

Firstgas

COMPLIANCE STATEMENT

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

Assessment Period 1 October 2018 – 30 September 2019





Introduction

Firstgas operates 2,500 kilometres of gas transmission pipelines (including the Maui pipeline), and more than 4,600 kilometres 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 Firstgas, please visit our website www.firstgas.co.nz.

Compliance Statement

This document is a Compliance Statement prepared pursuant to section 11.4 – 11.6 of the *Gas Transmission Services Default Price-Quality Path Determination 2017* (DPP Determination) issued by the Commerce Commission on 29 May 2017. This Compliance Statement covers Firstgas' gas transmission business (GTB) for the year ending 30 September 2019.

The following documents are provided with this Compliance Statement:

- Calculation of the wash-up amount
- Calculations for quality standard compliance
- Director certification
- KPMG assurance report

This Compliance Statement was prepared on 4 December 2019.

Compliance status for year ending 30 September 2019

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

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 2018 to 30 September 2019. This is the second Assessment Period in this DPP period (2017 – 2022).

1.1 Determining the wash-up amount

The DPP Determination requires gas transmission businesses (GTB) to calculate the Wash-up Amount for each Assessment Period. This must be calculated in accordance with the following formula, as specified in Schedule 7 of the DPP Determination for the second Assessment Period.:

Wash-Up Amount

= Actual allowable revenue – actual revenue – revenue forgone

1.2 Actual allowable revenue

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

Actual allowable revenue

= Actual net allowable revenue + actual pass through costs and recoverable costs + revenue wash-up draw down amount

Actual net allowable revenue

As specified in paragraph 5 of Schedule 7 of the DPP Determination, the actual net allowable revenue for the second Assessment Period is calculated using the following formula:

Actual net allowable revenue	=	Actual net allowable revenue of the previous Assessment Period $(1+\triangle CPI_t)$ x $(1-X)$
and where		

$$\triangle CPI_t = \frac{CPI_{Dec,t-1} + CPI_{Mar,t} + CPI_{Jun,t} + CPI_{Sep,t}}{CPI_{Dec,t-2} + CPI_{Mar,t-1} + CPI_{Jun,t-1} + CPI_{Sep,t-1}} -1$$

X = The annual rate of change, as specified in schedule 2, being zero

Actual net allowable = \$121.596 million x 1.63% x (1-0) revenue 2019 = \$123.575 million



Χ



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 2019).

Table 1: Pass-through and Recoverable costs

Pass-through and Recoverable Costs	Incurred in the year ending 30 September 2019
	\$000
Rates and levies	\$2,226
Balancing gas costs and revenue	(\$3,078)
Mokau Compressor fuel gas costs	637
Capex wash-up adjustment	714
Total actual pass-through costs and recoverable costs	499

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

Schedule 7 states that for the second Assessment period, the revenue wash-up draw down amount is nil.

Calculation of actual allowable revenue

Actual allowable revenue = \$123.575 million + \$0.499 million + \$0

= \$124.074 million

1.3 Actual Revenue

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

Actual Revenue	=	Actual revenue from prices + 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 Vector Transmission Code (VTC).

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





Maui transmission pipeline

As announced to customers on 2 August 2018 the prices for the Maui pipeline for the 2018/19 pricing year¹ were as follows:

Tariff	Value for 2018/19
Tariff 1 (\$ per GJ.km)	0.001601
Tariff 2 (\$ per GJ)	0.073132

The Actual Revenue from Prices for the Maui pipeline in 2018/19 was:

Tariff	Actual Quantity	Price	Total (\$million)			
Tariff 1	15,136,906,077 GJ.km	\$0.001601 per GJ.km	\$24.234			
Tariff 2	141,080,942 GJ	\$0.073132 per GJ	\$10.318			
Cash out rev	renue ²	\$0.001578 per GJ.km	\$0.000			
Actual Reve	Actual Revenue from Prices					

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 2018/19 pricing year were released as required under the Vector Transmission Code (VTC) 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 **\$93.128 million**.

Total Actual Revenue from Prices

The total Actual Revenue from Prices is \$127.680 million.

Actual Revenue from prices = Actual Revenue from Prices (Maui) + Actual Revenue from Prices (Non-Maui)

= \$34.552 million + \$93.128 million

= \$127.680 million³

Other regulated income

Firstgas received no other regulated income of the 2018/19 Assessment Period.

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¹ The 2018/19 pricing year is for the period 1 October 2018 to 30 September 2019. The pricing year is the same as the Assessment Period.

² Cash-out revenue is comprised of two elements: net earnings from the sale/purchase of gas and earnings from transmission revenue associated with these transactions. The transmission revenue element is not included here as it reflects a transaction between Maui and Non-Maui transmission networks managed by First Gas – hence a net zero value for First Gas Transmission. The amount represented here is the net amount earned from external parties. This is equal to the amount earned through the Maui Pipeline Operating Code (MPOC) of (\$0.055million) less the amount charged to First Gas as the operator of the Non-Maui Network under the MPOC that cannot be passed through to Vector Transmission Code customers under the VTC.

³ Actual revenue is based on quantities relating to the 12-month 2019 pricing period only. It does not include accrued revenue.



Calculation of actual revenue

Actual Revenue for 2018/19 = \$127.680 million +\$0 million

= \$127.680 million

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 it 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:

Revenue forgone = Actual net allowable revenue from prices x (revenue reduction

percentage - 20%

Where:

Actual net allowable

that calculated in section 1.2 above

revenue from prices

Revenue reduction

= 1 - (actual revenue from prices ÷ forecast revenue from prices)

percentage

Calculating the revenue reduction percentage

Revenue reduction percentage = 1 - (actual revenue from prices ÷ forecast revenue from prices)

 $= 1 - (\$127.680 \text{ million} \div 127.888 \text{ million})$

= (2%)

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.

Revenue foregone = Actual net allowable revenue from prices x (revenue reduction

percentage -20%4)

= \$123.575 million x 0

= \$0

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⁴ 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 **(\$3.606) million**.

Wash-Up Amount (\$million)

- = Actual allowable revenue- actual revenue- revenue forgone
- = \$124.074 \$127.680 \$0
- = (\$3.606) million

This amount will be passed into prices and back to consumers in the pricing year 1 October 2020 to 30 September 2021.





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 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:

- a) 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
- b) That should be responded to immediately by the GTB based on Good Industry Practice (GIP).5

Appendix 4 sets out the recorded events on the transmission pipeline from 1 October 2018 to 30 September 2019. Relevant incidents recorded during this period included one emergency:

- During a routine excavation of pipeline near Waikanae, some damage to the pipeline was found.
 Initially this was believed to be serious and potentially affecting the integrity of the pipeline. Pressure was reduced in the pipeline while Firstgas personnel investigated. Further review and tests confirmed there were no issues to pipeline integrity and pipeline pressure was returned to normal;
- The event was immediately reported to the Firstgas control room by Firstgas personnel who were on site carrying out the excavation work; and As Firstgas personnel were on site when the event started, the response time between the notification of the event and personnel on site was zero minutes.

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

The number of emergencies where response time exceeded 180 minutes is **nil**. Accordingly, Firstgas is compliant with the RTE quality standard.

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⁵ GIP refers to good industry practice. First Gas 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. First Gas' interpretation of emergency reflects that in the DPP. Once the operations duty manager declares an emergency the emergency response process is activated...



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. These processes are documented together in our Gas Transmission Operating Standard – Event logging.

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 5**. 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 CCO⁶ 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).

Our CCMP is available from the website of the critical contingency operator.⁷

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 2019 Assessment Period.



