



COMPLIANCE STATEMENT

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

Assessment Period 1 October 2021 – 30 September 2022



Introduction

First Gas Limited (Firstgas) owns and operates 2,500 kilometres of gas transmission pipelines. These pipelines transport around 20 percent of New Zealand's primary energy supply from Taranaki across the North Island. Firstgas also owns and operates more than 4,900 kilometres of gas distribution pipelines that service approximately 66,000 consumers across the regions of Northland, Waikato, Central Plateau, Bay of Plenty, Gisborne and Kāpiti Coast.

Firstgas is part of the wider Firstgas Group. Headquartered in New Plymouth, Firstgas Group is an umbrella brand consisting of Rockgas, Firstgas, Flexgas and Gas Services NZ. Firstgas and Rockgas deliver natural gas and supply LPG respectively to over 500,000 customers through their network of high-pressure gas transmission pipelines and distribution pipelines in the North Island, as well as through LPG distribution pipelines in the South Island, 36 local LPG suppliers, and over 180 Refill & Save locations across New Zealand.

Flexgas operates the Ahuroa gas storage facility in Central Taranaki. Gas Services NZ provides operational and maintenance support to all gas infrastructure owners, including other parts of Firstgas Group.

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*, consolidating all amendments as of 18 December 2018 (DPP Determination) issued by the Commerce Commission. This Compliance Statement covers Firstgas' gas transmission business (GTB) for the year ending 30 September 2022.

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 25 November 2022.

Compliance status for year ending 30 September 2022

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

For further information regarding this Compliance Statement, please contact:

Karen Boyes
Regulatory Policy Manager
First Gas Limited
Karen.Boyes@firstgasgroup.co.nz
04 979 5368

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 2021 to 30 September 2022. This is the fifth and last 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:

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

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 5 of Schedule 7 of the DPP Determination, the actual net allowable revenue for the fourth Assessment Period is calculated using the following formula:

$$\text{Actual net allowable revenue} = \text{Actual net allowable revenue of the previous Assessment Period} \times (1 + \Delta CPI_t) \times (1 - X)$$

and where

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

$$X = \text{The annual rate of change, as specified in schedule 2, being zero}$$

$$\text{Actual net allowable revenue (2022)} = \$129.361 \text{ million} \times (1 + 6.86\%) \times (1 - 0)$$

$$= \$138.235 \text{ million}$$

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 2022).

Table 1: Pass-through and Recoverable costs

Pass-through and Recoverable Costs	Incurred in the year ending 30 September 2022
	\$000
Rates and Levies	\$2,910
Balancing gas costs and revenue	\$4,685
Mokau Compressor fuel gas costs	\$1,414
Capex Wash-up Adjustment	\$868
Total actual pass-through costs and recoverable costs	\$9,878

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

The wash-up draw down amount for the fifth Assessment Period calculated following the requirements of Schedule 8 of the DPP Determination is **\$1.962 million**. The revenue wash-up draw down amount refers to revenue over-recovered in the FY2020 period, and includes an adjustment to recognise the time value of money as specified in the DPP Determination.

Calculation of actual allowable revenue

$$\begin{aligned}
 \text{Actual allowable revenue} &= \$138.235 \text{ million} + \$9.878 \text{ million} + \$1.962 \text{ million} \\
 &= \mathbf{\$150.075 \text{ million}}
 \end{aligned}$$

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

As announced to customers on 31 July 2021,² the prices for the Maui pipeline for the 2021/22 pricing year³ were as follows:

Tariff	Value for 2021/22
Tariff 1 (\$ per GJ.km)	0.001832
Tariff 2 (\$ per GJ)	0.083663

The Actual Revenue from Prices for the Maui pipeline in 2021/22 was:

Tariff	Actual Quantity	Price	Total (\$million)
Tariff 1	14,512,941,156.870 GJ.km	\$0.001832 per GJ.km	\$26.588
Tariff 2	131,110,799.000 GJ	\$0.083663 per GJ	\$10.969
Actual Revenue from Prices			\$37.557

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 2021/22 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 **\$99.013 million**.

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.

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

Total Actual Revenue from Prices

The total Actual Revenue from Prices is **\$136.673 million**.

$$\begin{aligned}
 \text{Actual Revenue from prices} &= \text{Actual Revenue from Prices (Maui)} + \text{Actual Revenue from Prices (Non-Maui)} \\
 &= \$37.557 \text{ million} + \$99.013 \text{ million} \\
 &= \$136.570 \text{ million}^5
 \end{aligned}$$

Other regulated income

Firstgas received \$1,852,967 other regulated income for the 2021/22 Assessment Period.

Calculation of actual revenue

$$\begin{aligned}
 \text{Actual Revenue for 2021/22} &= \$136.570 \text{ million} + \$1.853 \text{ million} \\
 &= \$138.423 \text{ million}
 \end{aligned}$$

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

$$\begin{aligned}
 \text{Revenue reduction percentage} &= 1 - (\text{actual revenue from prices} \div \text{forecast revenue from prices}) \\
 &= 1 - (\$136.570 \text{ million} \div \$139.362 \text{ million}) \\
 &= 2.0\%
 \end{aligned}$$

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

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**.

$$\begin{aligned}
 \text{Revenue foregone} &= \text{Actual net allowable revenue from prices} \times (\text{revenue reduction percentage} - 20\%^6) \\
 &= \$138.235 \text{ million} \times 0\% \\
 &= \$0
 \end{aligned}$$

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 **\$11.652 million**.

$$\begin{aligned}
 \text{Wash-Up Amount (\$million)} &= \text{Actual allowable revenue} - \text{actual revenue} - \text{revenue forgone} \\
 &= \$150.075 \text{ million} - \$138.423 \text{ million} - \$0 \\
 &= \$11.652 \text{ million}
 \end{aligned}$$

This amount will be passed into prices and recovered from consumers in the pricing year 1 October 2023 to 30 September 2024.

