



COMPLIANCE STATEMENT

Gas transmission services: Compliance with the wash-up amount calculation and quality standards

Assessment Period 1 October 2022 – 30 September 2023



Introduction

Firstgas is part of the Clarus group of companies which is one of New Zealand's largest energy groups with businesses that touch many aspects of the energy supply chain including Rockgas, Firstgas, Firstlight Network, First Renewables and Flexgas. Whether it's transmission, distribution, supply or storage of energy, the companies within the Clarus group service over half a million homes and businesses of all sizes around New Zealand.

Firstgas owns and operates more than 2,500 kms of high pressure gas transmission pipelines and stations that supply natural gas from Taranaki to industrial consumers throughout the North Island. It also owns 4,800kms of gas distribution networks across parts of the North Island. Combined, Firstgas connects over 300,000 homes and businesses with natural gas through its transmission and distribution systems. This essential infrastructure supports New Zealand's economy, so the group is committed to helping customers maximise value from it. Flexgas provides energy storage services to electricity generators, offering an important source of flexibility to the electricity system and supporting high levels of intermittent wind, hydro and solar generation.

Rockgas is New Zealand's largest LPG retail supplier, providing fast and reliable service through a national network of branches and franchises.

Firstlight Network is the lines company supplying electricity to the Tairāwhiti and Wairoa region, responsible for keeping the lights on across 12,000 square kilometres of the East Coast.

We are also investing in innovative renewable energy solutions such as biomethane and hydrogen, to help New Zealand reach its net zero carbon goals by 2050. Our First Renewables business is leading this work, alongside other options that will bring renewable energy to New Zealand homes, businesses and energy-intensive industries in the future.

Clarus was previously known as Firstgas Group.

Compliance Statement

This document is a Compliance Statement prepared pursuant to section 12.1 – 12.2 of the *Gas Transmission Services Default Price-Quality Path Determination 2022*. This Compliance Statement covers Firstgas' gas transmission business (GTB) for the year ending 30 September 2023.

The following documents are provided with this Compliance Statement:

- Calculation of the wash-up amount
- Calculations for quality standards compliance
- Director certification
- PwC assurance report

This Compliance Statement was prepared on 20 February 2024.

Compliance status for year ending 30 September 2023

Compliance with the requirement to calculate the wash-up amount	Yes
Compliance with quality standard – RTE	Yes
Compliance with quality standard – Major interruptions	Yes

Further information

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Disclaimer

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

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1. Wash-up amount compliance

First Gas Limited (Firstgas) is pleased to confirm that we have complied with the requirement to calculate the Wash-up Amount in clause 8.4 of the DPP Determination for the Assessment Period from 1 October 2022 to 30 September 2023. This is the first Assessment Period in this DPP period (2022 – 2026).

1.1 Determining the wash-up amount

The DPP Determination requires gas transmission businesses (GTB) to calculate the Wash-up Amount for the first Assessment Period. This must be calculated in accordance with the following formula, as specified in Schedule 6 of the DPP Determination:

$$\text{Wash-Up Amount} = \text{Actual allowable revenue} - \text{actual revenue} - \text{revenue forgone}$$

1.2 Actual allowable revenue

Actual allowable revenue must be calculated in accordance with the formula:

$$\text{Actual allowable revenue} = \text{Actual net allowable revenue} + \text{actual pass-through costs and recoverable costs} + \text{revenue wash-up draw down amount}$$

Actual net allowable revenue

As specified in paragraph 1 of Schedule 6 of the DPP Determination, the actual net allowable revenue for the first Assessment Period is the amount specified in Schedule 4 as the forecast net allowable revenue for the first Assessment Period;

$$\begin{aligned} \text{Actual net allowable revenue (2023)} &= \text{Forecast net allowable revenue for Assessment Period Ending 30 September 2023} \\ &= \$147.227 \text{ million} \end{aligned}$$

Actual Pass-through costs and Recoverable costs

Actual Pass-through and Recoverable costs are those that were incurred in this Assessment Period (the year ended 30 September 2023).

Table 1: Pass-through and Recoverable costs

Pass-through and Recoverable Costs	Incurred in the year ending 30 September 2023
	\$000
Rates and Levies	\$3,260
Balancing gas costs and revenue	\$2,081
Mokau Compressor fuel gas costs	\$686
Total actual pass-through costs and recoverable costs	\$6,027

Revenue wash-up draw down amount for the first Assessment Period

The wash-up draw down amount for the first Assessment Period calculated following the requirements of Schedule 8 of the DPP Determination is **\$2.550 million**. The revenue wash-up draw down amount refers to revenue under-recovered in the FY2021 period, and includes an adjustment to recognise the time value of money as specified in the DPP Determination.

Calculation of actual allowable revenue

$$\begin{aligned} \text{Actual allowable revenue} &= \$147.227 \text{ million} + \$6.027 \text{ million} + \$2.550 \text{ million} \\ &= \mathbf{\$155.804 \text{ million}} \end{aligned}$$

1.3 Actual Revenue

For the Assessment Period, GTBs must determine actual revenue as specified in the formula below:

$$\text{Actual Revenue} = \text{Actual revenue from prices} + \text{other regulated income}$$

Where:

Actual revenue from prices is the actual revenue from prices calculated as the sum of each price multiplied by each corresponding actual quantity

Other regulated income is income associated with the supply of gas transmission services other than through prices, investment related income, capital contributions and vested assets.

Firstgas' transmission business

The Firstgas transmission business consists of two pipeline systems – the Maui transmission pipeline and the non-Maui (ex-Vector) transmission pipelines. Each system currently has its own pricing and its own commercial access code – the Maui Pipeline Operating Code (MPOC) and the Gas Transmission Code (GTC).¹

To calculate the total Actual Revenue from Prices from our GTB, we have added together the Maui pipeline Actual Revenue from Prices with the non-Maui pipeline Actual Revenue from Prices.

Maui transmission pipeline

¹ This commercial code was previously referred to as the Vector Transmission Code (VTC) but was renamed as the Gas Transmission Code, effective 9 August 2021.

As announced to customers on 31 July 2022,² the prices for the Maui pipeline for the 2022/23 pricing year³ were as follows:

Tariff	Value for 2022/23
Tariff 1 (\$ per GJ.km)	0.002043
Tariff 2 (\$ per GJ)	0.093284

The Actual Revenue from Prices for the Maui pipeline in 2022/23 was:

Tariff	Actual Quantity	Price	Total (\$million)
Tariff 1	14,074,387,606.979 GJ.km	\$0.002043 per GJ.km	\$28.754
Tariff 2	130,999,758.917 GJ	\$0.093284 per GJ	\$12.220
Actual Revenue from Prices			\$40.974

Non-Maui transmission pipeline

The actual revenue for the non-Maui pipelines is set out in **Appendix 1**. The prices and quantities for the non-Maui pipeline for the 2022/23 pricing year were released as required under the Gas Transmission Code (GTC)⁴ and are attached in **Appendix 2**.

Based on the prices and quantities outlined in **Appendices 1 to 3**, the Actual Revenue from Prices for this Assessment Period on the non-Maui pipeline was **\$105.428 million**.

Total Actual Revenue from Prices

The total Actual Revenue from Prices is **\$146.402 million**.

$$\begin{aligned}
 \text{Actual Revenue from prices} &= \text{Actual Revenue from Prices (Maui)} + \text{Actual Revenue from Prices (Non-Maui)} \\
 &= \$40.974 \text{ million} + \$105.428 \text{ million} \\
 &= \$146.402 \text{ million}^5
 \end{aligned}$$

Other regulated income

² https://firstgas.co.nz/wp-content/uploads/Firstgas_Maui-prices-Notice-of-Change-to-Tariff-1--2-for-FY2022.pdf

³ The 2021/22 pricing year is for the period 1 October 2021 to 30 September 2022. The pricing year is the same as the Assessment Period.

⁴ https://firstgas.co.nz/wp-content/uploads/Firstgas_VTC-prices-Confirmed-CRFs-for-FY2022.pdf

⁵ Actual revenue is based on quantities relating to the 12-month 2022 pricing period. It does not include accrued revenue.

Firstgas recorded (\$0.013 million) in other regulated income for the 2022/23 Assessment Period.

Calculation of actual revenue

$$\begin{aligned}\text{Actual Revenue for 2022/23} &= \$146.402 \text{ million} + (\$0.013 \text{ million}) \\ &= \$146.389 \text{ million}\end{aligned}$$

1.4 Revenue foregone

Revenue foregone reflects a cap on the variance between actual revenue received from prices and that forecast to be received by Firstgas when we set prices for the Assessment Period. If actual revenue divided by forecast revenue is more than 20%, the cap is triggered, and revenue is foregone.

For the Assessment Period, GTBs must determine revenue foregone as specified in the formula below:

$$\text{Revenue foregone} = \text{Actual net allowable revenue from prices} \times (\text{revenue reduction percentage} - 20\%)$$

Where:

$$\text{Actual net allowable revenue from prices} = \text{that calculated in section 1.2 above}$$

$$\text{Revenue reduction percentage} = 1 - (\text{actual revenue from prices} \div \text{forecast revenue from prices})$$

Calculating the revenue reduction percentage

$$\begin{aligned}\text{Revenue reduction percentage} &= 1 - (\text{actual revenue from prices} \div \text{forecast revenue from prices}) \\ &= 1 - (\$146.402 \text{ million} \div \$156.765 \text{ million}) \\ &= 6.6\%\end{aligned}$$

Calculating the revenue foregone

As specified in paragraph 8 of Schedule 7, if the revenue reduction percentage is not greater than 20% then the revenue foregone is nil.

