/day Consumer group name or price Consumer type or types (eg, residential, Standard or non-standard revenue in disclosure day, \$ per GJ, etc.) discounts (if applicable) category code commercial, etc.) consumer group (specify) year 35 36 37 38 39 40 41 \$14,985 7,305 7,680 GN0V GN01 Business/Commercial Standard \$852 473 379 GN02 Standard \$1,586 564 1,022 ommercial GN03 Standard 883 1,823 ommercial \$2,706 GN04 ommercial/Industrial Standard \$1,684 337 1,346 42 GN05 arge Industrial Standard \$1,107 716 391 43 Non-Standard (NG60) Large Industrial Non-standard \$601 \$535 \$66 44 45 46 47 48 Add extra rows for additional consumer groups or price category codes as necessary 49 Standard consumer totals \$22,920 \$10,279 \$12,642 50 Non-standard consumer totals \$601 \$535 \$66 51 Total for all consumers \$23,521 \$10,813 \$12,708

Company Name
For Year Ended
Network / Sub-network Name

First Gas Limited (Distribution)
30 September 2018
North Island Network

SCHEDULE 9a: ASSET REGISTER

This schedule requires a summary of the quantity of assets that make up the network, by asset category and asset class.

sch ref

					Items at start of	Items at end of		Data accuracy
8	Operating Pressure	Asset Category	Asset Class	Units	year (quantity)	year (quantity)	Net change	(1–4)
9	Intermediate Pressure	Main pipe	IP PE main pipe	km	-	-	-	N/A
10	Intermediate Pressure	Main pipe	IP steel main pipe	km	175	196	21	3
11	Intermediate Pressure	Main pipe	IP other main pipe	km	-	-	-	N/A
12	Intermediate Pressure	Service pipe	IP PE service pipe	km	-	-	-	N/A
13	Intermediate Pressure	Service pipe	IP steel service pipe	km	2	2	-	3
14	Intermediate Pressure	Service pipe	IP other service pipe	km	-	-	-	N/A
15	Intermediate Pressure	Stations	Intermediate pressure DRS	No.	102	102	-	3
16	Intermediate Pressure	Line valve	IP line valves	No.	232	238	6	3
17	Intermediate Pressure	Special crossings	IP crossings	No.	17	17	=	2
18	Medium Pressure	Main pipe	MP PE main pipe	km	2,927	2,977	50	3
19	Medium Pressure	Main pipe	MP steel main pipe	km	132	130	(2)	3
20	Medium Pressure	Main pipe	MP other main pipe	km	-	-	-	3
21	Medium Pressure	Service pipe	MP PE service pipe	km	1,315	1,328	13	3
22	Medium Pressure	Service pipe	MP steel service pipe	km	14	12	(2)	3
23	Medium Pressure	Service pipe	MP other service pipe	km	1	1	-	3
24	Medium Pressure	Stations	Medium pressure DRS	No.	24	24	=	4
25	Medium Pressure	Line valve	MP line valves	No.	959	1,038	79	4
26	Medium Pressure	Special crossings	MP special crossings	No.	70	73	3	2
27	Low Pressure	Main pipe	LP PE main pipe	km	41	41	-	3
28	Low Pressure	Main pipe	LP steel main pipe	km	-	-	-	3
29	Low Pressure	Main pipe	LP other main pipe	km	-	-	-	N/A
30	Low Pressure	Service pipe	LP PE service pipe	km	31	30	(1)	3
31	Low Pressure	Service pipe	LP steel service pipe	km	-	-	-	3
32	Low Pressure	Service pipe	LP other service pipe	km	-	-	-	3
33	Low Pressure	Line valve	LP line valves	No.	12	11	(1)	4
34	Low Pressure	Special crossings	LP special crossings	No.	-	-	-	N/A
35	All	Monitoring and control systems	Remote terminal units	No.	-	-	-	3
36	All	Cathodic protection systems	Cathodic protection	No.	39	42	3	2

Company Name
First Gas Limited (Distribution)
For Year Ended
Network / Sub-network Name
North Island Network