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.

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:

- 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).⁷*

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

Event 11442 – 3 July 2022

Gas leak from the 200 pipeline at 58 Mathers Road, Te Kuiti. Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative arriving at the scene 157 minutes after the GTB became aware of the issue.

Event 11612 – 22 July 2022

100 pipeline exposed in flooded stream near Whanganui Airport. 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.

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

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.

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).

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 FY2022 Assessment Period.

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

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

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

	Pi2022, Qi2022	
Total	\$	99,012,821
Transmission standard charges between 1 October 2021 and 30 September 2022	\$	82,195,142
Transmission non-standard charges between 1 October 2021 and 30 September 2022	\$	13,262,429
Transmission STP charges between 1 October 2021 and 30 September 2022	\$	2,390,310
Charges billed outside of OATIS between 1 October 2021 and 30 September 2022	\$	1,164,940

Appendix 2: P_{i,2022}Q_{i,2022} from standard prices for the 2022 Assessment Period

PI2022, QI2022									
Standard charges								\$	82,195,142

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	GJ	Various	Various	Various	N/A	39,128,953.40	\$ 0.34	\$ 13,303,844
Standard	TSA	MDQ	OFF16601	Huntly	HTL16601	N/A	68,025.29	\$ 359.00	\$ 66,907.06
Standard	TSA	MDQ	KAP09008	Eltham	ELM12301	N/A	224,056.60	\$ 82.00	\$ 50,336.00
Standard	TSA	MDQ	KAP09008	Inglewood	IGW11901	N/A	46,977.33	\$ 82.00	\$ 10,553.81
Standard	TSA	MDQ	KAP09008	Kaponga	KPA12401	N/A	2,825.83	\$ 82.00	\$ 634.84
Standard	TSA	MDQ	KAP09008	New Plymouth	NPL12101	N/A	1,118,450.38	\$ 82.00	\$ 251,268.30
Standard	TSA	MDQ	KAP09008	Stratford	STR10201	N/A	115,772.29	\$ 82.00	\$ 26,009.12
Standard	TSA	MDQ	KAP09008	Waitara	WTR12001	N/A	151,523.18	\$ 82.00	\$ 34,040.82
Standard	TSA	MDQ	KAP09004	Ashhurst	ASH34301	N/A	16,463.52	\$ 349.00	\$ 15,741.83
Standard	TSA	MDQ	KAP09004	Belmont	BEL24510	N/A	1,992,220.80	\$ 431.00	\$ 2,352,457.98
Standard	TSA	MDQ	KAP09004	Dannevirke	DAN05001	N/A	86,402.69	\$ 359.00	\$ 84,982.37
Standard	TSA	MDQ	KAP09004	Feilding	FLD03001	N/A	321,545.00	\$ 349.00	\$ 307,449.88
Standard	TSA	MDQ	KAP09004	Flockhouse	FLH21901	N/A	252.58	\$ 349.00	\$ 241.51
Standard	TSA	MDQ	KAP09004	Foxton	FOX22101	N/A	57,364.28	\$ 349.00	\$ 54,849.68
Standard	TSA	MDQ	KAP09004	Greater Kapiti	GWP20102	N/A	314,193.94	\$ 431.00	\$ 371,007.09
Standard	TSA	MDQ	KAP09004	Greater Waitangirua	GTW06910	N/A	648,581.72	\$ 431.00	\$ 765,859.50
Standard	TSA	MDQ	KAP09004	Hastings	HST05210	N/A	2,547,245.60	\$ 359.00	\$ 2,505,373.07
Standard	TSA	MDQ	KAP09004	Hastings (Nova)	HST05203	N/A	220,460.00	\$ 359.00	\$ 216,836.00
Standard	TSA	MDQ	KAP09004	Hawera	HWA20801	N/A	415,898.44	\$ 339.00	\$ 386,272.79
Standard	TSA	MDQ	KAP09004	Hawera (Nova)	HWA20802	N/A	123,735.00	\$ 339.00	\$ 114,921.00
Standard	TSA	MDQ	KAP09004	Kairanga	KRG24101	N/A	1,008.13	\$ 349.00	\$ 963.94
Standard	TSA	MDQ	KAP09004	Kaitoke	KTG23901	N/A	32,485.00	\$ 339.00	\$ 30,171.00
Standard	TSA	MDQ	KAP09004	Kakariki	KKI23701	N/A	115,685.21	\$ 339.00	\$ 107,444.62
Standard	TSA	MDQ	KAP09004	Kuku	KUK22401	N/A	1,193.43	\$ 349.00	\$ 1,141.11
Standard	TSA	MDQ	KAP09004	Lake Alice	LAB20201	N/A	60,228.65	\$ 339.00	\$ 55,938.39
Standard	TSA	MDQ	KAP09004	Levin	LVN24401	N/A	393,066.51	\$ 349.00	\$ 375,836.20
Standard	TSA	MDQ	KAP09004	Longburn	LNB24301	N/A	372,840.27	\$ 349.00	\$ 356,496.58
Standard	TSA	MDQ	KAP09004	Manaia	MNA23402	N/A	27,602.14	\$ 339.00	\$ 25,635.96
Standard	TSA	MDQ	KAP09004	Mangaroa	MNG34001	N/A	32,120.00	\$ 359.00	\$ 31,592.00
Standard	TSA	MDQ	KAP09004	Mangatainoka	MKG05401	N/A	1,825.00	\$ 349.00	\$ 1,745.00
Standard	TSA	MDQ	KAP09004	Marton	MTN23801	N/A	286,720.13	\$ 339.00	\$ 266,296.23
Standard	TSA	MDQ	KAP09004	Matapu	MTP20601	N/A	837.07	\$ 339.00	\$ 777.44
Standard	TSA	MDQ	KAP09004	Oroua Downs	ORD24701	N/A	27,375.00	\$ 349.00	\$ 26,175.00
Standard	TSA	MDQ	KAP09004	Otaki	OTA22601	N/A	30,404.82	\$ 431.00	\$ 35,902.68
Standard	TSA	MDQ	KAP09004	Pahiatua	PHT04901	N/A	14,089.47	\$ 349.00	\$ 13,471.85
Standard	TSA	MDQ	KAP09004	Pahiatua DF	PHT04902	N/A	1,200,140.00	\$ 349.00	\$ 1,147,531.12
Standard	TSA	MDQ	KAP09004	Palmerston North	PLN24201	N/A	1,397,416.03	\$ 349.00	\$ 1,336,159.44
Standard	TSA	MDQ	KAP09004	Patea	PTA20901	N/A	23,927.64	\$ 339.00	\$ 22,223.20
Standard	TSA	MDQ	KAP09004	Pauatahanui 2	PAH23101	N/A	511.00	\$ 431.00	\$ 603.40
Standard	TSA	MDQ	KAP09004	Takapau	TKP05101	N/A	147,260.00	\$ 359.00	\$ 144,839.29
Standard	TSA	MDQ	KAP09004	Tawa A	TWA35610	N/A	3,495,661.19	\$ 431.00	\$ 4,127,753.35
Standard	TSA	MDQ	KAP09004	Tawa B (Nova)	TWB24810	N/A	372,845.00	\$ 431.00	\$ 440,263.55
Standard	TSA	MDQ	KAP09004	Te Horo	THO22701	N/A	1,040.98	\$ 431.00	\$ 1,229.21
Standard	TSA	MDQ	KAP09004	Waitotara	WTT20301	N/A	36,640.00	\$ 339.00	\$ 34,030.03
Standard	TSA	MDQ	KAP09004	Wanganui	WAG21501	N/A	1,588,204.99	\$ 339.00	\$ 1,475,072.58
Standard	TSA	MDQ	KAP09004	Waverley	WVY23601	N/A	553.34	\$ 339.00	\$ 513.92
Standard	TSA	MDQ	OFF14501	Ngaruawahia	NGW14501	N/A	10,501.94	\$ 359.00	\$ 10,329.30

