



COMPLIANCE STATEMENT

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

Assessment Period 1 October 2023 – 30 September 2024



Introduction

Firstgas is based in the energy-rich region of Taranaki. Firstgas owns more than 2,500 km of high-pressure gas transmission pipelines and stations that are essential to supplying natural gas to industrial customers throughout the North Island.

Firstgas also owns 4,800kms of gas distribution networks across the North Island. These networks extend north as far as Northland and south as far as Kāpiti, as well as covering Waikato, Hawkes Bay, Gisborne and the Bay of Plenty. Through these distribution networks, Firstgas directly connects more than 67,000+ homes and businesses to gas.

Firstgas has relationships with more than 4,500 landowners and iwi who have transmission pipelines running through their properties and land. We work in partnership with them as well as our contractors to keep them safe, while living and working around our pipelines.

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

Compliance Statement

This document is a Compliance Statement prepared pursuant to section 12.1 – 12.2 of the *Gas Transmission Services Default Price-Quality Path Determination 2022*. This Compliance Statement covers Firstgas' gas transmission business (GTB) for the year ended 30 September 2024.

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 18 February 2025.

Compliance status for year ended 30 September 2024

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

Further information

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Disclaimer

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

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1. Wash-up amount compliance

First Gas Limited (Firstgas) is pleased to confirm that we have complied with the requirement to calculate the Wash-up Amount in clause 8.4 of the DPP Determination for the Assessment Period from 1 October 2023 to 30 September 2024. This is the second Assessment Period in this DPP period (2022 – 2026).

1.1 Determining the wash-up amount

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

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

1.2 Actual allowable revenue

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

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

Actual net allowable revenue

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

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

Where

$$\Delta \text{CPI} = \frac{\text{CPI}_{\text{Dec},t-1} + \text{CPI}_{\text{Mar},t} + \text{CPI}_{\text{Jun},t} + \text{CPI}_{\text{Sep},t}}{\text{CPI}_{\text{Dec},t-2} + \text{CPI}_{\text{Mar},t-1} + \text{CPI}_{\text{Jun},t-1} + \text{CPI}_{\text{Sep},t-1}} - 1$$

$$X = \text{The annual rate of change as specified in schedule 2 is } -8.50\%$$

$$\text{Actual net allowable revenue (2024)} = \$147.227 \text{ million} \times (1 + 3.53\%) \times (1 - (-8.5\%))$$

$$= \$165.375 \text{ million}$$

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 2024).

Table 1: Pass-through and Recoverable costs

Pass-through and Recoverable Costs	Incurred in the year ended 30 September 2024
	\$000
Rates and Levies	\$2,563
Balancing gas costs and revenue	\$5,020
Mokau Compressor fuel gas costs	\$1,621
Capex wash-up adjustment	\$1,518
Total actual pass-through costs and recoverable costs	\$10,722

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

The revenue wash-up draw down amount for the second Assessment Period calculated following the requirements of Schedule 8 of the DPP Determination is **\$13.011 million**. The revenue wash-up draw down amount refers to revenue under-recovered in the FY2023 period, and includes an adjustment to recognise the time value of money as specified in the DPP Determination.

Calculation of actual allowable revenue

$$\begin{aligned}
 \text{Actual allowable revenue} &= \$165.375 \text{ million} + \$10.722 \text{ million} + \$13.011 \text{ million} \\
 &= \mathbf{\$189.108 \text{ million}}
 \end{aligned}$$

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 02 August 2023,² the prices for the Maui pipeline for the 2023/24 pricing year³ were as follows:

Tariff	Value for 2023/24
Tariff 1 (\$ per GJ.km)	0.002623
Tariff 2 (\$ per GJ)	0.119590

The Actual Revenue from Prices for the Maui pipeline in 2023/24 was:

Tariff	Actual Quantity	Price	Total (\$million)
Tariff 1	12,590,788,806.681 GJ.km	\$0.002623 per GJ.km	\$33.026
Tariff 2	108,687,758.800 GJ	\$0.119590 per GJ	\$12.998
Actual Revenue from Prices			\$46.024

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 2023/24 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 **\$136.642 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 [Notice regarding MPOC tariffs from 1 October 2023](#)

³ The 2023/24 pricing year is for the period 1 October 2023 to 30 September 2024. The pricing year is the same as the Assessment Period.

⁴ [Gas transmission code](#)

Total Actual Revenue from Prices

The total Actual Revenue from Prices is **\$182.666 million**.

$$\begin{aligned}
 \text{Actual Revenue from prices} &= \text{Actual Revenue from Prices (Maui)} + \text{Actual Revenue from Prices (Non-Maui)} \\
 &= \$46.024 \text{ million} + \$136.642 \text{ million} \\
 &= \$182.666 \text{ million}^5
 \end{aligned}$$

Other regulated income

Firstgas recorded -(\$0.418 million) in other regulated income for the 2023/24 Assessment Period.

Calculation of actual revenue

$$\begin{aligned}
 \text{Actual Revenue for 2023/24} &= \$182.666 \text{ million} + -(\$0.418 \text{ million}) \\
 &= \$182.248 \text{ million}
 \end{aligned}$$

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:

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

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

$$\begin{aligned}
 \text{Revenue reduction percentage} &= 1 - (\text{actual revenue from prices} \div \text{forecast revenue from prices}) \\
 &= 1 - (\$182.666 \text{ million} \div \$185.265 \text{ million}) \\
 &= 1.4\%
 \end{aligned}$$

⁵ Actual revenue is based on quantities relating to the 12-month 2024 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**.

$$\begin{aligned}
 \text{Revenue foregone} &= \text{Actual net allowable revenue from prices x (revenue reduction percentage -20\%⁶)} \\
 &= \$165.375 \text{ million x 0\%} \\
 &= \$0
 \end{aligned}$$

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 **\$6.860 million**.

$$\begin{aligned}
 \text{Wash-Up Amount (\$million)} &= \text{Actual allowable revenue – actual revenue – revenue forgone} \\
 &= \$189.108 \text{ million - } \$182.248 \text{ million - } \$0 \\
 &= \$6.860 \text{ million}
 \end{aligned}$$

This amount will be passed into prices and recovered from consumers in the pricing year 1 October 2025 to 30 September 2026.

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 16655 – 20 June 2024

Transpower Northland electricity outage – loss of power supply to Gas Transmission sites.

Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative already in the area affected.

Event 17544 – 25 September 2024

Mt Maunganui DP loss of supply - Critical Contingency.

Response Time to Emergency (RTE) of 180 minutes was achieved, with a Gas Transmission Business (GTB) representative arriving at the scene 64 minutes after the GTB became aware of the issue.

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.

2.2 Major Interruptions

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.

