

Summary of the Commission's enforcement decisions in response to non-compliance with the default price-quality path quality standards for electricity distributors for the 2012 assessment period

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Executive summary

Purpose of paper

- X1. The purpose of this paper is to explain the process and reasons behind the Commerce Commission's enforcement decisions in response to non-compliance with the default price-quality path quality standards for electricity distributors for the 2012 assessment period.

We warned three electricity distributors for failing to comply with the quality standards

- X2. We have issued warning letters to the following electricity distributors in response to their non-compliance with the quality standards in the 2012 assessment period:

X2.1 Aurora Energy Limited (**Aurora**);

X2.2 Eastland Network Limited (**Eastland**); and

X2.3 Electricity Invercargill Limited (**Electricity Invercargill**).

We are taking no further action against Orion New Zealand Limited

- X3. We have issued a no-further-action letter to Orion New Zealand Limited (**Orion**) in response to its non-compliance with the quality standards in the 2012, 2013 and 2014 assessment periods.

- X4. Orion was non-compliant with the quality standards in 2012, 2013 and 2014 as a result of the altered state of its network following the Canterbury earthquakes. Orion has since moved onto a customised price-quality path, which reflects more appropriate reliability limits for Orion following the earthquakes.

We considered that there was no serious fault on the part of the non-compliant electricity distributors

- X5. We assessed Eastland's, Aurora's and Electricity Invercargill's non-compliance using our enforcement criteria: extent of detriment, seriousness of conduct, and public interest.
- X6. Based on our assessment of each instance of non-compliance against these enforcement criteria, we exercised our enforcement discretion not to seek a penalty in Court.
- X7. In particular, having assessed the particular circumstances of each instance of non-compliance, we considered that in each case there was no serious fault on the part of the non-compliant electricity distributor.

We investigated the circumstances of the non-compliance

- X8. We investigated the circumstances of each instance of non-compliance.
- X9. This involved reviewing the compliance statements and other material provided by the non-compliant electricity distributors, requesting further information where necessary, and commissioning independent engineering reviews where warranted by the complexity of the circumstances of the non-compliance.

Our engineering advisors raised concerns about Eastland's and Aurora's asset management

- X10. In addition to assisting us to assess the circumstances of Eastland's and Aurora's non-compliance, our engineering advisors reported a number of concerns and recommendations related to Eastland's and Aurora's asset management.

The warnings may lead us towards a stronger enforcement response in future

- X11. It is an electricity distributor's responsibility to comply with the quality standards and to decide what actions to take in order to do so.
- X12. If an electricity distributor that has been warned fails to comply with the quality standards again, that electricity distributor's 2012 non-compliance will be a relevant factor that may lead us towards a stronger enforcement response. Particularly relevant would be the extent to which the concerns raised following that electricity distributor's 2012 non-compliance contributed to the second non-compliance.
- X13. We expect that electricity distributors' network performance and asset management will be the subject of increasing summary and analysis in future. The extent to which the non-compliant electricity distributors have addressed the concerns raised following their 2012 non-compliance will be considered as part of this process.

Purpose of paper

1. The purpose of this paper is to explain the process and reasons behind the Commission's enforcement decisions in response to non-compliance with the default price-quality path quality standards for electricity distributors for the 2012 assessment period.

Four electricity distributors failed to comply with the quality standards for the 2012 assessment period

Eastland, Aurora, Electricity Invercargill and Orion are subject to quality standards

2. Part 4 of the Commerce Act 1986 provides that all suppliers of electricity lines services (other than those supplied by Transpower) are subject to default/customised price-quality regulation unless they are exempt.
3. Eastland, Aurora, Electricity Invercargill and Orion are not exempt from price-quality regulation and are each currently subject to a price-quality path determination that sets quality standards they must comply with. The quality standards limit the permissible level of interruptions on an electricity distributor's network by frequency and duration.¹
4. The default price-quality path that applied to Eastland, Aurora, Electricity Invercargill and Orion in the 2011, 2012 and 2013 assessment periods was set by the Electricity Distribution Services Default Price-Quality Path Determination 2010 (**Determination**) and applied to the regulatory period from 01 April 2010 to 31 March 2015.²
5. Following each annual assessment period, all electricity distributors that are subject to default/customised price-quality regulation are required to provide us with an annual compliance statement which includes a report on their performance against the quality standards. Eastland, Aurora, Electricity Invercargill and Orion were therefore each required to provide us with a self-assessment against the quality standards for the 2012 assessment period.