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	MDQ	OFF16701	Oakura	OKU16701	N/A	18,984.75	\$ 82.00	\$ 4,265
Standard	TSA	MDQ	OFF13201	Okato	OKA13201	N/A	3,715.14	\$ 82.00	\$ 835
Standard	TSA	MDQ	OFF13001	Opunake	OPK13001	N/A	14,228.50	\$ 82.00	\$ 3,197
Standard	TSA	MDQ	OFF14101	Otorohanga	OTO14101	N/A	19,479.66	\$ 359.00	\$ 19,159
Standard	TSA	MDQ	OFF31101	Pirongia	PIR31101	N/A	3,195.11	\$ 359.00	\$ 3,143
Standard	TSA	MDQ	OFF31101	Te Awamutu DF	TAC31001	N/A	813,397.78	\$ 359.00	\$ 800,027
Standard	TSA	MDQ	PKU02308	Broadlands	BRO36301	N/A	92,330.00	\$ 462.00	\$ 116,867
Standard	TSA	MDQ	PKU02308	Edgecumbe	EGC30702	N/A	1,898.00	\$ 482.00	\$ 2,506
Standard	TSA	MDQ	PKU02308	Edgecumbe DF	EGC30701	N/A	1,520,932.27	\$ 482.00	\$ 2,008,464
Standard	TSA	MDQ	PKU02308	Gisborne	GIS07810	N/A	696,788.86	\$ 503.00	\$ 960,232
Standard	TSA	MDQ	PKU02308	Greater Mt Maunganui	GMM08001	N/A	1,008,124.89	\$ 441.00	\$ 1,218,036
Standard	TSA	MDQ	PKU02308	Greater Tauranga	GTT07701	N/A	497,822.22	\$ 441.00	\$ 601,478
Standard	TSA	MDQ	PKU02308	Kawerau	KAW04405	N/A	16,740.15	\$ 462.00	\$ 21,189
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Caxton)	KAW04410	N/A	250,362.05	\$ 462.00	\$ 316,897
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Tasman)	KAW04411	N/A	640,323.29	\$ 462.00	\$ 810,491
Standard	TSA	MDQ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	N/A	139,521.24	\$ 359.00	\$ 137,228
Standard	TSA	MDQ	PKU02308	Kinleith	KIN02601	N/A	37,816.23	\$ 359.00	\$ 37,195
Standard	TSA	MDQ	PKU02308	Kinleith (CHH mill)	KIN04310	N/A	3,924,026.22	\$ 359.00	\$ 3,859,522
Standard	TSA	MDQ	PKU02308	Lichfield 2	LCF20011	N/A	1,389,086.20	\$ 359.00	\$ 1,366,252
Standard	TSA	MDQ	PKU02308	Lichfield DF	LCF20010	N/A	690,320.00	\$ 359.00	\$ 678,972
Standard	TSA	MDQ	PKU02308	Okoroire Springs	OKS32801	N/A	1,597.61	\$ 359.00	\$ 1,571
Standard	TSA	MDQ	PKU02308	Opotiki	OPO32001	N/A	20,542.36	\$ 503.00	\$ 28,309
Standard	TSA	MDQ	PKU02308	Putaruru	PTR32601	N/A	28,715.74	\$ 359.00	\$ 28,244
Standard	TSA	MDQ	PKU02308	Rangiorua	RAG33401	N/A	108,770.00	\$ 441.00	\$ 131,418
Standard	TSA	MDQ	PKU02308	Reporoa	RPR30801	N/A	721,284.61	\$ 462.00	\$ 912,968
Standard	TSA	MDQ	PKU02308	Rotorua	ROT08101	N/A	596,035.16	\$ 462.00	\$ 754,434
Standard	TSA	MDQ	PKU02308	Taupo	TAU07001	N/A	232,053.32	\$ 462.00	\$ 293,722
Standard	TSA	MDQ	PKU02308	Te Puke	TPK33301	N/A	51,552.97	\$ 441.00	\$ 62,287
Standard	TSA	MDQ	PKU02308	Te Teko	TTK30601	N/A	10,980.06	\$ 482.00	\$ 14,500
Standard	TSA	MDQ	PKU02308	Tirau	TIR33502	N/A	10,848.92	\$ 359.00	\$ 10,671
Standard	TSA	MDQ	PKU02308	Tirau DF	TIR33501	N/A	523,421.62	\$ 359.00	\$ 514,817