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 FY2024 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* (March 2024) available from <https://cco.org.nz/publications/>

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

Pi2024, Qi2024

Total	\$	136,641,938
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Transmission standard charges between 1 October 2023 and 30 September 2024	\$	125,510,176
Transmission non-standard charges between 1 October 2023 and 30 September 2024	\$	5,463,588
Transmission STP charges between 1 October 2023 and 30 September 2024	\$	4,447,778
Charges billed outside of OATIS between 1 October 2023 and 30 September 2024	\$	1,220,395

Appendix 2: $P_{i,2024}Q_{i,2024}$ from standard prices for the 2024 Assessment Period

										Pi2024, Qi2024	
Standard charges										\$ 125,510,176	
Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total		
Standard	TSA	MDQ	F4000439	Kapuni (Lactose et al)	KAP12901	N/A	-	\$ -	\$ -		
Standard	TSA	MDQ	F4000439	Kapuni GTP	KAP09612	N/A	-	\$ -	\$ -		
Standard	TSA	MDQ	OFF16601	Huntly	HTL16601	N/A	63,456.15	\$ 519.00	\$ 89,983		
Standard	TSA	MDQ	KAP09008	Eltham	ELM12301	N/A	203,153.79	\$ 118.00	\$ 65,498		
Standard	TSA	MDQ	KAP09008	Inglewood	IGW11901	N/A	38,952.74	\$ 118.00	\$ 12,559		
Standard	TSA	MDQ	KAP09008	Kaponga	KPA12401	N/A	1,802.95	\$ 118.00	\$ 581		
Standard	TSA	MDQ	KAP09008	New Plymouth	NPL12101	N/A	1,073,251.11	\$ 118.00	\$ 346,021		
Standard	TSA	MDQ	KAP09008	Stratford	STR10201	N/A	110,750.27	\$ 118.00	\$ 35,706		
Standard	TSA	MDQ	KAP09008	Waitara	WTR12001	N/A	88,514.16	\$ 118.00	\$ 28,537		
Standard	TSA	MDQ	KAP09004	Ashhurst	ASH34301	N/A	15,375.73	\$ 504.00	\$ 21,173		
Standard	TSA	MDQ	KAP09004	Belmont	BEL24510	N/A	1,891,319.37	\$ 624.00	\$ 3,224,544		
Standard	TSA	MDQ	KAP09004	Dannevirke	DAN05001	N/A	81,909.96	\$ 519.00	\$ 116,151		
Standard	TSA	MDQ	KAP09004	Feilding	FLD03001	N/A	315,685.56	\$ 504.00	\$ 434,715		
Standard	TSA	MDQ	KAP09004	Flockhouse	FLH21901	N/A	271.94	\$ 504.00	\$ 374		
Standard	TSA	MDQ	KAP09004	Foxton	FOX22101	N/A	53,726.57	\$ 504.00	\$ 73,984		
Standard	TSA	MDQ	KAP09004	Greater Kapiti	GWP20102	N/A	274,259.34	\$ 624.00	\$ 467,590		
Standard	TSA	MDQ	KAP09004	Greater Waitangirua	GTW06910	N/A	609,407.14	\$ 624.00	\$ 1,038,989		
Standard	TSA	MDQ	KAP09004	Hastings	HST05210	N/A	2,396,649.65	\$ 519.00	\$ 3,398,528		
Standard	TSA	MDQ	KAP09004	Hastings (Nova)	HST05203	N/A	274,795.57	\$ 519.00	\$ 389,669		
Standard	TSA	MDQ	KAP09004	Hawera	HWA20801	N/A	367,693.22	\$ 490.00	\$ 492,267		
Standard	TSA	MDQ	KAP09004	Hawera (Nova)	HWA20802	N/A	40,718.99	\$ 490.00	\$ 54,515		
Standard	TSA	MDQ	KAP09004	Kairanga	KRG24101	N/A	333.79	\$ 504.00	\$ 460		
Standard	TSA	MDQ	KAP09004	Kaitoke	KT23901	N/A	30,020.00	\$ 490.00	\$ 40,191		
Standard	TSA	MDQ	KAP09004	Kakariki	KKI23701	N/A	119,289.69	\$ 490.00	\$ 159,705		
Standard	TSA	MDQ	KAP09004	Kuku	KUK22401	N/A	1,147.76	\$ 504.00	\$ 1,581		
Standard	TSA	MDQ	KAP09004	Lake Alice	LAB20201	N/A	58,159.84	\$ 490.00	\$ 77,864		
Standard	TSA	MDQ	KAP09004	Levin	LVN24401	N/A	328,405.39	\$ 504.00	\$ 452,230		
Standard	TSA	MDQ	KAP09004	Longburn	LNB24301	N/A	302,980.15	\$ 504.00	\$ 417,219		
Standard	TSA	MDQ	KAP09004	Manaia	MNA23402	N/A	18,939.30	\$ 490.00	\$ 25,356		
Standard	TSA	MDQ	KAP09004	Mangaroa	MNG34001	N/A	27,897.00	\$ 519.00	\$ 39,559		
Standard	TSA	MDQ	KAP09004	Mangatainoka	MGK05401	N/A	-	\$ -	\$ -		
Standard	TSA	MDQ	KAP09004	Marton	MTN23801	N/A	243,942.72	\$ 490.00	\$ 326,590		
Standard	TSA	MDQ	KAP09004	Matapu	MTP20601	N/A	2,268.62	\$ 490.00	\$ 3,037		
Standard	TSA	MDQ	KAP09004	Oroua Downs	ORD24701	N/A	27.82	\$ 504.00	\$ 38		
Standard	TSA	MDQ	KAP09004	Otaki	OTA22601	N/A	20,682.66	\$ 624.00	\$ 35,262		
Standard	TSA	MDQ	KAP09004	Pahiatua	PHT04901	N/A	10,331.32	\$ 504.00	\$ 14,227		
Standard	TSA	MDQ	KAP09004	Pahiatua DF	PHT04902	N/A	948,219.10	\$ 504.00	\$ 1,305,744		
Standard	TSA	MDQ	KAP09004	Palmerston North	PLN24201	N/A	1,112,459.58	\$ 504.00	\$ 1,531,912		
Standard	TSA	MDQ	KAP09004	Patea	PTA20901	N/A	24,618.29	\$ 490.00	\$ 32,959		
Standard	TSA	MDQ	KAP09004	Pauatahanui 2	PAH23101	N/A	512.40	\$ 624.00	\$ 874		
Standard	TSA	MDQ	KAP09004	Takapau	TKP05101	N/A	137,098.49	\$ 519.00	\$ 194,410		
Standard	TSA	MDQ	KAP09004	Tawa A	TWA35610	N/A	2,771,652.87	\$ 624.00	\$ 4,725,441		
Standard	TSA	MDQ	KAP09004	Tawa B (Nova)	TWB24810	N/A	435,259.11	\$ 624.00	\$ 742,081		
Standard	TSA	MDQ	KAP09004	Te Horo	THO22701	N/A	705.79	\$ 624.00	\$ 1,203		
Standard	TSA	MDQ	KAP09004	Waitotara	WTT20301	N/A	35,046.70	\$ 490.00	\$ 46,920		
Standard	TSA	MDQ	KAP09004	Wanganui	WAG21501	N/A	1,526,553.92	\$ 490.00	\$ 2,043,747		
Standard	TSA	MDQ	KAP09004	Waverley	WVY23601	N/A	309.93	\$ 490.00	\$ 415		
Standard	TSA	MDQ	OFF14501	Ngaruawahia	NGW14501	N/A	7,113.73	\$ 519.00	\$ 10,088		
Standard	TSA	MDQ	None	None	None	N/A	-	\$ -	\$ -		