⁶ Further information on the critical contingency operator is available from www.cco.org.nz

⁷ Refer to the First Gas Critical Contingency Management Plan available from http://www.cco.org.nz/Publications/



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

	Pi2019,Qi2019
Total	\$ 93,127,708

	P _{i2019} ,Q _{i2019}
Transmission standard published charges between 1 October 2018 and 30 September 2019	\$ 62,970,572
Transmission non-standard charges between 1 October 2018 and 30 September 2019	\$ 25,615,657
Transmission STP charges between 1 October 2018 and 30 September 2019	\$ 3,091,180
Charges billed outside OATIS between 1 October 2018 and 30 September 2019	\$ 1,450,299





Appendix 2: P_{i,2019}Q_{,i2019} from standard prices for the 2019 Assessment Period

Pi2019, Qi2019

Revenue from standard prices

\$ 62,970,572

-	0	11.2	Description of the last of the	Dell' de Date	D. C. D. C. L.	-	0			T 4 4
Туре	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price		Total
Standard Standard	TSA TSA	GJ MDQ	Various OFF16601	Various Huntly	Various HTL16601	N/A N/A	40,201,361.89 \$ 65,863.22 \$	0.05 356.00	\$ 2 \$	2,010,068
Standard	TSA	MDQ	KAP09008	Eltham	ELM12301	N/A	65,863.22 \$ 230,103.28 \$	81.00	\$	64,239 51,064
Standard	TSA	MDQ	KAP09008	Inglewood	IGW11901	N/A	48,175.17 \$	81.00	\$	10,691
Standard	TSA	MDQ	KAP09008	Kaponga	KPA12401	N/A	2,622.53 \$	81.00	\$	582
Standard	TSA	MDQ	KAP09008	New Plymouth	NPL12101	N/A	1,091,426.58 \$	81.00	\$	242,207
Standard	TSA	MDQ	KAP09008	Stratford	STR10201	N/A	101,841.19 \$	81.00	\$	22,600
Standard	TSA	MDQ	KAP09008	Waitara	WTR12001	N/A	131,289.47 \$	81.00	\$	29,135
Standard	TSA	MDQ	KAP09004	Ashhurst	ASH34301	N/A	10,175.84 \$	345.00	\$	9,618
Standard	TSA	MDQ	KAP09004	Belmont	BEL24510	N/A	2,055,811.22 \$	427.00	\$ 2	2,405,018
Standard	TSA	MDQ	KAP09004	Dannevirke	DAN05001	N/A	61,459.83 \$	356.00	\$	59,944
Standard	TSA	MDQ	KAP09004	Feilding	FLD03001	N/A	288,593.50 \$	345.00	\$	272,780
Standard	TSA	MDQ	KAP09004	Flockhouse	FLH21901	N/A	222.65 \$	345.00	\$	210
Standard	TSA	MDQ	KAP09004	Foxton	FOX22101	N/A	51,973.66 \$	345.00	\$	49,126
Standard	TSA	MDQ	KAP09004	Greater Waitangirua	GTW06910	N/A	451,007.08 \$	427.00	\$	527,616
Standard Standard	TSA TSA	MDQ MDQ	KAP09004 KAP09004	Hastings Hastings (Nova)	HST05210 HST05203	N/A N/A	2,511,824.54 \$ 299,408.16 \$	356.00 356.00	\$ 2 \$	2,449,889
Standard	TSA	MDQ	KAP09004	Hawera	HW A20801	N/A	500,471.99 \$	335.00	\$	459,337
Standard	TSA	MDQ	KAP09004	Hawera (Nova)	HW A20802	N/A	118,990.00 \$	335.00	\$	109,210
Standard	TSA	MDQ	KAP09004	Kairanga	KRG24101	N/A	110.60 \$	345.00	\$	105,210
Standard	TSA	MDQ	KAP09004	Kaitoke	KTK23901	N/A	28,607.81 \$	335.00	\$	26,256
Standard	TSA	MDQ	KAP09004	Kakariki	KKI23701	N/A	98,185.00 \$	335.00	\$	90,115
Standard	TSA	MDQ	KAP09004	Kuku	KUK22401	N/A	870.38 \$	345.00	\$	823
Standard	TSA	MDQ	KAP09004	Lake Alice	LAB20201	N/A	75,639.58 \$	335.00	\$	69,423
Standard	TSA	MDQ	KAP09004	Levin	LVN24401	N/A	372,099.30 \$	345.00	\$	351,710
Standard	TSA	MDQ	KAP09004	Longburn	LNB24301	N/A	273,949.60 \$	345.00	\$	258,939
Standard	TSA	MDQ	KAP09004	Manaia	MNA23402	N/A	30,640.72 \$	335.00	\$	28,122
Standard	TSA	MDQ	KAP09004	Mangaroa	MNG34001	N/A	27,295.07 \$	356.00	\$	26,622
Standard	TSA	MDQ	KAP09004	Mangatainoka	MGK05401	N/A	10,950.00 \$	345.00	\$	10,350
Standard	TSA	MDQ	KAP09004	Marton	MTN23801	N/A	341,313.36 \$	335.00	\$	313,260
Standard	TSA	MDQ	KAP09004	Matapu	MTP20601	N/A	554.80 \$	335.00	\$	509
Standard	TSA	MDQ	KAP09004	Okaiawa	OKW23401	N/A	- \$	335.00	\$	-
Standard	TSA	MDQ	KAP09004	Oroua Downs	ORD24701	N/A	10,234.60 \$	345.00	\$	9,674
Standard	TSA	MDQ	KAP09004	Otaki	OTA22601	N/A	24,685.28 \$	427.00	\$	28,878
Standard	TSA	MDQ	KAP09004	Pahiatua	PHT04901	N/A	23,271.74 \$	345.00	\$	21,997
Standard	TSA	MDQ	KAP09004	Pahiatua DF	PHT04902	N/A	616,930.00 \$	345.00	\$	583,126
Standard	TSA	MDQ	KAP09004	Palmerston North	PLN24201	N/A	1,265,417.43 \$	345.00		1,196,079
Standard	TSA	MDQ	KAP09004	Paraparaumu	PAU20101 PTA20901	N/A N/A	236,034.09 \$	427.00	\$	276,128
Standard Standard	TSA TSA	MDQ MDQ	KAP09004 KAP09004	Patea Pauatahanui 2	PAH23101	N/A	31,435.80 \$ 3,487.58 \$	335.00 427.00	\$	28,852 4,080
Standard	TSA	MDQ	KAP09004	Takapau	TKP05101	N/A	173,792.60 \$	356.00	\$	169,507
Standard	TSA	MDQ	KAP09004	Tawa A	TWA35610	N/A	3,058,821.48 \$	427.00	-	3,578,402
Standard	TSA	MDQ	KAP09004	Tawa B (Nova)	TWB24810	N/A	372,070.00 \$	427.00	\$	435,271
Standard	TSA	MDQ	KAP09004	Te Horo	THO22701	N/A	954.48 \$	427.00	\$	1,117
Standard	TSA	MDQ	KAP09004	Waikanae 2	WAK22802	N/A	76,398.22 \$	427.00	\$	89,375
Standard	TSA	MDQ	KAP09004	Waitotara	WTT20301	N/A	45,052.20 \$	335.00	\$	41,349
Standard	TSA	MDQ	KAP09004	Wanganui	WAG21501	N/A	1,532,322.99 \$	335.00	\$ 1	1,406,379
Standard	TSA	MDQ	KAP09004	Waverley	WVY23601	N/A	738.03 \$	335.00	\$	677
Standard	TSA	MDQ	OFF14501	Ngaruawahia	NGW14501	N/A	7,411.72 \$	356.00	\$	7,229
Standard	TSA	MDQ	OFF16701	Oakura	OKU16701	N/A	15,130.43 \$	81.00	\$	3,358
Standard	TSA	MDQ	OFF13201	Okato	OKA13201	N/A	3,666.79 \$	81.00	\$	814
Standard	TSA	MDQ	OFF13001	Opunake	OPK13001	N/A	15,668.28 \$	81.00	\$	3,477
Standard	TSA	MDQ	OFF14101	Otorohanga	OTO14101	N/A	16,971.57 \$	356.00	\$	16,553
Standard	TSA	MDQ	OFF31101	Pirongia	PIR31101	N/A	2,714.89 \$	356.00	\$	2,648
Standard	TSA	MDQ	OFF31101	Te Awamutu DF	TAC31001	N/A	690,503.42 \$	356.00	\$	673,477
Standard	TSA	MDQ	PKU02308	Broadlands	BRO36301	N/A	78,805.00 \$	457.00	\$	98,668
Standard	TSA	MDQ	PKU02308	Edgecumbe	EGC30702	N/A	2,808.12 \$	478.00	\$	3,677
Standard	TSA	MDQ	PKU02308	Edgecumbe DF Gisborne	EGC30701	N/A	1,437,358.44 \$	478.00		1,882,349
Standard Standard	TSA	MDQ MDQ	PKU02308		GIS07810 GMM08001	N/A	642,233.27 \$	498.00	\$ 1	876,253
Standard Standard	TSA	MDQ	PKU02308 PKU02308	Greater Mt Maunganui Greater Tauranga	GMM08001 GTT07701	N/A N/A	936,858.27 \$ 393,423.51 \$	437.00 437.00	\$ 1	1,121,663 471,030
Standard	TSA	MDQ	PKU02308 PKU02308	Kawerau	KAW04405	N/A N/A	393,423.51 \$ 14,733.38 \$	457.00		18,447
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Caxton)	KAW04405 KAW04410	N/A	238,253.26 \$	457.00	-	298,306
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Caxton) Kawerau (ex-Tasman)	KAW04410	N/A	666,091.58 \$	457.00	\$	833,983
Standard	TSA	MDQ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	102,850.34 \$	356.00	\$	100,314
Standard	TSA	MDQ	PKU02308	Kinleith	KIN02601	N/A	54,656.08 \$	356.00	\$	53,308
Standard	TSA	MDQ	PKU02308	Kinleith (CHH mill)	KIN04310	N/A	4,687,167.04 \$	356.00		4,571,593
Standard	TSA	MDQ	PKU02308	Lichfield 2	LCF20011	N/A	333,056.00 \$	0.98	\$	324,844
Standard	TSA	MDQ	PKU02308	Lichfield DF	LCF20010	N/A	588,019.00 \$	356.00	\$	573,520
Standard	TSA	MDQ	PKU02308	Okoroire Springs	OKS32801	N/A	1,538.84 \$	356.00	\$	1,501
Standard	TSA	MDQ	PKU02308	Opotiki	OPO32001	N/A	22,523.73 \$	498.00	\$	30,731
Standard	TSA	MDQ	PKU02308	Putaruru	PTR32601	N/A	132,535.87 \$	356.00	\$	129,268
Standard	TSA	MDQ	PKU02308	Rangiuru	RAG33401	N/A	85,274.65 \$	437.00	\$	102,096
Standard	TSA	MDQ	PKU02308	Reporoa	RPR30801	N/A	604,945.29 \$	457.00	\$	757,425
Standard	TSA	MDQ	PKU02308	Rotorua	ROT08101	N/A	535,270.73 \$	457.00		670,188
Standard	TSA	MDQ	PKU02308	Taupo	TAU07001	N/A	190,307.37 \$	457.00	\$	238,275
Standard	TSA	MDQ	PKU02308	Te Puke	TPK33301	N/A	46,370.60 \$	437.00	\$	55,518
	TSA	MDQ	PKU02308	Te Teko	TTK30601	N/A	6,153.17 \$	478.00	\$	8,058
Standard										
Standard Standard	TSA	MDQ	PKU02308	Tirau	TIR33502	N/A	8,260.32 \$	356.00	\$	8,057
Standard				Tirau DF Tokoroa	TIR33502 TIR33501 TKR19701	N/A N/A N/A	8,260.32 \$ 509,301.76 \$ 178,134.15 \$	356.00 356.00 356.00		8,057 496,744 173,742