SCHEDULE 9b: ASSET AGE PROFILE

Pressure Mase Mas	2016 2017 2018 unknown (quantity) default dates 1 0 21 196			No. with age	
Propertion Pro	No. with age Of year No. with age Of y			No. with age	
Permis presser Main pre Markets presser	2016 2017 2018 unknown (quantity) default dates				
Intermediate Pressure Main pige IP Earnin pige IP Earnin pige Im	1 0 21	1 0 21			
Intermediate Pressure Main pige Pateel main pige Main pig		1 0 21			
Intermedate Pressure Intermeda	6 10 6 - 238 - 17 - 17 - 18 - 17 - 18 - 18 - 18 - 1		1 0 21	1 0 21 -	196
Intermediate Pressure Service pipe P steel service pipe P other service pipe P othe	6 10 6 - 238 - 17 - 17 - 18 - 17 - 18 - 18 - 18 - 1				
Intermediate Pressure Stations Pother service pipe Pother serv	6 10 6 - 238 - 17 - 17 - 18 - 17 - 18 - 18 - 18 - 1				-
Intermediate Pressure Intermediate Intermediate Pressure Intermediate Pr	6 10 6 - 238 - 17 - 17 - 18 - 17 - 18 - 18 - 18 - 1	- 0 -	- 0 -	- 0	2 -
Intermediate Pressure Une valve Pline valves No.	6 10 6 - 238 - 17 - 17 - 18 - 17 - 18 - 18 - 18 - 1				-
Intermediate Pressure Special crossings P crossings	17	- 2 -	- 2 -	- 2	102 -
Medium Pressure Main pipe MP PE main pipe Image: Main pipe MP PE main pipe Image: MP PE main pipe<	40 54 50 . 2,977	6 10 6	6 10 6	6 10 6 -	238
Medium Pressure Main pipe MP steel main pipe km 9 80 26 15 2 0 <td>0 0 0 (2) 130</td> <td></td> <td></td> <td></td> <td>17 -</td>	0 0 0 (2) 130				17 -
Medium Pressure Main pipe MP PE service pipe km 0 2 0 2 0 2 4 3 4 3 3 3 3 2 1 1 1 1 0	16 17 13 - 1,328 . 0 0 0 (2) - 12 24 . 30 24 79 - 1,038 3 3 12 73 . 0 0 0 - 41 41	40 54 50	40 54 50	40 54 50 -	2,977 -
Medium Pressure Service pipe MP Eservice pipe km 0 27 91 64 178 226 243 43 43 38 44 39 37 35 33 22 16 18 15 14 18 22 14 16 17 13 - 1,3 Medium Pressure Service pipe MP Stevice pipe km 0 11 1 1 0 0 - - 0	0 0 (2) 12 12	0 0 (2)	0 0 (2)	0 0 (2)	130 -
Medium Pressure Service pipe MP steel service pipe km 0 11 1 1 0	0 0 (2) 12 12				-
Medium Pressure Stations Medium pressure PRS No.		16 17 13	16 17 13	16 17 13 -	1,328
Medium Pressure Stations Medium pressure DRS No. 3 1 2 1 1 2 -	30 24 79 . 1,038	0 0 (2)	0 0 (2)	0 0 (2) -	12 -
Medium Pressure Line valve MP line valves No. 9 140 97 208 127 42 39 7 8 4 11 16 23 2 10 8 16 11 13 26 18 23 51 30 24 79 - 1,0 Low Pressure Min pipe LP Earl main pipe Image: Amount of the main pipe	30 24 79 . 1,038				1 -
Medium Pressure Special crossings MP special crossings No. - - - 8 26 8 6 1 1 -	0 0 - 41 - 41 - 41 - 41 - 41 - 41 - 41 -				
Low Pressure Main pipe UP Steel main pipe km 2 2 20 2 3 3 3 2 0 0 0 0 0 0 0 0 0 0 0	0 0 41	30 24 79	30 24 79	30 24 79 -	1,038
Low Pressure Main pipe LP steel main pipe km Low Pressure Main pipe LP other main pipe km Low Pressure Service pipe LP P Service pipe km D		- 3 3 12	- 3 3	- 3 3 12	
Low Pressure Main pipe LP other main pipe km 0 2 8 4 4 3 4 3 0 0 0 0 0 0 1 0 0 0 1 2 1 0 0 0 0 (1) - Low Pressure Service pipe LP steerice pipe km 0 0 2 8 4 3 4 3 0 0 0 0 0 0 0 1 0 0 0 0 1 2 1 0 0 0 0 (1) - Low Pressure Service pipe LP steerice pipe km 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		0 0 -	0 0 -	0 0	41 -
Low Pressure Service pipe LP PE service pipe km 0 2 2 8 4 3 3 4 3 0 0 0 0 0 0 0 1 0 0 0 0 1 2 1 0 0 0 0 (1) - Low Pressure Service pipe LP other service pipe km 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 (1) - 30 -				-
Low Pressure Service pipe LP steel service pipe km 0 0 0 0 - <td>0 0 (1) - 30 -</td> <td></td> <td></td> <td></td> <td>-</td>	0 0 (1) - 30 -				-
Low Pressure Service pipe LP other service pipe km	-I -I -I -I -I -I	0 0 (1)	0 0 (1)	0 0 (1) -	30 -
					-
Low Pressure Line valve LP line valves No 1 4 3 1 - (1) 3					-
	1 - (1) 3 11 -	1 - (1) 3	- 1 - (1)	1 - (1) 3	11 -
Low Pressure Special crossings LP special crossings No					-

