NZ EDB 2023 AMP REVIEW

Resilience Assessment Report







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EXECUTIVE SUMMARY

Background

29 EDBs

ELECTRICITY DISTRIBUTION BUSINESSES

IAEngg was engaged by the NZ Commerce Commission (ComCom) in July 2023 to undertake a review of the 2023 Asset Management Plans (AMPs) of the 29 Electricity Distribution Businesses (EDBs).

This report is the deliverable on resilience planning in stage 2 of the project, and covers IAEngg's assessment on the resilience planning of the EDBs.

Specific deliverables for resilience planning assessment include:

- EDB's understanding of environmental risks and planning for High Impact Low Probability (HILP) events;
- The level of assessment that has been undertaken by EDBs to determine the resilience initiatives; and
- Provide independent opinion on:
 - Initiatives raised to improve resilience;
 - Assessment of natural disaster risk to networks;
 - Resilience assessment and evaluation;
 - Analysis of expenditure on resilience, and
 - Identification of good electricity industry practice.

Complexity

The review task was complex due to a number of factors:

- The AMPs are lengthy documents and the timeframe for this high-level review did not allow a comprehensive detailed review of each of the 29 AMPs. IAEngg needed to target areas of the AMP to extract the required information for analysis;
- IAEngg's scope of resilience assessment includes the analysis of expenditure in resilience. However, the majority of EDBs do not itemise the expenditure they define as resilience related, but the expenditure has been grouped into the various capex and opex regulatory categories. For the minority of EDBs who have stated the value of the resilience expenditure, the details have been summarised in this report.
- IAENgg has found that there are differences in how EDBs classify resilience expenditure. Some EDBs have included reliability improvement expenditure under resilience. We are of the opinion that reliability improvement expenditure should not be included under the resilience theme as their benefits apply to both normal supply interruption as well as HILP events.



Review approach

IAEngg's review focuses on the following:

Level of assessment that has been undertaken by EDB for naturally occurring HILP events

Initiatives raised to improve resilience

Proposed expenditure on resilience in 2026-2030 period

Justification for the proposed expenditure

Identification of good industry practice

Many naturally occurring and man-made events can impact the grid's ability to supply electricity. Most of these events occur relatively frequently but with least serious damage. There are also those that rarely occur but with much serious damages, commonly referred to as "High Impact Low Probability" (HILP) events.

Grid resilience as discussed in this report (and aligned with the scope of ComCom's engagement) refers to the grid's ability to absorb the impact of HILP events so electricity

supply can either be maintained or be restored promptly after an interruption.

For the resilience assessment covered in this report, we have focussed on EDB approach to deal with naturally occurring HILP events that are either climate related (storms, floods, bushfires etc.) or geographically related (earthquakes, volcanoes etc.). Man-made events, such as cyber-attacks, are considered outside the scope of the review.

The primary source of information for the review came from the AMPs.



High level findings across EDBs

Capex and opex summary

The initiatives are those identified in the AMPs:

Initiatives to improve supply reliability such as network sectionalisation, installation of reclosers, new Advanced Distribution Management Systems to increase situation awareness and automatic switching order generation.

Initiatives to rapidly respond and recover after large-scale supply disruptions, mostly to do with ready access to mobile generators, mobile substations & network asset spares, regular emergency exercises and mutual aid arrangements.

Design resilience in new assets and network configuration, making use of the opportunities presented by load growth augmentation, new customer projects and asset renewals.

Modify existing assets to increase their resilience against floods, earthquakes and strong wind.

As the majority of EDBs do not separately itemise the expenditure they define as resilience related, IAEngg has not been able to extract the resilience expenditure from the AMPs.

Resilience Framework

All EDBs have considered planning for HILP events as part of their risk management, business continuity and broader asset management function.

EDBs generally have a framework that they use for resilience assessment. A common framework quoted is Electricity Engineers Association's Resilience Guide.

Resilience Standards

A few resilience standards have been mentioned: NZ Society of Earthquake Engineering for seismic strengthening, 1-in-100-year or 1-in-500-year flood standards and recent experiences of extreme climatic events. There are, however, no justification in the AMPs for the adoption of these standards.