Туре	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Tota
Standard	TSA	MDQ	PKU02308	Waikeria	WKE19201	N/A	37,761.60 \$		\$ 36,830
Standard	TSA	MDQ	PKU02308	Whakatane	WHK32101	N/A	98,361.92 \$		\$ 128,814
Standard	TSA	MDQ	OFF15901	Pungarehu No 1	PGU13101	N/A	104.37 \$		\$ 23
Standard	TSA	MDQ	OFF15901	Pungarehu No 2	PGH15901	N/A	841.34 \$		\$ 187
Standard	TSA	MDQ	RTW3203	Alfriston	ALF15501	N/A	7,300.00 \$		\$ 6,900
Standard Standard	TSA TSA	MDQ MDQ	RTW3203 RTW3203	Drury 1 Flat Bush	DRU15101 FLB15601	N/A N/A	356,245.57 \$ 625,245.00 \$		\$ 336,725 \$ 590,985
Standard	TSA	MDQ	RTW3203	Glenbrook	GLB03401	N/A	2,457,200.00 \$	345.00	\$ 2,322,559
Standard	TSA	MDQ	RTW3203	Greater Auckland	GTA03610	N/A	16,132,854.25 \$		\$ 15,248,862
Standard	TSA	MDQ	RTW3203	Harrisville 2	HAR11802	N/A	552,847.28 \$		\$ 522,554
Standard	TSA	MDQ	RTW3203	Hunua	HUN15301	N/A	140,525.00 \$		\$ 132,825
Standard	TSA	MDQ	RTW3203	Hunua (Nova)	HUN15302	N/A	164,250.00 \$		\$ 155,250
Standard	TSA	MDQ	RTW3203	Hunua 3	HUN15303	N/A	160,600.00 \$	345.00	\$ 151,800
Standard	TSA	MDQ	RTW3203	Kingseat	KIG16801	N/A	470.85 \$	345.00	\$ 445
Standard	TSA	MDQ	RTW3203	Marsden 2	MSD01802	N/A	15,937.92 \$		\$ 22,924
Standard	TSA	MDQ	RTW3203	Pukekohe	PUK04201	N/A	127,463.11 \$		\$ 120,479
Standard	TSA	MDQ	RTW3203	Ramarama	RAM15201	N/A	29,882.55 \$		\$ 28,245
Standard	TSA	MDQ	RTW3203	Tuakau 2	TUK06502	N/A	1,044,113.08 \$		\$ 986,901 \$ 216,889
Standard Standard	TSA TSA	MDQ MDQ	RTW3203 RTW3203	Waitoki Warkworth	WTK33901 WRK18901	N/A N/A	229,462.53 \$ 22,662.40 \$		\$ 216,889 \$ 32,597
Standard	TSA	MDQ	RTW3203	Wellsford	WEL18301	N/A	1,676.81 \$		\$ 2,412
Standard	TSA	MDQ	RTW3203	Whangarei	WHG07501	N/A	180,198.04 \$		\$ 259,189
Standard	TSA	MDQ	RTS13201	Greater Hamilton	GTH11301	N/A	2,376,954.92 \$		\$ 1,074,514
Standard	TSA	MDQ	TEK28701	Cambridge	CAM17201	N/A	684,362.94 \$		\$ 667,488
Standard	TSA	MDQ	TEK28701	Horotiu	HRU16101	N/A	511,115.90 \$		\$ 498,513
Standard	TSA	MDQ	TEK28701	Kiwitahi 1 (Peroxide)	KIW34201	N/A	365,000.00 \$		\$ 356,000
Standard	TSA	MDQ	TEK28701	Kiwitahi 2	KIW34202	N/A	23,434.40 \$		\$ 22,857
Standard	TSA	MDQ	TEK28701	Matangi	MTG17301	N/A	969.65 \$		\$ 946
Standard	TSA	MDQ	TEK28701	Morrinsville	MRV16302	N/A	77,433.94 \$		\$ 75,525
Standard	TSA	MDQ	TEK28701	Morrinsville DF	MRV16301	N/A	332,726.01 \$		\$ 324,522
Standard	TSA	MDQ	TEK28701	Tatuanui DF	TAT16401	N/A	- \$	356.00	\$ -
Standard	TSA	MDQ	TEK28701	Waitoa	WTA16501	N/A	529,099.07 \$		\$ 516,053
Standard	TSA	MDQ	OFF17001	Te Kuiti North	TKN17001	N/A	41,661.49 \$		\$ 40,634
Standard	TSA	MDQ	OFF17401	Te Kuiti South	TKS17401	N/A	323,183.85 \$		\$ 315,215
Standard	TSA	OR	OFF16601	Huntly	HTL16601	No Zone	736.58 \$		\$ 7,184
Standard	TSA	OR	KAP09008	Eltham	ELM12301	No Zone	856.76 \$		\$ 1,901
Standard	TSA	OR	KAP09008	Inglewood	IGW11901	No Zone	354.03 \$		\$ 786
Standard	TSA	OR	KAP09008	Kaponga	KPA12401	No Zone	34.90 \$		\$ 77
Standard	TSA	OR	KAP09008	Stratford	STR10201	No Zone	12,632.08 \$		\$ 28,033
Standard	TSA	OR OR	KAP09004	Dannevirke	DAN05001	No Zone	4,637.35 \$		\$ 45,230
Standard Standard	TSA TSA	OR	KAP09004 KAP09004	Foxton Kaitoke	FOX22101 KTK23901	No Zone No Zone	1,386.67 \$ 20.05 \$		\$ 13,107 \$ 184
Standard	TSA	OR	KAP09004	Kakariki	KKI23701	No Zone	1,352.02 \$		\$ 12,409
Standard	TSA	OR	KAP09004	Kuku	KUK22401	No Zone	150.39 \$		\$ 1,421
Standard	TSA	OR	KAP09004	Lake Alice	LAB20201	No Zone	167.47 \$		\$ 1,537
Standard	TSA	OR	KAP09004	Levin	LVN24401	No Zone	3,031.49 \$		\$ 28,654
Standard	TSA	OR	KAP09004	Mangaroa	MNG34001	No Zone	103.18 \$		\$ 1,006
Standard	TSA	OR	KAP09004	Mangatainoka	MGK05401	No Zone	- \$		\$ -
Standard	TSA	OR	KAP09004	Marton	MTN23801	No Zone	362.33 \$		\$ 3,325
Standard	TSA	OR	KAP09004	Matapu	MTP20601	No Zone	182.90 \$	9.18	\$ 1,679
Standard	TSA	OR	KAP09004	Pahiatua	PHT04901	No Zone	821.76 \$	9.45	\$ 7,767
Standard	TSA	OR	KAP09004	Pahiatua DF	PHT04902	No Zone	1,938.91 \$	9.45	\$ 18,327
Standard	TSA	OR	KAP09004	Palmerston North	PLN24201	No Zone	7,554.76 \$		\$ 71,408
Standard	TSA	OR	KAP09004	Patea	PTA20901	No Zone	50.56 \$		\$ 464
Standard	TSA	OR	KAP09004	Takapau	TKP05101	No Zone	117.45 \$		\$ 1,146
Standard	TSA	OR	KAP09004	Waitotara	WTT20301	No Zone	3.94 \$		\$ 36
Standard	TSA	OR	KAP09004	Wanganui	WAG21501	No Zone	3,392.04 \$		\$ 31,132
Standard	TSA	OR	KAP09004	Waverley	WVY23601	No Zone	13.29 \$		\$ 122
Standard Standard	TSA TSA	OR OR	OFF14501	Ngaruawahia	NGW14501	No Zone	59.97 \$ 21,398.69 \$		\$ 585
Standard Standard	TSA	OR	None None	None None	None None	Auckland Zone Edgecumbe Zone	21,398.69 \$ 3,598.54 \$		\$ 202,262 \$ 47,126
Standard	TSA	OR	None	None	None	Hastings Zone	9,399.12 \$		\$ 91,674
Standard	TSA	OR	None	None	None	Hawera Zone	4,298.07 \$		\$ 39,448
Standard	TSA	OR	None	None	None	Kawerau Zone	2,121.65 \$		\$ 26,564
Standard	TSA	OR	None	None	None	Kinleith Zone	30,070.20 \$		\$ 293,287
Standard	TSA	OR	None	None	None	Kiwitahi Zone	103.65 \$		\$ 1,011
Standard	TSA	OR	None	None	None	Manawatu Zone	3,375.17 \$		\$ 31,902
Standard	TSA	OR	None	None	None	Marsden	902.53 \$		\$ 12,982
Standard	TSA	OR	None	None	None	Morrinvsille Zone	2,041.67 \$		\$ 19,913
Standard	TSA	OR	None	None	None	New Plymouth Zone	4,657.87 \$		\$ 10,337
Standard	TSA	OR	None	None	None	Okaiawa-Manaia Zone	1,202.86 \$		\$ 11,040
Standard	TSA	OR	None	None	None	South Auckland Rural Zone	9,127.00 \$		\$ 86,269
Standard	TSA	OR	None	None	None	Tirau Zone	7,676.34 \$		\$ 74,871
Standard	TSA	OR	None	None	None	Wellington Zone	23,472.57 \$		\$ 274,597
Standard	TSA	OR	None OFF16701	None	None OKU16701	Western BayOfPlenty Zone	8,283.85 \$		\$ 99,179
Standard Standard	TSA	OR OR	OFF16701 OFF13201	Okato	OKU16701	No Zone	1,032.42 \$		\$ 2,291
Standard Standard	TSA	OR	OFF13201 OFF13001	Okato	OKA13201 OPK13001	No Zone	133.86 \$ 82.97 \$		\$ 297 \$ 184
Standard Standard	TSA TSA	OR	OFF14101	Opunake Otorohanga	OPK13001 OTO14101	No Zone No Zone	1,659.84 \$		\$ 184 \$ 16,189
Standard	TSA	OR	OFF 14101 OFF 31101	Pirongia	PIR31101	No Zone	95.81 \$		\$ 934
Standard	TSA	OR	OFF31101	Te Awamutu DF	TAC31001	No Zone	13,322.93 \$		\$ 129,944
Standard	TSA	OR	PKU02308	Broadlands	BRO36301	No Zone	477.95 \$		\$ 5,984
Standard	TSA	OR	PKU02308	Gisborne	GIS07810	No Zone	3,048.96 \$		\$ 41,600
Standard	TSA	OR	PKU02308	Kihikihi (Te Awamutu)	KIH19101	No Zone	13,894.42 \$		\$ 135,518
	TSA	OR	PKU02308	Lichfield 2	LCF20011	No Zone	7,906.89 \$		\$ 77,119
Standard		OR	PKU02308	Lichfield DF	LCF20010	No Zone	767.23 \$		\$ 7,483
Standard Standard	TSA						· · •		
	TSA TSA	OR	PKU02308	Okoroire Springs	OKS32801	No Zone	52.71 \$	9.75	\$ 514
Standard				Okoroire Springs Opotiki	OKS32801 OPO32001	No Zone No Zone	52.71 \$ 130.35 \$		\$ 514 \$ 1,778