		Company Name	First Ga	s Limited (Distri	ibution)
		For Year Ended	30	September 20:	18
	Netwo	ork / Sub-network Name	Noi	rth Island Netw	ork
SCI	HEDULE 9c: REPORT ON PIPELINE DATA	·			
	schedule requires a summary of the key characteristics of the pipeline network.				
ref					
8	Network Information (end of year)				
9	System length by material (defined by GDB)	Length (km)	%		
)	Steel	340	7.21%		
1	PE	4,376	92.77%		
2	Other	1	0.02%		
3			-		
4			-		
5			-		
6	System length	4,717	100.00%		
7					
					Gas conveyed for
			Weighted average		Persons not
		System length	pipe diameter	Number of ICPs	involved in the
8	By operating pressure:	(km) (at year end)	(mm)	(at year end)	GDB (TJ)
Э	Intermediate pressure	198	72	38	5,66
0	Medium pressure	4,448	23	61,953	4,43
	Low pressure	71	31	1,561	4
21	Total	4,717	25	63,552	10,14

First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended **North Island Network** Network / Sub-network Name **SCHEDULE 9d: REPORT ON DEMAND** This schedule requires a summary of the key measures of network demand for the disclosure year (number of new connections including, maximum monthly loads and total gas conveyed) sch ref 8 9d(i): Consumer Connections 9 10 Number of ICPs connected in year by consumer type 11 Number of connections (ICPs) 12 Consumer types defined by GDB Residential 1,261 13 Commercial 124 14 15 16 17 1,385 18 Total 9d(ii): Gas Delivered 19 20 21 Number of ICPs at year end 63,552 connections 22 Maximum daily load 39,840 (GJ per day) 23 Maximum monthly load 1,074,813 (GJ per month) Number of directly billed ICPs 24 (at year end) 10.141.734 25 Total gas conveyed (GJ per annum) 26 Average daily delivery 27,786 (GJ per day) 27 28 **Load factor** 78.63%

First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended **North Island Network** Network / Sub-network Name SCHEDULE 10a: REPORT ON NETWORK RELIABILITY AND INTERRUPTIONS This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and CAIDI) for the disclosure year GDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory Notes to Templates). The SAIDI and SAIFI information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and so is subject to the assurance report required by section 2.8. 10a(i): Interruptions Interruptions by class Actual 9 10 Class A (planned interruptions by GTB) 11 Class B (planned interruptions on the network) 12 Class C (unplanned interruptions on the network) 13 Class D (unplanned interruptions by GTB) 14 Class I (unplanned interruptions caused by third party damage) 16 Number of unplanned outage events (interruptions that affect more than 5 ICPs) 17 North Island regions 18 19 20 21 Number of unplanned outage events caused by third party damage (interruptions that affect more than 5 ICPs) 22 23 North Island regions 24 25 26 27 28 10a(ii): Reliability Overall reliability 29 SAIDI SAIFI CAIDI 30 Based on the total number of interruptions 143.21 182 31 Class I (unplanned interruptions caused by third party damage) 74.23 32 Class B (planned interruptions on the network) SAIDI SAIFI CAIDI 33 North Island regions 402 269.91 34 35 36 37 38 Class C (unplanned interruptions on the network) SAIDI SAIFI CAIDI 39 North Island regions 80 0.70 115.50 40 41 42 43



First Gas Limited (Distribution) Company Name 30 September 2018 For Year Ended Network / Sub-network Name North Island Network SCHEDULE 10b: REPORT ON NETWORK INTEGRITY AND CONSUMER SERVICE This schedule requires a summary of the key measures of network Integrity (gas escapes, response time to emergencies etc) for the disclosure year. 10b(i): System Condition and Integrity Number of confirmed public reported gas escapes per system length (escapes/1000 km) First Gas Regions 10 11 12 13 14 Number of leaks detected by routine survey per system length (leaks/1000 km) 16 First Gas Regions 17 19 20 Number of third party damage events per system length (events/1000 km) First Gas Regions 22 23 24 25 26 27 Number of poor pressure events due to network causes Actual 28 First Gas Regions 29 30 31 32 33 Number of telephone calls to emergency numbers answered within 30 seconds per total number of calls 35 First Gas Regions 36 37 38 39 Product control—safety of distribution gas Number of non-compliant odour tests 41 10b(ii): Consumer Service 42 Proportion of Proportion of emergencies Average call emergencies responded to response time Number of Response time to emergencies (RTE) within 1 hour (%) within 3 hours (%) (hours) emergencies 44 45 46 47 48 49 **Number of complaints** Actual Number of complaints per average total consumer numbers