Accordingly, the revenue foregone for this Assessment Period is **nil**.

$$\begin{aligned}\text{Revenue foregone} &= \text{Actual net allowable revenue from prices} \times (\text{revenue reduction percentage} - 20\%^6) \\ &= \$147.227 \text{ million} \times 0\% \\ &= \$0\end{aligned}$$

⁶ As specified in paragraph 8 of Schedule 6 of the DPP Determination, if the revenue reduction percentage is not greater than 20% then the revenue foregone is nil.

1.5 Compliance with the Price Path

Compliance with the DPP Determination requires that the GTB calculate the Wash-up Amount. The Wash-up Amount for this Assessment Period is **\$9.415 million**.

$$\begin{aligned}
 \text{Wash-Up Amount (\$million)} &= \text{Actual allowable revenue} - \text{actual revenue} - \text{revenue forgone} \\
 &= \$155.804 \text{ million} - \$146.389 \text{ million} - \$0 \\
 &= \$9.415 \text{ million}
 \end{aligned}$$

This amount will be passed into prices and recovered from consumers in the pricing year 1 October 2024 to 30 September 2025.

2. Quality standards compliance

We are pleased to confirm that Firstgas has complied with the two quality standards specified in clause 9.1 of the DPP Determination for this Assessment Period.

Compliance with the response time to emergencies (RTE) standard	Yes
Compliance with major interruptions standard	Yes

2.1 Response Time to Emergencies

Clause 9 requires us to provide information on “Response Time to Emergencies” (‘RTE’) relating to incidents and responses that could fall under this clause. The following quality assessment formula is used:

A GTB’s RTE values for an Assessment Period must be such that the response time to any emergency must be no greater than 180 minutes.

Emergency is defined in the DPP Determination as follows:

- An incident that has occurred on or in the near vicinity of a GTB’s assets on the transmission network, including leaks, unplanned disruptions of supply, third party damage, near-miss incidents, equipment failure, overpressure, or ignitions and*
- That should be responded to immediately by the GTB based on Good Industry Practice (GIP).⁷*

There were **four** emergencies in this assessment period:

Event 12968 – 29 January 2023

Erosion of riverbank on Washer Road, Te Puke, threatening pipeline stability, due to storm event. Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative arriving at the scene 15 minutes after the GTB became aware of the issue.

Event 13077 – 15 February 2023

505 pipeline exposure upstream of Kaitaratahi SS, due to Cyclone Gabrielle. Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative arriving at the scene 72 minutes after the GTB became aware of the issue.

Event 13674 – 2 May 2023

300 Line Derby Road Mainline Valve Emergency Response, due to crack indications in risers. Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative already being at the scene; the person at the scene was the one who identified the issue which led to the emergency being declared.

Event 13932 – 9 June 2023

Oil spill at Rotowaro Compressor Station. Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative already being at the scene; the person at the scene was the one who identified the issue which led to the emergency being declared.

⁷ GIP refers to good industry practice. Firstgas adheres to the ‘Guidelines for a Certificate of Fitness of High-Pressure Gas and Liquids Transmission Pipelines’ issued by Worksafe New Zealand and NZ as a basis for good industry practice. When an incident occurs, the operations team immediately determine whether the incident meets the criteria for an emergency. Firstgas’ interpretation of emergency reflects that in the DPP. Once the operations duty manager declares an emergency the emergency response process is activated.

Exclusion of certain emergencies

No applications were made to the Commerce Commission to consider emergencies exceeding 180 minutes be treated as having complied with the quality standard for that emergency.

Calculation of RTE

There were four emergencies in this assessment period, which were responded to within 180 minutes. Accordingly, Firstgas remains compliant with the RTE quality standard.

2.2 Major Interruptions

As specified in paragraph 9.1 of the DPP Determination, a GTB must have no major interruptions in the Assessment Period to be compliant with the quality standard.

A major interruption means any “*declaration of a Critical Contingency caused or contributed to by an incident on the transmission assets owned or controlled by the GTB, which results in curtailment directions being issued in respect of any band beyond band 1.*”

The number of major interruptions in this assessment period is **nil**. Accordingly, Firstgas is compliant with the major interruption quality standard.

2.3 Policies and procedures

All GTB integrity data (including RTE) is recorded and compiled by our Gas Control Team at our Gas Transmission Operations Centre at Bell Block in Taranaki. This is done following a prescriptive set of processes that have been developed to ensure accuracy and consistency of reporting.

An emergency event is triggered by the Gas Transmission Duty Manager declaring an Emergency. Circumstances which lead to an emergency being declared are summarised in **Appendix 4**. These are consistent with the definition of Emergency in the DPP Determination.

RTE statistics for each emergency event are entered into an information system, and the data is retained for reporting and analysis. Our Gas Control Team completes quality control and remediation work in line with the detailed procedures outline in the Operating Standard mentioned above. RTE performance is monitored by the Gas Control Team, and emergencies are reported to the Firstgas Executive Team, including the time taken to respond.

Procedures in the event of a Critical Contingency event

Firstgas is bound by the *Gas Governance (Critical Contingency Management Regulations 2008) Regulations* that are administered by the Gas Industry Company. Under the regulations, a Critical Contingency Operator (CCO) is appointed. The role of the CCO⁸ is to:

- Determine and declare the onset of a Critical Contingency
- Call for load curtailment as required to balance the system
- Monitor the supply and demand balance and adjust load curtailment as necessary and
- Determine when it is safe to terminate a Critical Contingency.

While Firstgas is not the CCO, we remain in direct control and management of the transmission system at all times during a Critical Contingency and activate processes and procedures contained in our Critical Contingency Management Plan (CCMP).

⁸ Further information on the Critical Contingency Operator is available from www.cco.org.nz

Our CCMP is available from the website of the Critical Contingency Operator.⁹

2.4 Compliance with quality standards

As illustrated in sections 2.1 and 2.2 of this Compliance Statement, Firstgas has complied with the quality standards for the FY2023 Assessment Period.

Appendix 1: Summary of the prices and quantities for the Non-Maui network

	Pi2023, Qi2023	
Total	\$	105,427,732
Transmission standard charges between 1 October 2022 and 30 September 2023	\$	92,426,340
Transmission non-standard charges between 1 October 2022 and 30 September 2023	\$	9,161,076
Transmission STP charges between 1 October 2022 and 30 September 2023	\$	2,645,094
Charges billed outside of OATIS between 1 October 2022 and 30 September 2023	\$	1,195,221

⁹ Refer to the *Firstgas Critical Contingency Management Plan* (30 September 2020) available from <https://cco.org.nz/publications/>

Appendix 2: $P_{i,2023}Q_{i,2023}$ from standard prices for the 2023 Assessment Period