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID Zone	Quantity	Price	Total
Standard	TSA	MDQ	OFF16701	Oakura	OKU16701	15,462.35	\$ 118.00	\$ 4,985
Standard	TSA	MDQ	OFF13201	Okato	OKA13201	2,248.34	\$ 118.00	\$ 725
Standard	TSA	MDQ	OFF13001	Opunake	OPK13001	13,003.61	\$ 118.00	\$ 4,192
Standard	TSA	MDQ	OFF14101	Otorohanga	OTO14101	14,953.74	\$ 519.00	\$ 21,205
Standard	TSA	MDQ	OFF31101	Pirongia	PIR31101	2,361.22	\$ 519.00	\$ 3,348
Standard	TSA	MDQ	OFF31101	Te Awamutu DF	TAC31001	692,587.88	\$ 519.00	\$ 982,112
Standard	TSA	MDQ	PKU02308	Broadlands	BRO36301	74,979.08	\$ 667.00	\$ 136,642
Standard	TSA	MDQ	PKU02308	Edgecumbe	EGC30702	2,233.33	\$ 697.00	\$ 4,253
Standard	TSA	MDQ	PKU02308	Edgecumbe DF	EGC30701	1,178,482.38	\$ 697.00	\$ 2,244,268
Standard	TSA	MDQ	PKU02308	Gisborne	GIS07810	407,035.67	\$ 728.00	\$ 809,623
Standard	TSA	MDQ	PKU02308	Greater Mt Maunganui	GMM08001	987,300.72	\$ 638.00	\$ 1,721,032
Standard	TSA	MDQ	PKU02308	Greater Tauranga	GTT07701	485,038.90	\$ 638.00	\$ 845,505
Standard	TSA	MDQ	PKU02308	Kawerau	KAW04405	12,458.55	\$ 667.00	\$ 22,705
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Caxton)	KAW04410	250,274.97	\$ 667.00	\$ 456,102
Standard	TSA	MDQ	PKU02308	Kawerau (ex-Tasman)	KAW04411	637,956.55	\$ 667.00	\$ 1,162,615
Standard	TSA	MDQ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	128,163.58	\$ 519.00	\$ 181,740
Standard	TSA	MDQ	PKU02308	Kinleith	KIN02601	37,181.74	\$ 519.00	\$ 52,725
Standard	TSA	MDQ	PKU02308	Kinleith (CHH mill)	KIN04310	4,099,196.60	\$ 519.00	\$ 5,812,795
Standard	TSA	MDQ	PKU02308	Lichfield 2	LCF20011	743,927.23	\$ 519.00	\$ 1,054,913
Standard	TSA	MDQ	PKU02308	Lichfield DF	LCF20010	631,561.66	\$ 519.00	\$ 895,575
Standard	TSA	MDQ	PKU02308	Okoroire Springs	OKS32801	3,391.55	\$ 519.00	\$ 4,809
Standard	TSA	MDQ	PKU02308	Opotiki	OPO32001	17,229.35	\$ 728.00	\$ 34,270
Standard	TSA	MDQ	PKU02308	Putaruru	PTR32601	35,808.82	\$ 519.00	\$ 50,778
Standard	TSA	MDQ	PKU02308	Rangiora	RAG33401	108,704.00	\$ 638.00	\$ 189,486
Standard	TSA	MDQ	PKU02308	Reporoa	RPR30801	356,032.34	\$ 667.00	\$ 648,835
Standard	TSA	MDQ	PKU02308	Reporoa DF	RPR30802	261,355.84	\$ 667.00	\$ 476,296
Standard	TSA	MDQ	PKU02308	Rotorua	ROT08101	466,397.38	\$ 667.00	\$ 849,965
Standard	TSA	MDQ	PKU02308	Taupou	TAU07001	184,463.25	\$ 667.00	\$ 336,167
Standard	TSA	MDQ	PKU02308	Tauriko	TKO39301	755,087.45	\$ 638.00	\$ 1,316,245
Standard	TSA	MDQ	PKU02308	Te Puke	TPK33301	66,675.77	\$ 638.00	\$ 116,227
Standard	TSA	MDQ	PKU02308	Te Teko	TTK30601	3,445.89	\$ 697.00	\$ 6,562
Standard	TSA	MDQ	PKU02308	Tirau	TIR33502	5,515.50	\$ 519.00	\$ 7,821
Standard	TSA	MDQ	PKU02308	Tirau DF	TIR33501	250,402.70	\$ 519.00	\$ 355,079
Standard	TSA	MDQ	PKU02308	Tokoroa	TKR19701	163,234.89	\$ 519.00	\$ 231,472
Standard	TSA	MDQ	PKU02308	Waikeria	WKE19201	34,340.00	\$ 519.00	\$ 48,695
Standard	TSA	MDQ	PKU02308	Whakatane	WHK32101	103,332.49	\$ 697.00	\$ 196,783
Standard	TSA	MDQ	OFF15901	Pungarehu No 1	PGU13101	111.63	\$ 118.00	\$ 36
Standard	TSA	MDQ	OFF15901	Pungarehu No 2	PGH15901	512.40	\$ 118.00	\$ 165
Standard	TSA	MDQ	RTW3203	Alfriston	ALF15501	-	\$ -	\$ -
Standard	TSA	MDQ	RTW3203	Drury 1	DRU15101	45,746.32	\$ 504.00	\$ 62,995
Standard	TSA	MDQ	RTW3203	Flat Bush	FLB15601	495,763.78	\$ 504.00	\$ 682,691
Standard	TSA	MDQ	RTW3203	Glenbrook	GLB03401	2,230,028.99	\$ 504.00	\$ 3,070,860
Standard	TSA	MDQ	RTW3203	Greater Auckland	GTA03610	15,386,401.71	\$ 504.00	\$ 21,187,832
Standard	TSA	MDQ	RTW3203	Harrisville 2	HAR11802	716,416.11	\$ 504.00	\$ 986,540
Standard	TSA	MDQ	RTW3203	Hunua	HUN15301	135,225.57	\$ 504.00	\$ 186,212
Standard	TSA	MDQ	RTW3203	Hunua (Nova)	HUN15302	84,710.49	\$ 504.00	\$ 116,651
Standard	TSA	MDQ	RTW3203	Hunua 3	HUN15303	36,600.00	\$ 504.00	\$ 50,400
Standard	TSA	MDQ	RTW3203	Kingseat	KIG16801	3.66	\$ 504.00	\$ 5
Standard	TSA	MDQ	RTW3203	Marsden 2	MSD01802	19,149.76	\$ 766.00	\$ 40,078
Standard	TSA	MDQ	RTW3203	Pukekohe	PUK04201	134,745.68	\$ 504.00	\$ 185,551
Standard	TSA	MDQ	RTW3203	Ramarama	RAM15201	58,713.08	\$ 504.00	\$ 80,851
Standard	TSA	MDQ	RTW3203	Tuakau 2	TUK06502	473,131.16	\$ 504.00	\$ 651,525
Standard	TSA	MDQ	RTW3203	Waitoki	WTK33901	316,041.04	\$ 504.00	\$ 435,204
Standard	TSA	MDQ	RTW3203	Waiuku	WKU16901	55,332.25	\$ 504.00	\$ 76,195
Standard	TSA	MDQ	RTW3203	Warkworth	WRK18901	23,225.76	\$ 766.00	\$ 48,609
Standard	TSA	MDQ	RTW3203	Wellsford	WEL18301	2,186.77	\$ 766.00	\$ 4,577
Standard	TSA	MDQ	RTW3203	Whangarei	WHG07501	194,126.21	\$ 766.00	\$ 406,286
Standard	TSA	MDQ	RTS13201	Greater Hamilton	GTH11301	2,355,571.33	\$ 392.00	\$ 2,522,907
Standard	TSA	MDQ	TEK28701	Cambridge	CAM17201	700,104.86	\$ 519.00	\$ 992,772
Standard	TSA	MDQ	TEK28701	Horotiu	HRU16101	565,586.85	\$ 519.00	\$ 802,021
Standard	TSA	MDQ	TEK28701	Kiwitahi 1 (Peroxide)	KIW34201	347,700.00	\$ 519.00	\$ 493,050
Standard	TSA	MDQ	TEK28701	Kiwitahi 2	KIW34202	18,075.00	\$ 519.00	\$ 25,631
Standard	TSA	MDQ	TEK28701	Matangi	MTG17301	1,429.73	\$ 519.00	\$ 2,027
Standard	TSA	MDQ	TEK28701	Morrinsville	MRV16302	84,728.11	\$ 519.00	\$ 120,147