Company	First Gas Limited (Distribution)
For Year Ended	30 September 2018

Schedule 14: Mandatory Explanatory Notes

- 1. This schedule requires GDBs to provide explanatory notes to information provided in accordance with clauses 2.3.1, 2.4.21, 2.4.22, and sub-clauses 2.5.1(1)(e) and 2.5.2(1)(e).
- 2. This schedule is mandatory—GDBs must provide the explanatory comment specified below, in accordance with clause 2.7.1. Information provided in boxes 1 to 12 of this schedule is part of the audited disclosure information, and so is subject to the assurance requirements specified in section 2.8.
- 3. Schedule 15 (Voluntary Explanatory Notes to Schedules) provides for GDBs to give additional explanation of disclosed information should they elect to do so.

Return on Investment (Schedule 2)

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

Box 1: Explanatory comment on return on investment

The vanilla return on investment (ROI) for our Distribution business of 4.75% is lower than the 2017 result of 10.58%.

This decrease in ROI is primarily due to the decrease in revenue between the two disclosure years and an increase in operational expenditure in 2018. The 2017 DPP reset for gas distribution businesses (GDBs) resulted in a decrease in prices and associated revenue for First Gas (Distribution) from 1 October 2017. First Gas' operational expenditure increased in 2018 due to a provision for settlement of claims brought by the Commerce Commission under sections 47 and 27 of the Commerce Act 1986 in relation to First Gas' acquisition of GasNet's Bay of Plenty gas distribution pipelines.

Further, the ROI for 2017 was higher than normal due to the irregular disclosure period of 15 months. Whilst the ROI calculation was adjusted to reflect the period, the revenue component of the calculation was high as the winter months of July, August and September from both 2016 and 2017 were included in the disclosure period. These winter months see higher revenues than other months, with colder temperatures leading to an increase in the use of gas.

There has been no re-classification of items in the disclosure year.

Regulatory Profit (Schedule 3)

- In the box below, comment on regulatory profit for the disclosure year as disclosed in Schedule 3. This comment must include
 - a description of material items included in other regulated income (other than gains / (losses) on asset disposals), as disclosed in 3(I) of Schedule 3
 - 5.2 information on reclassified items in accordance with sub-clause 2.7.1(2).



Box 2: Explanatory comment on regulatory profit

There are no items of other regulated income and accordingly no reclassified items.

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

- 6. If the GDB incurred merger and acquisitions expenditure during the disclosure year, provide the following information in the box below:
 - 6.1 information on reclassified items in accordance with sub-clause 2.7.1(2)
 - any other commentary on the benefits of the merger and acquisition expenditure to the GDB.

Box 3: Explanatory comment on merger and acquisition expenditure

No merger and acquisition expenditure has been included during the disclosure year.

Value of the Regulatory Asset Base (Schedule 4)

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

Box 4: Explanatory comment on the value of the regulatory asset based (rolled forward)

The value of the regulated asset base (RAB) has been determined by rolling forward the initial RAB with adjustments made for additions, disposals, depreciation and revaluation in accordance with the applicable Input Methodologies.

Exemptions applied to RAB

In 2017, the Commerce Commission exempted First Gas Limited (Distribution) from completing the historic information in Schedule 4(1) Regulatory Asset Base Value (Rolled Forward) relating to periods prior to First Gas ownership. First Gas purchased the non-Auckland gas distribution network on 20 April 2016; historical disclosures were made by Vector Limited. We have continued to apply this exemption in the 2018 disclosures.

Amendment to opening unallocated RAB

In 2018, we reviewed the not-directly attributable assets for our distribution and transmission businesses.

In Schedule 4(ii), the opening unallocated RAB value is different to the closing unallocated RAB value that was disclosed in 2017. This is because in 2017 a small number of assets directly attributable to our transmission business were included in the closing unallocated RAB value for our distribution business. These transmission assets have been removed from the unallocated RAB value for our distribution network in 2018. The closing unallocated RAB balance in 2017 was \$156.571 million. After removing the directly attributable transmission assets, the opening unallocated RAB for 2018 is \$156.441 million.