Option and Cost-Benefit Analysis

Good industry practice for investment planning in a capital constrained industry would require

methods to prioritise the expenditure to ensure the appropriate areas are targeted. Little details can be found in the AMPs to justify the areas targeted for resilience expenditure, cost/benefit assessments for capital rationing, and modelling to support an increase probability/frequency of occurrence of the HILP events (if required for justification). This is not to say that the background work has not been undertaken, but this work is not presented in the AMPs.

Conclusions

In conclusion, IAEngg supports the notion of investing to "harden" the EDB networks against HILP events. Standardisation of the assessment framework, the resilience standards to be used, and approach for cost/benefit assessments will be essential. Last but not least, customers should be consulted on the level of resilience they are prepared to pay.



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INTRODUCTION



1 INTRODUCTION

IAEngg was engaged by the NZ Commerce Commission (ComCom) in July 2023 to undertake a review of the 2023 Asset Management Plans (AMPs) of the 29 Electricity Distribution Businesses (EDBs).

The review was conducted over two stages

Stage 1 included a desktop review and a detailed forecasting report. Stage 2 covered the AMP disclosure requirements and resilience planning.

This report is the deliverable for Stage 2, and covers IAEngg's assessment on the resilience planning of the EDBs. We have also included the resilience planning of Transpower as a comparison.

Specific deliverables for resilience planning assessment include:

- EDB's understanding of environmental risks and planning for High Impact Low Probability (HILP) events;
- the level of assessment that has been undertaken by EDBs to determine the resilience initiatives; and
- Provide independent opinion on:
 - initiatives raised to improve resilience;
 - assessment of natural disaster risk to networks;
 - >>> resilience assessment and evaluation;
 - analysis of expenditure on resilience, and
 - identification of good electricity industry practice.



APPROACH

2 APPROACH

This section outlines the approach taken by IAEngg to assess the EDB's resilience approach and initiatives contained in the AMPs.

2.1 Definition of Resilience

EDBs are in the business of supplying reliable electricity supply to its customers at a cost that is justified. Many naturally occurring and manmade events can impact the grid's ability to supply electricity. Most of these events occur relatively frequently but do not result in serious damage to the grid. There are also those that rarely occur but result in serious

damage, commonly referred to as "High Impact Low Probability" (HILP) events. Grid resilience as discussed in this report (and aligned with the scope of ComCom's engagement) refers to the grid's ability to absorb the impact of HILP events so electricity supply can either be maintained or be restored promptly after an interruption.

For the resilience assessment covered in this report, we have focussed on EDB approach to deal with naturally occurring HILP events that are either climate related (storms, floods, bushfires etc.) or geographically related (earthquakes, volcanoes etc.).

Man-made events, such as cyber-attacks, are not considered for the following reasons:



There are separate regulations governing cyber security in NZ which are distinct from the resilience framework promulgated by the NZ National Emergency Management Agency;



ComCom's focus of the review is on HILP events, and this had been driven by the extreme weather events that have occurred in NZ recently.



2.2 Approach

IAEngg's review focuses on the following:

Determining the level of assessment that has been undertaken by EDB for naturally occurring HILP events

Initiatives raised to improve resilience

Proposed expenditure on resilience in 2026-2030 period

Justification for the proposed expenditure

Identification of good industry practice

The key source of information for the review was the AMPs published by the EDBs. This was supplemented, for a limited number of EDBs, by meetings to clarify information provided in the AMP. The number of EDBs with which a meeting was held was limited due to the time and resources available to undertake the project.





2.3 Drivers for Resilience Planning

Drivers for proactive resilience investment

Electricity is an essential supply without which people's quality of lives will be severely affected. It is important to point out that the energy Sector is uniquely critical because it provides an "enabling function" across other critical infrastructure sectors such as water supply, wastewater management, telecommunication and transport.

