Notice to supply information to the Commerce Commission under section 53ZD of the Commerce Act 1986

To: Powerco Limited
    Level 2
    Npdc Civic Centre
    84 Liardet Street
    New Plymouth 4310

1. Purpose of the Notice

1.1 For the purpose of carrying out its functions and exercising its powers under Part 4 of the Act, the Commission requires, under section 53ZD(d) of the Act, that Powerco provides the Commission with the information and director certifications specified in this notice.

2. Interpretation

2.1 Unless the context otherwise requires:

(a) terms in bold type in this notice, including its schedules, have the meaning given to those terms in clause 4.2 of the Powerco Limited Electricity Distribution Customised Price-Quality Path Determination 2018, [2018] NZCC 5, where the term ‘assessment period’ in this notice has the meaning given to that term in paragraph (a) of the definition of ‘assessment period’ in clause 4.2 of the Powerco Limited Electricity Distribution Customised Price-Quality Path Determination 2018, [2018] NZCC 5;

(b) terms used in this notice that are defined in the Act but not in this notice have the same meanings as in the Act;

(c) terms used in this notice that are defined in the IM determination but not in this notice have the same meanings as in the IM determination;

(d) any reference to a period of time is interpreted in accordance with section 35 of the Interpretation Act 1999;

(e) a word which denotes the singular also denotes the plural and vice-versa;

(f) any reference to “clause” or “Schedule” is to a clause or schedule of this notice;

(g) a reference to “Utilities Disputes Limited” includes a reference to any other entity operating an ‘approved scheme’ as that term is defined in clause 3 of schedule 4 of the Electricity Industry Act 2010; and

(h) all expenditure information required under this notice must be provided in nominal dollars.

3. Annual Delivery Report

3.1 Within 5 months and 5 working days after the end of each assessment period,
Powerco must provide to the Commission and make publicly available on its website an Annual Delivery Report relating to the most recent completed assessment period.

3.2 The Annual Delivery Report referred to in clause 3.1 is intended to allow stakeholders to assess Powerco's progress in delivering the projects and programmes approved as part of its customised price-quality path, and must include—

(a) volumetric measures as specified in clause 3.3;
(b) qualitative measures as specified in clause 3.4; and
(c) a certificate in the form set out in Schedule 2, signed by at least one director of Powerco.

3.3 For the purpose of clause 3.2(a), Powerco's Annual Delivery Report must include volumetric measures containing—

(a) ‘total actual expenditure’ for the most recent completed assessment period, the sum of ‘total actual expenditure’ accumulated during the CPP regulatory period to date, the ‘forecast total expenditure’ for the current assessment period, the sum of ‘forecast total expenditure’ during the CPP regulatory period to date, the variance between ‘forecast total expenditure’ and ‘total actual expenditure’ for each completed assessment period, the sum of the variance between ‘forecast total expenditure’ and ‘total actual expenditure’ accumulated during the CPP regulatory period to date, ‘forecast total expenditure’ for the most recent completed assessment period and the sum of ‘forecast total expenditure’ during the CPP regulatory period to date;

(b) capital expenditure forecasts for the most recent completed assessment period, the sum of capital expenditure forecasts during the CPP regulatory period to date, capital expenditure actuals for the most recent completed assessment period, the sum of capital expenditure actuals accumulated during the CPP regulatory period to date, the variance between capital expenditure forecasts and capital expenditure actuals for the most recent completed assessment period, the sum of the variance between capital expenditure forecasts and capital expenditure actuals accumulated during the CPP regulatory period to date, ‘total capex’ as specified in Schedule 1 for the most recent completed assessment period and the sum of ‘total capex’ as specified in Schedule 1 during the CPP regulatory period to date, for each CPP capex category including—

(i) ‘total growth and security’ expenditure disaggregated by ‘major projects (a project with total capital expenditure of more than $5 million)’, ‘minor capital expenditure projects (projects with total capital expenditure of between $1 million and $5 million)’, ‘routine capital expenditure projects (projects with total expenditure of up to $1 million)’, ‘communications’ and ‘reliability’;

(ii) ‘total asset replacement and renewal expenditure less capital contributions’, ‘capital contributions funding asset replacement and
renewal’, ‘total asset replacement and renewal expenditure’ and
asset replacement and renewal expenditure disaggregated by ‘zone
substations’, ‘distribution transformers’, ‘distribution switchgear’,
‘overhead structures’, ‘overhead conductors’, ‘cables’ and ‘secondary
systems’;