Туре	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	OR	PKU02308	Rangiuru	RAG33401	No Zone	7,440.81	\$ 11.97	\$ 89,086
Standard	TSA	OR	PKU02308	Reporoa	RPR30801	No Zone	3,881.95	\$ 12.52	\$ 48,604
Standard	TSA	OR	PKU02308	Rotorua	ROT08101	No Zone	10,276.91	\$ 12.52	\$ 128,673
Standard	TSA	OR	PKU02308	Taupo	TAU07001	No Zone	616.30	\$ 12.52	\$ 7,716
Standard	TSA	OR	PKU02308	Te Teko	TTK30601	No Zone	2,123.27	\$ 13.10	\$ 27,806
Standard	TSA	OR	PKU02308	Tokoroa	TKR19701	No Zone	1,732.02	\$ 9.75	\$ 16,893
Standard	TSA	OR	PKU02308	Waikeria	WKE19201	No Zone	107.72	\$ 9.75	\$ 1,051
Standard	TSA	OR	PKU02308	Whakatane	WHK32101	No Zone	308.31	\$ 13.10	\$ 4,038
Standard	TSA	OR	OFF15901	Pungarehu No 1	PGU13101	No Zone	22.67	\$ 2.22	\$ 50
Standard	TSA	OR	OFF15901	Pungarehu No 2	PGH15901	No Zone	18.61	\$ 2.22	\$ 41
Standard	TSA	OR	RTW3203	Glenbrook	GLB03401	No Zone	63,596.32	\$ 9.45	\$ 601,116
Standard	TSA	OR	RTW3203	Warkworth	WRK18901	No Zone	2,716.29	\$ 14.38	\$ 39,070
Standard	TSA	OR	RTW3203	Wellsford	WEL18301	No Zone	52.13	\$ 14.38	\$ 750
Standard	TSA	OR	RTW3203	Whangarei	WHG07501	No Zone	441.94	\$ 14.38	\$ 6,357
Standard	TSA	OR	RTS13201	Greater Hamilton	GTH11301	No Zone	4,818.51	\$ 4.52	\$ 21,782
Standard	TSA	OR	TEK28701	Cambridge	CAM17201	No Zone	1,960.15	\$ 9.75	\$ 19,118
Standard	TSA	OR	TEK28701	Horotiu	HRU16101	No Zone	4,700.13	\$ 9.75	\$ 45,842
Standard	TSA	OR	TEK28701	Matangi	MTG17301	No Zone	167.16	\$ 9.75	\$ 1,630
Standard	TSA	OR	TEK28701	Tatuanui DF	TAT16401	No Zone	-	\$ 9.75	\$ -
Standard	TSA	OR	TEK28701	Waitoa	WTA16501	No Zone	8,110.42	\$ 9.75	\$ 79,104
Standard	TSA	OR	OFF17001	Te Kuiti North	TKN17001	No Zone	205.74	\$ 9.75	\$ 2,007
Standard	TSA	OR	OFF17401	Te Kuiti South	TKS17401	No Zone	1,190.85	\$ 9.75	\$ 11,615
Standard	TSA	GJ	KAP09008	Pokuru 2 Delivery	PKD02402	N/A	15,264.15	\$ 0.04	\$ 544
Standard	TSA	GJ	KAP09008	Pokuru 2 Delivery	PKD02402	N/A	114,777.42	\$ 0.12	\$ 13,572
Standard	TSA	GJ	F4000439	Ballance 8201	BAL08201	N/A	2,936,385.97	\$ 0.29	\$ 851,552
Standard	TSA	GJ	F4000439	Ballance 9626	BAL09626	N/A	3,474,228.00	\$ 0.29	\$ 1,007,526