The New Zealand integrated approach to civil defence emergency management can be described by the four areas of activity, known as the '4 Rs' - Reduction, Readiness, Response and Recovery:

4 Rs				
Reduction	Readiness	Response	Recovery	
Identifying and analysing long-term risks to human life and property from hazards; taking steps to eliminate these risks if practicable, and, if not, reducing the magnitude of their impact and the likelihood of their occurring.	Developing operaticapabilities before emergency happer help and response pageneral public, programmes for enlifeline utilities an Actions taken im during or directly a emergency to save property, and to recover.	a civil defence as; including self- programmes for the and specific mergency services, d other agencies. mediately before, fter a civil defence	The coordinated efforts and processes to bring about the immediate, mediumterm and long-term holistic regeneration of a community following a civil defence emergency.	

In New Zealand energy infrastructure is classified as "lifeline" utility. EDBs have existing duties as lifeline utilities under the Civil Defence Emergency Management Act 2002 to "function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency" (s. 60 (a)).

As such, risk assessment and contingency planning have traditionally been adopted by

EDBs as part of their corporate risk management process and operational planning for HILP events. The focus in the past has traditionally been on the last 3 'Rs' — to be ready to respond swiftly to HILP events and restore electricity supply within the shortest timeframe. Proactive investments to reduce or eliminate the risks ("network hardening") have generally not been considered economical due to the low probability nature of those events.



Recent severe weather events have heightened community awareness of the need to invest to protect critical infrastructure:



Beginning on Friday, 27 January 2023, regions across the upper North Island of New Zealand experienced widespread catastrophic floods caused by heavy rainfall, with Auckland being the most significantly affected.



Shortly afterwards, in February 2023 Cyclone Gabrielle caused significant devastation in northern and eastern regions of North Island. A national state of emergency was announced for only the third time in New Zealand's history. At the height of the cyclone's impact, around 225,000 homes were without power, and thousands of people were displaced as flood waters rose. Cyclone Gabrielle was described as NZ's costliest non-earthquake natural disaster.

For resilience to extreme climatic and seismic events, there is a general consensus that the frequency of extreme climatic events (such as storms and floodings) is increasing as a result of climate change. The review of the 2023AMP has revealed that some EDBs have forecasted increased expenditure to harden the network against extreme weather events. Some EDBs have also suggested that increased resilience expenditures are likely to be proposed in their 2024AMP after they have time to consider the severe weather events that occurred in early 2023.





2.4 Good Industry Practice

2.4.1 Definition of HILP events

Resilience planning of EDBs focuses on HILP events. There is no national or international accepted definition of what constitutes HILP events although there is a general acceptance that HILP events are unpredictable and/or unexpected events that deviate from normal expectations. Impact on EDBs is to do with metrics such as percentage of customers without electricity supply or aggregated hours of customer minutes off supply. Probability of the event is expressed in terms such as "1-in-100-year" or "1-in-200-year". The "1-in-100-year" is generally used by town planners to decide where houses can be built.

2.4.2 Definition of good industry practice

Our assessment of the resilience approach adopted by EDBs required us to identify good electricity industry practices. The following definition of good industry practice has been used in our assessment noting that there are no international standards or defined approaches to resilience planning used in the electricity supply industry:

The degree of skill diligence, prudence, foresight and economic management which would reasonably and ordinarily be expected from a skilled and experienced operator engaged in the same type of undertaking under the same or similar circumstances.

The definition does imply a degree of subjectivity which IAEngg applies based on its collective expertise in the electricity supply industry.

2.4.3 Good industry practice for resilience planning

The characteristics of good resilience planning approach include:

Adoption of a formal framework;

- Standards are adopted that align with industry/sector standards and clear justification provided for deviation. For example, frequency of low probability events is aligned with other electricity industry participants and other utilities such as water authorities;
- Demonstrate balance between proactive expenditure and reacting / recovering after an event;
- For specific network hardening initiatives, such as network hardening for floods & inundation, increase in wind speed and hot dry summers, supporting evidences that these are the areas where climate change will impact and hence priority areas to address; and
- Some form of cost/benefit assessments.