(iii) ‘total expenditure on other network assets’ (ie, consumer connections
less capital contributions, asset relocations less capital contributions,
and network evolution); and

(iv) ‘total expenditure on non-network assets’, and expenditure on non-
network assets disaggregated by ‘ICT’ and ‘facilities’;

(c) operational expenditure forecasts for the most recent completed
assessment period, the sum of operational expenditure forecasts
accumulated during the CPP regulatory period to date, operational
expenditure actuals for the most recent completed assessment period, the
sum of operational expenditure actuals accumulated during the CPP
regulatory period to date, the variance between operational expenditure
forecasts and operational expenditure actuals for the most recent
completed assessment period, the sum of the variance between
operational expenditure forecasts and operational expenditure actuals
accumulated during the CPP regulatory period to date, ‘total opex’ as
specified in Schedule 1 for the most recent completed assessment period
and the sum of ‘total opex’ as specified in Schedule 1 during the CPP
regulatory period to date, including-

(i) ‘vegetation management’;

(ii) ‘corrective maintenance’;

(iii) ‘preventive maintenance and inspection’;

(iv) ‘reactive maintenance’;

(v) ‘system operations and network support’; and

(vi) ‘non-network opex’ and non-network opex disaggregated by
‘corporate’, ‘ICT’, ‘facilities’ and ‘insurance and governance’;

(d) conductor replacement forecasts as specified in Schedule 1 for the most
recent completed assessment period, conductor replacement actuals for
the most recent completed assessment period, the variance between
conductor replacement forecasts as specified in Schedule 1 and conductor
replacement actuals for the most recent completed assessment period,
‘conductor replacement forecasts in kms replaced for the western region’
for the most recent completed assessment period, ‘conductor replacement
actuals in kms replaced for the western region’ for the most recent
completed assessment period, ‘conductor replacement forecasts in kms
replaced for the eastern region’ for the most recent completed assessment
period and ‘conductor replacement actuals in kms replaced for the eastern
region’ for the most recent completed assessment period;

(e) overhead structures forecasts as specified in Schedule 1 for the most
recent completed assessment period, overhead structures actuals for the most recent completed assessment period, the variance between overhead structures forecasts as specified in Schedule 1 and overhead structures actuals for the most recent completed assessment period, 

(f) ‘units replaced – zone substation switchgear’;

(g) average unit value per renewed asset (value of assets divided by quantity) for the most recent completed assessment period for poles, cross-arm assemblies, conductor (per km), including average unit value per-

(i) sub-transmission;

(ii) distribution; and

(iii) low voltage;

(h) average unit value per renewed asset (value of assets divided by quantity) for the most recent completed assessment period for power transformers, distribution transformers and zone substation switchgear;

(i) transformer replacement forecasts as specified in Schedule 1 for the most recent completed assessment period, transformer replacement actuals for the most recent completed assessment period, the variance between transformer replacement forecasts as specified in Schedule 1 and transformer replacement actuals for the most recent completed assessment period, ‘forecast distribution transformer units replaced – assets up to 22kV’, ‘forecast power transformer units replaced – assets 22kV to 110kV’, ‘actual distribution transformer units replaced – assets up to 22kV’ and ‘actual power transformer units replaced – assets 22kV to 110kV’;

(j) for each ‘major project’ (a project with total capital expenditure of more than $5 million): its ‘project/programme name’, a ‘brief description of project/programme’, its ‘forecast expenditure as specified in Schedule 1 for the most recent completed assessment period ($000)’, ‘actual costs for the most recent completed assessment period ($000)’, ‘variance between major project forecasts as specified in Schedule 1 and major project actuals for the most recent completed assessment period’, ‘reference to primary supporting information for the project’ and a ‘description of progress of the major project’;

(k) ‘number of material asset defects identified in backlog for the most recent
completed assessment period, but not yet remedied’, ‘number of new material asset defects identified in backlog for the most recent completed assessment period, but not yet remedied’, a ‘description of progress on clearing backlogs’, ‘number of material asset defects remedied for the most recent completed assessment period’ and the sum of ‘number of material asset defects remedied for the most recent completed assessment period’ accumulated during the CPP regulatory period to date, where ‘remedies’ in this paragraph may include operational expenditure (maintenance or repair) and capital expenditure (refurbishment or renewal);