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID Zone	Quantity	Price	Total
Standard	TSA	MDQ	TEK28701	Morrinsville DF	MRV16301	288,116.85	\$ 519.00	\$ 408,559
Standard	TSA	MDQ	TEK28701	Tatunui DF	TAT16401	512,400.00	\$ 519.00	\$ 726,600
Standard	TSA	MDQ	TEK28701	Te Rapa Cogen	TRC02003	2,438,021.32	\$ 519.00	\$ 3,457,194
Standard	TSA	MDQ	TEK28701	Waitoa	WTA16501	698,182.86	\$ 519.00	\$ 990,046
Standard	TSA	MDQ	OFF17001	Te Kuiti North	TKN17001	55,186.26	\$ 519.00	\$ 78,256
Standard	TSA	MDQ	OFF17401	Te Kuiti South	TKS17401	316,949.46	\$ 519.00	\$ 449,445
Standard	TSA	MDQ		Cambridge		3,410.00	\$ 519.00	\$ 4,835
Standard	TSA	MDQ		Eltham		5,890.00	\$ 118.00	\$ 1,899
Standard	TSA	MDQ		Greater Auckland		21,080.00	\$ 504.00	\$ 29,028
Standard	TSA	MDQ		Greater Hamilton		5,890.00	\$ 392.00	\$ 6,308
Standard	TSA	MDQ		Marton		5,580.00	\$ 490.00	\$ 7,470
Standard	TSA	MDQ		New Plymouth		4,960.00	\$ 118.00	\$ 1,599
Standard	TSA	MDQ		Tauriko		6,820.00	\$ 638.00	\$ 11,888
Standard	TSA	MDQ		Tawa A		14,880.00	\$ 624.00	\$ 25,369
Standard	TSA	MDQ		Waitoa		5,270.00	\$ 519.00	\$ 7,473
Standard	TSA	GJ	F4000439	Kapuni (Lactose et al)	KAP12901	29,034.38	\$ 0.15	\$ 4,355
Standard	TSA	GJ	F4000439	Kapuni GTP	KAP09612	-	\$ -	\$ -
Standard	TSA	GJ	OFF16601	Huntly	HTL16601	30,003.56	\$ 0.82	\$ 24,603
Standard	TSA	GJ	KAP09008	Eltham	ELM12301	140,934.18	\$ 0.82	\$ 115,566
Standard	TSA	GJ	KAP09008	Inglewood	IGW11901	28,777.86	\$ 0.82	\$ 23,598
Standard	TSA	GJ	KAP09008	Kaponga	KPA12401	1,196.75	\$ 0.82	\$ 981
Standard	TSA	GJ	KAP09008	New Plymouth	NPL12101	744,848.15	\$ 0.82	\$ 610,775
Standard	TSA	GJ	KAP09008	Stratford	STR10201	75,512.58	\$ 0.82	\$ 61,920
Standard	TSA	GJ	KAP09008	Waitara	WTR12001	92,028.20	\$ 0.82	\$ 75,463
Standard	TSA	GJ	KAP09004	Ashhurst	ASH34301	9,979.74	\$ 0.82	\$ 8,183
Standard	TSA	GJ	KAP09004	Belmont	BEL24510	1,242,391.16	\$ 0.82	\$ 1,018,761
Standard	TSA	GJ	KAP09004	Dannevirke	DAN05001	46,924.92	\$ 0.82	\$ 38,478
Standard	TSA	GJ	KAP09004	Feilding	FLD03201	187,022.24	\$ 0.82	\$ 153,358
Standard	TSA	GJ	KAP09004	Flockhouse	FLH21901	102.18	\$ 0.82	\$ 84
Standard	TSA	GJ	KAP09004	Foxton	FOX22101	31,791.93	\$ 0.82	\$ 26,069
Standard	TSA	GJ	KAP09004	Greater Kapiti	GWP20102	175,588.68	\$ 0.82	\$ 143,983
Standard	TSA	GJ	KAP09004	Greater Waitangirua	GTW06910	379,820.04	\$ 0.82	\$ 311,452
Standard	TSA	GJ	KAP09004	Hastings	HST05210	1,631,715.29	\$ 0.82	\$ 1,338,007
Standard	TSA	GJ	KAP09004	Hastings (Nova)	HST05203	185,244.48	\$ 0.82	\$ 151,900
Standard	TSA	GJ	KAP09004	Hawera	HWA20801	180,632.30	\$ 0.82	\$ 148,118
Standard	TSA	GJ	KAP09004	Hawera (Nova)	HWA20802	53,471.16	\$ 0.82	\$ 43,846
Standard	TSA	GJ	KAP09004	Kairanga	KRG24101	602.09	\$ 0.82	\$ 494
Standard	TSA	GJ	KAP09004	Kaitoke	KTK23901	17,539.69	\$ 0.82	\$ 14,383
Standard	TSA	GJ	KAP09004	Kakariki	KKI23701	73,907.83	\$ 0.82	\$ 60,604
Standard	TSA	GJ	KAP09004	Kuku	KUK22401	792.70	\$ 0.82	\$ 650
Standard	TSA	GJ	KAP09004	Lake Alice	LAB20201	34,236.60	\$ 0.82	\$ 28,074
Standard	TSA	GJ	KAP09004	Levin	LVN24401	206,913.29	\$ 0.82	\$ 169,669
Standard	TSA	GJ	KAP09004	Longburn	LNB24301	199,718.60	\$ 0.82	\$ 163,769
Standard	TSA	GJ	KAP09004	Manaia	MNA23402	9,402.35	\$ 0.82	\$ 7,710
Standard	TSA	GJ	KAP09004	Mangaroa	MNG34001	16,121.11	\$ 0.82	\$ 13,219
Standard	TSA	GJ	KAP09004	Mangatainoka	MGK05401	-	\$ -	\$ -
Standard	TSA	GJ	KAP09004	Marton	MTN23801	162,868.78	\$ 0.82	\$ 133,552
Standard	TSA	GJ	KAP09004	Matapu	MTP20601	350.20	\$ 0.82	\$ 287
Standard	TSA	GJ	KAP09004	Oroua Downs	ORD24701	6,139.13	\$ 0.82	\$ 5,034
Standard	TSA	GJ	KAP09004	Otaki	OTA22601	16,618.76	\$ 0.82	\$ 13,627
Standard	TSA	GJ	KAP09004	Pahiatua	PHT04901	6,935.94	\$ 0.82	\$ 5,687
Standard	TSA	GJ	KAP09004	Pahiatua DF	PHT04902	684,496.71	\$ 0.82	\$ 561,287
Standard	TSA	GJ	KAP09004	Palmerston North	PLN24201	764,227.25	\$ 0.82	\$ 626,666
Standard	TSA	GJ	KAP09004	Patea	PTA20901	12,878.55	\$ 0.82	\$ 10,560
Standard	TSA	GJ	KAP09004	Pauatahanui 2	PAH23101	340.54	\$ 0.82	\$ 279
Standard	TSA	GJ	KAP09004	Takapau	TKP05101	84,430.43	\$ 0.82	\$ 69,233
Standard	TSA	GJ	KAP09004	Tawa A	TWA35610	1,947,156.84	\$ 0.82	\$ 1,596,669
Standard	TSA	GJ	KAP09004	Tawa B (Nova)	TWB24810	226,034.32	\$ 0.82	\$ 185,348
Standard	TSA	GJ	KAP09004	Te Horo	THO22701	338.67	\$ 0.82	\$ 278
Standard	TSA	GJ	KAP09004	Waitotara	WTT20301	21,656.27	\$ 0.82	\$ 17,758
Standard	TSA	GJ	KAP09004	Wanganui	WAG21501	970,230.05	\$ 0.82	\$ 795,589
Standard	TSA	GJ	KAP09004	Waverley	WVY23601	159.95	\$ 0.82	\$ 131
Standard	TSA	GJ	OFF14501	Ngaruawahia	NGW14501	5,382.57	\$ 0.82	\$ 4,414