Appendix 3: Pi,2019,Q,i2019 from non-standard prices for the 2019 Assessment Period

 P_{i2019}, Q_{i2019}

Revenue from non-standard prices

\$ 25,615,657

Contract ID	Unit	Receipt Point ID		Delivery Point ID	Zone	Quantity	Price		Total
FGL17001	DAY	RTW3203	Greater Auckland	GTA03610	N/A	365	219.86	\$	80,248.50
FGL17001	OR	RTW3203	Greater Auckland	GTA03610	N/A	-	9.45	\$	-
FGL17001	GJ	RTW3203	Greater Auckland	GTA03610	N/A	294,394	0.41	\$	121,996.81
FGL17001	MDQ	RTW3203	Greater Auckland	GTA03610	N/A	511,365			
FGL17004	DAY	PKU02308	Te Puke	TPK33301	N/A	365	95.31	\$	34,788.08
FGL17004	OR	PKU02308	Te Puke	TPK33301	N/A	-	11.41	\$	
FGL17004	GJ	PKU02308	Te Puke	TPK33301	N/A	5,648	0.05	\$	282.40
FGL17004	MDQ	PKU02308	Te Puke	TPK33301	N/A	30,450			
FGL17031	DAY	RTW3203	Greater Auckland	GTA03610	N/A	365	696.90	\$	254,368.00
FGL17031	OR	RTW3203	Greater Auckland	GTA03610	N/A	- 504.000	4.39	\$	-
FGL17031 FGL17007	MDQ Other	RTW3203 KAP09004	Greater Auckland Hastings (Nova)	GTA03610 HST05203	N/A N/A	584,000 12	150.00	\$	1,800.00
FGL17007 FGL17008	Other	KAP09004 KAP09004	Hawera (Nova)	HWA20802	N/A	12	75.00	\$	900.00
FGL17009	Other	RTW3203	Hunua (Nova)	HUN15302	N/A	12	101.25	\$	1,215.00
FGL17010	GJ	KAP09008	Pokuru 2 Delivery	PKD02402	N/A	5,393,786	0.37		1,995,700.82
FGL17010	MDQ	KAP09008	Pokuru 2 Delivery	PKD02402	N/A	5,393,786	-		1,000,100.02
FGL17010	OR	KAP09008	Pokuru 2 Delivery	PKD02402	N/A	-	-		
FGL17011	DAY	RTW3203	Northland Dairy Factories	NDF33601	N/A	365	5,009.15	\$	1,828,340.81
FGL17011	OR	RTW3203	Northland Dairy Factories	NDF33601	N/A	-	14.20	\$	-
FGL17011	GJ	RTW3203	Northland Dairy Factories	NDF33601	N/A	1,006,237	0.06	\$	58,880.22
FGL17011	MDQ	RTW3203	Northland Dairy Factories	NDF33601	N/A	5,393,786			
FGL17034	DAY	F4000439	Kapuni GTP	KAP09612	N/A	365	20.61	\$	7,522.65
FGL17012	MDQ	KUP37501	Frankley Road-Bi	F4000439	N/A	2,244,123	0.29	\$	650,795.67
FGL17012	GJ	KUP37501	Frankley Road-Bi	F4000439	N/A	2,244,123			
FGL17012	OR	KUP37501	Frankley Road-Bi	F4000439	N/A	11,679	2.29	\$	26,744.91
FGL17037	DAY	PKU02308	Lichfield 2	LCF20011	N/A	92	3,803.84	\$	349,952.88
FGL17037	OR	PKU02308	Lichfield 2	LCF20011	N/A	18	9.75	\$	171.08
FGL17037	GJ	PKU02308	Lichfield 2	LCF20011	N/A	321,022	0.05	\$	16,051.12
FGL17037	MDQ	PKU02308	Lichfield 2	LCF20011	N/A	358,800	-	\$	-
FGL17013	DAY	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	365	51.25	\$	18,706.16
FGL17013	OR	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	15	9.04	\$	133.25
FGL17013	GJ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	8,694	0.05	\$	434.72
FGL17013	MDQ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	44,050	-	\$	-
FGL17014	DAY	KAP09004	Pahiatua DF	PHT04902	N/A	92	3,434.88	\$	316,008.66
FGL17014	OR	KAP09004	Pahiatua DF	PHT04902	N/A	-	9.45	\$	-
FGL17014	GJ	KAP09004	Pahiatua DF	PHT04902	N/A	283,703	0.05	\$	14,185.16
FGL17014	MDQ	KAP09004	Pahiatua DF	PHT04902	N/A	334,328			
FGL17015	MDQ	KAP09004	Hastings	HST05210	N/A	300,817	0.69	\$	207,563.73
FGL17015	GJ	KAP09004	Hastings	HST05210	N/A	163,525	-	\$	-
FGL17015	OR	KAP09004	Hastings	HST05210	N/A	4,777	9.18	\$	43,851.30
FGL17016	MDQ	RTW3203	Marsden 1	MSD01801	N/A	8,500	0.98	\$	8,330.00
FGL17016	GJ	RTW3203	Marsden 1	MSD01801	N/A	2,503	-	\$	-
FGL17016	OR	RTW3203	Marsden 1	MSD01801	N/A	726	14.33	\$	10,403.58
FGL17036	DAY	RTW3203	Marsden 1	MSD01801	N/A	365	20,602.28		7,519,833.96
FGL17036	OR	RTW3203	Marsden 1	MSD01801	N/A	-	14.23	\$	
FGL17036	GJ	RTW3203	Marsden 1	MSD01801	N/A	3,929,371	0.06	\$	243,228.06
FGL17036	MDQ	RTW3203	Marsden 1	MSD01801	N/A	5,285,800			
FGL17017	OR	KAP09004	Mokoia	MOK35801	N/A	453	8.35	\$	3,782.55
FGL17017	GJ	KAP09004	Mokoia	MOK35801	N/A	2,963	1.02	\$	3,022.26
FGL17017	MDQ	KAP09004	Mokoia	MOK35801	N/A	109,500			
FGL17018	DAY	RTW3203	Warkworth	WRK18901	N/A	365	659.92	\$	240,870.00
FGL17018	OR	RTW3203	Warkworth	WRK18901	N/A	-	14.38	\$	404.010.0
FGL17018	GJ	RTW3203	Warkworth	WRK18901	N/A	225,633	0.54	\$	121,842.06
FGL17018	MDQ	RTW3203	Warkworth	WRK18901	N/A	547,500	27.05	e	12 507 07
FGL17021	Other DAY	F4000439	Stratford 2	STR00521	N/A N/A	365	37.25	\$	13,597.97 1,813,062.70
FGL17022	MDQ	F4000439	Stratford 2	STR00521		365	4,967.30	\$	1,013,062.70
FGL17022	GJ	F4000439 F4000439	Stratford 2 Stratford 2	STR00521	N/A N/A	18,250,000 2,009,332			
FGL17022 FGL17022	OR OR	F4000439 F4000439		STR00521	N/A N/A	2,009,332	0.00	e	
FGL17022 FGL17020	DAY	F4000439 F4000439	Stratford 2 Stratford 3 Delivery Point	STR00521 STR00511	N/A N/A	365	0.99 5,418.87		- 1,977,886.58
FGL17020 FGL17020	GJ	F4000439 F4000439	Stratford 3 Delivery Point Stratford 3 Delivery Point	STR00511 STR00511	N/A N/A	2,054,897	0,410.07	Ą	1,311,000.08
FGL17020	MDQ	F4000439 F4000439	Stratford 3 Delivery Point	STR00511	N/A	2,054,897			
FGL17020	OR	F4000439 F4000439	Stratford 3 Delivery Point	STR00511	N/A	20,440,000	0.32	¢	-
FGL17020	OR	STR00513	Frankley Road-Bi	F4000439	N/A	-	0.32		-
FGL17020 FGL17019	Other	F4000439	Stratford 3 Delivery Point	STR00511	N/A	365	37.25		13,597.97
FGL17019	DAY	KUP37501	Frankley Road out to Maui	FOUT0001	N/A	365	5,722.54		2,088,726.28
FGL17023	OR	KUP37501	Frankley Road out to Maui	FOUT0001	N/A	-	0.58		-
FGL17023	GJ	KUP37501	Frankley Road out to Maui	FOUT0001	N/A	11,616,287	- 0.56	\$	-
FGL17023	MDQ	KUP37501	Frankley Road out to Maui	FOUT0001	N/A	12,410,000		Ÿ	-
FGL17023	DAY	KUP37501	Kapuni GTP	KAP09612	N/A	365	1.00	\$	365.00
			Kapuni GTP	KAP09612	N/A	20,085	0.58		11,649.30
	OR								
FGL17024	OR G I	KUP37501							,
	OR GJ MDQ	KUP37501 KUP37501	Kapuni GTP Kapuni GTP Kapuni GTP	KAP09612 KAP09612	N/A N/A	7,550,260 9,125,000	-	\$	-