(l) ‘overhead lines inspected for the western region for the most recent completed assessment period (measured by number of poles, and estimated line length)’, the sum of ‘overhead lines inspected for the western region’ accumulated during the CPP regulatory period to date, ‘overhead lines inspected for the eastern region for the most recent completed assessment period (measured by number of poles, and estimated line length)’ and the sum of ‘overhead lines inspected for the eastern region’ accumulated during the CPP regulatory period to date;

(m) ‘number of pole-mounted transformers/substations inspected for the western region for the most recent completed assessment period (measured by number for each category)’, the sum of ‘number of pole-mounted transformers/substations inspected for the western region for the most recent completed assessment period (measured by number for each category)’ accumulated during the CPP regulatory period to date, ‘number of one pole mounted transformers/substations inspected for the western region for the most recent completed assessment period’, the sum of ‘number of one pole mounted transformers/substations inspected for the western region for the most recent completed assessment period’ accumulated during the CPP regulatory period to date, ‘number of two pole mounted transformers/substations inspected for the western region for the most recent completed assessment period’ and the sum of ‘number of two pole mounted transformers/substations inspected for the western region for the most recent completed assessment period’ accumulated during the CPP regulatory period to date;

(n) ‘number of pole-mounted transformers/substations inspected for the eastern region for the most recent completed assessment period (measured by number for each category)’, the sum of ‘number of pole-mounted transformers/substations inspected for the eastern region for the most recent completed assessment period (measured by number for each category)’ accumulated during the CPP regulatory period to date, ‘number of one pole mounted transformers/substations inspected for the eastern region for the most recent completed assessment period’, the sum of ‘number of one pole mounted transformers/substations inspected for the eastern region for the most recent completed assessment period’ accumulated during the CPP regulatory period to date, ‘number of two pole mounted transformers/substations inspected for the eastern region for the most recent completed assessment period’ and the sum of ‘number of two pole mounted transformers/substations inspected for the eastern region for the most recent completed assessment period’
accumulated during the **CPP regulatory period** to date;

(o) ‘number of ground-mounted transformers/substations inspected for the western region for the most recent completed assessment period (measured by number for each category)’, the sum of ‘number of ground-mounted transformers/substations inspected for the western region for the most recent completed assessment period (measured by number for each category)’ accumulated during the **CPP regulatory period** to date, ‘number of ground-mounted transformers/substations inspected for the eastern region for the most recent completed assessment period (measured by number for each category)’ and the sum of ‘number of ground-mounted transformers/substations inspected for the eastern region for the most recent completed assessment period (measured by number for each category)’ accumulated during the **CPP regulatory period** to date;

(p) ‘number of red tag poles identified for the most recent completed assessment period’, the sum of ‘number of red tag poles identified for the most recent completed assessment period’ accumulated during the **CPP regulatory period** to date, ‘number of red tag poles replaced for the most recent completed assessment period’ and the sum of ‘number of red tag poles replaced for the most recent completed assessment period’ accumulated during the **CPP regulatory period** to date;

(q) vegetation management work, including ‘tree sites managed as forecast for the most recent completed assessment period’, ‘actual tree sites managed for the most recent completed assessment period’, ‘variance between forecasts and actual tree sites managed for the most recent completed assessment period’, ‘breakdown of trees trimmed and trees removed for the most recent completed assessment period’, a description of **Powerco’s** overall progress on the introduction of the cyclical vegetation management strategy at the end of the most recent completed **assessment period**, the ‘% of vegetation management work cleared as forecast for the most recent completed assessment period’ and ‘% of vegetation management work cleared as forecast for the CPP regulatory period to date’;

(r) Enterprise Resource Planning progress, including a description of **Powerco’s** expenditure forecast for the most recent completed **assessment period** and its progress against its expenditure forecast for the most recent completed **assessment period**;

(s) ‘number of full-time equivalent staff forecast to be recruited in the most recent completed assessment period’, ‘number of full-time equivalent staff actually recruited in the most recent completed assessment period’, ‘variance between forecast and actual number of full-time equivalent staff recruited in the most recent completed assessment period’, and ‘description of areas of work for full-time equivalent staff recruited in the most recent completed assessment period’;

(t) **SAIDI** and **SAIFI** performance by network **planned interruptions** information, including the **SAIDI limit** for the most recent completed **assessment period**, **SAIFI limit** for the most recent completed **assessment period**, **SAIDI assessed value** for the most recent completed **assessment**
period, SAIFI assessed value for the most recent completed assessment period, ‘SAIDI assessed value for the western region for the most recent completed assessment period’, ‘SAIDI assessed value for the eastern region for the most recent completed assessment period’, ‘SAIFI assessed value for the western region for the most recent completed assessment period’ and ‘SAIFI assessed value for the eastern region for the most recent completed assessment period’;