Standard	TSA	MDQ	PKU02308	Tokoroa	TKR19701	N/A	192,577.08	\$ 359.00	\$ 189,411
Standard	TSA	MDQ	PKU02308	Waikeria	WKE19201	N/A	36,200.70	\$ 359.00	\$ 35,606
Standard	TSA	MDQ	PKU02308	Whakatane	WHK32101	N/A	97,971.13	\$ 482.00	\$ 129,376
Standard	TSA	MDQ	OFF15901	Pungarehu No 1	PGU13101	N/A	126.66	\$ 82.00	\$ 28
Standard	TSA	MDQ	OFF15901	Pungarehu No 2	PGH15901	N/A	921.99	\$ 82.00	\$ 207
Standard	TSA	MDQ	RTW3203	Alfriston	ALF15501	N/A	8,260.75	\$ 349.00	\$ 7,899
Standard	TSA	MDQ	RTW3203	Drury 1	DRU15101	N/A	314,117.97	\$ 349.00	\$ 300,348
Standard	TSA	MDQ	RTW3203	Flat Bush	FLB15601	N/A	585,095.00	\$ 349.00	\$ 559,447
Standard	TSA	MDQ	RTW3203	Glenbrook	GLB03401	N/A	2,299,643.65	\$ 349.00	\$ 2,198,837
Standard	TSA	MDQ	RTW3203	Greater Auckland	GTA03610	N/A	15,181,816.97	\$ 349.00	\$ 14,516,313
Standard	TSA	MDQ	RTW3203	Harrisville 2	HAR11802	N/A	538,586.85	\$ 349.00	\$ 514,978
Standard	TSA	MDQ	RTW3203	Hunua	HUN15301	N/A	135,309.52	\$ 349.00	\$ 129,378
Standard	TSA	MDQ	RTW3203	Hunua (Nova)	HUN15302	N/A	140,525.00	\$ 349.00	\$ 134,365
Standard	TSA	MDQ	RTW3203	Hunua 3	HUN15303	N/A	51,210.00	\$ 349.00	\$ 48,965
Standard	TSA	MDQ	RTW3203	Kingseat	KIG16801	N/A	3.65	\$ 349.00	\$ 3
Standard	TSA	MDQ	RTW3203	Marsden 2	MSD01802	N/A	8,391.45	\$ 530.00	\$ 12,185
Standard	TSA	MDQ	RTW3203	Pukekohe	PUK04201	N/A	125,650.54	\$ 349.00	\$ 120,143
Standard	TSA	MDQ	RTW3203	Ramarama	RAM15201	N/A	48,703.15	\$ 349.00	\$ 46,568
Standard	TSA	MDQ	RTW3203	Tuakau 2	TUK06502	N/A	913,588.64	\$ 349.00	\$ 873,541
Standard	TSA	MDQ	RTW3203	Waitoki	WTK33901	N/A	322,669.99	\$ 349.00	\$ 308,526
Standard	TSA	MDQ	RTW3203	Waiuku	WUK16901	N/A	72,328.98	\$ 349.00	\$ 69,158
Standard	TSA	MDQ	RTW3203	Warkworth	WRK18901	N/A	26,139.52	\$ 530.00	\$ 37,956
Standard	TSA	MDQ	RTW3203	Wellsford	WEL18301	N/A	1,597.24	\$ 530.00	\$ 2,319
Standard	TSA	MDQ	RTW3203	Whangarei	WHG07501	N/A	197,348.61	\$ 530.00	\$ 286,561
Standard	TSA	MDQ	RTS13201	Greater Hamilton	GTH11301	N/A	2,563,902.06	\$ 191.00	\$ 1,341,658
Standard	TSA	MDQ	TEK28701	Cambridge	CAM17201	N/A	776,640.89	\$ 359.00	\$ 763,874
Standard	TSA	MDQ	TEK28701	Horotiu	HRU16101	N/A	528,119.12	\$ 359.00	\$ 519,438
Standard	TSA	MDQ	TEK28701	Kiwitahi 1 (Peroxide)	KIW34201	N/A	365,000.00	\$ 359.00	\$ 359,000
Standard	TSA	MDQ	TEK28701	Kiwitahi 2	KIW34202	N/A	21,645.00	\$ 359.00	\$ 21,289
Standard	TSA	MDQ	TEK28701	Matangi	MTG17301	N/A	1,706.09	\$ 359.00	\$ 1,678
Standard	TSA	MDQ	TEK28701	Morrinsville	MRV16302	N/A	80,984.85	\$ 359.00	\$ 79,654
Standard	TSA	MDQ	TEK28701	Morrinsville DF	MRV16301	N/A	346,750.00	\$ 359.00	\$ 341,050
Standard	TSA	MDQ	TEK28701	Tatuanui DF	TAT16401	N/A	547,500.00	\$ 359.00	\$ 538,500