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID Zone	Quantity	Price	Total
Standard	TSA	GJ	OFF16701	Oakura	OKU16701	10,488.43	\$ 0.82	\$ 8,601
Standard	TSA	GJ	OFF13201	Okato	OKA13201	1,726.20	\$ 0.82	\$ 1,415
Standard	TSA	GJ	OFF13001	Opunake	OPK13001	7,876.92	\$ 0.82	\$ 6,459
Standard	TSA	GJ	OFF14101	Otorohanga	OTO14101	9,133.58	\$ 0.82	\$ 7,490
Standard	TSA	GJ	OFF31101	Pirongia	PIR31101	1,244.02	\$ 0.82	\$ 1,020
Standard	TSA	GJ	OFF31101	Te Awamutu DF	TAC31001	441,091.89	\$ 0.82	\$ 361,695
Standard	TSA	GJ	PKU02308	Broadlands	BRO36301	51,355.03	\$ 0.82	\$ 42,111
Standard	TSA	GJ	PKU02308	Edgecumbe	EGC30702	854.80	\$ 0.82	\$ 701
Standard	TSA	GJ	PKU02308	Edgecumbe DF	EGC30701	947,467.68	\$ 0.82	\$ 776,923
Standard	TSA	GJ	PKU02308	Gisborne	GIS07810	271,169.77	\$ 0.82	\$ 222,359
Standard	TSA	GJ	PKU02308	Greater Mt Maunganui	GMM08001	720,808.68	\$ 0.82	\$ 591,063
Standard	TSA	GJ	PKU02308	Greater Tauranga	GTT07701	306,193.84	\$ 0.82	\$ 251,079
Standard	TSA	GJ	PKU02308	Kawerau	KAW04405	8,159.10	\$ 0.82	\$ 6,690
Standard	TSA	GJ	PKU02308	Kawerau (ex-Caxton)	KAW04410	189,261.84	\$ 0.82	\$ 155,195
Standard	TSA	GJ	PKU02308	Kawerau (ex-Tasman)	KAW04411	493,741.38	\$ 0.82	\$ 404,868
Standard	TSA	GJ	PKU02308	Kihikihi (Te Awamutu)	KIH19101	82,321.40	\$ 0.82	\$ 67,504
Standard	TSA	GJ	PKU02308	Kinleith	KIN02601	19,110.62	\$ 0.82	\$ 15,671
Standard	TSA	GJ	PKU02308	Kinleith (CHH mill)	KIN04310	2,679,222.74	\$ 0.82	\$ 2,196,963
Standard	TSA	GJ	PKU02308	Lichfield 2	LCF20011	485,851.33	\$ 0.82	\$ 398,398
Standard	TSA	GJ	PKU02308	Lichfield DF	LCF20010	427,913.99	\$ 0.82	\$ 350,889
Standard	TSA	GJ	PKU02308	Okoroire Springs	OKS32801	1,242.85	\$ 0.82	\$ 1,019
Standard	TSA	GJ	PKU02308	Opotiki	OPO32001	8,945.77	\$ 0.82	\$ 7,336
Standard	TSA	GJ	PKU02308	Putaruru	PTR32601	18,375.52	\$ 0.82	\$ 15,068
Standard	TSA	GJ	PKU02308	Rangiora	RAG33401	45,267.10	\$ 0.82	\$ 37,119
Standard	TSA	GJ	PKU02308	Reporoa	RPR30801	293,192.82	\$ 0.82	\$ 240,418
Standard	TSA	GJ	PKU02308	Reporoa DF	RPR30802	143,397.43	\$ 0.82	\$ 117,586
Standard	TSA	GJ	PKU02308	Rotorua	ROT08101	315,048.46	\$ 0.82	\$ 258,340
Standard	TSA	GJ	PKU02308	Taupou	TAU07001	113,418.13	\$ 0.82	\$ 93,003
Standard	TSA	GJ	PKU02308	Tauriko	TKO39301	359,941.89	\$ 0.82	\$ 295,152
Standard	TSA	GJ	PKU02308	Te Puke	TPK33301	41,910.59	\$ 0.82	\$ 34,367
Standard	TSA	GJ	PKU02308	Te Teko	TTK30601	150.14	\$ 0.82	\$ 123
Standard	TSA	GJ	PKU02308	Tirau	TIR33502	6,272.30	\$ 0.82	\$ 5,143
Standard	TSA	GJ	PKU02308	Tirau DF	TIR33501	105,276.25	\$ 0.82	\$ 86,327
Standard	TSA	GJ	PKU02308	Tokoroa	TKR19701	84,343.55	\$ 0.82	\$ 69,162
Standard	TSA	GJ	PKU02308	Waikeria	WKE19201	22,410.05	\$ 0.82	\$ 18,376
Standard	TSA	GJ	PKU02308	Whakatane	WHK32101	70,549.66	\$ 0.82	\$ 57,851
Standard	TSA	GJ	OFF15901	Pungarehu No 1	PGU13101	48.42	\$ 0.82	\$ 40
Standard	TSA	GJ	OFF15901	Pungarehu No 2	PGH15901	157.16	\$ 0.82	\$ 129
Standard	TSA	GJ	RTW3203	Alfriston	ALF15501	-	\$ -	\$ -
Standard	TSA	GJ	RTW3203	Drury 1	DRU15101	217,211.70	\$ 0.82	\$ 178,114
Standard	TSA	GJ	RTW3203	Flat Bush	FLB15601	330,177.03	\$ 0.82	\$ 270,745
Standard	TSA	GJ	RTW3203	Glenbrook	GLB03401	2,018,036.40	\$ 0.82	\$ 1,654,790
Standard	TSA	GJ	RTW3203	Greater Auckland	GTA03610	11,101,316.63	\$ 0.82	\$ 9,103,080
Standard	TSA	GJ	RTW3203	Harrisville 2	HAR11802	340,527.93	\$ 0.82	\$ 279,233
Standard	TSA	GJ	RTW3203	Hunua	HUN15301	70,421.42	\$ 0.82	\$ 57,746
Standard	TSA	GJ	RTW3203	Hunua (Nova)	HUN15302	78,834.29	\$ 0.82	\$ 64,644
Standard	TSA	GJ	RTW3203	Hunua 3	HUN15303	11,499.86	\$ 0.82	\$ 9,430
Standard	TSA	GJ	RTW3203	Kingseat	KIG16801	37.06	\$ 0.82	\$ 30
Standard	TSA	GJ	RTW3203	Marsden 2	MSD01802	896.50	\$ 0.82	\$ 735
Standard	TSA	GJ	RTW3203	Pukekohe	PUK04201	95,009.11	\$ 0.82	\$ 77,907
Standard	TSA	GJ	RTW3203	Ramarama	RAM15201	26,974.68	\$ 0.82	\$ 22,119
Standard	TSA	GJ	RTW3203	Tuakau 2	TUK06502	382,349.65	\$ 0.82	\$ 313,527
Standard	TSA	GJ	RTW3203	Waitoki	WTK33901	212,214.80	\$ 0.82	\$ 174,016
Standard	TSA	GJ	RTW3203	Waiuku	WKU16901	29,734.61	\$ 0.82	\$ 24,382
Standard	TSA	GJ	RTW3203	Warkworth	WRK18901	12,084.01	\$ 0.82	\$ 9,909
Standard	TSA	GJ	RTW3203	Wellsford	WEL18301	1,541.52	\$ 0.82	\$ 1,264
Standard	TSA	GJ	RTW3203	Whangarei	WHG07501	136,457.62	\$ 0.82	\$ 111,895
Standard	TSA	GJ	RTS13201	Greater Hamilton	GTH11301	1,621,426.28	\$ 0.82	\$ 1,329,570
Standard	TSA	GJ	TEK28701	Cambridge	CAM17201	557,626.49	\$ 0.82	\$ 457,254
Standard	TSA	GJ	TEK28701	Horotiu	HRU16101	327,999.21	\$ 0.82	\$ 268,959
Standard	TSA	GJ	TEK28701	Kiwitahi 1 (Peroxide)	KIW34201	190,945.92	\$ 0.82	\$ 156,576
Standard	TSA	GJ	TEK28701	Kiwitahi 2	KIW34202	5,438.84	\$ 0.82	\$ 4,460
Standard	TSA	GJ	TEK28701	Matangi	MTG17301	764.93	\$ 0.82	\$ 627