(u) SAIDI and SAIFI performance by network unplanned interruptions information, including the SAIDI limit for the most recent completed assessment period, SAIFI limit for the most recent completed assessment period, SAIDI assessed value for the most recent completed assessment period, ‘SAIDI assessed value for the western region for the most recent completed assessment period’, ‘SAIDI assessed value for the eastern region for the most recent completed assessment period’, ‘SAIFI assessed value for the western region for the most recent completed assessment period’ and ‘SAIFI assessed value for the eastern region for the most recent completed assessment period’;

(v) average length of planned outages and unplanned outages information for the most recent completed assessment period, including ‘average length of planned outages on the distribution network (6.6kV to 22kV) (minutes)’, ‘average length of planned outages on the subtransmission network (22kV to 110kV) (minutes)’, ‘average length of unplanned outages on the distribution network (6.6kV to 22kV) (minutes)’ and ‘average length of unplanned outages on the subtransmission network (22kV to 110kV) (minutes)’;

(w) worst served feeders and consumers performance information for the most recent completed assessment period, broken down per Powerco feeder class (F1 to F5), including-

(i) feeder interruption duration index for the worst-performing 10 feeders in each class, including the location of the feeder;

(ii) feeder interruption frequency index for the worst-performing 10 feeders in each class, including the location of the feeder;

(iii) number of feeders exceeding its interruption duration targets;

(iv) number of feeders exceeding its interruption frequency targets;

(v) duration of outages experienced per ICP by the 20 worst-served ICPs, where low voltage (<6.6kV) network interruptions and interruptions requested by the consumer are excluded;

(vi) number of outages experienced per ICP by the 20 worst-served ICPs, where low voltage (<6.6kV) network interruptions and interruptions requested by the consumer are excluded;

(vii) a description of initiatives undertaken in the most recent completed assessment period to improve the performance of the worst-performing feeders and the quality of supply to worst-served
consumers; and

(viii) ‘number of consumers experiencing more than 5 planned interruptions during the most recent completed assessment period’; and

(x) complaints information, including-

(i) ‘% of complaints responded to in 2 days’;

(ii) ‘total number of complaints received in the most recent completed assessment period’;

(iii) ‘complaints resolved within 20 days during the most recent completed assessment period (%)’;

(iv) ‘complaints resolved within 40 days during the most recent completed assessment period (%)’;

(v) ‘number of complaints deadlocked and referred to Utilities Disputes Limited during the most recent completed assessment period’; and

(vi) ‘complaints deadlocked and referred to Utilities Disputes Limited during the most recent completed assessment period (%)’.

3.4 For the purpose of clause 3.2(b), Powerco’s Annual Delivery Report must include qualitative measures containing-

Introduction

(a) an introduction from Powerco’s board or Chief Executive Officer, including-

(i) an explanation of Powerco’s key achievements in delivering the projects and programmes approved as part of its customised price-quality path;

(ii) how Powerco is progressing towards delivery of the projects and programmes approved as part of its customised price-quality path;

(iii) any instances where Powerco is not delivering the projects and programmes approved as part of its customised price-quality path; and

(iv) why Powerco is not progressing, or is progressing with its intended CPP investment programme in the manner identified in clause 3.4(a)(ii);

Delivery of Outcomes

(b) a description of the steps taken by Powerco to ensure that the projects and programmes approved as part of its customised price-quality path are achieved and put into practice as efficiently as possible;

Network evolution initiatives
(c) a description of Powerco’s network evolution initiatives, including an overview of-

(i) what projects it has assessed and worked on in the most recent completed assessment period;

(ii) an explanation of progress on the Whangamata major growth and security project, key learnings to date, and how this is benefitting consumers;

(iii) how it is working and sharing knowledge with the wider energy industry;

(iv) what it has learnt in the most recent completed assessment period; and

(v) what areas it envisions as becoming important for innovation in the future;

Data improvement/information quality programmes

(d) a description of Powerco’s data improvement and information quality programmes, including-

(i) what programmes and initiatives it has undertaken in the most recent completed assessment period;

(ii) what it has learnt in the most recent completed assessment period; and

(iii) how its programmes and initiatives are benefitting consumers;