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	MDQ	TEK28701	Waitoa	WTA16501	N/A	630,654.45	\$ 359.00	\$ 620,288
Standard	TSA	MDQ	OFF17001	Te Kuiti North	TKN17001	N/A	53,607.10	\$ 359.00	\$ 52,726
Standard	TSA	MDQ	OFF17401	Te Kuiti South	TKS17401	N/A	316,126.50	\$ 359.00	\$ 310,930
Standard	TSA	OR	F4000439	Kapuni (Lactose et al)	KAP12901	No Zone	26,919.20	\$ -	\$ -
Standard	TSA	OR	F4000439	Kapuni GTP	KAP09612	No Zone	-	\$ -	\$ -
Standard	TSA	OR	OFF16601	Huntly	HTL16601	No Zone	298.23	\$ 9.84	\$ 2,933
Standard	TSA	OR	KAP09008	Eltham	ELM12301	No Zone	874.65	\$ 2.25	\$ 1,965
Standard	TSA	OR	KAP09008	Inglewood	IGW11901	No Zone	298.01	\$ 2.25	\$ 670
Standard	TSA	OR	KAP09008	Kaponga	KPA12401	No Zone	6.80	\$ 2.25	\$ 15
Standard	TSA	OR	KAP09008	Stratford	STR10201	No Zone	4,641.35	\$ 2.25	\$ 10,427
Standard	TSA	OR	KAP09004	Dannevirke	DAN05001	No Zone	744.16	\$ 9.84	\$ 7,319
Standard	TSA	OR	KAP09004	Foxton	FOX22101	No Zone	2,752.30	\$ 9.56	\$ 26,317
Standard	TSA	OR	KAP09004	Kaitoke	KTK23901	No Zone	3.44	\$ 9.29	\$ 32
Standard	TSA	OR	KAP09004	Kakariki	KKI23701	No Zone	4,990.86	\$ 9.29	\$ 46,353
Standard	TSA	OR	KAP09004	Kuku	KUK22401	No Zone	71.87	\$ 9.56	\$ 687
Standard	TSA	OR	KAP09004	Lake Alice	LAB20201	No Zone	564.03	\$ 9.29	\$ 5,238
Standard	TSA	OR	KAP09004	Levin	LVN24401	No Zone	1,307.49	\$ 9.81	\$ 12,502
Standard	TSA	OR	KAP09004	Mangaroa	MNG34001	No Zone	2.48	\$ 9.81	\$ 24
Standard	TSA	OR	KAP09004	Mangatainoka	MKG05401	No Zone	-	\$ 9.56	\$ -
Standard	TSA	OR	KAP09004	Marton	MTN23801	No Zone	1,613.21	\$ 9.29	\$ 14,983
Standard	TSA	OR	KAP09004	Matapu	MTP20601	No Zone	174.56	\$ 9.29	\$ 1,621
Standard	TSA	OR	KAP09004	Pahiatua	PHT04901	No Zone	52.97	\$ 9.56	\$ 507
Standard	TSA	OR	KAP09004	Pahiatua DF	PHT04902	No Zone	742.16	\$ 9.56	\$ 7,096
Standard	TSA	OR	KAP09004	Palmerston North	PLN24201	No Zone	1,392.05	\$ 9.56	\$ 13,310
Standard	TSA	OR	KAP09004	Patea	PTA20901	No Zone	50.40	\$ 9.29	\$ 468
Standard	TSA	OR	KAP09004	Takapau	TKP05101	No Zone	1,262.07	\$ 9.84	\$ 12,413
Standard	TSA	OR	KAP09004	Waitotara	WTT20301	No Zone	895.26	\$ 9.29	\$ 8,315
Standard	TSA	OR	KAP09004	Wanganui	WAG21501	No Zone	2,624.84	\$ 9.29	\$ 24,379
Standard	TSA	OR	KAP09004	Waverley	WVY23601	No Zone	2.14	\$ 9.29	\$ 20
Standard	TSA	OR	OFF14501	Ngaruawahia	NGW14501	No Zone	52.80	\$ 9.84	\$ 519
Standard	TSA	OR	None	None	None	Auckland Zone	51,474.48	\$ 9.56	\$ 492,181
Standard	TSA	OR	None	None	None	Edgecumbe Zone	1,991.25	\$ 13.21	\$ 26,295
Standard	TSA	OR	None	None	None	Hastings Zone	16,798.69	\$ 9.84	\$ 165,225
Standard	TSA	OR	None	None	None	Hawera Zone	6,351.84	\$ 9.29	\$ 58,994
Standard	TSA	OR	None	None	None	Kawerau Zone	1,202.11	\$ 12.66	\$ 15,216
Standard	TSA	OR	None	None	None	Kinleith Zone	113,414.74	\$ 9.84	\$ 1,115,504
Standard	TSA	OR	None	None	None	Kiwitahi Zone	150.90	\$ 9.84	\$ 1,484
Standard	TSA	OR	None	None	None	Manawatu Zone	1,776.88	\$ 9.56	\$ 16,990
Standard	TSA	OR	None	None	None	Marsden	746.69	\$ 14.52	\$ 10,842
Standard	TSA	OR	None	None	None	Morrinsville Zone	684.70	\$ 9.84	\$ 6,734
Standard	TSA	OR	None	None	None	New Plymouth Zone	6,080.63	\$ 2.25	\$ 13,661
Standard	TSA	OR	None	None	None	Okaia-Manaia Zone	14.01	\$ 9.29	\$ 130
Standard	TSA	OR	None	None	None	South Auckland Rural Zone	7,775.69	\$ 9.56	\$ 74,348
Standard	TSA	OR	None	None	None	Tirau Zone	126.05	\$ 9.84	\$ 1,240
Standard	TSA	OR	None	None	None	Wellington Zone	35,084.42	\$ 11.81	\$ 414,285
Standard	TSA	OR	None	None	None	Western BayOfPlenty Zone	3,276.46	\$ 12.08	\$ 39,587
Standard	TSA	OR	OFF16701	Oakura	OKU16701	No Zone	279.80	\$ 2.25	\$ 629
Standard	TSA	OR	OFF13201	Okato	OKA13201	No Zone	99.89	\$ 2.25	\$ 224
Standard	TSA	OR	OFF13001	Opunake	OPK13001	No Zone	158.84	\$ 2.25	\$ 357
Standard	TSA	OR	OFF14101	Otorohanga	OTO14101	No Zone	346.20	\$ 9.84	\$ 3,405
Standard	TSA	OR	OFF31101	Pirongia	PIR31101	No Zone	30.69	\$ 9.84	\$ 302
Standard	TSA	OR	OFF31101	Te Awamutu DF	TAC31001	No Zone	33,585.95	\$ 9.84	\$ 330,339
Standard	TSA	OR	PKU02308	Broadlands	BRO36301	No Zone	302.37	\$ 12.66	\$ 3,827
Standard	TSA	OR	PKU02308	Gisborne	GIS07810	No Zone	1,288.34	\$ 13.78	\$ 17,754
Standard	TSA	OR	PKU02308	Kihikihiki (Te Awamutu)	KIH19101	No Zone	4,241.93	\$ 9.84	\$ 41,722
Standard	TSA	OR	PKU02308	Lichfield 2	LCF20011	No Zone	-	\$ 9.84	\$ -
Standard	TSA	OR	PKU02308	Lichfield DF	LCF20010	No Zone	5,757.01	\$ 9.84	\$ 56,624
Standard	TSA	OR	PKU02308	Okoroire Springs	OKS32801	No Zone	15.35	\$ 9.84	\$ 151
Standard	TSA	OR	PKU02308	Opotiki	OPO32001	No Zone	1,049.65	\$ 13.78	\$ 14,465
Standard	TSA	OR	PKU02308	Putaruru	PTR32601	No Zone	2,508.82	\$ 9.84	\$ 24,676
Standard	TSA	OR	PKU02308	Rangioru	RAG33401	No Zone	2.65	\$ 12.08	\$ 32
Standard	TSA	OR	PKU02308	Reporoa	RPR30801	No Zone	3,677.44	\$ 12.66	\$ 46,547
Standard	TSA	OR	PKU02308	Rotorua	ROT08101	No Zone	1,387.03	\$ 12.66	\$ 17,556