$P_{i,2023}, Q_{i,2023}$

Standard charges \$ 92,426,340

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	MDQ	F4000439	Kapuni (Lactose et al)	KAP12901	N/A	-	\$ -	\$ -
Standard	TSA	MDQ	F4000439	Kapuni GTP	KAP09612	N/A	-	\$ -	\$ -
Standard	TSA	MDQ	OFF16601	Huntly	HTL16601	N/A	62,717.10	\$ 404.00	\$ 69,418.38
Standard	TSA	MDQ	KAP09008	Eltham	ELM12301	N/A	209,278.87	\$ 92.00	\$ 52,749.74
Standard	TSA	MDQ	KAP09008	Inglewood	IGW11901	N/A	46,985.95	\$ 92.00	\$ 11,843.03
Standard	TSA	MDQ	KAP09008	Kaponga	KPA12401	N/A	2,843.94	\$ 92.00	\$ 716.83
Standard	TSA	MDQ	KAP09008	New Plymouth	NPL12101	N/A	1,108,916.55	\$ 92.00	\$ 279,507.73
Standard	TSA	MDQ	KAP09008	Stratford	STR10201	N/A	125,434.98	\$ 92.00	\$ 31,616.49
Standard	TSA	MDQ	KAP09008	Waitara	WTR12001	N/A	148,337.31	\$ 92.00	\$ 37,389.13
Standard	TSA	MDQ	KAP09004	Ashhurst	ASH34301	N/A	15,266.99	\$ 393.00	\$ 16,438.15
Standard	TSA	MDQ	KAP09004	Belmont	BEL24510	N/A	1,918,465.82	\$ 486.00	\$ 2,554,450.38
Standard	TSA	MDQ	KAP09004	Dannevirke	DAN05001	N/A	94,828.74	\$ 404.00	\$ 104,961.13
Standard	TSA	MDQ	KAP09004	Feilding	FLD03001	N/A	312,762.58	\$ 393.00	\$ 336,755.32
Standard	TSA	MDQ	KAP09004	Flockhouse	FLH21901	N/A	138.70	\$ 393.00	\$ 149.34
Standard	TSA	MDQ	KAP09004	Foxton	FOX22101	N/A	62,389.50	\$ 393.00	\$ 67,175.54
Standard	TSA	MDQ	KAP09004	Greater Kapiti	GWP20102	N/A	281,256.07	\$ 486.00	\$ 374,494.38
Standard	TSA	MDQ	KAP09004	Greater Waitangirua	GTW06910	N/A	664,185.27	\$ 486.00	\$ 884,367.23
Standard	TSA	MDQ	KAP09004	Hastings	HST05210	N/A	2,294,531.54	\$ 404.00	\$ 2,539,700.66
Standard	TSA	MDQ	KAP09004	Hastings (Nova)	HST05203	N/A	266,305.00	\$ 404.00	\$ 294,759.51
Standard	TSA	MDQ	KAP09004	Hawera	HWA20801	N/A	298,787.35	\$ 382.00	\$ 312,703.48
Standard	TSA	MDQ	KAP09004	Hawera (Nova)	HWA20802	N/A	159,643.25	\$ 382.00	\$ 167,078.69
Standard	TSA	MDQ	KAP09004	Kairanga	KRG24101	N/A	887.68	\$ 393.00	\$ 955.78
Standard	TSA	MDQ	KAP09004	Kaitoke	KTK23901	N/A	29,200.00	\$ 382.00	\$ 30,560.00
Standard	TSA	MDQ	KAP09004	Kakariki	KKI23701	N/A	128,966.35	\$ 382.00	\$ 134,973.01
Standard	TSA	MDQ	KAP09004	Kuku	KUK22401	N/A	1,558.66	\$ 393.00	\$ 1,678.23
Standard	TSA	MDQ	KAP09004	Lake Alice	LAB20201	N/A	60,793.41	\$ 382.00	\$ 63,624.88
Standard	TSA	MDQ	KAP09004	Levin	LVN24401	N/A	358,512.72	\$ 393.00	\$ 386,015.07
Standard	TSA	MDQ	KAP09004	Longburn	LN24301	N/A	287,309.15	\$ 393.00	\$ 309,349.31
Standard	TSA	MDQ	KAP09004	Mania	MNA23402	N/A	22,809.55	\$ 382.00	\$ 23,871.91
Standard	TSA	MDQ	KAP09004	Mangaroa	MNG34001	N/A	28,670.00	\$ 404.00	\$ 31,733.37
Standard	TSA	MDQ	KAP09004	Mangatainoka	MGK05401	N/A	1,825.00	\$ 393.00	\$ 1,965.00
Standard	TSA	MDQ	KAP09004	Marton	MTN23801	N/A	298,896.84	\$ 382.00	\$ 312,818.06
Standard	TSA	MDQ	KAP09004	Matapu	MTP20601	N/A	438.00	\$ 382.00	\$ 458.40
Standard	TSA	MDQ	KAP09004	Oroua Downs	ORD24701	N/A	25,815.00	\$ 393.00	\$ 27,795.33
Standard	TSA	MDQ	KAP09004	Otaki	OTA22601	N/A	26,565.80	\$ 486.00	\$ 35,372.54
Standard	TSA	MDQ	KAP09004	Pahiatua	PHT04901	N/A	12,642.23	\$ 393.00	\$ 13,612.04
Standard	TSA	MDQ	KAP09004	Pahiatua DF	PHT04902	N/A	1,068,571.32	\$ 393.00	\$ 1,150,543.91
Standard	TSA	MDQ	KAP09004	Palmerston North	PLN24201	N/A	1,238,928.86	\$ 393.00	\$ 1,333,969.98
Standard	TSA	MDQ	KAP09004	Patea	PTA20901	N/A	19,828.85	\$ 382.00	\$ 20,752.38
Standard	TSA	MDQ	KAP09004	Pauatahanui 2	PAH23101	N/A	511.00	\$ 486.00	\$ 680.40
Standard	TSA	MDQ	KAP09004	Takapau	TKP05101	N/A	157,150.00	\$ 404.00	\$ 173,941.37
Standard	TSA	MDQ	KAP09004	Tawa A	TWA35610	N/A	2,998,251.81	\$ 486.00	\$ 3,992,192.99
Standard	TSA	MDQ	KAP09004	Tawa B (Nova)	TWB24810	N/A	349,616.47	\$ 486.00	\$ 465,516.73
Standard	TSA	MDQ	KAP09004	Te Horo	THO22701	N/A	1,124.57	\$ 486.00	\$ 1,497.37
Standard	TSA	MDQ	KAP09004	Waitotara	WTT20301	N/A	35,744.60	\$ 382.00	\$ 37,409.42
Standard	TSA	MDQ	KAP09004	Wanganui	WAG21501	N/A	1,543,361.53	\$ 382.00	\$ 1,615,244.12
Standard	TSA	MDQ	KAP09004	Waverley	WVY23601	N/A	404.42	\$ 382.00	\$ 423.26
Standard	TSA	MDQ	OFF14501	Ngaruawahia	NGW14501	N/A	8,998.77	\$ 404.00	\$ 9,960.28
Standard	TSA	MDQ	None	None	None	N/A	-	\$ -	\$ -

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	MDQ	OFF16701	Oakura	OKU16701	N/A	18,135.83	\$ 92.00	\$ 4,571
Standard	TSA	MDQ	OFF13201	Okato	OKA13201	N/A	3,756.25	\$ 92.00	\$ 947
Standard	TSA	MDQ	OFF13001	Opunake	OPK13001	N/A	13,897.29	\$ 92.00	\$ 3,503
Standard	TSA	MDQ	OFF14101	Otorohanga	OTO14101	N/A	17,993.08	\$ 404.00	\$ 19,916
Standard	TSA	MDQ	OFF31101	Pirongia	PIR31101	N/A	2,334.47	\$ 404.00	\$ 2,584
Standard	TSA	MDQ	OFF31101	Te Awamutu DF	TAC31001	N/A	681,181.68	\$ 404.00	\$ 753,965
Standard	TSA	MDQ	PKU02308	Broadlands	BRO36301	N/A	83,772.00	\$ 520.00	\$ 119,346
Standard	TSA	MDQ	PKU02308	Edgecumbe	EGC30702	N/A	2,091.45	\$ 543.00	\$ 3,111
Standard	TSA	MDQ	PKU02308	Edgecumbe DF	EGC30701	N/A	1,411,484.32	\$ 543.00	\$ 2,099,825
Standard	TSA	MDQ	PKU02308	Gisborne	GIS07810	N/A	587,725.79	\$ 567.00	\$ 912,988
Standard	TSA	MDQ	PKU02308	Greater Mt Maunganui	GMM08001	N/A	972,999.82	\$ 497.00	\$ 1,324,879
Standard	TSA	MDQ	PKU02308	Greater Tauranga	GTT07701	N/A	509,267.00	\$ 497.00	\$ 693,440
Standard	TSA	MDQ	PKU02308	Kawerau	KAW04405	N/A	21,073.13	\$ 520.00	\$ 30,022
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Caxton)	KAW04410	N/A	223,200.32	\$ 520.00	\$ 317,984
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Tasman)	KAW04411	N/A	646,595.24	\$ 520.00	\$ 921,177
Standard	TSA	MDQ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	141,288.39	\$ 404.00	\$ 156,385
Standard	TSA	MDQ	PKU02308	Kinleith	KIN02601	N/A	41,779.44	\$ 404.00	\$ 46,244
Standard	TSA	MDQ	PKU02308	Kinleith (CHH mill)	KIN04310	N/A	4,095,102.98	\$ 404.00	\$ 4,532,662
Standard	TSA	MDQ	PKU02308	Lichfield 2	LCF20011	N/A	1,188,322.06	\$ 404.00	\$ 1,315,293
Standard	TSA	MDQ	PKU02308	Lichfield DF	LCF20010	N/A	689,087.05	\$ 404.00	\$ 762,716
Standard	TSA	MDQ	PKU02308	Okoroire Springs	OKS32801	N/A	2,182.70	\$ 404.00	\$ 2,416
Standard	TSA	MDQ	PKU02308	Opotiki	OPO32001	N/A	21,787.15	\$ 567.00	\$ 33,845
Standard	TSA	MDQ	PKU02308	Putaruru	PTR32601	N/A	30,555.17	\$ 404.00	\$ 33,820
Standard	TSA	MDQ	PKU02308	Rangiora	RAG33401	N/A	108,770.00	\$ 497.00	\$ 148,106
Standard	TSA	MDQ	PKU02308	Reporoa	RPR30801	N/A	695,814.65	\$ 520.00	\$ 991,298
Standard	TSA	MDQ	PKU02308	Rotorua	ROT08101	N/A	491,265.20	\$ 520.00	\$ 699,885
Standard	TSA	MDQ	PKU02308	Taupo	TAU07001	N/A	208,622.79	\$ 520.00	\$ 297,216
Standard	TSA	MDQ	PKU02308	Tauriko	TKO39301	N/A	166,281.81	\$ 497.00	\$ 226,417
Standard	TSA	MDQ	PKU02308	Te Puke	TPK33301	N/A	63,041.90	\$ 497.00	\$ 85,841
Standard	TSA	MDQ	PKU02308	Te Teko	TTK30601	N/A	3,944.75	\$ 543.00	\$ 5,868
Standard	TSA	MDQ	PKU02308	Tirau	TIR33502	N/A	6,500.60	\$ 404.00	\$ 7,195
Standard	TSA	MDQ	PKU02308	Tirau DF	TIR33501	N/A	297,256.49	\$ 404.00	\$ 329,018
Standard	TSA	MDQ	PKU02308	Tokoroa	TKR19701	N/A	177,381.74	\$ 404.00	\$ 196,335
Standard	TSA	MDQ	PKU02308	Waikeria	WKE19201	N/A	23,581.00	\$ 404.00	\$ 26,101
Standard	TSA	MDQ	PKU02308	Whakatane	WHK32101	N/A	115,214.40	\$ 543.00	\$ 171,401
Standard	TSA	MDQ	OFF15901	Pungarehu No 1	PGU13101	N/A	-	\$ -	\$ -
Standard	TSA	MDQ	OFF15901	Pungarehu No 2	PGH15901	N/A	1,078.94	\$ 92.00	\$ 272
Standard	TSA	MDQ	RTW3203	Alfriston	ALF15501	N/A	3,985.00	\$ 393.00	\$ 4,291
Standard	TSA	MDQ	RTW3203	Drury 1	DRU15101	N/A	266,177.39	\$ 393.00	\$ 286,597
Standard	TSA	MDQ	RTW3203	Flat Bush	FLB15601	N/A	542,755.00	\$ 393.00	\$ 584,391
Standard	TSA	MDQ	RTW3203	Glenbrook	GLB03401	N/A	2,247,411.29	\$ 393.00	\$ 2,419,815
Standard	TSA	MDQ	RTW3203	Greater Auckland	GTA03610	N/A	15,883,312.59	\$ 393.00	\$ 17,101,758
Standard	TSA	MDQ	RTW3203	Harrisville 2	HAR11802	N/A	481,393.11	\$ 393.00	\$ 518,322
Standard	TSA	MDQ	RTW3203	Hunua	HUN15301	N/A	141,620.00	\$ 393.00	\$ 152,484
Standard	TSA	MDQ	RTW3203	Hunua (Nova)	HUN15302	N/A	134,134.25	\$ 393.00	\$ 144,424
Standard	TSA	MDQ	RTW3203	Hunua 3	HUN15303	N/A	36,500.00	\$ 393.00	\$ 39,300
Standard	TSA	MDQ	RTW3203	Kingseat	KIG16801	N/A	3.65	\$ 393.00	\$ 4
Standard	TSA	MDQ	RTW3203	Marsden 2	MSD01802	N/A	9,126.97	\$ 597.00	\$ 14,928
Standard	TSA	MDQ	RTW3203	Pukekohe	PUK04201	N/A	120,237.57	\$ 393.00	\$ 129,461
Standard	TSA	MDQ	RTW3203	Ramarama	RAM15201	N/A	40,186.72	\$ 393.00	\$ 43,270
Standard	TSA	MDQ	RTW3203	Tuakau 2	TUK06502	N/A	812,013.58	\$ 393.00	\$ 874,305
Standard	TSA	MDQ	RTW3203	Waitoki	WTK33901	N/A	316,158.20	\$ 393.00	\$ 340,411
Standard	TSA	MDQ	RTW3203	Waiuku	WKU16901	N/A	48,545.00	\$ 393.00	\$ 52,269
Standard	TSA	MDQ	RTW3203	Warkworth	WRK18901	N/A	20,863.85	\$ 597.00	\$ 34,125
Standard	TSA	MDQ	RTW3203	Wellsford	WEL18301	N/A	1,518.77	\$ 597.00	\$ 2,484
Standard	TSA	MDQ	RTW3203	Whangarei	WHG07501	N/A	204,506.35	\$ 597.00	\$ 334,494
Standard	TSA	MDQ	RTS13201	Greater Hamilton	GTH11301	N/A	2,432,610.77	\$ 264.00	\$ 1,759,477
Standard	TSA	MDQ	TEK28701	Cambridge	CAM17201	N/A	759,658.41	\$ 404.00	\$ 840,827
Standard	TSA	MDQ	TEK28701	Horotiu	HRU16101	N/A	543,530.00	\$ 404.00	\$ 601,606
Standard	TSA	MDQ	TEK28701	Kiwitahi 1 (Peroxide)	KIW34201	N/A	346,750.00	\$ 404.00	\$ 383,800
Standard	TSA	MDQ	TEK28701	Kiwitahi 2	KIW34202	N/A	23,110.96	\$ 404.00	\$ 25,580
Standard	TSA	MDQ	TEK28701	Matangi	MTG17301	N/A	1,221.79	\$ 404.00	\$ 1,352
Standard	TSA	MDQ	TEK28701	Morrinsville	MRV16302	N/A	83,351.40	\$ 404.00	\$ 92,257