¹ The quality standards requirements that relate to the 2012 assessment period are set out in the Electricity Distribution Services Default Price-Quality Path Determination 2010, available at: <http://www.comcom.govt.nz/dmsdocument/9542>. Further explanation of the quality standards is provided at *Initial Reset of the Default Price-Quality Path for Electricity Distribution Businesses, Decisions Paper*, 30 November 2009, available at: <http://www.comcom.govt.nz/dmsdocument/589>. Quality performance is measured by SAIDI and SAIFI. SAIDI (System Average Interruption Duration Index) measures interruption duration and is calculated as the average outage duration for each consumer connection in units of time. SAIFI (System Average Interruption Frequency Index) measures interruption frequency and is calculated as the average number of interruptions that a consumer connection would experience over a year.

² That price-quality path was subsequently reset in 2012 for all non-exempt electricity distributors except for Orion by the *Electricity Distribution Services Default Price-Quality Path Determination 2012* [2012] NZCC 35, which took effect on 1 April 2013. On 1 April 2014, Orion moved from a default price-quality path determination to a customised price-quality path determination (see *Orion New Zealand Limited Customised Price-Quality Path Determination 2013* [2013] NZCC 21).

Eastland, Aurora, Electricity Invercargill and Orion failed to comply with the quality standards for the 2012 assessment period

6. Eastland, Aurora, Electricity Invercargill and Orion all reported non-compliance with the quality standards for the 2012 assessment period in their 2012 compliance statements.³
7. Orion also reported non-compliance with the quality standards for the 2013 and 2014 assessment periods in its 2013 and 2014 compliance statements.
8. The performance of Eastland, Aurora, Electricity Invercargill and Orion against the quality standards in the assessment periods relevant to their non-compliance is described in more detail in the attachments to this paper.

Contravention of a price-quality requirement under the Commerce Act 1986

9. We consider that the non-compliant electricity distributors have contravened a price-quality requirement applying to regulated goods or services as described in section 87(1)(a) of the Commerce Act 1986 (**Act**).
10. For such contraventions, a Court may impose a pecuniary penalty of up to \$500,000 in the case of an individual or up to \$5,000,000 in the case of a body corporate.⁴ A Court may also order compensation be paid to any person who has suffered, or is likely to suffer, loss or damage as a result of the contravention.⁵

Our enforcement responses to non-compliance with the quality standards for the 2012 assessment period

11. We have issued warning letters to the following electricity distributors in response to their non-compliance with the quality standards for the 2012 assessment period:
 - 11.1 Aurora;
 - 11.2 Eastland; and
 - 11.3 Electricity Invercargill.
12. We have issued a no-further-action letter to Orion in response to its non-compliance with the quality standards for the 2012, 2013 and 2014 assessment periods.

³ Eastland, Aurora and Electricity Invercargill subsequently reported compliance with the quality standards for the 2013 and 2014 assessment periods in their 2013 and 2014 compliance statements.

⁴ Section 87(1)(a) of the Commerce Act 1986.

⁵ Section 87A(1) of the Commerce Act 1986.

Reasons for our enforcement responses to the non-compliance with the quality standards for the 2012 assessment period

Our approach to deciding on the appropriate enforcement response to the four instances of non-compliance

13. Using the enforcement criteria,⁶ we analysed each instance of non-compliance from three perspectives:
 - 13.1 extent of detriment;
 - 13.2 seriousness of conduct; and
 - 13.3 public interest.
14. After assessing the non-compliance against these enforcement criteria, we considered the level of enforcement response required to deter electricity distributors from failing to comply with the quality standards.