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	OR	PKU02308	Taupo	TAU07001	No Zone	979.85	\$ 12.66	\$ 12,402
Standard	TSA	OR	PKU02308	Te Teko	TTK30601	No Zone	20.74	\$ 13.21	\$ 274
Standard	TSA	OR	PKU02308	Tokoroa	TKR19701	No Zone	2,317.81	\$ 9.84	\$ 22,797
Standard	TSA	OR	PKU02308	Waikeria	WKE19201	No Zone	-	\$ 9.84	\$ -
Standard	TSA	OR	PKU02308	Whakatane	WHK32101	No Zone	1,477.64	\$ 13.21	\$ 19,513
Standard	TSA	OR	OFF15901	Pungarehu No 1	PGU13101	No Zone	22.25	\$ 2.25	\$ 50
Standard	TSA	OR	OFF15901	Pungarehu No 2	PGH15901	No Zone	11.76	\$ 2.25	\$ 26
Standard	TSA	OR	RTW3203	Glenbrook	GLB03401	No Zone	8,664.29	\$ 9.56	\$ 82,845
Standard	TSA	OR	RTW3203	Waiuku	WKU16901	No Zone	-	\$ 9.56	\$ -
Standard	TSA	OR	RTW3203	Warkworth	WRK18901	No Zone	15,410.15	\$ 14.52	\$ 223,764
Standard	TSA	OR	RTW3203	Wellsford	WEL18301	No Zone	182.54	\$ 14.52	\$ 2,651
Standard	TSA	OR	RTW3203	Whangarei	WHG07501	No Zone	1,288.17	\$ 14.52	\$ 18,705
Standard	TSA	OR	RTS13201	Greater Hamilton	GTH11301	No Zone	7,047.94	\$ 5.23	\$ 36,881
Standard	TSA	OR	TEK28701	Cambridge	CAM17201	No Zone	4,231.31	\$ 9.84	\$ 41,617
Standard	TSA	OR	TEK28701	Horotiu	HRU16101	No Zone	2,375.60	\$ 9.84	\$ 23,365
Standard	TSA	OR	TEK28701	Matangi	MTG17301	No Zone	10.73	\$ 9.84	\$ 105
Standard	TSA	OR	TEK28701	Tatuanui DF	TAT16401	No Zone	-	\$ 9.84	\$ -
Standard	TSA	OR	TEK28701	Waitoa	WTA16501	No Zone	1,424.26	\$ 9.84	\$ 14,008
Standard	TSA	OR	OFF17001	Te Kuiti North	TKN17001	No Zone	1,486.10	\$ 9.84	\$ 14,617
Standard	TSA	OR	OFF17401	Te Kuiti South	TKS17401	No Zone	20.20	\$ 9.84	\$ 199
Standard	Kapuni (Lac)	GJ	F4000439	Kapuni (Lactose et al)	KAP12901	N/A	26,732.23	\$ 0.34	\$ 9,089
Standard	Ballance Am	GJ	F4000439	Ballance 8201	BAL08201	N/A	3,024,690.00	\$ 0.34	\$ 1,028,395
Standard	Ballance Am	GJ	F4000439	Ballance 9626	BAL09626	N/A	3,744,334.00	\$ 0.34	\$ 1,273,074
Standard	Stratford 2	GJ	F4000439	Stratford 2	STR00521	N/A	767,239.00	\$ 1.06	\$ 260,861
Standard	Stratford 3	GJ	F4000439	Stratford 3 Delivery Po	STR00511	N/A	7,895,543.69	\$ 0.34	\$ 2,684,485
Standard	TCC (Taranaki)	GJ	F4000439	TCC (Taranaki Combin	TCC00201	N/A	3,044,579.12	\$ 0.34	\$ 1,035,157