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	MDQ	TEK28701	Morrinsville DF	MRV16301	N/A	271,520.00	\$ 404.00	\$ 300,532
Standard	TSA	MDQ	TEK28701	Tatuanui DF	TAT16401	N/A	547,500.00	\$ 404.00	\$ 606,000
Standard	TSA	MDQ	TEK28701	Te Rapa Cogen	TRC02003	N/A	559,023.08	\$ 404.00	\$ 618,754
Standard	TSA	MDQ	TEK28701	Waitoa	WTA16501	N/A	752,216.39	\$ 404.00	\$ 832,590
Standard	TSA	MDQ	OFF17001	Te Kuiti North	TKN17001	N/A	62,476.24	\$ 404.00	\$ 69,152
Standard	TSA	MDQ	OFF17401	Te Kuiti South	TKS17401	N/A	337,869.38	\$ 404.00	\$ 373,970
Standard	TSA	GJ	F4000439	Kapuni (Lactose et al)	KAP12901	N/A	32,290.72	\$ 0.39	\$ 12,593
Standard	TSA	GJ	F4000439	Kapuni GTP	KAP09612	N/A	-	\$ -	\$ -
Standard	TSA	GJ	OFF16601	Huntly	HTL16601	N/A	39,992.70	\$ 0.39	\$ 15,597
Standard	TSA	GJ	KAP09008	Eltham	ELM12301	N/A	144,685.31	\$ 0.39	\$ 56,427
Standard	TSA	GJ	KAP09008	Inglewood	IGW11901	N/A	28,382.22	\$ 0.39	\$ 11,069
Standard	TSA	GJ	KAP09008	Kaponga	KPA12401	N/A	1,226.67	\$ 0.39	\$ 478
Standard	TSA	GJ	KAP09008	New Plymouth	NPL12101	N/A	743,450.14	\$ 0.39	\$ 289,946
Standard	TSA	GJ	KAP09008	Stratford	STR10201	N/A	76,936.65	\$ 0.39	\$ 30,005
Standard	TSA	GJ	KAP09008	Waitara	WTR12001	N/A	86,712.28	\$ 0.39	\$ 33,818
Standard	TSA	GJ	KAP09004	Ashhurst	ASH34301	N/A	9,655.08	\$ 0.39	\$ 3,765
Standard	TSA	GJ	KAP09004	Belmont	BEL24510	N/A	1,258,088.95	\$ 0.39	\$ 490,655
Standard	TSA	GJ	KAP09004	Dannevirke	DAN05001	N/A	51,265.95	\$ 0.39	\$ 19,994
Standard	TSA	GJ	KAP09004	Feilding	FLD03001	N/A	193,168.41	\$ 0.39	\$ 75,336
Standard	TSA	GJ	KAP09004	Flockhouse	FLH21901	N/A	171.17	\$ 0.39	\$ 67
Standard	TSA	GJ	KAP09004	Foxton	FOX22101	N/A	31,088.58	\$ 0.39	\$ 12,125
Standard	TSA	GJ	KAP09004	Greater Kapiti	GWP20102	N/A	172,557.18	\$ 0.39	\$ 67,297
Standard	TSA	GJ	KAP09004	Greater Waitangirua	GTW06910	N/A	368,475.95	\$ 0.39	\$ 143,706
Standard	TSA	GJ	KAP09004	Hastings	HST05210	N/A	1,442,368.02	\$ 0.39	\$ 562,524
Standard	TSA	GJ	KAP09004	Hastings (Nova)	HST05203	N/A	165,401.35	\$ 0.39	\$ 64,507
Standard	TSA	GJ	KAP09004	Hawera	HWA20801	N/A	191,739.02	\$ 0.39	\$ 74,778
Standard	TSA	GJ	KAP09004	Hawera (Nova)	HWA20802	N/A	62,679.87	\$ 0.39	\$ 24,445
Standard	TSA	GJ	KAP09004	Kairanga	KRG24101	N/A	896.97	\$ 0.39	\$ 350
Standard	TSA	GJ	KAP09004	Kaitoke	KTK23901	N/A	16,835.63	\$ 0.39	\$ 6,566
Standard	TSA	GJ	KAP09004	Kakariki	KKI23701	N/A	76,503.66	\$ 0.39	\$ 29,836
Standard	TSA	GJ	KAP09004	Kuku	KUK22401	N/A	647.86	\$ 0.39	\$ 253
Standard	TSA	GJ	KAP09004	Lake Alice	LAB20201	N/A	33,300.57	\$ 0.39	\$ 12,987
Standard	TSA	GJ	KAP09004	Levin	LVN24401	N/A	210,230.22	\$ 0.39	\$ 81,990
Standard	TSA	GJ	KAP09004	Longburn	LN24301	N/A	197,375.19	\$ 0.39	\$ 76,976
Standard	TSA	GJ	KAP09004	Mania	MNA23402	N/A	10,887.20	\$ 0.39	\$ 4,246
Standard	TSA	GJ	KAP09004	Mangaroa	MNG34001	N/A	14,636.37	\$ 0.39	\$ 5,708
Standard	TSA	GJ	KAP09004	Mangatainoka	MGK05401	N/A	-	\$ -	\$ -
Standard	TSA	GJ	KAP09004	Marton	MTN23801	N/A	183,724.71	\$ 0.39	\$ 71,653
Standard	TSA	GJ	KAP09004	Matapu	MTP20601	N/A	424.10	\$ 0.39	\$ 165
Standard	TSA	GJ	KAP09004	Oroua Downs	ORD24701	N/A	10,473.43	\$ 0.39	\$ 4,085
Standard	TSA	GJ	KAP09004	Otaki	OTA22601	N/A	15,495.28	\$ 0.39	\$ 6,043
Standard	TSA	GJ	KAP09004	Pahiatua	PHT04901	N/A	7,066.81	\$ 0.39	\$ 2,756
Standard	TSA	GJ	KAP09004	Pahiatua DF	PHT04902	N/A	704,184.04	\$ 0.39	\$ 274,632
Standard	TSA	GJ	KAP09004	Palmerston North	PLN24201	N/A	786,786.60	\$ 0.39	\$ 306,847
Standard	TSA	GJ	KAP09004	Patea	PTA20901	N/A	10,919.18	\$ 0.39	\$ 4,258
Standard	TSA	GJ	KAP09004	Pauatahanui 2	PAH23101	N/A	327.06	\$ 0.39	\$ 128
Standard	TSA	GJ	KAP09004	Takapau	TKP05101	N/A	89,920.22	\$ 0.39	\$ 35,069
Standard	TSA	GJ	KAP09004	Tawa A	TWA35610	N/A	1,947,868.97	\$ 0.39	\$ 759,669
Standard	TSA	GJ	KAP09004	Tawa B (Nova)	TWB24810	N/A	224,392.94	\$ 0.39	\$ 87,513
Standard	TSA	GJ	KAP09004	Te Horo	THO22701	N/A	360.06	\$ 0.39	\$ 140
Standard	TSA	GJ	KAP09004	Waitotara	WTT20301	N/A	19,985.62	\$ 0.39	\$ 7,794
Standard	TSA	GJ	KAP09004	Wanganui	WAG21501	N/A	973,660.02	\$ 0.39	\$ 379,727
Standard	TSA	GJ	KAP09004	Waverley	WVY23601	N/A	135.78	\$ 0.39	\$ 53
Standard	TSA	GJ	OFF14501	Ngaruawahia	NGW14501	N/A	5,362.09	\$ 0.39	\$ 2,091
Standard	TSA	GJ	OFF16701	Oakura	OKU16701	N/A	10,075.84	\$ 0.39	\$ 3,930
Standard	TSA	GJ	OFF13201	Okato	OKA13201	N/A	1,674.08	\$ 0.39	\$ 653
Standard	TSA	GJ	OFF13001	Opunake	OPK13001	N/A	9,168.11	\$ 0.39	\$ 3,576
Standard	TSA	GJ	OFF14101	Otorohanga	OTO14101	N/A	9,637.64	\$ 0.39	\$ 3,759
Standard	TSA	GJ	OFF31101	Pirongia	PIR31101	N/A	1,292.34	\$ 0.39	\$ 504
Standard	TSA	GJ	OFF31101	Te Awamutu DF	TAC31001	N/A	608,598.10	\$ 0.39	\$ 237,353
Standard	TSA	GJ	PKU02308	Broadlands	BRO36301	N/A	54,057.17	\$ 0.39	\$ 21,082
Standard	TSA	GJ	PKU02308	Edgecumbe	EGC30702	N/A	1,178.63	\$ 0.39	\$ 460
Standard	TSA	GJ	PKU02308	Edgecumbe DF	EGC30701	N/A	1,070,000.05	\$ 0.39	\$ 417,300