Asset management improvements

(e) Powerco’s asset management improvements, including-

(i) its progress in attaining ISO55000 accreditation by the end of the CPP regulatory period;

(ii) its progress in developing an asset health criticality framework which allows for condition-based assessments to link with its future expenditure needs and reliability needs; and

(iii) what specific assets are being improved and to what extent, including asset health trends on all major asset categories specified in clause 3.3;

Streamlined works delivery

(f) Powerco’s streamlined works delivery, including-

(i) what it has achieved in streamlined works delivery during the CPP regulatory period; and

(ii) how its achievements during the CPP regulatory period have
benefitted **consumers**, with particular reference to their effect on unit rates;

*Enterprise Resource Planning programme*

(g) the ongoing implementation of **Powerco**'s Enterprise Resource Planning, including-

(i) an explanation of its progress against its overall programme milestones;

(ii) the extent to which it is on track for successful delivery of its programmes;

(iii) when **consumers** will benefit from the programme; and

(iv) details of expected efficiency gains and business process quality improvements achieved through the implementation of the Enterprise Resource Planning programme;

*Stakeholder engagement initiatives*

(h) what **Powerco** has done to inform **consumers** of its customised price-quality path work programme in the most recent completed **assessment period**;

(i) how it has notified **consumers** of increased planned outages in the most recent completed **assessment period**;

(j) what initiatives it has implemented for-

(i) the worst-served **consumers** in the most recent completed **assessment period**;

(ii) vulnerable **consumers**; and

(iii) providing faster connections, including quotations and physical connections;

(k) its wider community work in the most recent completed **assessment period**;

*Safety and hazard control initiatives*

(l) **Powerco**'s safety and hazard control initiatives, including-

(i) what initiatives it has implemented internally and what initiatives it has implemented publically to improve safety and hazard control; and

(ii) discussion on the overall trends and improvement in network resilience;

*Environment*

(m) **Powerco**'s environmental measures, including what work and initiatives it
has undertaken to reduce the overall environmental impacts of its operations during the most recent completed assessment period;

Customer satisfaction

(n) how Powerco has improved consumer satisfaction during the most recent completed assessment period; and

(o) what engagement Powerco has had with Utilities Disputes Limited during the most recent completed assessment period.

Sue Begg, Deputy Chair

Dated at Wellington this 28th day of March 2018.

COMMERCE COMMISSION
## Schedule 1: Expenditure forecasts

### Capex summary (nominal)

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2023</th>
<th>Total</th>
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<td><strong>Renewals capex</strong></td>
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<td>Overhead structures</td>
<td>28,998</td>
<td>35,923</td>
<td>39,040</td>
<td>40,102</td>
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<td>Cables</td>
<td>6,999</td>
<td>8,056</td>
<td>7,584</td>
<td>7,260</td>
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<td>Zone substations</td>
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<td>16,393</td>
<td>16,708</td>
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<td>Distribution transformers</td>
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<td>Distribution switchgear</td>
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<td>10,030</td>
<td>10,206</td>
<td>10,424</td>
<td>8,782</td>
<td>49,275</td>
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<td><strong>Secondary systems</strong></td>
<td>4,753</td>
<td>4,806</td>
<td>4,510</td>
<td>7,172</td>
<td>19,352</td>
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<td><strong>Total renewals capex</strong></td>
<td>82,721</td>
<td>91,446</td>
<td>100,335</td>
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<td><strong>Growth and security capex</strong></td>
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<td>Palmerston North</td>
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<td>9,604</td>
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<td>Whangamata</td>
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<td>Kopa-Tairua</td>
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<td>Motuora - NPL GXP</td>
<td>9,832</td>
<td>10,030</td>
<td>10,206</td>
<td>10,424</td>
<td>8,782</td>
<td>49,275</td>
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<td><strong>Total growth and security capex</strong></td>
<td>63,720</td>
<td>58,929</td>
<td>63,733</td>
<td>65,543</td>
<td>64,318</td>
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<td><strong>Other network capex</strong></td>
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<td>Consumer connection</td>
<td>11,946</td>
<td>12,152</td>
<td>12,173</td>
<td>10,910</td>
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<td>Asset relocations</td>
<td>821</td>
<td>855</td>
<td>874</td>
<td>890</td>
<td>908</td>
<td>4,348</td>
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<tr>
<td>Network evolution</td>
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<tr>
<td><strong>Total other network capex</strong></td>
<td>12,767</td>
<td>13,007</td>
<td>13,046</td>
<td>11,800</td>
<td>12,909</td>
<td>63,529</td>
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<td><strong>Non-network capex</strong></td>
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<td>Corporate</td>
<td>24,586</td>
<td>25,427</td>
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<td>ICT Opex</td>
<td>5,518</td>
<td>6,308</td>
<td>6,344</td>
<td>6,322</td>
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<td>Insurance and governance</td>
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<td>2,337</td>
<td>2,432</td>
<td>2,470</td>
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<td>Facilities</td>
<td>2,062</td>
<td>2,024</td>
<td>2,227</td>
<td>2,225</td>
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<td><strong>Total Non-network capex</strong></td>
<td>34,408</td>
<td>36,097</td>
<td>36,458</td>
<td>36,594</td>
<td>36,420</td>
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<tr>
<td><strong>Total capex (excluding cost of financing)</strong></td>
<td>180,867</td>
<td>173,754</td>
<td>193,277</td>
<td>190,608</td>
<td>187,740</td>
<td>926,247</td>
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### Opex summary (nominal)