Calculation of revaluation rate and revaluation of assets

Following a change in the base year by Statistics New Zealand, the opening CPI value (CPI₄-4) does not agree to closing CPI value disclosed in 2017. The opening CPI value disclosed in 2018 of 1005 reflects the Statistics New Zealand revision to the All Groups Index SE9A.



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

- 8. In the box below, provide descriptions and workings of the material items recorded in the following asterisked categories of 5a(i) of Schedule 5a-
 - 8.1 Income not included in regulatory profit / (loss) before tax but taxable
 - 8.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible
 - 8.3 Income included in regulatory profit / (loss) before tax but not taxable
 - 8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax

Box 5: Regulatory tax allowance: permanent differences

Permanent differences consist largely of a provisional non-deductible payment to settle claims brought by the Commerce Commission under sections 47 and 27 of the Commerce Act 1986 in relation to First Gas' acquisition of GasNet's Bay of Plenty gas pipelines.¹ There are also immaterial amounts of non-deductible professional fees and entertainment expenses.

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

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

Box 6: Tax effect of other temporary differences (current disclosure year)

Temporary differences include immaterial movements in provisions and accruals.

Related party transactions: disclosure of related party transactions (Schedule 5b)

10. In the box below, provide descriptions of related party transactions beyond those disclosed on Schedule 5b including identification and descriptions as to the nature of directly attributable costs disclosed under sub-clause 2.3.6(2)(b).

Box 7: Related party transactions

A description of all related party transactions has been disclosed in Schedule 5b.

Cost allocation (Schedule 5d)

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

¹ First Gas has accepted the claims brought by the Commerce Commission. The provisional amount included in the 2018 disclosure accounts is in line with the final settlement determined by the courts in February 2019.



Box 8: Cost allocation

All operating costs disclosed in Schedule 5d (except some specified business support costs and pass-through costs), are directly attributable to either the First Gas distribution or transmission business. First Gas has applied the avoided cost allocation methodology (ACAM) in accordance with the applicable Input Methodologies.

Approach to cost allocation

The accounting-based allocation approach (ABAA) has been applied in accordance with the applicable Input Methodologies determination to allocate not directly attributable costs (shared costs) between First Gas' distribution and transmission businesses. Causal cost allocators have been used where a cost driver has led to the cost being incurred.

Where a single causal allocator cannot be established for a shared cost, a proxy allocator has been used. The rationale behind the use of each proxy allocator is based on an analysis of each cost item that is not directly attributable. The key allocator that can be used as a proxy is determined by management. This is based on management's experience and knowledge, and an analysis of each of the cost areas.

Treatment of costs

Business support costs that are not directly attributable arise in the areas of:

- Legal and consulting fees, which has a causal cost allocator of management's estimate of time spent;
- Employee related costs such as mobile phones, stationery, travel, information technology hardware and software, and advertising for positions, which have a causal cost allocator of employee numbers;
- General expenses such as telephones, sponsorship and professional fees for audit, tax, information and technology and treasury functions which have a proxy cost allocator of the Regulatory Asset Base (RAB);
- Directors fees which has a proxy cost allocator of RAB;
- Insurance costs which has a proxy cost allocator of RAB; and
- Commerce Act levies which have a causal cost allocator of RAB.

Only one allocation method is used for each area.

First Gas has refined the cost allocators applied to its information disclosure accounts this year. Where possible, we have allocated the shared costs at a greater level of disaggregation than in previous years. Further information on the effect of this refinement to allocators is available in Schedule 5d of this disclosure document.

Asset allocation (Schedule 5e)

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



Box 9: Commentary on asset allocation

Non-network assets that are not directly attributable have been allocated across all First Gas regulated businesses based on head count.

In 2018, we reviewed the not-directly attributable assets for our distribution business. This review identified a number of directly attributable non-network assets that had been previously considered not directly attributable.

During the 2018 disclosure period, these assets were re-classified from "Not directly attributable" to "directly attributable."

Capital Expenditure for the Disclosure Year (Schedule 6a)

- 13. In the box below, comment on expenditure on assets for the disclosure year, as disclosed in Schedule 6a. This comment must include
 - a description of the materiality threshold applied to identify material projects and programmes described in Schedule 6a;
 - 13.2 information on reclassified items in accordance with sub-clause 2.7.1(2).

Box 10: Explanation of capital expenditure for the disclosure year

A project or programme is considered material if the estimated total project cost is equal to or exceeds \$0.5 million.

There have been no re-classified items.