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	GJ	PKU02308	Gisborne	GIS07810	N/A	306,492.85	\$ 0.39	\$ 119,532
Standard	TSA	GJ	PKU02308	Greater Mt Maunganui	GMM08001	N/A	721,540.74	\$ 0.39	\$ 281,401
Standard	TSA	GJ	PKU02308	Greater Tauranga	GTT07701	N/A	333,649.55	\$ 0.39	\$ 130,123
Standard	TSA	GJ	PKU02308	Kawerau	KAW04405	N/A	7,829.02	\$ 0.39	\$ 3,053
Standard	TSA	GJ	PKU02308	Kawerau (ex-Caxton)	KAW04410	N/A	211,969.04	\$ 0.39	\$ 82,668
Standard	TSA	GJ	PKU02308	Kawerau (ex-Tasman)	KAW04411	N/A	472,725.47	\$ 0.39	\$ 184,363
Standard	TSA	GJ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	75,441.95	\$ 0.39	\$ 29,422
Standard	TSA	GJ	PKU02308	Kinleith	KIN02601	N/A	20,426.87	\$ 0.39	\$ 7,966
Standard	TSA	GJ	PKU02308	Kinleith (CHH mill)	KIN04310	N/A	2,934,398.59	\$ 0.39	\$ 1,144,415
Standard	TSA	GJ	PKU02308	Lichfield 2	LCF20011	N/A	480,278.88	\$ 0.39	\$ 187,309
Standard	TSA	GJ	PKU02308	Lichfield DF	LCF20010	N/A	456,895.15	\$ 0.39	\$ 178,189
Standard	TSA	GJ	PKU02308	Okoroire Springs	OKS32801	N/A	1,146.58	\$ 0.39	\$ 447
Standard	TSA	GJ	PKU02308	Opotiki	OPO32001	N/A	10,157.88	\$ 0.39	\$ 3,962
Standard	TSA	GJ	PKU02308	Putaruru	PTR32601	N/A	14,856.09	\$ 0.39	\$ 5,794
Standard	TSA	GJ	PKU02308	Rangioru	RAG33401	N/A	57,034.14	\$ 0.39	\$ 22,243
Standard	TSA	GJ	PKU02308	Reporoa	RPR30801	N/A	473,202.81	\$ 0.39	\$ 184,549
Standard	TSA	GJ	PKU02308	Rotorua	ROT08101	N/A	321,324.67	\$ 0.39	\$ 125,317
Standard	TSA	GJ	PKU02308	Taupo	TAU07001	N/A	116,520.66	\$ 0.39	\$ 45,443
Standard	TSA	GJ	PKU02308	Tauriko	TKO39301	N/A	40,735.16	\$ 0.39	\$ 15,887
Standard	TSA	GJ	PKU02308	Te Puke	TPK33301	N/A	42,125.89	\$ 0.39	\$ 16,429
Standard	TSA	GJ	PKU02308	Te Teko	TTK30601	N/A	176.14	\$ 0.39	\$ 69
Standard	TSA	GJ	PKU02308	Tirau	TIR33502	N/A	5,795.94	\$ 0.39	\$ 2,260
Standard	TSA	GJ	PKU02308	Tirau DF	TIR33501	N/A	128,031.36	\$ 0.39	\$ 49,932
Standard	TSA	GJ	PKU02308	Tokoroa	TKR19701	N/A	86,309.26	\$ 0.39	\$ 33,661
Standard	TSA	GJ	PKU02308	Waikeria	WKE19201	N/A	11,232.01	\$ 0.39	\$ 4,380
Standard	TSA	GJ	PKU02308	Whakatane	WHK32101	N/A	66,610.93	\$ 0.39	\$ 25,978
Standard	TSA	GJ	OFF15901	Pungarehu No 1	PGU13101	N/A	63.74	\$ 0.39	\$ 25
Standard	TSA	GJ	OFF15901	Pungarehu No 2	PGH15901	N/A	100.28	\$ 0.39	\$ 39
Standard	TSA	GJ	RTW3203	Alfriston	ALF15501	N/A	3,907.32	\$ 0.39	\$ 1,524
Standard	TSA	GJ	RTW3203	Drury 1	DRU15101	N/A	226,283.39	\$ 0.39	\$ 88,251
Standard	TSA	GJ	RTW3203	Flat Bush	FLB15601	N/A	351,574.81	\$ 0.39	\$ 137,114
Standard	TSA	GJ	RTW3203	Glenbrook	GLB03401	N/A	1,643,859.26	\$ 0.39	\$ 641,105
Standard	TSA	GJ	RTW3203	Greater Auckland	GTA03610	N/A	11,870,862.70	\$ 0.39	\$ 4,629,636
Standard	TSA	GJ	RTW3203	Harrisville 2	HAR11802	N/A	368,449.75	\$ 0.39	\$ 143,695
Standard	TSA	GJ	RTW3203	Hunua	HUN15301	N/A	76,547.18	\$ 0.39	\$ 29,853
Standard	TSA	GJ	RTW3203	Hunua (Nova)	HUN15302	N/A	97,000.69	\$ 0.39	\$ 37,830
Standard	TSA	GJ	RTW3203	Hunua 3	HUN15303	N/A	10,436.74	\$ 0.39	\$ 4,070
Standard	TSA	GJ	RTW3203	Kingseat	KIG16801	N/A	81.10	\$ 0.39	\$ 32
Standard	TSA	GJ	RTW3203	Marsden 2	MSD01802	N/A	871.70	\$ 0.39	\$ 340
Standard	TSA	GJ	RTW3203	Pukekohe	PUK04201	N/A	103,154.27	\$ 0.39	\$ 40,230
Standard	TSA	GJ	RTW3203	Ramarama	RAM15201	N/A	27,777.65	\$ 0.39	\$ 10,833
Standard	TSA	GJ	RTW3203	Tuakau 2	TUK06502	N/A	451,374.66	\$ 0.39	\$ 176,036
Standard	TSA	GJ	RTW3203	Waitoki	WTK33901	N/A	221,592.54	\$ 0.39	\$ 86,421
Standard	TSA	GJ	RTW3203	Waiuku	WKU16901	N/A	29,012.29	\$ 0.39	\$ 11,315
Standard	TSA	GJ	RTW3203	Warkworth	WRK18901	N/A	15,009.03	\$ 0.39	\$ 5,854
Standard	TSA	GJ	RTW3203	Wellsford	WEL18301	N/A	1,522.05	\$ 0.39	\$ 594
Standard	TSA	GJ	RTW3203	Whangarei	WHG07501	N/A	149,307.04	\$ 0.39	\$ 58,230
Standard	TSA	GJ	RTS13201	Greater Hamilton	GTH11301	N/A	1,627,397.09	\$ 0.39	\$ 634,685
Standard	TSA	GJ	TEK28701	Cambridge	CAM17201	N/A	581,088.71	\$ 0.39	\$ 226,625
Standard	TSA	GJ	TEK28701	Horotiu	HRU16101	N/A	312,605.99	\$ 0.39	\$ 121,916
Standard	TSA	GJ	TEK28701	Kiwitahi 1 (Peroxide)	KIW34201	N/A	213,152.58	\$ 0.39	\$ 83,130
Standard	TSA	GJ	TEK28701	Kiwitahi 2	KIW34202	N/A	6,145.68	\$ 0.39	\$ 2,397
Standard	TSA	GJ	TEK28701	Matangi	MTG17301	N/A	808.60	\$ 0.39	\$ 315
Standard	TSA	GJ	TEK28701	Morrinsville	MRV16302	N/A	48,881.84	\$ 0.39	\$ 19,064
Standard	TSA	GJ	TEK28701	Morrinsville DF	MRV16301	N/A	136,252.90	\$ 0.39	\$ 53,139
Standard	TSA	GJ	TEK28701	Tatuanui DF	TAT16401	N/A	366,343.43	\$ 0.39	\$ 142,874
Standard	TSA	GJ	TEK28701	Te Rapa Cogen	TRC02003	N/A	386,099.92	\$ 0.39	\$ 150,579
Standard	TSA	GJ	TEK28701	Waitoa	WTA16501	N/A	518,701.55	\$ 0.39	\$ 202,294
Standard	TSA	GJ	OFF17001	Te Kuiti North	TKN17001	N/A	30,459.10	\$ 0.39	\$ 11,879
Standard	TSA	GJ	OFF17401	Te Kuiti South	TKS17401	N/A	173,757.23	\$ 0.39	\$ 67,765
Standard	TSA	OR	F4000439	Kapuni (Lactose et al)	KAP12901	N/A	32,290.72	\$ -	\$ -
Standard	TSA	OR	F4000439	Kapuni GTP	KAP09612	N/A	-	\$ -	\$ -
Standard	TSA	OR	OFF16601	Huntly	HTL16601	N/A	713.39	\$ 11.07	\$ 7,896