These dot points are expanded further below.

2.4.4 Framework for resilience planning

We recognise that frameworks are still evolving particularly in the area of resilience planning for climate change adaptation. It is also important to point out that resilience planning needs to be a whole-of-system approach involving other lifeline utilities and local governments. For example, it may not be prudent to invest in network hardening against floods and inundation in low lying areas where consumers of electricity are likely to have evacuated when those events occur.

A number of formal frameworks have been adopted by utilities. IAEngg is not advocating one framework over another but emphases the importance of a formal framework to guide a systematic approach to resilience planning. Once a framework is adopted, regular review and comparison of business performance against the framework will also allow an EDB to assess the scale of its maturity and make improvements.



FOUR FRAMEWORKS ARE DISCUSSED BELOW:

NZ National Emergency Management Agency 4Rs Framework

The 4Rs are Reduction, Readiness, Response and Recovery. The first step of the framework is hazard identification:

- HAZARD IDENTIFICATION The first edition of the National Hazardscape Report¹ provides a contemporary summary of the physical nature, distribution, frequency of occurrence and impacts and consequences of 17 key hazards affecting New Zealand. The hazards described in the National Hazardscape Report include geological, meteorological, biological, technological and social hazards. The report also provides information on how the hazards are currently managed across reduction, readiness, response and recovery. The document aimed at informing policy makers, hazard managers and their advisors in carrying out hazard and risk management at the national and local level.
- HAZARD REDUCTION Certain sections of the CDEM Act 2002 applies to Lifeline Utilities of which EDBs are part of². The CDEM framework is reproduced below:



Duties under the Act are mainly to do with readiness, emergency response and recovery but the Act could be used to support investments to reduce the hazard.

² https://www.civildefence.govt.nz/cdem-sector/lifeline-utilities/duties-of-lifeline-utilities



¹ https://www.civildefence.govt.nz/resources/national-hazardscape-report

NZ EEA Resilience Guide

The NZ Electricity Engineers' Association (EEA) has published a Resilience Guide³. The Guidelines have been developed by the EEA Asset Management Group, recognising the importance of good resilience planning in the electricity supply industry. Good resilience planning supports effective management of issues arising from major emergency events such as natural disasters, large earthquakes, extreme weather events and other extreme events that impact on network assets.

Apart from covering the principles of emergency management preparedness, the

guide also includes a spreadsheet-based practical self-assessment tool (RMMAT) that enables EDBs to rate their organisation's degree of overall resilience. The assessment tool has been structured around the 4R's framework as defined in National CDEM Plan Order.

It is noted that the EEA Resilience Guide has been used by many EDBs as framework for resilience assessment. A number of EDBs have taken the additional step of using the RMMAT to assess the maturity of their resilience and to identify opportunities for improvement.

3

EN ISO 14091:2021 Adaptation to climate change — Guidelines on vulnerability, impacts and risk assessment⁴

The recently adopted and published European Standard: 'Adaptation to climate change - Guidelines on vulnerability, impacts and risk assessment' (EN ISO 14091:2021) provides a basis for climate change adaptation planning, implementation, and monitoring and evaluation for any organization, regardless of size, type and nature.

This document gives guidelines for assessing the risks related to the potential impacts of climate change. It describes how to understand an organization's vulnerability and how to develop and implement a sound risk assessment in the context of climate change. It can be used for assessing both present and future climate change risks.

This document is structured starting with an introduction to the concept of climate change risk assessment, followed by the preparation, the implementation and the documentation and communication of the climate change risk assessment.

The standard provides guidance on the use of screening assessments and impact chains, allowing for qualitative and quantitative analysis. This type of information, documented in an internationally agreed way, helps organizations of all kinds and sizes make better business decisions. It is also a useful tool for climate-related reporting.

4

IEEE PES Technical Report (PES-TR83): Resilience Framework, Methods, and Metrics for the Electricity Sector, October 2020⁵

Unlike the frameworks discussed so far, the IEEE Technical Report focuses entirely on the electricity sector and hence more relevant to the EDBs. The report is very comprehensive and

covers resilience metrics, reliability versus resilience, qualitative and quantitative benefit assessments, and case studies of its application by US utilities.