Focus for capital expenditure

First Gas remains focused on building and maintaining a safe and resilient gas distribution for our customers, whilst actively pursuing growth across our network. This focus is reflected in the work programme that was undertaken this year:

- Integrity upgrades to mains pipes;
- Upgrades to District Regulating Station and metering equipment;
- Mains extensions for subdivisions;
- New residential connections; and
- Open Country Dairy Horotiu expansion

Further detail on our expenditure during this period, and our future work programme is available in our 2018 Asset Management Plan published on the First Gas website here: http://firstgas.co.nz/about-us/regulatory/distribution/

Operational Expenditure for the Disclosure Year (Schedule 6b)

- 14. In the box below, comment on operational expenditure for the disclosure year, as disclosed in Schedule 6b. This comment must include-
 - 14.1 Commentary on assets replaced or renewed with asset replacement and renewal operational expenditure, as reported in 6b(i) of Schedule 6b
 - 14.2 Information on reclassified items in accordance with sub-clause 2.7.1(2)
 - 14.3 Commentary on any material atypical expenditure included in operational expenditure disclosed in Schedule 6b, including the value of the expenditure, the purpose of the expenditure, and the operational expenditure categories the expenditure relates to.



Box 11: Explanation of operational expenditure for the disclosure year

There has been no operational expenditure on asset replacement and renewal.

There have been no re-classified items.

First Gas has incurred atypical expenditure in 2018. The business support category includes the provision for settlement of the claims brought by the Commerce Commission under sections 47 and 27 of the Commerce Act 1986 in relation to First Gas' acquisition of GasNet's Bay of Plenty gas distribution pipelines.

Variance between forecast and actual expenditure (Schedule 7)

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

Box 12: Explanation of the variance between forecast and actual expenditure

Capital expenditure

Overall, our capital expenditure on network assets was \$2.6 million (16%) lower than that forecast in our Asset Management Plan for this period. This lower expenditure reflects a deferral of projects as we complete further investigation or manage work plans to minimise the impact of construction on customers. Major variances in expenditure over the year relate to:

- The deferral of the IP20 Cambridge reinforcement project until the 2019 disclosure year.
 This project was deferred so our work could be aligned with the Waipa District Council relocation of approximately 650 metres of the South Waikato Expressway (\$1.7 million);
- A delay in the work programme to replace pre-1985 pipelines, as a strategy review is currently underway to determine the priority areas to address first (\$2 million); and
- Rescheduling the execution of the Hamilton DRS 100 upgrade to limit the impact on customers in the area, to predominantly FY2019 (\$0.5 million).

Operational expenditure

Total operating expenditure is \$1.8 million (22%) above that forecast for the period. This increase is driven by the unexpected investigation by the Commission under sections 27 and 47 of the Commerce Act 1986. A provision for settlement is included in the 2018 disclosure accounts.

Excluding this one-off provisional payment, our operating expenditure over the past year is \$1.6 million (19%) below forecast. This reflects efficiency gains we have achieved by optimising our business systems and processes, including efficiencies achieved through our updated contract with our primary service provider.

Further detail on our expenditure for this period, and future work programme is available in our 2018 Asset Management Plan published on the First Gas website here: http://firstgas.co.nz/about-us/regulatory/distribution/

Information relating to revenues and quantities for the disclosure year

16. In the box below, please explain reasons for any material differences between target revenue disclosed before the start of the pricing year in accordance with clause 2.4.1 and sub-clause 2.4.3(3), and total billed line charge revenue for the disclosure year as disclosed in Schedule 8



Box 13: Explanatory comment relating to revenue for the disclosure year

Our line charge revenue of \$23.5 million is \$1.8 million above the target revenue forecast in our pricing methodology for the period.

Target revenue was determined using the allowable notional revenue calculated in accordance with the 2017 DPP Determination for gas distribution services, adjusted for a forecast volume growth of approximately 1%. This forecast was based on historic growth in volumes and consumer connections.

In 2018, the growth in our consumer connections and volume exceeded our forecast as:

- Continued efforts to make gas more accessible saw an increase in consumer connections and gas use above that forecast; and
- The historic data used in our forecast was based on consumption from two years prior which was an abnormally dry and warm year with low gas use.
- 17. If price category codes or consumer groups (as applicable) have been changed in a disclosure year, please explain in the box below the effect of this on the allocation of ICPs, quantities and revenues between consumer groups disclosed in Schedule 8.

Box 14: Explanatory comment relating to changed price category codes or consumer groups

First Gas introduced a new price category on 1 October 2017. The GN0V tariff is a fully variable tariff available to new residential connections and compliments the existing GN0R tariff which includes a fixed component. Joining this pricing plan is optional for new consumers and there was no uptake of the GN0V pricing plan in this disclosure period. This category has had no effect on the allocation of ICPs, quantities and revenues between consumer groups.