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<tr>
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<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2023</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Network opex</strong></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Corrective maintenance</td>
<td>13,133</td>
<td>14,731</td>
<td>15,058</td>
<td>14,315</td>
<td>14,107</td>
<td>71,344</td>
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<tr>
<td>Preventive maintenance and inspection</td>
<td>11,751</td>
<td>12,855</td>
<td>13,122</td>
<td>12,665</td>
<td>12,828</td>
<td>63,691</td>
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<tr>
<td>Reactive maintenance</td>
<td>7,524</td>
<td>7,788</td>
<td>8,058</td>
<td>8,148</td>
<td>8,243</td>
<td>39,762</td>
</tr>
<tr>
<td>System operations and network support</td>
<td>15,202</td>
<td>16,238</td>
<td>16,831</td>
<td>16,486</td>
<td>16,720</td>
<td>81,478</td>
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<td>Vegetation management</td>
<td>10,367</td>
<td>9,840</td>
<td>9,742</td>
<td>10,236</td>
<td>9,814</td>
<td>50,000</td>
</tr>
<tr>
<td><strong>Total network opex</strong></td>
<td>57,977</td>
<td>61,533</td>
<td>63,202</td>
<td>61,851</td>
<td>61,712</td>
<td>306,275</td>
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<tr>
<td><strong>Non-network opex</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corporate</td>
<td>24,586</td>
<td>25,427</td>
<td>25,453</td>
<td>25,566</td>
<td>25,724</td>
<td>126,408</td>
</tr>
<tr>
<td>ICT Opex</td>
<td>5,518</td>
<td>6,308</td>
<td>6,344</td>
<td>6,322</td>
<td>6,307</td>
<td>30,809</td>
</tr>
<tr>
<td>Insurance and governance</td>
<td>2,242</td>
<td>2,337</td>
<td>2,432</td>
<td>2,470</td>
<td>2,507</td>
<td>11,989</td>
</tr>
<tr>
<td>Facilities</td>
<td>2,062</td>
<td>2,024</td>
<td>2,227</td>
<td>2,225</td>
<td>2,232</td>
<td>10,771</td>
</tr>
<tr>
<td><strong>Total Non-network opex</strong></td>
<td>34,408</td>
<td>36,097</td>
<td>36,458</td>
<td>36,594</td>
<td>36,420</td>
<td>179,977</td>
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<tr>
<td><strong>Total opex</strong></td>
<td>92,385</td>
<td>97,631</td>
<td>99,660</td>
<td>98,445</td>
<td>98,132</td>
<td>486,252</td>
</tr>
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</table>
Schedule 2: Form of director’s certificate

I/We, [insert full name/s], being director/s of Powerco Limited, certify that, having made all reasonable enquiry, to the best of my/our knowledge and belief, the attached Annual Delivery Report of Powerco Limited is true and accurate *[except in the following respects].

*[insert description of non-compliance]*

[Signatures of directors]

[Date]

*Delete if inapplicable.

Note: Section 103(2) of the Commerce Act 1986 provides that no person shall attempt to deceive or knowingly mislead the Commission in relation to any matter before it. It is an offence to contravene section 103(2) and any person who does so is liable on summary conviction to a fine not exceeding $100,000 in the case of an individual or $300,000 in the case of a body corporate.