⁵ https://resourcecenter.ieee-pes.org/publications/technical-reports/pes tp tr83 itslc 102920



³ (https://www.eea.co.nz/tools/products/details.aspx?SECT=publications&ITEM=3049)

⁴ https://www.iso.org/standard/68508.html

2.4.5 Standards for resilience planning

To ensure resilience planning is conducted in an open and consistent manner by each EDB, resilience planning standards should be specified. The key questions for standards are:

- What are the metrics for "high impact"?
- What are the metrics for "low probability"?

Section 4.2 of the IEEE PES Technical Report (PESTR83) provides good discussion about metrics used by various entities in the US (IEEE & DOE) on quantifying the impact of an event. It does not, however, advocate the use of probability on the basis that the probability may change with time due to climate change. Also, inherent with unpredictable events, it is likely that there is a high degree of uncertainty associated with the determination of the probability.

IAEngg believes that EDBs should state the standards they use for resilience planning and, where possible, compare those used by other EDBs, Transpower and other lifeline utilities.

2.4.6 Cost-Benefit analysis

Due to competing priorities for capital investment and the need to ensure the investment is in the long-term interest of customers, EDBs find themselves faced with the task to quantify, in monetary terms, the benefits brought about by proactive investment in network resilience against HILP events.

There is no widely accepted or standardized method or publicly available solution that can be used to perform cost-benefit analyses involving improvements to system resilience. In IEEE PES Technical Report (PES-TR83), two methods used

to calculate resilience's value can be broadly categorized as a bottom-up approach and an economy-wide approach. These two methods are defined as

- Bottom-up approach: These include a) stated preference methods, which use surveys and interviews to ask customers about their intended or actual behaviour during interruptions, and b) revealed preference methods, which use real-world data to estimate a valuation of non-market goods.
- Economy-wide approach: These analyze the effects of power interruptions on regional economies using economic output and employment indicators, including a) input-output models, b) computational general equilibrium models, c) macro-econometric models, and d) production function approaches.

Calculating the value of resilience is a complex activity and remains an ongoing research area for the industry. Current approaches in the resilience valuation have limitations as they do not appropriately capture the potentially devastating consequences of not having adequate resilience. For example, prolonged outages lasting weeks is no longer just a mere inconvenience but results in significant pain and suffering or even deaths that are not straight forward to assign a monetary valuation. Various attempts have been made to calculate the value of resilience activities. A recent publication by the NSW Treasury in Australia sets out the framework of how to undertake disaster resilience cost-benefit analysis⁶.



⁶ NSW Treasury, Disaster Cost-Benefit Framework (TPG23-17), October 2023





3 FINDINGS

This section presents the findings of the review including summaries of the results of the analysis and observations.

3.1 Level of Resilience Assessment by EDBs

All EDBs have considered planning for HILP events as part of their risk management, business continuity and broader asset management function.

EDBs generally have a framework that they use for resilience assessment. A common framework quoted is EEA's Resilience Guide:

Northpower's risk management is carried out in accordance with, or informed by a number of standards and guides that include EEA Resilience Guide (2022) and EEA Asset Criticality Guide (2019)

The Resilience Management Maturity Assessment Spreadsheet Tool (RMMAT) was developed by **Unison** and adopted by EEA in EEA's 2020 version of the Resilience Guide

Wellington Electricity follows the 4R (Reduction, Readiness, Response & Recovery) approach as described in the EEA Resilience Guide for hazard management. It also uses the resilience maturity measurement tool (RMMAT) to assess its resilience thereby identifying opportunities for improvement

In 2020 **Powerco** engaged specialist climate change consultant Tonkin and Taylor to conduct a climate change vulnerability assessment. The initial assessment resulted in further work to develop Powerco's Geographical Information System (GIS) to understand and visualise risk exposure to flooding and coastal inundation