Contract ID	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
FGL17035	OR	TEK28701	Tatuanui DF	TAT16401	N/A	-	9.75	\$ -
FGL17035	GJ	TEK28701	Tatuanui DF	TAT16401	N/A	383,334	0.05	\$ 19,166.68
FGL17035	MDQ	TEK28701	Tatuanui DF	TAT16401	N/A	602,250		
FGL17026	Other	KAP09004	Tawa B (Nova)	TWB24810	N/A	12	3,190.91	\$ 38,290.93
FGL17027	Other	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	N/A	730	18.63	\$ 13,597.97
FGL17028	DAY	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	N/A	365	6,547.80	\$ 2,389,946.28
FGL17028	GJ	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	N/A	6,052,285		
FGL17028	MDQ	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	N/A	23,360,000		
FGL17028	OR	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	N/A	-	1.02	\$ -
FGL17006	Other	TEK28701	Te Rapa Cogen	TRC02003	N/A	1,095	11.60	\$ 12,702.00
FGL17005	DAY	TEK28701	Te Rapa Cogen	TRC02003	N/A	365	2,395.49	\$ 874,353.85
FGL17005	OR	TEK28701	Te Rapa Cogen	TRC02003	N/A	-	1.05	\$ -
FGL17005	GJ	TEK28701	Te Rapa Cogen	TRC02003	N/A	3,761,792	0.05	\$ 188,089.60
FGL17005	GJ	TEK28701	Te Rapa Cogen	TRC02003	N/A	8,468,000		
FGL17030	DAY	PKU02308	Whakatane	WHK32101	N/A	365	3,642.00	\$ 1,329,330.00
FGL17030	OR	PKU02308	Whakatane	WHK32101	N/A	534	13.10	\$ 6,992.80
FGL17030	GJ	PKU02308	Whakatane	WHK32101	N/A	915,785	0.06	\$ 54,947.13
FGL17030	MDQ	PKU02308	Whakatane	WHK32101	N/A	1,241,000		
FGL17030	GJ	PKU02308	Whakatane	WHK32101	N/A	915,785	0.06	\$ 54,947.13
FGL17030	MDQ	PKU02308	Whakatane	WHK32101	N/A	1,241,000	-	\$ -

STP charges⁸

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Revenue from STP charges	\$	3,091,180
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Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Frankley Rd to Kupe Production Station - STP	GJ	F4000439	Kupe Delivery Point	KUP37503	N/A	3,238	0.29	\$ 939.00
Frankley Road to Kaimiro - STP	GJ	F4000439	Kaimiro Mixing Station Delivery	KAI07602	N/A	1,137,607	0.29	\$ 329,906.03
Frankley Road to Kapuni GTP - STP	GJ	F4000439	Kapuni GTP	KAP09612	N/A	8,403,609	0.29	\$ 2,437,046.61
Kaimiro to Frankley Road - STP	GJ	KAI07601	Frankley Road-Bi	F4000439	N/A	-	0.29	\$ -
Kaimiro to Kapuni - STP	GJ	KAI07601	Kapuni GTP	KAP09612	N/A	-	0.29	\$ -
Kapuni GTP to Frankley Road - STP	GJ	KAP09009	Frankley Road-Bi	F4000439	N/A	1,114,787	0.29	\$ 323,288.33
Kupe to Frankley Road - STP	GJ	KUP37501	Frankley Road-Bi	F4000439	N/A	-	0.29	\$ -
Kupe to Kapuni GTP - STP	GJ	KUP37501	Kapuni GTP	KAP09612	N/A	-	0.29	\$ -

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⁸ 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: Incident data

Event Time	Event No.	Summary	Site & Location	Emergency (Y/N)?	Consumers Interupted	Event Cause	Response Time (HH:mm)
3:23:00 AM	1 2924	Mokau CS - Unit failed to start. Loss of station compression.	Mokau CS	N	0	Equipment Failure	2:45
3:03:00 PM	1 2926	Oaonui Production Station Trip	Oaonui PS	N	0	Equipment Failure	0:00
6:15:00 AM	2929	Henderson CS - Power Outage	Henderson CS	N	1	Third Party	1:57
5:15:00 AM	1 2937	Henderson CS - Power Outage	Henderson CS	N	0	Third Party	2:46
2:06:00 PM		Horotiu West DP - smell of gas reported	Horotiu DP	N	0	Equipment Failure	1:02
2:43:00 PM		Henderson DP - Smell of gas report	Henderson DP	N	0	Third Party	1:47
10:59:00 PM	1 2953	Pohokura Production Station Trip Txcomcom	Pohokura PS	N	0	Third Party	0:00
8:45:00 PM		Henderson Compressor Station trip power outage. Txcomcom.	Henderson CS	N	0	Third Party	2:20
7:41:00 AM		Rimu Production Station flowing off-spec gas (High Wobbe)	Rimu PS	N	0	Third Party	0:00
8:34:00 AM		Rimu Production Station - Off Spec Gas (High Wobbe)	Rimu PS	N	0	Third Party	0:00
3:54:00 PM		Rimu Production Station - Off Spec Gas (High Wobbe) TxComCom	Rimu PS	N	0	Third Party	0:00
8:30:00 AM		TxComCom Kaponga DP reported smell of gas	Kaponga DP	N	0	Equipment Failure	1:32
10:51:00 AM		Oaonui Production Station - Shut Down	Oaonui PS	N	0	Third Party	0:00
9:53:00 AM		Kaitoke DP - Off spec gas - Low temperature.	Kaitoke DP	N	0	Equipment Failure	1:12
8:46:00 PM		Mokau Unit #1 duty fan stopped, causing loss of station (Station Inhibit) trip.	Mokau CS	N	0	Equipment Failure	0:00
11:18:00 PM		Kiwitahi DP - Gas Venting - TxComCom. CALLED IN BY RYAN PHIPPS.	Kiwitahi DP	N	0	Equipment Failure	1:02
7:42:00 PM		McKee - Tikorang i#3 - loss of production. TxComCom.	McKee PS	N	0	Third Party	0:00
1:37:00 AM		Pohokura PS Trip - TxComCom.	Pohokura PS	N	0	Third Party	0:00
2:22:00 AN		Pohokura off spec H/C dew point. Txcomcom.	Pohokura PS	N	0	Third Party	0:00
1:51:00 PM		Txcomcom Pohokura PS off spec gas	Pohokura PS	N	0	Third Party	0:00
1:30:00 PM		Txcomcom Pohokura PS trip.	Pohokura PS	N	0	Third Party	0:00
3:09:00 PM		Loss of gas supply to Ammonia Urea Plant - TxComCom	Ammonia Urea DP	N	1	Equipment Failure	0:00
4:29:00 PM		TXCOMCOM - McKee PS shut In	McKee PS	N	0	Third Party	0:00
4:40:00 PM		Pohokura PS - shut down	Pohokura PS	N	0	Third Party	0:00
8:37:00 AM		Pohokura trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
6:00:00 PM		Kupe PS unplanned shutdown Txcomcom	Kupe PS	N	0	Third Party	0:00
9:30:00 PM		Kupe - High wobbe on start up. TxComCom.	Kupe PS	N	0	Third Party	0:00
1:55:00 PM		Pohokura PS Trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
9:42:00 PM		KGTP - Gas leak reported. TxComCom.	KGTP CS	N	0	Not an Event	0:57
3:04:00 AN		Henderson c/s Loss of A/C Power. Station unavailable. TxComCom.	Henderson CS	N	1	Equipment Failure	3:40
6:26:00 PM		Henderson C/S - Unavailable - no mains power. TxComCom.	Henderson CS	N	1	Equipment Failure	3:19
7:45:00 PM		· ·	Kaitoke CS	N	0	Equipment Failure	33:12
2:40:00 PM		Reported smell of gas - Okaiawa DP. TxComCom.	Okaiawa DP	N	0	Not an Event	0:23
6:10:00 PM		Henderson CS Loss of Power. TxComCom. Station Unavailable.	Henderson CS	N	1	Third Party	3:19
6:15:00 PM		Waikumete DP - Report of smell and noise from DP. TxComCom.	Waikumete DP	N	0	Equipment Failure	0:29
3:38:00 PM		KGTP - Unplanned shut down. Loss of compressor station. TxComCom.	KGTP PS	N	0	Third Party	0:00
11:30:00 PM		Kupe Production trip. TxComCom.	Kupe PS	N	0	Third Party	0:00
10:07:00 PM		Kupe PS - Plant Shut down. TxComCom.	Kupe PS	N	0	Third Party	0:00
11:03:00 PM		Kupe PS - High Wobbe. TxComCom.	Kupe PS	N	0	Third Party	0:00
6:00:00 PM		Mokau total loss of compression. TxComCom.	Mokau CS	N	0	Equipment Failure	1:20
8:47:00 PM		Parawera MLV reported smell of gas. TxComCom (also 3461).	Parawera MLV	N	0	Equipment Failure	1:35
11:08:00 AM		Pohokura PS trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
10:37:00 AM		Kuku Beach Road reported smell of gas. TxComCom.	Kuku DP	N	0	Not an Event	1:02
7:43:00 AN		Cheal Cout of spec Gas.	Cheal C PS	N	0	Third Party	0:00
11:35:00 AM		Cheal C out of spec gas exported. TxComCom.	Cheal C PS	N	0	Third Party	0:00
6:04:00 AN		Cheal C off Spec low WOBBE gas delivered to pipeline. TxComCom. Cooler found with a pin prick leak on one of the tubes due to corrosion. TxComCom	1	N N	0	Third Party Equipment Failure	0:00
9:36:00 AN		ļ	Mokau CS		0		0:00
8:26:00 AV		Mokau station total station outage. TxComCom.	1	N N	0	Equipment Failure	0:00
10:27:00 PM		Kupe PS trip. TxComCom. Kupe Production Station off-spec gas. TxComCom.	Kupe PS Kupe PS	N	0	Third Party Third Party	0:00
		, ,					
8:56:00 AN		Oaonui Production Station - Unplanned Shut down	Oaonui PS	N Y	0	Third Party Third Party	0:00
11:50:00 AM 4:40:00 PM		601 pipeline damage found during DCVG excavation, Waikanae area. TxComCom. Gas leak found by Electrix staff on Kimray temp controller. Drury DP.	Drury DP	N	0		1:39
12:29:00 PM		1 1	KGTP CS			Equipment Failure	0:00
4:00:00 AM		Kapuni Compressor station - gas leak on PGC#5. TxComCom. Cheal C recordedlow WOBBE gas to pipeline. TxComCom.	Cheal C PS	N N	0	Equipment Failure Third Party	0:00
2:56:00 PM		Minor leak on the valve gland packing log LG-20801	Hawera DP	N	0		0:00
12:30:00 AM		Pohokura production trip. TxComCom.	Pohokura PS	N	0	Equipment Failure Third Party	0:00
12:30:00 AV		Henderson Valley Power outage - compressor shut down. TxComCom.	Henderson CS	N N	0	Third Party	0:00
		Pohokura PS - Plant Trip. TxComCom.	Pohokura PS	N			0:00
1:19:00 PM 9:26:00 AM		•			0	Third Party	
		Gas venting from relief. TxComCom	Maungaturoto DP	N	0	Equipment Failure	3:29
1:22:00 AV		Pohokura Production Station Trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
3:00:00 PM		Oaonui offshore trip, reduced flow. TxComcom.	Oaonui PS	N	0	Third Party	0:00
3:21:00 PM		Pohokura Production Station Trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
12:34:00 PM		Mahoenui #1 Unit Malfunction Inhibited Station on Gas detection.	Mahoenui CS	N	0	Equipment Failure	3:51
3:30:00 PM		Henderson C/S - Loss of station compression. TxComCom.	Henderson CS	N	0	Equipment Failure	2:12
2:24:00 PM	3/20	Pin hole leak at weld on pressure indicator	Rangiuru DP	N	0	Equipment Failure	0:00