Appendix 3: $P_{i,2022}, Q_{i,2022}$ from non-standard prices for the 2022 Assessment Period

								Pi2022, Qi2022
Revenue from non-standard prices								\$ 13,262,429
Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
FGL17001	DAY	Auckland District Health Board - SA	Greater Auckland	GTA03610	N/A	365	217.99	\$ 79,568.10
FGL17001	OR	Auckland District Health Board - SA	Greater Auckland	GTA03610	N/A	-	9.56	\$ -
FGL17001	GJ	Auckland District Health Board - SA	Greater Auckland	GTA03610	N/A	174,626	0.44	\$ 77,132.46
FGL17031	MDQ	CHH Penrose - SA	Greater Auckland	GTA03610	N/A	182	1,001.10	\$ 182,199.45
FGL17031	OR	CHH Penrose - SA	Greater Auckland	GTA03610	N/A	307	9.56	\$ 2,939.24
FGL17031	GJ	CHH Penrose - SA	Greater Auckland	GTA03610	N/A	205,628	0.17	\$ 34,956.81
FGL17007	Other	Hastings Delivery Point Charges - RTL	Hastings (Nova)	HST05203	N/A	12	150.00	\$ 1,800.00
FGL17008	Other	Hawera Delivery Point Charges - RTL	Hawera (Nova)	HWA20802	N/A	12	75.00	\$ 900.00
FGL17009	Other	Hunua Delivery Point Charges - RTL	Hunua (Nova)	HUN15302	N/A	12	101.25	\$ 1,215.00
FGL17010	MDQ	Kapuni To Pokuru 2 - ISC	Pokuru 2 Delivery	PKD02402	N/A	1,902,271	0.43	\$ 817,976.53
FGL17011	DAY	Kauri and Maungatoroto Dairy Factories	Northland Dairy Factories	NDF33601	N/A	365	5,794.60	\$ 2,115,030.25
FGL17011	OR	Kauri and Maungatoroto Dairy Factories	Northland Dairy Factories	NDF33601	N/A	1,566	14.96	\$ 23,426.37
FGL17011	GJ	Kauri and Maungatoroto Dairy Factories	Northland Dairy Factories	NDF33601	N/A	938,168	0.07	\$ 60,980.94
FGL17012	MDQ	Kupe to Frankley Road - ISC	Frankley Road-Bi	F4000439	N/A	1,000,904	0.34	\$ 340,307.36
FGL17012	OR	Kupe to Frankley Road - ISC	Frankley Road-Bi	F4000439	N/A	6,786	2.33	\$ 15,811.38
FGL17015	MDQ	PanPac Hastings IUC	Hastings	HST05210	N/A	291,247	0.72	\$ 209,697.84
FGL17015	OR	PanPac Hastings IUC	Hastings	HST05210	N/A	12,160	9.66	\$ 117,465.78
FGL17016	MDQ	Refining New Zealand - IUC	Marsden 1	MSD01801	N/A	-	-	\$ -
FGL17036	MDQ	Refining New Zealand - SA	Marsden 1	MSD01801	N/A	182	15,322.08	\$ 2,788,618.59
FGL17036	OR	Refining New Zealand - SA	Marsden 1	MSD01801	N/A	-	14.96	\$ -
FGL17036	GJ	Refining New Zealand - SA	Marsden 1	MSD01801	N/A	642,710	0.07	\$ 41,776.15
FGL17017	OR	Rimu Production Station - SA	Mokoia	MOK35801	N/A	296	8.78	\$ 2,598.88
FGL17017	GJ	Rimu Production Station - SA	Mokoia	MOK35801	N/A	662	1.08	\$ 714.96
FGL17018	DAY	Southern Paprika Warkworth - SA	Warkworth	WRK18901	N/A	365	693.70	\$ 253,200.00
FGL17018	OR	Southern Paprika Warkworth - SA	Warkworth	WRK18901	N/A	-	14.52	\$ -
FGL17018	GJ	Southern Paprika Warkworth - SA	Warkworth	WRK18901	N/A	229,968	0.57	\$ 131,081.81
FGL17021	Other	Stratford Peaker Power Station - ICA	Stratford 2	STR00521	N/A	365	39.17	\$ 14,295.25
FGL17023	DAY	Supplementary Agreement - Kupe to Frankley Road	Frankley Road out to Maui	FOUT0001	N/A	365	8,793.45	\$ 3,209,607.46
FGL17023	OR	Supplementary Agreement - Kupe to Frankley Road	Frankley Road out to Maui	FOUT0001	N/A	-	0.68	\$ -
FGL17023	GJ	Supplementary Agreement - Kupe to Frankley Road	Frankley Road out to Maui	FOUT0001	N/A	16,594,412	-	\$ -
FGL17024	DAY	Supplementary Agreement - Kupe to Kapuni	Kapuni GTP	KAP09612	N/A	365	1.00	\$ 365.00
FGL17024	OR	Supplementary Agreement - Kupe to Kapuni	Kapuni GTP	KAP09612	N/A	9,926	0.68	\$ 6,749.39
FGL17024	GJ	Supplementary Agreement - Kupe to Kapuni	Kapuni GTP	KAP09612	N/A	6,720,578	-	\$ -
FGL17026	Other	Tawa B Delivery Point Charges - RTL	Tawa B (Nova)	TWB24810	N/A	12	3,338.61	\$ 40,063.33
FGL17027	Other	TCC - ICA	TCC (Taranaki Combined Cycle)	TCC00201	N/A	365	39.17	\$ 14,295.25
FGL17006	Other	Te Rapa Cogen - ICA	Te Rapa Cogen	TRC02003	N/A	365	36.63	\$ 13,369.95
FGL17005	DAY	Te Rapa Cogen - SA	Te Rapa Cogen	TRC02003	N/A	365	2,518.21	\$ 919,146.65
FGL17005	OR	Te Rapa Cogen - SA	Te Rapa Cogen	TRC02003	N/A	-	1.12	\$ -
FGL17005	GJ	Te Rapa Cogen - SA	Te Rapa Cogen	TRC02003	N/A	3,589,733	0.08	\$ 287,178.64
FGL17030	DAY	Whakatane Mill Limited - SA	Whakatane	WHK32101	N/A	365	3,829.00	\$ 1,397,585.00
FGL17030	OR	Whakatane Mill Limited - SA	Whakatane	WHK32101	N/A	-	14.88	\$ -
FGL17030	GJ	Whakatane Mill Limited - SA	Whakatane	WHK32101	N/A	1,006,250	0.06	\$ 60,375.00