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	GJ	TEK28701	Morrinsville	MRV16302		50,100.23	\$ 0.82	\$ 41,082
Standard	TSA	GJ	TEK28701	Morrinsville DF	MRV16301		191,591.10	\$ 0.82	\$ 157,105
Standard	TSA	GJ	TEK28701	Tatuanui DF	TAT16401		399,186.28	\$ 0.82	\$ 327,333
Standard	TSA	GJ	TEK28701	Te Rapa Cogen	TRC02003		1,597,928.61	\$ 0.82	\$ 1,310,301
Standard	TSA	GJ	TEK28701	Waitoa	WTA16501		477,967.88	\$ 0.82	\$ 391,934
Standard	TSA	GJ	OFF17001	Te Kuiti North	TKN17001		28,049.82	\$ 0.82	\$ 23,001
Standard	TSA	GJ	OFF17401	Te Kuiti South	TKS17401		154,183.27	\$ 0.82	\$ 126,430
Standard	TSA	OR	F4000439	Kapuni (Lactose et al)	KAP12901	No Zone	29,034.38	\$ -	\$ -
Standard	TSA	OR	F4000439	Kapuni GTP	KAP09612	No Zone	-	\$ -	\$ -
Standard	TSA	OR	OFF16601	Huntly	HTL16601	No Zone	1,517.02	\$ 14.18	\$ 21,512
Standard	TSA	OR	KAP09008	Eltham	ELM12301	No Zone	1,904.74	\$ 3.22	\$ 6,141
Standard	TSA	OR	KAP09008	Inglewood	IGW11901	No Zone	2,325.56	\$ 3.22	\$ 7,498
Standard	TSA	OR	KAP09008	Kaponga	KPA12401	No Zone	112.86	\$ 3.22	\$ 364
Standard	TSA	OR	KAP09008	Stratford	STR10201	No Zone	4,966.93	\$ 3.22	\$ 16,014
Standard	TSA	OR	KAP09004	Dannevirke	DAN05001	No Zone	298.71	\$ 14.18	\$ 4,236
Standard	TSA	OR	KAP09004	Foxton	FOX22101	No Zone	1,044.59	\$ 13.77	\$ 14,384
Standard	TSA	OR	KAP09004	Kaitoke	KTZ23901	No Zone	171.44	\$ 13.39	\$ 2,295
Standard	TSA	OR	KAP09004	Kakariki	KKZ23701	No Zone	928.08	\$ 13.39	\$ 12,425
Standard	TSA	OR	KAP09004	Kuku	KUK22401	No Zone	71.98	\$ 13.77	\$ 991
Standard	TSA	OR	KAP09004	Lake Alice	LAB20201	No Zone	1,113.54	\$ 13.39	\$ 14,908
Standard	TSA	OR	KAP09004	Levin	LNV24401	No Zone	1,176.33	\$ 13.77	\$ 16,199
Standard	TSA	OR	KAP09004	Mangaroa	MNG34001	No Zone	165.60	\$ 14.18	\$ 2,348
Standard	TSA	OR	KAP09004	Mangatainoka	MKG05401	No Zone	-	\$ -	\$ -
Standard	TSA	OR	KAP09004	Marton	MTN23801	No Zone	7,470.98	\$ 13.39	\$ 100,021
Standard	TSA	OR	KAP09004	Matapu	MTP20601	No Zone	17.54	\$ 13.39	\$ 235
Standard	TSA	OR	KAP09004	Pahiatua	PHT04901	No Zone	224.45	\$ 13.77	\$ 3,091
Standard	TSA	OR	KAP09004	Pahiatua DF	PHT04902	No Zone	13,994.64	\$ 13.77	\$ 192,713
Standard	TSA	OR	KAP09004	Palmerston North	PLN24201	No Zone	4,952.67	\$ 13.77	\$ 68,201
Standard	TSA	OR	KAP09004	Patea	PTA20901	No Zone	367.63	\$ 13.39	\$ 4,922
Standard	TSA	OR	KAP09004	Takapau	TKP05101	No Zone	261.76	\$ 14.18	\$ 3,712
Standard	TSA	OR	KAP09004	Waitotara	WTT20301	No Zone	1,660.75	\$ 13.39	\$ 22,234
Standard	TSA	OR	KAP09004	Wanganui	WAG21501	No Zone	7,378.37	\$ 13.39	\$ 98,781
Standard	TSA	OR	KAP09004	Waverley	WVY23601	No Zone	6.15	\$ 13.39	\$ 82
Standard	TSA	OR	OFF14501	Ngaruawahia	NGW14501	No Zone	859.05	\$ 14.18	\$ 12,182
Standard	TSA	OR	None	None	None	Auckland Zone	54,044.27	\$ 13.77	\$ 744,216
Standard	TSA	OR	None	None	0	Edgecumbe Zone	6,503.97	\$ 19.04	\$ 123,860
Standard	TSA	OR	None	None	0	Hastings Zone	17,352.57	\$ 14.18	\$ 246,065
Standard	TSA	OR	None	None	0	Hawera Zone	10,268.29	\$ 13.39	\$ 137,472
Standard	TSA	OR	None	None	0	Kawerau Zone	3,095.52	\$ 18.22	\$ 56,413
Standard	TSA	OR	None	None	0	Kinleith Zone	59,731.86	\$ 14.18	\$ 847,017
Standard	TSA	OR	None	None	0	Kiwitahi Zone	217.48	\$ 14.18	\$ 3,084
Standard	TSA	OR	None	None	0	Manawatu Zone	4,270.52	\$ 13.77	\$ 58,807
Standard	TSA	OR	None	None	0	Marsden	421.56	\$ 20.93	\$ 8,823
Standard	TSA	OR	None	None	0	Morrinsville Zone	11,006.37	\$ 14.18	\$ 156,074
Standard	TSA	OR	None	None	0	New Plymouth Zone	8,435.21	\$ 3.22	\$ 27,195
Standard	TSA	OR	None	None	0	Okaiawa-Manaia Zone	229.62	\$ 13.39	\$ 3,074
Standard	TSA	OR	None	None	0	South Auckland Rural Zone	21,481.98	\$ 13.77	\$ 295,817
Standard	TSA	OR	None	None	0	Tirau Zone	9,456.06	\$ 14.18	\$ 134,090
Standard	TSA	OR	None	None	0	Wellington Zone	29,197.32	\$ 17.05	\$ 497,790
Standard	TSA	OR	None	None	0	Western BayOfPlenty Zone	3,159.95	\$ 17.43	\$ 55,083
Standard	TSA	OR	OFF16701	Oakura	OKU16701	No Zone	1,135.04	\$ 3.22	\$ 3,659
Standard	TSA	OR	OFF13201	Okato	OKA13201	No Zone	362.17	\$ 3.22	\$ 1,168
Standard	TSA	OR	OFF13001	Opunake	OPK13001	No Zone	282.14	\$ 3.22	\$ 910
Standard	TSA	OR	OFF14101	Otorohanga	OTO14101	No Zone	285.13	\$ 14.18	\$ 4,043
Standard	TSA	OR	OFF31101	Pirongia	PIR31101	No Zone	39.45	\$ 14.18	\$ 559
Standard	TSA	OR	OFF31101	Te Awamutu DF	TAC31001	No Zone	16,387.90	\$ 14.18	\$ 232,386
Standard	TSA	OR	PKU02308	Broadlands	BRO36301	No Zone	996.97	\$ 18.22	\$ 18,169
Standard	TSA	OR	PKU02308	Gisborne	GIS07810	No Zone	4,596.06	\$ 19.89	\$ 91,419
Standard	TSA	OR	PKU02308	Kihikihi (Te Awamutu)	KIH19101	No Zone	18,110.25	\$ 14.18	\$ 256,809
Standard	TSA	OR	PKU02308	Lichfield 2	LCF20011	No Zone	8,439.39	\$ 14.18	\$ 119,673
Standard	TSA	OR	PKU02308	Lichfield DF	LCF20010	No Zone	5,589.93	\$ 14.18	\$ 79,267
Standard	TSA	OR	PKU02308	Okoroire Springs	OKS32801	No Zone	376.94	\$ 14.18	\$ 5,345
Standard	TSA	OR	PKU02308	Opotiki	OPO32001	No Zone	225.39	\$ 19.89	\$ 4,483