Event Time	Event No.	Summary	Site & Location	Emergency (Y/N)?	Consumers	Event Cause	Response Time
0.00.00.41	4 0705	On the LDD. Distriction to the second control of the second contro	Objection LDD		or aptou		(HH:mm)
8:30:00 AM 1:08:00 PM		Stratford DP - Pilot venting to atmosphere on stand by stream	Stratford DP Mokau CS	N N	0	Equipment Failure	0:00
10:30:00 PM		Mokau CS - Station trip, loss of compression. TxComCom. Rimu Production Station Wobbe Off-Spec. TxComCom.	Rimu PS	N	0	Third Party Third Party	0:00
6:05:00 PM		Funny Smell Reported. TxComCom.	400 pipeline, Te Kuiti	N	0	Not an Event	0:00
9:45:00 AM		Pokuru CS, Loss of compression. TxComCom.	Pokuru CS	N	0	Equipment Failure	1:26
10:25:00 AM		Waikanae - Loss of supply to network. TxComCom.	Waikanae DP	N	0	Equipment Failure	0:00
2:06:00 AM	/ 3781	Rimu PS Wobbe Alarms. TxComCom.	Rimu PS	N	0	Third Party	0:00
7:45:00 AM	A 3791	Derby Road - Reported Gas Leak. TxComCom.	Derby Road CS	N	0	System Quality	0:00
2:01:00 PM	л 3798	Power Blip caused #2 to Trip at Henderson CS. TxComCom.	Henderson CS	N	0	Equipment Failure	0:01
12:49:00 AM	A 3854	Papakura East PR Stn - Failed Relief - venting Gas	Papakura East PRS	N	0	Equipment Failure	0:59
4:15:00 AM	Л 3906	Kaitoke 2 malfunction fault. Resulted in loss of station availability. TxComCom.	Kaitoke CS	N	0	Equipment Failure	7:49
8:17:00 AM	Л 3936	Mangahewa PS - Plant Outage. TxComCom.	Mangahewa PS	N	0	Third Party	0:00
4:11:00 PM	Л 3946	Kupe Production Station unplanned outage. TxComCom.	Kupe PS	N	0	Third Party	0:00
11:13:00 AM		Papakura East Regulator Failure, causing gas leak on site. TxComCom.	Papakura East PRS	N	0	Equipment Failure	0:17
1:21:00 PM		Kaitoke Compressor ESD. TxComCom.	Kaitoke CS	N	0	Equipment Failure	0:47
1:50:00 PM		Derby Road noise reported from site - venting regulator. TxComCom.	Derby Road CS	N	0	Equipment Failure	1:29
5:38:00 PM		Waikumete DP smell of gas reported. TxComCom.	Waikumete DP	N	0	Not an Event	1:18
9:25:00 AM		Marton DP Heater Outage - low temps. TxComCom.	Marton DP	N	0	Equipment Failure	1:09
1:43:00 PM		50mm pipe damaged at Mahoenui Compressor Station. TxComCom.	Mahoenui CS	N	0	Equipment Failure	0:45
12:17:00 AM		Pukekohe East - 15 Mill Rod - Smell of Gas report. TxComCom.	200 Pipeline, Pukekohe	N	0	Not an Event	2:41
2:50:00 PM		Todd McKee Outage following Localized Power outage. TxComCom.	McKee PS	N	0	Third Party	0:00
6:31:00 AM		Pohokura Unplanned Outage. TxComCom.	Pohokura PS	N	0	Third Party	0:00
1:51:00 PM		Mokoia Mixing Station Off Spec Gas - High and Low Wobbe. TxComCom. Pohokura PS Trip. TxComCom.	Rimu PS Pohokura PS	N N	0	Third Party	0:00
2:59:00 PM		Henderson CS Trip - no power to site. No curtailments. TxComCom.		N N	0	Third Party	0:00
3:42:00 PM 8:32:00 PM		Critical High Wobbe Alarm, Cheal Production Station. TxComCom.	Henderson CS Cheal PS	N	0	Third Party Third Party	0:09
4:42:00 AN		Henderson CS Trip. No curtailments. TxComCom power outage	Henderson CS	N	0	Equipment Failure	2:29
8:58:00 AV		Pirongia DP minor gas leak. TxComCom.	Pirongia DP	N	0	Equipment Failure	0:00
11:40:00 AM		Rimu Production Station High Wobbe. TxComCom.	Rimu PS	N	0	Third Party	0:00
12:36:00 PM		Kawerau CS ESD - station unavailable. TxComCom.	Kawerau CS	N	0	Third Party	44:02
7:52:00 AM		Pokuru Compressor Station loss of compression. TxComCom.	Pokuru CS	N	0	Equipment Failure	0:45
9:37:00 PM		Two very small gas leaks. TxComCom.	Bruce McLaren DP	N	0	Equipment Failure	1:54
9:30:00 AM	A 4124	Tariki MLV Reported smell of gas. TxComCom.	Tariki MLV	N	0	Not an Event	0:55
1:30:00 PM	A 4131	Henderson CS shutdown, power outage. Loss of compression. TxComCom.	Henderson CS	N	0	Equipment Failure	1:20
5:45:00 AM	Л 4145	Pokuru Both compressors unavailable. TxComCom.	Pokuru CS	N	0	Equipment Failure	1:50
6:30:00 AM	Л 4146	Kaitoke - total loss of compression. TxComCom.	Kaitoke CS	N	0	Equipment Failure	2:58
4:09:00 PM	И 4155	Longburn DP, Reported Smell of Gas. TxComCom.	Longburn DP	N	0	Not an Event	0:28
6:11:00 AM	A 4200	Henderson C/S - Loss of compression. TxComCom.	Henderson CS	N	1	Equipment Failure	1:06
8:35:00 AM	Л 4265	Henderson CS loss of compression due to mains failure. TxComCom.	Henderson CS	N	0	Not an Event	2:02
6:23:00 PM	A 4281	Henderson Valley compressor trip. TxComCom.	Henderson CS	N	1	Third Party	1:15
6:36:00 AM	Л 4285	Waitara DP Delivery Temperature off specification. TxComCom.	Waitara DP	N	0	Equipment Failure	2:08
2:51:00 PM		Cheal PS , Critical High Wobbe. TxComCom.	Cheal PS	N	0	Third Party	0:00
6:30:00 PM		Pohokura production trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
3:49:00 PM		Henderson CS, Station Trip due to Mains Fail. TxComCom.	Henderson CS	N	0	Equipment Failure	1:59
3:53:00 PM		Oaonui PS Outage. TxComCom.	Oaonui PS	N	0	Third Party	0:00
1:17:00 PM		Defect began leaking during final stages of repair sleeve fitment. TxComCom.	111 pipeline, Takapu Rd	N	0	Not an Event	0:00
6:15:00 PM		McKee Tik#1 off Spec Gas Low Wobbe. TxComCom.	Mckee PS	N	0	Third Party	0:00
8:04:00 AV		Pohokura Export gas trip. TxComCom.	Pohokura PS	N	0	Third Party	0:00
5:15:00 PM		Henderson Compressor station outage. TxComCom.	Henderson CS	N N	1	Equipment Failure	1:08 0:22
7:32:00 PM		Mokau compressor loss of compression. TxComCom.	Mokau CS	N N	0	Equipment Failure	1:19
9:39:00 AN		Tuakau DP - Smell of Gas Reported. TxComCom.	Tuakau DP	N	0	Not an Event	1:19
11:40:00 PM		Cheal C - High Wobbe. TxComCom.	Cheal C PS	N	0	Third Party	0:00
4:06:00 AV		Sidewinder PS - Low Wobbe. TxComCom.	Sidewinder PS	N	0	Third Party	0:00
12:10:00 AM		Henderson Compressor Station ESD. TxComCom.	Henderson CS	N	0	Not an Event	1:57
9:00:00 AM		Gas leak on the side of the odorant tank building at Kapuni. TxComCom.	KGTP Odorant	N	0	Equipment Failure	1:00
3:30:00 PM		Cannon Road MLV - Gas leak from bolts on LPT system. TxComCom.	Cannon Road MLV	N	0	Equipment Failure	0:00
10:14:00 PM		Henderson CS trip due to power outage. TxComCom.	Henderson CS	N	1	Third Party	2:07
7:15:00 AM		Pokuru Compressor Station loss of compression. TxComCom.	Pokuru CS	N	0	Not an Event	1:10
10:34:00 AM		Oaonui Production Station unplanned outage. TxComCom.	Oaonui PS	N	0	Third Party	0:00
6:00:00 PM	A 4626	Patea Delivery Point Off Spec Gas delivered -21.4 °C. TxComCom.	Patea DP	N	0	Not an Event	14:40
9:50:00 AM		Henderson Compressor Station ESD	Henderson CS	N	0	Equipment Failure	0:00
5:15:00 PM		Kupe PS Trip. TxComCom.	Kupe PS	N	0	Third Party	0:00
7:15:00 PM	И 4705	Patea DP Off spec gas delivered to Network - Low Temp. TxComCom.	Patea Delivery Point	N	0	Equipment Failure	19:22
1:12:00 AM	A 4730	Henderson C/S - Loss of compression due to power outage. TxComCom.	Henderson CS	N	1	Equipment Failure	1:43
3:07:00 AM	A 4731	Pokuru - Total Odorant Failure. TxComCom.	Pokuru CS	N	0	Equipment Failure	0:46
8:24:00 PM	Л 4737	Tikorangi #1 metering Off Spec Low Wobbe. TxComCom.	Tikorangi Mixing Station	N	0	Third Party	0:00
1:22:00 PM	И 4776	Stem leak on new valve. Minor gas leak. TxComCom.	Waiuku DP	N	0	Equipment Failure	0:00
3:20:00 PM	И 4755	Oaonui PS Trip. TxComCom.	Oaonui PS	N	0	Third Party	0:00
	<i>1</i> 4756	Tatuanui DP, Relief monitor alarm. TxComCom.	Tatuanui DP	N	0	Equipment Failure	0.58