Our decision to issue warning letters in response to Eastland's, Aurora's and Electricity Invercargill's 2012 quality standards non-compliance

15. Based on our assessment of each instance of non-compliance against the enforcement criteria, we have exercised our enforcement discretion not to seek a penalty from Eastland, Aurora or Electricity Invercargill.
16. In terms of conduct, having assessed the particular circumstances of each instance of non-compliance, we considered that in each case there was no serious fault on the part of the non-compliant electricity distributors.
17. While any network outage causes inconvenience for consumers, in each instance of non-compliance, we did not identify any significant specific detriment to consumers as a result of the non-compliance, or any over-riding public interest in seeking a penalty.
18. In responding to non-compliance with price-quality requirements, we use warning letters as an alternative to seeking a penalty or compensation where:
 - 18.1 we consider that a supplier is non-compliant; but
 - 18.2 we do not consider that, in the circumstances, a stronger response is necessary to achieve deterrence.
19. Having considered the particular circumstances of each instance of non-compliance, we consider that a warning letter should be sufficient to deter each of the electricity distributors from failing to comply with the quality standards again.

⁶ More detail on our enforcement criteria is available at: <http://www.comcom.govt.nz/enforcement-criteria/>.

20. If a warning letter turns out to be insufficient to deter the electricity distributors from failing to comply with the quality standards again, we may take a stronger response next time. If there is material deterioration in network reliability, it is likely to cause further non-compliance with the quality standards in the short to medium term.

Our decision to take no further action in response to Orion's 2012, 2013 and 2014 quality standards non-compliance

21. Orion was non-compliant with the quality standards in 2012, 2013 and 2014 as a result of the altered state of its network following the Canterbury earthquakes.
22. The reliability limits that Orion failed to meet were set based on Orion's quality performance prior to the earthquakes. Given the extent of the impact of the earthquakes on its network, Orion could not, in our view, have reasonably been expected to meet those limits.
23. Following the earthquakes, Orion applied for a customised price-quality path that includes a variation to the reliability limits, which is the Part 4 mechanism designed to deal with that situation.
24. Orion has since moved onto a customised price-quality path, which reflects more appropriate reliability limits for Orion following the earthquakes.
25. In responding to non-compliance with price-quality requirements, we use no-further-action letters where:
- 25.1 we consider that a business may be, or is, non-compliant; but
- 25.2 in the circumstances, we do not consider that the business needs to be warned for non-compliance or advised of a compliance risk.
26. In this case, we do not consider a warning is necessary.
27. Because the same rationale applies for the 2013 and 2014 assessment periods, our no-further-action letter to Orion applies to the 2012, 2013 and 2014 assessment periods.

Our process for investigating the non-compliance with the quality standards for the 2012 assessment period

We investigated the circumstances of each non-compliance

28. To inform our analysis of each case of non-compliance against the enforcement criteria, we sought to establish the circumstances of each case of non-compliance.
29. In each case, this began with a review of the electricity distributor's compliance statements and any further information initially provided by the electricity distributor.

30. We then requested that the electricity distributor explain the circumstances that led to its non-compliance and provide supporting evidence, where this information had not already been provided.
31. After conducting our initial review, we considered what further investigation was required to assess the explanation provided by the electricity distributor and establish the circumstances that contributed to the non-compliance.
32. In two instances we considered that an independent review of the circumstances of the non-compliance would assist us in establishing the circumstances of the non-compliance.

Eastland and Aurora

33. Following our review of Eastland's and Aurora's compliance statements, we gave Eastland and Aurora the opportunity to explain the circumstances that led to their non-compliance.
34. Following Eastland's and Aurora's explanations, we considered that there were grounds for an independent review of the circumstances of the non-compliance.
35. To assist us in reviewing the circumstances of Eastland's and Aurora's non-compliance, we engaged Strata Energy Consulting (**Strata**). We asked Strata to provide advice on the circumstances of the non-compliance and any other concerns related to those electricity distributors' quality performance.⁷ We also gave Eastland and Aurora an opportunity to respond to Strata's findings.
36. Strata's review of Eastland's and Aurora's network performance included assessment of:
 - 36.1 the reasons for Eastland's and Aurora's non-compliance with the quality standards;
 - 36.2 the reasonableness of the quality standards for Eastland and Aurora;
 - 36.3 Eastland's and Aurora's distribution networks and asset management practices; and
 - 36.4 Eastland's and Aurora's likely future reliability performance.