STP charges¹⁰

PI2022, Q12022

STP charges

\$ 2,390,310

Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point Zone	Quantity	Price	Total
Frankley Rd to	Gj	F4000439	Kupe Delivery Point	KUP37503	N/A	3	0.34 \$ 1.07
Frankley Road	Gj	F4000439	Kaimiro Mixing Station Delivery	KAI07602	N/A	7,073	0.34 \$ 2,404.82
Frankley Road	Gj	F4000439	Kapuni GTP	KAP09612	N/A	4,687,804	0.34 \$ 1,593,853.21
Kaimiro to Fran	Gj	KAI07601	Frankley Road-Bi	F4000439	N/A	-	0.34 \$ -
Kaimiro to Kapu	Gj	KAI07601	Kapuni GTP	KAP09612	N/A	526,268	0.34 \$ 178,931.12
Kapuni GTP to f	Gj	KAP09009	Frankley Road-Bi	F4000439	N/A	1,809,176	0.34 \$ 615,119.97
Kupe to Frankle	Gj	KUP37501	Frankley Road-Bi	F4000439	N/A	-	0.34 \$ -
Kupe to Kapuni	Gj	KUP37501	Kapuni GTP	KAP09612	N/A	-	0.34 \$ -

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 2017* has been prepared in accordance with all the relevant requirements.



Director: Mark Adrian Ratcliffe



Director: Fiona Ann Oliver

25 November 2022

Date

25 November 2022

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 2017

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 2017 consolidating all amendments as of 18 December 2018 (the “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 2022.

In our opinion, in all material respects:

- As 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 clauses 11.5 and 11.6 of the Determination in preparing the Compliance Statement for the assessment period ended 30 September 2022.

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 Determination, for the identification of risks that may threaten compliance with the Determination, controls that would mitigate those risks, and monitoring the Company’s ongoing compliance.

Our Independence and Quality Control

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.

In accordance with the Professional and Ethical Standard 3 (Amended) *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance Engagements* or other professional requirements, or requirements in law or regulation, that are at least as demanding, our firm 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.



We are independent of the Company. In addition to our role as auditors, our firm carries out other assurance services for the Company in the areas of Gas Distribution Services: Default price-quality path compliance statement and Disclosure Information, including as independent appraiser of related party transactions. Additionally, we have performed agreed upon procedures on distribution pricing and corporate models, and modelling services for the Future Gas Working Group, of which First Gas 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 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 2022, has been prepared, in all material respects, in accordance with the requirements in clauses 11.5 to 11.6 of the Determination.

SAE 3100 (Revised) requires that we plan and perform our procedures to obtain reasonable assurance about whether the Company has complied, in all material respects, with the Determination in preparing the Compliance Statement for the assessment period ended 30 September 2022.

An assurance engagement to report on the Company's compliance with the 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 Determination will continue in the future.

Use of Report

This report has been prepared for the Directors and the Commerce Commission in accordance with clause 11.5(d) and schedule 11 of the Determination 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 stylized, handwritten-style signature of 'PricewaterhouseCoopers' in a dark grey or black ink.

Chartered Accountants
25 November 2022

Christchurch, New Zealand