Network Reliability for the Disclosure Year (Schedule 10a)

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

Box 15: Commentary on network reliability for the disclosure year

A total of 241 interruptions were experienced on the network in 2018. This is a decrease from the 395 interruptions experienced in 2017,² and is largely due to a decrease in planned interruptions.

The number of planned interruptions reflects the mix of work undertaken during the period. Typically, growth projects such as new subdivision or connection work will see lower planned interruptions to consumers, in comparison to asset replacement and renewal work on existing connected assets, which may see greater planned interruptions. In previous years we have had larger work programmes to replace cast iron pipes and sections of pre-1985 polyethylene (PE) pipelines. As per box 12, we have delayed the work programme to replace the pre-1985 PE pipe due to a review of the replacement strategy. This programme of work is expected to restart in 2019.

Unplanned interruptions caused by third parties have decreased slightly this year. First Gas has continued to advertise and educate developers and contractors on the need to check the area before they commence works and dig. We are members of the "before u dig" service and actively promote its use.

Unplanned SAIDI not caused by third party damage (Class C) has also decreased this disclosure period, from 1,308 minutes in the 2017 disclosure period to 80 minutes this year. Whilst lower interruption numbers affect this result, the main driver of the lower SAIDI is the reduction in temporary disconnections and their duration. In 2017 there were 12 temporary disconnection events accounting for 1,172 minutes compared to 3 events this year accounting for only 39 SAIDI minutes.

Temporary disconnections occur when First Gas is unable to restore supply when we respond to the event. Typically, this will happen if the interruption occurs in the evening and it is unsafe or too disruptive for works to continue, or the consumer requests that we leave the supply disconnected for a specified period. In these cases, the site is made safe and First Gas will return to reinstate supply the following day or at the time requested. Any period of disconnection is undertaken with the customer's agreement.

Insurance cover

- 19. In the box below, provide details of any insurance cover for the assets used to provide gas pipeline services, including-
- 20. The GDB's approaches and practices in regard to the insurance of assets, including the level of insurance:
- 21. In respect of any self-insurance, the level of reserves, details of how reserves are managed and invested, and details of any reinsurance.

Box 16: Explanation of insurance cover

Insurance cover is in place for a large number of group assets, excluding distribution pipeline assets. These policies cover material damage, business interruption and contract works insurance.

Insurance costs are allocated to the Distribution business based on the businesses share of total RAB forecasts.

Amendments to previously disclosed information

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

² 494 interruptions were incurred in the 15-month 2017 disclosure period. This is pro-rated to 395 interruptions to reflect a comparative 12-month period.

- 22.1 a description of each error; and
- for each error, reference to the web address where the disclosure made in accordance with clause 2.12.1 is publicly disclosed.

Box 17: Disclosure of amendment to previously disclosed information

No amendments are required.

Company First Gas Limited (Distribution)

For Year Ended 30 September 2018

Schedule 15: Voluntary Explanatory Notes

1. This schedule enables GDBs to provide, should they wish to:

- 1.1 additional explanatory comment to reports prepared in accordance with clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1, and 2.5.2.
- 1.2 information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.
- 2. Information in this schedule is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.
- 3. Provide additional explanatory comment in the box below.

Box 1: Voluntary explanatory comment on disclosed information

In completing this disclosure, First Gas has made two minor amendments to information after discussion with the Commerce Commission. These amendments are:

- **Schedule 4**. Adjusting the opening Unallocated RAB balance disclosed in Schedule 4 as discussed in box 4 of the mandatory notes; and
- Schedule 5d. When comparing the change in cost allocations in Schedule 5d(iii) the CY-1 result is based on a 12-month period (October 2016 September 2017) rather than the 2017 disclosure period. The 2017 disclosure period for First Gas covered the 15 months from July 2016 to September 2017.

In 2017 we received an exemption for schedule 4(i): Regulatory Asset Base (rolled forward). The exemption applies from the 2017 to 2019 disclosures and exempts First Gas from completing the roll forward information relating to periods prior to the 2016 disclosure. First Gas purchased its distribution network in April 2016. This exemption was applied in the 2018 disclosure.



Schedule 19 Certification for Year-end Disclosures

Clause 2.9.3

We, Philippa Jane Dunphy and Euan Richard Krogh, being directors of First Gas Limited, certify that, having made all reasonable enquiry, to the best of our knowledge:

- a) the information prepared for the purposes of clauses 2.3.1, 2.3.2, 2.4.21, 2.4.22, 2.5.1, 2.5.2 and 2.7.1 of the *Gas Distribution Information Disclosure Determination 2012* in all material respects complies with that determination; and
- b) the historical information used in the preparation of Schedules 8, 9a, 9b, 9c, 9d, 10a, 10b and 14 has been properly extracted from the First Gas Limited's accounting and other records sourced from the applicable financial and non-financial systems, and that sufficient appropriate records have been retained.