Appendix 5: 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:9

- 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 Control Room
- Uncontrolled escape of gas
- Unplanned supply interruption to multiple end users
- Under or over Odorisation, 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

⁹ Extracted from Firstgas' standard 06121 Incident and emergency classification



APPENDIX 6: COMPLIANCE STATEMENT CERTIFICATE – GTB

We, Philippa Jane Dunphy, and Euan Richard Krogh, being Directors of Firstgas Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached Compliance Statement of Firstgas Limited, and related information, prepared for the purposes of the *Gas Transmission Services Default Price-Quality Path Determination 2017* has been prepared in accordance with all the relevant requirements.

Director

Philippa Jane Dunphy

04 December 2019

Date

Director

Euan Richard Krogh

04 December 2019

Date



Appendix 7: Auditor assurance



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

Opinion

In our opinion, in all material respects, the Compliance Statement of First Gas Limited for Gas Transmission Services Default Price-Quality Path compliance for the period commencing 1 October 2018 and ending 30 September 2019 ("the Compliance Statement") has been prepared in accordance with clause 11 of Gas Transmission Services Default Price-Quality Path Determination 2018 NZCC 14 ("the Determination").

As far as appears from examination, in all material respects, the information used in the preparation of the Compliance Statement for the year ended 30 September 2019 has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems.

Information subject to assurance

We have performed an engagement to provide reasonable assurance in relation to the company's Compliance Statement for the assessment period commencing 1 October 2018 and ending 30 September 2019.

Criteria

Our engagement relates to the Compliance Statement prepared by the company to provide reasonable assurance that the Gas Transmission Services Default Price-Quality Path is in compliance with clause 11 of the Determination during the assessment period 1 October 2018 to 30 September 2019.

Standards we followed

We conducted our reasonable assurance engagement in accordance with 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) *Assurance Engagements on Compliance*. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion. 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 Compliance Statement is free from material misstatement, whether due to fraud or error;
- considered relevant internal controls when designing our assurance procedures, however we do not
 express an opinion 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 Compliance Statement 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 Compliance Statement.



Use of this assurance Report

Our report should not be regarded as suitable to be used or relied on by any parties other than the company and the New Zealand Commerce Commission in relation to clause 11 of the Determination, for any purpose or in any context. Any party other than the company 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 the company and the New Zealand Commerce Commission for our work, for this independent reasonable assurance report, or for the opinions we have reached.

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

First Gas Limited's responsibility for the Compliance Statement

First Gas Limited is responsible for the preparation and fair presentation of the Compliance Statement in accordance with clause 11 of the Determination. This responsibility includes such internal control as management determine is necessary to enable the preparation of a Compliance Statement that is free from material misstatement whether due to fraud or error.

Our responsibility

Our responsibility is to express an opinion to the directors of the company and to the New Zealand Commerce Commission on whether the preparation and presentation of the Compliance Statement is, in all material respects, in accordance with clause 11 of 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 and other assurance services to the company. Subject to certain restrictions, partners and employees of our firm may also deal with the company on normal terms within the ordinary course of trading activities of the business of the company. These matters have not impaired our independence as assurance providers of the company for this engagement. The firm has no other relationship with, or interest in, the company.

KPMG Auckland

6 December 2019