Type	Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total
Standard	TSA	OR	PKU02308	Putaruru	PTR32601	No Zone	570.36	\$ 14.18	\$ 8,088
Standard	TSA	OR	PKU02308	Rangioru	RAG33401	No Zone	19.37	\$ 17.43	\$ 338
Standard	TSA	OR	PKU02308	Reporoa	RPR30801	No Zone	320.21	\$ 18.22	\$ 5,836
Standard	TSA	OR	PKU02308	Reporoa DF	RPR30802	No Zone	84.35	\$ 18.22	\$ 1,537
Standard	TSA	OR	PKU02308	Rotorua	ROT08101	No Zone	5,077.52	\$ 18.22	\$ 92,533
Standard	TSA	OR	PKU02308	Tauupo	TAU07001	No Zone	998.99	\$ 18.22	\$ 18,206
Standard	TSA	OR	PKU02308	Tauriko	TKO39301	No Zone	5,339.59	\$ 17.43	\$ 93,078
Standard	TSA	OR	PKU02308	Te Teko	TTK30601	No Zone	24.27	\$ 19.04	\$ 462
Standard	TSA	OR	PKU02308	Tokoroa	TKR19701	No Zone	1,643.44	\$ 14.18	\$ 23,305
Standard	TSA	OR	PKU02308	Waikeria	WKE19201	No Zone	1,147.64	\$ 14.18	\$ 16,274
Standard	TSA	OR	PKU02308	Whakatane	WHK32101	No Zone	635.24	\$ 19.04	\$ 12,097
Standard	TSA	OR	OFF15901	Pungarehu No 1	PGU13101	No Zone	8.88	\$ 3.22	\$ 29
Standard	TSA	OR	OFF15901	Pungarehu No 2	PGH15901	No Zone	31.94	\$ 3.22	\$ 103
Standard	TSA	OR	RTW3203	Glenbrook	GLB03401	No Zone	75,292.89	\$ 13.77	\$ 1,036,820
Standard	TSA	OR	RTW3203	Waiuku	WKU16901	No Zone	848.84	\$ 13.77	\$ 11,689
Standard	TSA	OR	RTW3203	Warkworth	WRK18901	No Zone	198.56	\$ 20.93	\$ 4,156
Standard	TSA	OR	RTW3203	Wellsford	WEL18301	No Zone	58.68	\$ 20.93	\$ 1,228
Standard	TSA	OR	RTW3203	Whangarei	WHG07501	No Zone	114.23	\$ 20.93	\$ 2,391
Standard	TSA	OR	RTS13201	Greater Hamilton	GTH11301	No Zone	15,352.27	\$ 10.71	\$ 164,429
Standard	TSA	OR	TEK28701	Cambridge	CAM17201	No Zone	7,337.90	\$ 14.18	\$ 104,054
Standard	TSA	OR	TEK28701	Horotiu	HRU16101	No Zone	479.11	\$ 14.18	\$ 6,794
Standard	TSA	OR	TEK28701	Matangi	MTG17301	No Zone	70.87	\$ 14.18	\$ 1,005
Standard	TSA	OR	TEK28701	Tatuanui DF	TAT16401	No Zone	2,486.73	\$ 14.18	\$ 35,263
Standard	TSA	OR	TEK28701	Te Rapa Cogen	TRC02003	No Zone	49,689.64	\$ 14.18	\$ 704,615
Standard	TSA	OR	TEK28701	Waitoa	WTA16501	No Zone	4,320.34	\$ 14.18	\$ 61,264
Standard	TSA	OR	OFF17001	Te Kuiti North	TKN17001	No Zone	689.07	\$ 14.18	\$ 9,771
Standard	TSA	OR	OFF17401	Te Kuiti South	TKS17401	No Zone	321.68	\$ 14.18	\$ 4,562
Standard	TSA	OR	0	0	0	Papakura authorised overruns difference	-	\$ -	\$ -3,700
Standard	TSA	GJ	F4000439	Stratford 2	STRO0521	Stratford 2 - Standard pricing Throughput Charges	1,896,117.84	\$ 0.15	\$ 284,418
Standard	TSA	GJ	F4000439	Stratford 3 Delivery Point	STRO0511	Stratford 3 Storage - Delivery Standard Pricing Throughput Charges	5,609,805.88	\$ 0.15	\$ 841,471
Standard	TSA	GJ	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	TCC (Taranaki Combined Cycle) - Standard Pricing Throughput Charge	6,324,251.64	\$ 0.15	\$ 948,638

Appendix 3: $P_{i,2024}, Q_{i,2024}$ from non-standard prices for the 2024 Assessment Period