17	Detrogl
Director	Director
Philippa Jane Dunphy	Euan Richard Krogh
Date 28 February 2019	Date 28 February 2019



Independent Reasonable Assurance Report to the Directors of First Gas Limited and to the New Zealand Commerce Commission

Conclusion

We have concluded that, in all material respects, Schedules 1, 2, 3, 4, 5 (a-g), 6 (a-b), 7, 10(a)(ii) and 14 (boxes 1 – 12) of the First Gas Limited Gas Distribution Information Disclosure Requirements Information Templates (the 'schedules'), have been prepared, in accordance with the Commerce Commission Gas Distribution Information Disclosure Amendments Determination (No. 1) 2017 – 14 June 2017 and the related Reasons Paper and Input Methodologies (together 'the determination') for the 12 months ended 30 September 2018.

As far as appears from an examination of them, proper records to enable the complete and accurate compilation of the schedules as at 30 September 2018 have been kept by First Gas Limited for the 12 months ended 30 September 2018.

As far as appears from examination, the information used in the preparation of the schedules as at 30 September 2018 has been properly extracted from First Gas Limited's accounting and other records and has been sourced, where appropriate, from First Gas Limited's financial and non-financial systems.

Information subject to assurance

We have performed an engagement to provide reasonable assurance in relation to First Gas Limited's schedules for the 12 months ended 30 September 2018.

Criteria

We have performed an engagement to provide reasonable assurance in relation to the Schedules 1, 2, 3, 4, 5 (a-g), 6 (a-b), 7, 10(a)(ii) and 14 (boxes 1 – 12) prepared in accordance with the determination for the 12 months ended 30 September 2018.

Standards we followed

We conducted our reasonable assurance engagement in accordance with International Standard on Assurance Engagements (New Zealand) ISAE (NZ) 3000 (Revised) *Assurance Engagements other than audits or reviews of historical financial information* and Standard on Assurance Engagements SAE 3100 *Compliance Engagements*. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. In accordance with those standards we have:

- used our professional judgement to assess the risk of material misstatement and plan and perform the engagement to obtain reasonable assurance that the schedules are free from material misstatement, whether due to fraud or error;
- considered relevant internal controls when designing our assurance procedures, however we do not
 express a conclusion on the effectiveness of these controls; and
- ensured that the engagement team possesses the appropriate knowledge, skills and professional competencies.



How to interpret reasonable assurance and material misstatement

Reasonable assurance is a high level of assurance, but is not a guarantee that it will always detect a material misstatement when it exists.

Misstatements, including omissions, within the schedules are considered material if, individually or in the aggregate, they could reasonably be expected to influence the relevant decisions of the intended users taken on the basis of the schedules.

Use of this assurance Report

Our report should not be regarded as suitable to be used or relied on by any parties other than First Gas Limited and the New Zealand Commerce Commission in relation to section 2.8.1 of the determination for any purpose or in any context. Any party other than First Gas Limited or the New Zealand Commerce Commission who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk.

To the fullest extent permitted by law, we accept or assume no responsibility and deny any liability to any party other than First Gas Limited and the New Zealand Commerce Commission for our work, for this independent reasonable assurance report, or for the conclusions we have reached.

Our report is released to First Gas Limited and the New Zealand Commerce Commission on the basis that it shall not be copied, referred to or disclosed, in whole (save for First Gas Limited's own internal purposes) or in part, without our prior written consent.

Directors' responsibility for the schedules

The directors of the company are responsible for the preparation and fair presentation of the schedules in accordance with the determination. This responsibility includes such internal control as the directors determine is necessary to enable the preparation of the schedules that is free from material misstatement whether due to fraud or error.

Our responsibility

Our responsibility is to express a conclusion to the directors on the preparation and presentation of the schedules in accordance with the determination.

Our independence and quality control

We have complied with the independence and other ethical requirements of Professional and Ethical Standard 1 (Revised) issued by the New Zealand Auditing and Assurance Standards Board, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies Professional and Ethical Standard 3 (Amended) and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our firm has also provided audit, other assurance and non-audit services to First Gas Limited. Partners and employees of our firm may also deal with First Gas Limited on normal terms within the ordinary course of trading activities of the business of First Gas Limited. These matters have not impaired our independence as assurance practitioners for this assurance engagement. The firm has no other relationship with, or interest in, First Gas Limited.

Krm?

KPMG Auckland

28 February 2019