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	OR	KAP09008	Eltham	ELM12301	No Zone	855.29	\$ 2.52	\$ 2,156
Standard	TSA	OR	KAP09008	Inglewood	IGW11901	No Zone	412.48	\$ 2.52	\$ 1,040
Standard	TSA	OR	KAP09008	Kaponga	KPA12401	No Zone	2.01	\$ 2.52	\$ 5
Standard	TSA	OR	KAP09008	Stratford	STR10201	No Zone	1,632.70	\$ 2.52	\$ 4,115
Standard	TSA	OR	KAP09004	Dannevirke	DAN05001	No Zone	219.73	\$ 11.07	\$ 2,432
Standard	TSA	OR	KAP09004	Foxton	FOX22101	No Zone	188.92	\$ 10.77	\$ 2,034
Standard	TSA	OR	KAP09004	Kaitoke	KTK23901	No Zone	242.27	\$ 10.47	\$ 2,536
Standard	TSA	OR	KAP09004	Kakariki	KKI23701	No Zone	551.94	\$ 10.47	\$ 5,776
Standard	TSA	OR	KAP09004	Kuku	KUK22401	No Zone	46.93	\$ 10.77	\$ 505
Standard	TSA	OR	KAP09004	Lake Alice	LAB20201	No Zone	170.45	\$ 10.47	\$ 1,784
Standard	TSA	OR	KAP09004	Levin	LVN24401	No Zone	1,265.94	\$ 10.77	\$ 13,631
Standard	TSA	OR	KAP09004	Mangaroa	MNG34001	No Zone	40.27	\$ 11.07	\$ 446
Standard	TSA	OR	KAP09004	Mangatainoka	MGK05401	No Zone	-	\$ -	\$ -
Standard	TSA	OR	KAP09004	Marton	MTN23801	No Zone	2,795.84	\$ 10.47	\$ 29,261
Standard	TSA	OR	KAP09004	Matapu	MTP20601	No Zone	224.25	\$ 10.47	\$ 2,347
Standard	TSA	OR	KAP09004	Pahiatua	PHT04901	No Zone	86.80	\$ 10.77	\$ 935
Standard	TSA	OR	KAP09004	Pahiatua DF	PHT04902	No Zone	3,605.32	\$ 10.77	\$ 38,819
Standard	TSA	OR	KAP09004	Palmerston North	PLN24201	No Zone	7,688.27	\$ 10.77	\$ 82,781
Standard	TSA	OR	KAP09004	Patea	PTA20901	No Zone	581.52	\$ 10.47	\$ 6,086
Standard	TSA	OR	KAP09004	Takapau	TKP05101	No Zone	150.22	\$ 11.07	\$ 1,663
Standard	TSA	OR	KAP09004	Waitotara	WTT20301	No Zone	276.81	\$ 10.47	\$ 2,897
Standard	TSA	OR	KAP09004	Wanganui	WAG21501	No Zone	2,363.09	\$ 10.47	\$ 24,732
Standard	TSA	OR	KAP09004	Waverley	WVY23601	No Zone	4.22	\$ 10.47	\$ 44
Standard	TSA	OR	OFF14501	Ngaruawahia	NGW14501	No Zone	29.05	\$ 11.07	\$ 322
Standard	TSA	OR	None	None	None	Auckland Zone	70,940.62	\$ 10.77	\$ 763,826
Standard	TSA	OR	None	None	0	0 Edgecumbe Zone	4,703.03	\$ 14.88	\$ 69,966
Standard	TSA	OR	None	None	0	0 Hastings Zone	6,704.86	\$ 11.07	\$ 74,213
Standard	TSA	OR	None	None	0	0 Hawera Zone	9,339.90	\$ 10.47	\$ 97,749
Standard	TSA	OR	None	None	0	0 Kaverau Zone	1,733.92	\$ 14.25	\$ 24,702
Standard	TSA	OR	None	None	0	0 Kinleith Zone	103,817.16	\$ 11.07	\$ 1,149,099
Standard	TSA	OR	None	None	0	0 Kiwitihi Zone	384.69	\$ 11.07	\$ 4,258
Standard	TSA	OR	None	None	0	0 Manawatu Zone	3,819.12	\$ 10.77	\$ 41,121
Standard	TSA	OR	None	None	0	0 Marsden	348.10	\$ 16.36	\$ 5,694
Standard	TSA	OR	None	None	0	0 Morrinsville Zone	6,628.33	\$ 11.07	\$ 73,366
Standard	TSA	OR	None	None	0	0 New Plymouth Zone	3,881.10	\$ 2.52	\$ 9,782
Standard	TSA	OR	None	None	0	0 Okaiawa-Manaia Zone	36.43	\$ 10.47	\$ 381
Standard	TSA	OR	None	None	0	0 South Auckland Rural Zone	15,633.38	\$ 10.77	\$ 168,327
Standard	TSA	OR	None	None	0	0 Tirau Zone	2,869.32	\$ 11.07	\$ 31,759
Standard	TSA	OR	None	None	0	0 Wellington Zone	51,785.87	\$ 13.32	\$ 689,533
Standard	TSA	OR	None	None	0	0 Western BayOfPlenty Zone	3,281.25	\$ 13.62	\$ 44,679
Standard	TSA	OR	OFF16701	Oakura	OKU16701	No Zone	140.96	\$ 2.52	\$ 355
Standard	TSA	OR	OFF13201	Okato	OKA13201	No Zone	46.56	\$ 2.52	\$ 117
Standard	TSA	OR	OFF13001	Opunake	OPK13001	No Zone	486.67	\$ 2.52	\$ 1,227
Standard	TSA	OR	OFF14101	Otorohanga	OTO14101	No Zone	364.56	\$ 11.07	\$ 4,035
Standard	TSA	OR	OFF31101	Pirongia	PIR31101	No Zone	35.60	\$ 11.07	\$ 394
Standard	TSA	OR	OFF31101	Te Awamutu DF	TAC31001	No Zone	72,004.64	\$ 11.07	\$ 796,983
Standard	TSA	OR	PKU02308	Broadlands	BRO36301	No Zone	751.78	\$ 14.25	\$ 10,710
Standard	TSA	OR	PKU02308	Gisborne	GIS07810	No Zone	2,049.37	\$ 15.53	\$ 31,835
Standard	TSA	OR	PKU02308	Kihikihi (Te Awamutu)	KIH19101	No Zone	5,152.06	\$ 11.07	\$ 57,026
Standard	TSA	OR	PKU02308	Lichfield 2	LCF20011	No Zone	3,324.48	\$ 11.07	\$ 36,797
Standard	TSA	OR	PKU02308	Lichfield DF	LCF20010	No Zone	3,701.82	\$ 11.07	\$ 40,974
Standard	TSA	OR	PKU02308	Okoroire Springs	OKS32801	No Zone	1,002.75	\$ 11.07	\$ 11,099
Standard	TSA	OR	PKU02308	Opotiki	OPO32001	No Zone	401.38	\$ 15.53	\$ 6,235
Standard	TSA	OR	PKU02308	Putaruru	PTR32601	No Zone	93.05	\$ 11.07	\$ 1,030
Standard	TSA	OR	PKU02308	Rangioru	RAG33401	No Zone	715.82	\$ 13.62	\$ 9,747
Standard	TSA	OR	PKU02308	Reporoa	RPR30801	No Zone	9,451.71	\$ 14.25	\$ 134,654
Standard	TSA	OR	PKU02308	Rotorua	ROT08101	No Zone	3,110.25	\$ 14.25	\$ 44,310
Standard	TSA	OR	PKU02308	Taupo	TAU07001	No Zone	425.53	\$ 14.25	\$ 6,062
Standard	TSA	OR	PKU02308	Tauriko	TKO39301	No Zone	737.01	\$ 13.62	\$ 10,035
Standard	TSA	OR	PKU02308	Te Teko	TTK30601	No Zone	15.44	\$ 14.88	\$ 230
Standard	TSA	OR	PKU02308	Tokoroa	TKR19701	No Zone	1,625.23	\$ 11.07	\$ 17,989
Standard	TSA	OR	PKU02308	Waikeria	WKE19201	No Zone	8.71	\$ 11.07	\$ 96
Standard	TSA	OR	PKU02308	Whakatane	WHK32101	No Zone	286.91	\$ 14.88	\$ 4,268