⁷ More detail on the scope of Strata's review is set out in the Strata Reports. We expect that the scope of any future engineering reviews for compliance and enforcement purposes may be somewhat narrower, as quality performance increasingly becomes the subject of summary and analysis.

37. In order to assess the above:
 - 37.1 Strata first undertook a desk-top review to assess Eastland's and Aurora's asset management framework and to inform the onsite review;
 - 37.2 Strata then undertook the onsite review; and
 - 37.3 following the onsite review, Strata assessed further information requested from Eastland and Aurora.
38. Strata's findings for each of Eastland and Aurora were provided to us as reports dated 24 June for Aurora and 9 July 2013 for Eastland. Strata's reports have already been made available to Eastland and Aurora, respectively, and both Eastland and Aurora have responded to the reports. Strata made one minor revision to its report on Eastland following Eastland's response.
39. Strata's reports, and Eastland's and Aurora's responses to those reports, informed our analysis of the non-compliance against the enforcement criteria and are being made publicly available together with this paper.

Electricity Invercargill

40. Following our review of Electricity Invercargill's compliance statements, we gave Electricity Invercargill the opportunity to explain the circumstances that led to its non-compliance.
41. Electricity Invercargill identified that its non-compliance was attributable to three outages and provided a detailed incident report for each of those outages. Analysis of the incident reports indicated that the outages were due to isolated operational incidents, had any of which not occurred, Electricity Invercargill would have complied with the quality standards.
42. Based on our assessment of the information provided by Electricity Invercargill, we considered that an independent review was unnecessary. The circumstances that led to Electricity Invercargill's non-compliance were more readily identifiable than in the case of both Eastland and Aurora.

Orion

43. Orion's non-compliance with the quality standards in 2012, 2013 and 2014 was as a result of the altered state of its network following the Canterbury earthquakes.
44. Orion has since moved onto a customised price-quality path, which reflects more realistic reliability limits for Orion following the earthquakes.
45. As part of the process for assessing Orion's CPP application, Orion's quality performance and asset management practices were subject to considerable scrutiny.
46. Accordingly, we considered that an independent review of Orion's 2012, 2013 and 2014 non-compliance was unnecessary.

Concerns about Eastland's and Aurora's asset management

47. In addition to assisting us to assess the circumstances of Eastland's and Aurora's non-compliance, Strata's findings included a number of concerns and recommendations related to asset management.

Strata's findings about Eastland

48. Strata's report on Eastland highlighted a number of concerns with Eastland's asset management and made a number of suggestions. Strata expressed concern that, unless Eastland took steps to address certain asset management issues, it was likely to continue to fail to meet the reliability limits in some years.
49. Eastland cooperated with Strata's investigation and has indicated that it will consider Strata's findings and recommendations, while noting that it did not agree with all of them.
50. During its review, Strata found that Eastland had already taken steps to address some of the factors that contributed to the non-compliance. For example, Strata found that Eastland has increased its tree management efforts following the non-compliance.

Strata's findings about Aurora

51. Strata's report on Aurora also highlighted a number of concerns with Aurora's asset management and made a number of suggestions.
52. Aurora largely agreed with Strata's findings, and indicated that it had initiated work streams aimed at implementing Strata's recommendations.
53. During its review, Strata found that Aurora had already taken steps to address some of the factors that contributed to the non-compliance. For example, Strata found that Aurora is targeting significant capital expenditure at improving the reliability of its worst performing feeders.

Our expectations regarding future quality performance

54. It is an electricity distributor's responsibility to comply with the quality standards and to decide what actions to take in order to do so.
55. We acknowledge that, following their failure to comply with the quality standards in the 2012 assessment period, Eastland, Aurora and Electricity Invercargill have each complied with the quality standards for the 2013 and 2014 assessment periods.
56. Notwithstanding their 2013 and 2014 compliance with the quality standards, we will take the warnings into account in exercising our enforcement discretion if any of the electricity distributors fail to comply with regulatory requirements again.