								Pi2024, Qi2024	
Revenue from non-standard prices								\$ 5,463,588	
Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total	
Hastings Delivery Point Charges - RTL	Day	KAP09004	Hastings (Nova)	HST05203	Hastings Delivery Point Charges - RTL Other	12	150.00	\$ 1,800.00	
Hawera Delivery Point Charges - RTL	Day	KAP09004	Hawera (Nova)	HWA20802	Hawera Delivery Point Charges - RTL Other	12	75.00	\$ 900.00	
Hunua Delivery Point Charges - RTL	Day	RTW3203	Hunua (Nova)	HUN15302	Hunua Delivery Point Charges - RTL Other	12	101.25	\$ 1,215.00	
Kauri and Maungatoroto Dairy Factories	GJ	RTW3203	Northland Dairy Factories	NDF33601	Kauri and Maungatoroto Dairy Factories Capacity Reservation Charges	366	6,695.20	\$ 2,450,442.70	
Kauri and Maungatoroto Dairy Factories	MDQ	RTW3203	Northland Dairy Factories	NDF33601	Kauri and Maungatoroto Dairy Factories Overrun Charges	-	-	\$ -	
Kauri and Maungatoroto Dairy Factories	OR	RTW3203	Northland Dairy Factories	NDF33601	Kauri and Maungatoroto Dairy Factories Throughput Charges	869,916	0.35	\$ 303,252.83	
Pan Pac Hastings SA	GJ	KAP09004	Hastings	HST05210	Pan Pac Hastings SA Overrun Charges	-	-	\$ -	
Pan Pac Hastings SA	MDQ	KAP09004	Hastings	HST05210	Pan Pac Hastings SA Throughput Charges	28,218	2.24	\$ 63,207.73	
PanPac Hastings IUC	OR	KAP09004	Hastings	HST05210	PanPac Hastings IUC Capacity Reservation Charges	-	-	\$ -	
PanPac Hastings IUC	MDQ	KAP09004	Hastings	HST05210	PanPac Hastings IUC Overrun Charges	-	-	\$ -	
Southern Paprika Warkworth - SA	OR	RTW3203	Warkworth	WRK18901	Southern Paprika Warkworth - SA Capacity Reservation Charges	366	825.47	\$ 302,123.26	
Southern Paprika Warkworth - SA	OR	RTW3203	Warkworth	WRK18901	Southern Paprika Warkworth - SA Overrun Charges	486	20.93	\$ 10,170.80	
Southern Paprika Warkworth - SA	GJ	RTW3203	Warkworth	WRK18901	Southern Paprika Warkworth - SA Throughput Charges	229,372	1.16	\$ 266,530.55	
Stratford Peaker Power Station - ICA	MDQ	F4000439	Stratford 2	STR00521	Stratford Peaker Power Station - ICA Other	366	44.17	\$ 16,165.20	
Tawa B Delivery Point Charges - RTL	OR	KAP09004	Tawa B (Nova)	TWB24810	Tawa B Delivery Point Charges - RTL Other	12	3,538.53	\$ 42,462.34	
TCC - ICA	GJ	F4000439	TCC (Taranaki Combined Cycle)	TCC00201	TCC - ICA Other	366	44.17	\$ 16,165.20	
Whakatane Mill Limited - SA	Day	PKU02308	Whakatane	WHK32101	Whakatane Mill Limited - SA Capacity Reservation Charges	366	4,674.08	\$ 1,710,714.74	
Whakatane Mill Limited - SA	MDQ	PKU02308	Whakatane	WHK32101	Whakatane Mill Limited - SA Overrun Charges	-	-	\$ -	
Whakatane Mill Limited - SA	OR	PKU02308	Whakatane	WHK32101	Whakatane Mill Limited - SA Throughput Charges	798,731	0.35	\$ 278,437.63	

STP charges¹⁰

								Pi2024, Qi2024	
STP charges								\$ 4,447,778	
Contract	Unit	Receipt Point ID	Delivery Point	Delivery Point ID	Zone	Quantity	Price	Total	
Ballance Amonia-Urea Plant (8201) - STP	GJ	F4000439	Ballance 8201	BAL08201	Ballance Amonia-Urea Plant (8201) - STP Throughput Charges	2,849,200.00	\$ 0.15	\$ 427,380	
Ballance Amonia-Urea Plant (9626) - STP	GJ	F4000439	Ballance 9626	BAL09626	Ballance Amonia-Urea Plant (9626) - STP Throughput Charges	3,433,977.00	\$ 0.15	\$ 515,097	
Frankley Rd to Kupe Production Station - STP	GJ	F4000439	Kupe Delivery Point	KUP37503	Frankley Rd to Kupe Production Station - STP Throughput Charges	0.00	\$ 0.15	\$ 0	
Frankley Road to Kaimiro - STP	GJ	F4000439	Kaimiro Mixing Station Delivery	KAI07602	Frankley Road to Kaimiro - STP Throughput Charges	3,584.00	\$ 0.15	\$ 538	
Frankley Road to Kapuni GTP - STP	GJ	F4000439	Kapuni GTP	KAP09612	Frankley Road to Kapuni GTP - STP Throughput Charges	3,341,926.94	\$ 0.15	\$ 501,289	
Kaimiro to Frankley Road - STP	GJ	KAI07601	Frankley Road-Bi	F4000439	Kaimiro to Frankley Road - STP Throughput Charges	1,118.00	\$ 0.15	\$ 168	
Kaimiro to Kapuni - STP	GJ	KAI07601	Kapuni GTP	KAP09612	Kaimiro to Kapuni - STP Throughput Charges	620,279.36	\$ 0.15	\$ 93,042	
Kapuni GTP to Frankley Road - STP	GJ	KAP09009	Frankley Road-Bi	F4000439	Kapuni GTP to Frankley Road - STP Throughput Charges	3,023,676.37	\$ 0.15	\$ 453,551	
Kupe to Frankley Road - STP	GJ	KUP37501	Frankley Road-Bi	F4000439	Kupe to Frankley Road - STP Throughput Charges	11,736,721.51	\$ 0.15	\$ 1,760,508	
Kupe to Kapuni GTP - STP	GJ	KUP37501	Kapuni GTP	KAP09612	Kupe to Kapuni GTP - STP Throughput Charges	637,048.60	\$ 0.15	\$ 95,557	
Kupe to Kapuni GTP - STP	GJ	KUP37501	Kapuni GTP	KAP09612	Kupe to Kapuni GTP - STP Throughput Charges	2,827,422.16	\$ 0.15	\$ 424,113	
Kapuni GTP to Frankley Road - STP	GJ	KAP09009	Frankley Road-Bi	F4000439	Kapuni GTP to Frankley Road - STP Throughput Charges	1,176,900	0.15	\$ 176,534.97	

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, tsunamis & 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**Compliance Statement Certificate – GTB**

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



Director: Fiona Ann Oliver



Director: Mark Adrian Ratcliffe

Date 18 February 2025

Date 18 February 2025

Appendix 6: Auditor assurance



Independent Assurance Report

To the Directors of First Gas Limited and the Commerce Commission

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

Opinion

We have undertaken a reasonable assurance engagement in respect of the compliance of First Gas Limited (the “Company”) with the Gas Transmission Services Default Price-Quality Path Determination 2022 (the “PQ Determination”) in preparing the Gas transmission services: Compliance with the wash-up amount calculation and quality standards compliance statement (the “Compliance Statement”) for the assessment period ended 30 September 2024.

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 the PQ Determination in preparing the Compliance Statement for the assessment period ended 30 September 2024.

Basis for Opinion

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

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

Director’s Responsibilities

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

Our Independence and Quality Management

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

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

In our capacity as auditor and assurance practitioner, our firm provides audit and other assurance services. The firm has no other relationship with, or interests in, the Company.



Assurance Practitioner's responsibilities

Our responsibility is to express an opinion on whether the Company has complied, in all material respects, with PQ Determination 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 2024, has been prepared, in accordance with the requirements of the PQ 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 PQ Determination in preparing the Compliance Statement for the assessment period ended 30 September 2024.

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

Inherent Limitations

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

Use of Report

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

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

A handwritten signature in black ink that reads 'PricewaterhouseCoopers' in a cursive, flowing script.

PricewaterhouseCoopers
19 February 2025

Christchurch