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	OR	OFF15901	Pungarehu No 1	PGU13101	No Zone	63.74	\$ 2.52	\$ 161
Standard	TSA	OR	OFF15901	Pungarehu No 2	PGH15901	No Zone	4.81	\$ 2.52	\$ 12
Standard	TSA	OR	RTW3203	Glenbrook	GLB03401	No Zone	1,976.25	\$ 10.77	\$ 21,279
Standard	TSA	OR	RTW3203	Waiuku	WKU16901	No Zone	1,585.75	\$ 10.77	\$ 17,074
Standard	TSA	OR	RTW3203	Warkworth	WRK18901	No Zone	1,041.58	\$ 16.36	\$ 17,036
Standard	TSA	OR	RTW3203	Wellsford	WEL18301	No Zone	295.97	\$ 16.36	\$ 4,841
Standard	TSA	OR	RTW3203	Whangarei	WHG07501	No Zone	1,435.42	\$ 16.36	\$ 23,478
Standard	TSA	OR	RTS13201	Greater Hamilton	GTH11301	No Zone	10,305.91	\$ 7.23	\$ 74,541
Standard	TSA	OR	TEK28701	Cambridge	CAM17201	No Zone	12,561.68	\$ 11.07	\$ 139,039
Standard	TSA	OR	TEK28701	Horotiu	HRU16101	No Zone	2,039.72	\$ 11.07	\$ 22,577
Standard	TSA	OR	TEK28701	Matangi	MTG17301	No Zone	109.59	\$ 11.07	\$ 1,213
Standard	TSA	OR	TEK28701	Tatuanui DF	TAT16401	No Zone	-	\$ -	\$ -
Standard	TSA	OR	TEK28701	Te Rapa Cogen	TRC02003	No Zone	7,138.28	\$ 11.07	\$ 79,010
Standard	TSA	OR	TEK28701	Waitoa	WTA16501	No Zone	6,526.81	\$ 11.07	\$ 72,242
Standard	TSA	OR	OFF17001	Te Kuiti North	TKN17001	No Zone	997.52	\$ 11.07	\$ 11,041
Standard	TSA	OR	OFF17401	Te Kuiti South	TKS17401	No Zone	910.49	\$ 11.07	\$ 10,078
Standard	Ballance Am	Throughput C	F4000439	Ballance 8201	BAL08201	Ballance Amonia-Urea Plant	3,024,054.00	\$ 0.39	\$ 1,179,381
Standard	Ballance Am	Throughput C	F4000439	Ballance 9626	BAL09626	Ballance Amonia-Urea Plant	3,689,989.62	\$ 0.39	\$ 1,439,096
Standard	Stratford 2	Throughput C	F4000439	Stratford 2	STR00521	Stratford 2 - Standard pricin	1,639,174.00	\$ 0.39	\$ 639,278
Standard	Stratford 3	Throughput C	F4000439	Stratford 3 Delivery Po	STR00511	Stratford 3 Storage - Deliver	5,005,398.30	\$ 0.39	\$ 1,952,105
Standard	TCC (Taranaki	Throughput C	F4000439	TCC (Taranaki Combin	TCC00201	TCC (Taranaki Combined Cy	3,326,604.60	\$ 0.39	\$ 1,297,376

Appendix 3: $P_{i,2023}, Q_{i,2023}$ from non-standard prices for the 2023 Assessment Period

PI2023, QI2023									
Revenue from non-standard prices								\$	9,161,076
Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total	
Hastings Delivery Point Charges - RTL	Day	KAP09004	Hastings (Nova)	HST05203	Hastings Delivery Point Charges - RTL Other	12	150.00	\$ 1,800.00	
Hawera Delivery Point Charges - RTL	Day	KAP09004	Hawera (Nova)	HWA20802	Hawera Delivery Point Charges - RTL Other	12	75.00	\$ 900.00	
Hunua Delivery Point Charges - RTL	Day	RTW3203	Hunua (Nova)	HUN15302	Hunua Delivery Point Charges - RTL Other	12	101.25	\$ 1,215.00	
Kapuni To Pokuru 2 - ISC	GJ	KAP09008	Pokuru 2 Delivery	PKD02402	Kapuni To Pokuru 2 - ISC Throughput Charges	1,702,358	0.43	\$ 732,013.94	
Kauri and Maungatoroto Dairy Factories	MDQ	RTW3203	Northland Dairy Factories	NDF33601	Kauri and Maungatoroto Dairy Factories Capacity Reservation Charges	365	5,752.76	\$ 2,099,757.73	
Kauri and Maungatoroto Dairy Factories	OR	RTW3203	Northland Dairy Factories	NDF33601	Kauri and Maungatoroto Dairy Factories Overrun Charges	-	-	\$ -	
Kauri and Maungatoroto Dairy Factories	GJ	RTW3203	Northland Dairy Factories	NDF33601	Kauri and Maungatoroto Dairy Factories Throughput Charges	861,884	0.30	\$ 258,565.17	
Kupe to Frankley Road - ISC	MDQ	KUP37501	Frankley Road-Bi	F4000439	Kupe to Frankley Road - ISC Capacity Reservation Charges	626,894	0.39	\$ 244,488.66	
Kupe to Frankley Road - ISC	OR	KUP37501	Frankley Road-Bi	F4000439	Kupe to Frankley Road - ISC Overrun Charges	5,093	2.52	\$ 12,834.36	
PanPac Hastings IUC	MDQ	KAP09004	Hastings	HST05210	PanPac Hastings IUC Capacity Reservation Charges	96,543	0.80	\$ 77,234.40	
PanPac Hastings IUC	OR	KAP09004	Hastings	HST05210	PanPac Hastings IUC Overrun Charges	2,682	11.07	\$ 29,686.83	
Rimu Production Station - SA	OR	KAP09004	Mokoia	MOK35801	Rimu Production Station - SA Overrun Charges	-	-	\$ -	
Rimu Production Station - SA	GJ	KAP09004	Mokoia	MOK35801	Rimu Production Station - SA Throughput Charges	-	-	\$ -	
Southern Paprika Warkworth - SA	MDQ	RTW3203	Warkworth	WRK18901	Southern Paprika Warkworth - SA Capacity Reservation Charges	365	710.75	\$ 259,422.47	
Southern Paprika Warkworth - SA	OR	RTW3203	Warkworth	WRK18901	Southern Paprika Warkworth - SA Overrun Charges	699	16.36	\$ 11,430.17	
Southern Paprika Warkworth - SA	GJ	RTW3203	Warkworth	WRK18901	Southern Paprika Warkworth - SA Throughput Charges	282,478	0.96	\$ 271,882.33	
Stratford Peaker Power Station - ICA	Day	F4000439	Stratford 2	STR00521	Stratford Peaker Power Station - ICA Other	365	41.24	\$ 15,052.61	
Supplementary Agreement - Kupe to Frankley Road	MDQ	KUP37501	Frankley Road out to Maui	FOU00001	Supplementary Agreement - Kupe to Frankley Road Capacity Reservation Charges	365	6,800.11	\$ 2,482,040.15	
Supplementary Agreement - Kupe to Frankley Road	OR	KUP37501	Frankley Road out to Maui	FOU00001	Supplementary Agreement - Kupe to Frankley Road Overrun Charges	-	-	\$ -	
Supplementary Agreement - Kupe to Frankley Road	GJ	KUP37501	Frankley Road out to Maui	FOU00001	Supplementary Agreement - Kupe to Frankley Road Throughput Charges	10,584,392	-	\$ -	
Supplementary Agreement - Kupe to Kapuni	MDQ	KAP09612	Kapuni GTP	KAP09612	Supplementary Agreement - Kupe to Kapuni Capacity Reservation Charges	365	1.00	\$ 365.00	
Supplementary Agreement - Kupe to Kapuni	OR	KUP37501	Kapuni GTP	KAP09612	Supplementary Agreement - Kupe to Kapuni Overrun Charges	10,519	0.78	\$ 8,205.16	
Supplementary Agreement - Kupe to Kapuni	GJ	KUP37501	Kapuni GTP	KAP09612	Supplementary Agreement - Kupe to Kapuni Throughput Charges	6,309,015	-	\$ -	
Tawa B Delivery Point Charges - RTL	Day	KAP09004	Tawa B (Nova)	TWB24810	Tawa B Delivery Point Charges - RTL Other	12	3,522.12	\$ 42,265.41	
TCC - ICA	Day	F4000439	TCC (Taranaki Combined Cyl)	TCC00201	TCC - ICA Other	365	41.24	\$ 15,052.61	
Te Rapa Cogen - ICA	Day	TEK28701	Te Rapa Cogen	TRC02003	Te Rapa Cogen - ICA Other	273	38.58	\$ 10,532.34	
Te Rapa Cogen - SA	MDQ	TEK28701	Te Rapa Cogen	TRC02003	Te Rapa Cogen - SA Capacity Reservation Charges	273	2,651.63	\$ 723,894.99	
Te Rapa Cogen - SA	OR	TEK28701	Te Rapa Cogen	TRC02003	Te Rapa Cogen - SA Overrun Charges	-	-	\$ -	
Te Rapa Cogen - SA	GJ	TEK28701	Te Rapa Cogen	TRC02003	Te Rapa Cogen - SA Throughput Charges	2,376,204	0.09	\$ 213,858.36	
Whakatane Mill Limited - SA	MDQ	PKU02308	Whakatane	WHK32101	Whakatane Mill Limited - SA Capacity Reservation Charges	365	4,033.42	\$ 1,472,200.02	
Whakatane Mill Limited - SA	OR	PKU02308	Whakatane	WHK32101	Whakatane Mill Limited - SA Overrun Charges	-	-	\$ -	
Whakatane Mill Limited - SA	GJ	PKU02308	Whakatane	WHK32101	Whakatane Mill Limited - SA Throughput Charges	587,929	0.30	\$ 176,378.73	