57. If an electricity distributor that has been warned fails to comply with the quality standards again, that electricity distributor's 2012 non-compliance will be a relevant factor that may lead us towards a stronger enforcement response. Particularly relevant would be the extent to which the concerns raised following that electricity distributor's 2012 non-compliance contributed to the second non-compliance.
58. Further, we may draw the warning letters to the attention of the Court in any future proceedings we might bring against any of those electricity distributors for a similar contravention.
59. Any Court action could include an application for compensation for affected consumers.
60. We expect that electricity distributors' network performance and asset management will be the subject of increasing summary and analysis efforts in future. The extent to which the non-compliant electricity distributors have addressed the concerns raised following their 2012 non-compliance will be considered as part of this process.

Closing remarks

61. We appreciated the cooperation of the non-compliant electricity distributors during our investigations.
62. We encourage all electricity distributors to consider their asset management practices in light of Strata's reports on Eastland and Aurora.

Timeframe for enforcement decisions

63. While we do not have an explicit timeframe for investigating non-compliance or making enforcement decisions, we expect to respond to future instances of non-compliance with the price-quality path more quickly.

Quality performance is a complex area

64. We appreciate that quality performance is a complex area and that electricity distributors face challenging decisions in managing their networks to comply with the quality standards. We encourage initiatives such as the ENA Quality of Supply and Incentive Working Group that can provide a forum for electricity distributors to share their challenges and ideas regarding quality performance.

Attachment 1: Eastland's non-compliance

Eastland's network

1. Eastland's electricity distribution network area covers the East Cape and Northern Hawke's Bay regions. This area corresponds to the Gisborne District Council and the Wairoa District Council territories.
2. Eastland supplies nearly 25,500 consumer connections.
3. Eastland is part of the Eastland Group, which owns and operates a range of infrastructure businesses in the Gisborne area.

Eastland's 2012 quality standards non-compliance

4. Eastland's compliance statement for the 2012 assessment period shows and states that Eastland was non-compliant with the quality standards.
5. Eastland was non-compliant with the quality standards in 2012 because it exceeded a reliability limit in both the 2011 and 2012 assessment periods. In Eastland's case, it exceeded its SAIDI limit in both periods.
6. Eastland's performance against the reliability limits for 2011 and 2012 is represented by the following table.

Eastland's performance against the annual reliability limits for 2011 and 2012

	Quality measure	Limit	Assessed	Result
2012	SAIDI	302.38	392.15	29.69% over the limit
	SAIFI	4.26	3.41	19.95% under the limit
2011	SAIDI	302.38	334.00	10.46% over the limit
	SAIFI	4.26	3.49	18.08% under the limit

Source: Eastland's 2012 DPP Compliance Statement

7. Eastland's explanation of the non-compliance, along with Strata's assessment of Eastland's explanation, is provided in section 4 of Strata's report on Eastland.

Attachment 2: Aurora's non-compliance

Aurora's network

1. Aurora's electricity distribution network area covers Dunedin and the Central Otago region.
2. Aurora supplies over 83,300 consumer connections.
3. Aurora is wholly owned by the Dunedin City Council through its holding company Dunedin City Holdings Limited.

Aurora's 2012 quality standards non-compliance

4. Aurora's compliance statement for the 2012 assessment period shows and states that Aurora was non-compliant with the quality standards.
5. Aurora was non-compliant with the quality standards in 2012 because it exceeded a reliability limit in both the 2011 and 2012 assessment periods. In Aurora's case, it exceeded its SAIFI limit in 2012 and its SAIDI limit in both periods.
6. Aurora's performance against the reliability limits for 2011 and 2012 is represented by the following table.

Aurora's performance against the annual reliability limits for 2011 and 2012

	Quality measure	Limit	Assessed	Result
2012	SAIDI	98.29	115.88	17.90% over the limit
	SAIFI	1.67	1.79	7.19% over the limit
2011	SAIDI	98.29	110.95	12.88% over the limit
	SAIFI	1.67	1.48	11.38% under the limit

Source: Aurora's 2012 DPP Compliance Statement

7. Aurora's explanation of the non-compliance, along with Strata's assessment of Aurora's explanation, is provided in section 4 of Strata's report on Aurora.

Aurora submitted its 2012 compliance statement late

8. In addition to Aurora's non-compliance with the quality standards, Aurora failed to submit its 2012 compliance statement within 50 working days of 31 March 2012, as required by the Determination. Aurora's compliance statement was due on 14 June 2012 but not provided until 3 August 2012.

9. Aurora advised that its failure to submit its compliance statement on time was due to a loss of archived SAIDI and SAIFI data, which delayed the issuance of the audit report.
10. We understand that Aurora has since addressed the system issue that caused the loss of archived SAIDI and SAIFI data.

Attachment 3: Electricity Invercargill's non-compliance

Electricity Invercargill's network

1. Electricity Invercargill supplies lines services in Invercargill City and the Bluff township area.
2. Electricity Invercargill supplies just over 17,200 consumer connections.
3. Electricity Invercargill is wholly owned by the Invercargill City Council through its holding company Invercargill City Holdings Limited.

Electricity Invercargill's 2012 quality standards non-compliance

4. Electricity Invercargill's compliance statement for the 2012 assessment period shows and states that Electricity Invercargill was non-compliant with the quality standards.
5. Electricity Invercargill was non-compliant with the quality standards in 2012 because it exceeded a reliability limit in both the 2011 and 2012 assessment periods. In Electricity Invercargill's case, it exceeded its SAIDI limit in 2012 and its SAIFI limit in both periods.
6. Electricity Invercargill's performance against the reliability limits for 2011 and 2012 is represented by the following table.

Electricity Invercargill's performance against the annual reliability limits for 2011 and 2012

	Quality measure	Limit	Assessed	Result
2012	SAIDI	45.64	63.63	39.42% over the limit
	SAIFI	1.13	1.29	14.16% over the limit
2011	SAIDI	45.64	44.77	1.91% under the limit
	SAIFI	1.13	1.18	4.42% over the limit

Source: Electricity Invercargill's 2012 DPP Compliance Statement

7. Electricity Invercargill identified that its non-compliance was attributable to three outages and provided a detailed incident report for each of those outages. Analysis of the incident reports indicated that the outages were due to isolated operational incidents, had any of which not occurred, Electricity Invercargill would have complied with the quality standards.

Attachment 4: Orion's non-compliance

Orion's network

1. Orion owns and operates the electricity distribution network in central Canterbury between the Waimakariri and Rakaia rivers, and from the Canterbury coast to Arthur's Pass.
2. Orion's network is contained within the boundaries of the two local councils that own Orion, Christchurch City Council (which owns 89.3%) and Selwyn District Council (which owns 10.7%).
3. Orion supplies just over 189,000 consumer connections.

Orion's 2012, 2013 and 2014 quality standards non-compliance

4. Orion's compliance statements for the 2012, 2013 and 2014 assessment periods show that Orion failed to comply with its quality standards for each of those assessment periods.
5. Orion was non-compliant with the quality standards in 2012 because it exceeded a reliability limit in both the 2011 and 2012 assessment periods. It was non-compliant in both 2013 and 2014 because it exceeded a reliability limit in the assessment year and in both prior assessment periods. In Orion's case, it exceeded its SAIDI and SAIFI limits in 2011, 2012, 2013 and 2014.
6. Orion's performance against the reliability limits for 2011, 2012, 2013 and 2014 is represented by the following table.

Orion's performance against the annual reliability limits for 2011, 2012, 2013 and 2014

	Quality measure	Limit	Assessed	Result
2014	SAIDI	59.73	105.74	78.71% over the limit
	SAIFI	0.776	1.221	59.19% over the limit
2013	SAIDI	59.73	85.50	44.50% over the limit
	SAIFI	0.776	0.971	26.60% over the limit
2012	SAIDI	59.73	133.72	125.99% over the limit
	SAIFI	0.776	1.897	147.33% over the limit

2011	SAIDI	59.73	106.34	79.72% over the limit
	SAIFI	0.776	1.239	61.54% over the limit

Source: Orion's 2014 DPP Compliance Statement

- Orion was non-compliant with the quality standards in 2012, 2013 and 2014 as a result of the altered state of its network following the Canterbury earthquakes.