STP charges¹⁰

PI2023, QI2023									
STP charges								\$	2,645,094
Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point Zone	Quantity	Price	Total		
Frankley Rd to Kupe Production Station - STP	GJ	F4000439	Kupe Delivery Point	KUP37503	Frankley Rd to Kupe Production Station - STP Throughput Charges	0	0.39	\$ 0.00	
Frankley Road to Kaimiro - STP	GJ	F4000439	Kaimiro Mixing Station Deliv	KAI07602	Frankley Road to Kaimiro - STP Throughput Charges	4,528	0.39	\$ 1,765.92	
Frankley Road to Kapuni GTP - STP	GJ	F4000439	Kapuni GTP	KAP09612	Frankley Road to Kapuni GTP - STP Throughput Charges	3,794,493	0.39	\$ 1,479,852.39	
Kaimiro to Frankley Road - STP	GJ	KAI07601	Frankley Road-Bi	F4000439	Kaimiro to Frankley Road - STP Throughput Charges	-	-	\$ -	
Kaimiro to Kapuni - STP	GJ	KAI07601	Kapuni GTP	KAP09612	Kaimiro to Kapuni - STP Throughput Charges	592,995	0.39	\$ 231,267.92	
Kapuni GTP to Frankley Road - STP	GJ	KAP09009	Frankley Road-Bi	F4000439	Kapuni GTP to Frankley Road - STP Throughput Charges	2,390,277	0.39	\$ 932,207.99	
Kupe to Frankley Road - STP	GJ	KUP37501	Frankley Road-Bi	F4000439	Kupe to Frankley Road - STP Throughput Charges	-	-	\$ -	
Kupe to Kapuni GTP - STP	GJ	KUP37501	Kapuni GTP	KAP09612	Kupe to Kapuni GTP - STP Throughput Charges	-	-	\$ -	

¹⁰ Standard Through-put Charges (STP) are charges for inter-pipeline movement or any bi-directional point at which a pipeline interconnects with the Maui Pipeline.

Appendix 4: Gas Transmission emergency classification

Emergency incident: An incident that has a major effect on a gas pipeline asset, or its ability to supply gas, and may threaten public and/or building safety.

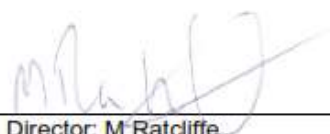
Transmission emergency incidents include but are not limited to:¹¹

- Potential or actual gas supply critical contingency
- Any structural damage to a transmission pipeline
- Off-specification gas, NZS 5442
- Significant chemical or odorant spill
- Serious property or asset damage or failure
- Missing persons
- Civil Defence emergency (includes natural disaster)
- Terrorism
- Incident affecting the use of airways, rail or major roadways
- Natural disaster including earthquakes, tsunami & volcanic eruption
- Forced Abandonment of the Bell Block Control Room
- Uncontrolled escape of gas
- Unplanned supply interruption to multiple end users
- Under or over Odourisation, NZS 5263
- Potential or actual serious harm to personnel or public
- Major disease or pandemic
- Explosion or Fire
- Civil unrest
- Political attack
- Major storms, landslide or flood
- Major control or communications system failure
- Cyber attack

¹¹ Extracted from Firstgas' standard 06121 Incident and Emergency Classification

Appendix 5: Director certificate for compliance

We, Mark Adrian Ratcliffe, and Fiona Ann Oliver, being Directors of First Gas Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached Compliance Statement of First Gas Limited, and related information, prepared for the purposes of the *Gas Transmission Services Default Price-Quality Path Determination 2022* has been prepared in accordance with all the relevant requirements.



Director: M Ratcliffe



Director: F Oliver

15 March 2024

Date

15 March 2024

Date



Independent Assurance Report

To the Directors of First Gas Limited and the Commerce Commission

Assurance report pursuant to Gas Transmission Services Default Price-Quality Path Determination 2022

Opinion

We have undertaken a reasonable assurance engagement in respect of the compliance of First Gas Limited (the “Company”) with the Gas Transmission Services Default Price-Quality Path Determination 2022 (the “PQ Determination”) in preparing the Gas transmission services: Compliance with the wash-up amount calculation and quality standards compliance statement (the “Compliance Statement”) for the assessment period ended 30 September 2023.

In our opinion, in all material respects:

- A far as appears from an examination, the information used in the preparation of the Compliance Statement has been properly extracted from the Company’s accounting and other records, and has been sourced, where appropriate, from its financial and non-financial systems; and
- The Company has complied with the PQ Determination in preparing the Compliance Statement for the assessment period ended 30 September 2023.

Basis for Opinion

We have conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised): *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* and Standard on Assurance Engagements (SAE) 3100 (Revised) *Compliance Engagements* (“SAE 3100 (Revised)”), issued by the New Zealand Auditing and Assurance Standards Board.

We believe the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Director’s Responsibilities

The Directors are responsible on behalf of the Company for compliance with the PQ Determination, for the identification of risks that may threaten compliance with the PQ Determination, controls that would mitigate those risks, and monitoring the Company’s ongoing compliance.

Our Independence and Quality Management

We have complied with the Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)* or other professional requirements, or requirements in law or regulation, that are at least as demanding, which include independence and other requirements founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We apply Professional and Ethical Standard 3 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, which requires our firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



We are independent of the Company. Our firm carries out other services for the First Gas Group as auditor of the financial statements, and other services for the Company in the areas of compliance with Gas Distribution Services: Default price quality path compliance and Disclosure Information, Gas Transmission Services: Disclosure Information, agreed upon procedures pertaining to the corporate model review and distribution pricing model, and modelling services for the Future of Gas Working Group of which First Gas Limited is a member. The provision of these other services has not impaired our independence.

Assurance Practitioner's responsibilities

Our responsibility is to express an opinion on whether the Company has complied, in all material respects, with the PQ Determination in the preparation of the Compliance Statement and report our opinion to you on whether:

- As far as appears from our examination, the information used in the preparation of the Compliance Statement has been properly extracted from the Company's accounting and other records, sourced from its financial and non-financial systems; and
- The Compliance Statement, for the assessment period ended 30 September 2023, has been prepared, in all material respects, in accordance with the requirements in clauses 12.1 and 12.2 of the Determination.

SAE 3100 (Revised) required that we plan and perform our procedures to obtain reasonable assurance about whether the Company has complied, in all material respects, with the PQ Determination in preparing the Compliance Statement for the assessment period ended 30 September 2023.

An assurance engagement to report on the Company's compliance with the PQ Determination involves performing procedures to obtain evidence about the compliance activity and controls implemented. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance may occur and not be detected. A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the PQ Determination will continue in the future.

Use of Report

This report has been prepared for the Directors and the Commerce Commission in accordance with para A13 of the Notice to supply information to the Commerce Commission under section 53N of the Commerce Act 1986, issued on 31 May 2022 (the "Notice") and is provided solely to assist you in establishing that compliance requirements have been met.

Our report should not be used for any other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility for any reliance on this report to anyone other than the Directors of the Company, as a body, and the Commerce Commission, or for any purpose other than that for which it was prepared.

A handwritten signature in dark ink that reads 'PricewaterhouseCoopers'.

Chartered Accountants
15 March 2024

Christchurch, New Zealand