Orion aligns their business continuity responsibilities using Civil Defence's 4Rs approach to resilience planning — reduce, ready, respond and recover. Orion has also set a target by end FY2024 to introduce the methodology of the EEA Resilience Guide

Centralines network resilience maturity is assessed on an annual basis through the EEA's Resilience Management Maturity Assessment Tool (RMMAT)

Horizon Energy has recently completed resilience gap analysis based on the EEA Resilience Guide. The gasp analysis has been translated into an implementation plan to bridge the gap between EA's practices and industry best practices

Network Tasman has conducted a specific risk analysis (based on ISO 31000 Risk Management framework) for each zone substation to assess the impact of incidents like earthquake, flood/Tsunami, coastal inundation/storm surge, extreme weather, landslip/movement. Network Tasman sees earthquake & liquefactions as key risks to the network. An individual assessment of each of the substations has been completed for earthquake and where required seismic strengthening activities have already been completed.



3.2 EDB Initiatives to Improve Resilience

There are a number of common themes for proactive resilience investments:

A Focus on recovery from HILP events

Example of EDBs investing to improve recovery from HILP events

Mainpower has invested in five power transformers held as strategic spares. These are surplus units that are held to support network resilience and emergency responses.

FirstLight is proposing the installation of 3 x new 750 kVA generators at different locations of the network to enhance supply security.

Westpower is commissioning a trailer mounted mobile standby generator for use in emergency situation.

Wellington Electricity has mobile substations to provide an alternate method for restoring supply during a major asset failure.

B Seismic strengthening of supply substations and offices

Example of EDBs investing to improve seismic strength of their assets

Powerco has conducted seismic assessment of zone substation buildings against the New Zealand Society of Earthquake Engineering (NZSEE) grades. Powerco's standard requires all zone substation buildings to be at least 67% of the new building standard (NBS). Since the completion of the assessment, Powerco has instigated a program to seismically strengthen zone substation buildings and switchrooms.

Electra has invested in a capex program to seismically strengthen zone substation buildings and other buildings, based on an earthquake of Richter magnitude 7.5 or greater on a major Wellington fault.

Wellington Electricity has an ongoing seismic reinforcement programme to strengthen substations to a minimum of 67% of NBS at Importance Level of IL4.

Centralines is planning seismic strengthening of transformer mounts at Takapau Zone Substation.

To improve resilience to major seismic events, **Marlborough Lines** has decided that polemounted transformers 200kVA and above are, where practical, replaced with a ground-mounted transformer of equivalent or bigger size.



C Resilient designs and equipment specifications for new or replacement assets

Example of EDBs adopting resilient standards in new asset designs and specifications

Orion is replacing end-of-life poles with higher strength poles that can withstand higher wind loading.

Powerco's standard LV pillars are vulnerable to coastal inundation as they are not waterproof. A newer submersible design is now used in those areas.

Unison's strategy is to improving network resiliency when undertaking investment to meet customer needs.

Marlborough Lines is currently considering whether a 1:100 year flood level standard is appropriate for critical assets or whether 1:250 or 1:450 (such as Transpower now use) is more appropriate.

Northpower is introducing new design standards for network assets aimed at reducing the risk of failure related to wind damage.

D Relocation of assets and facilities from flood-prone areas

Example of EDBs Relocating Assets & Facilities from Flood-prone areas

Vector is investing in a capex program for the relocation and elevation of zone substations to mitigate the risk of flood and inundation.

Marlborough Lines Alfred Street site, which houses the network control centre, is below earthquake code and has a number of structural issues including water-tightness. A decision has been made to relocate the network control room, demolish the site and rebuild.

While there are common themes, there are also significant variations in the initiatives to address resilience. Details of each EDB's plan can be found in Section 7.



3.3 Analysing EDB Expenditure on Resilience

With the exception of a few EDBs, resilience is not grouped in specific paragraphs or chapter in the AMPs. Rather, resilience is included in discussions on topics relating to risk management, network security, asset replacement & renewal, and reliability.

There are variations in how expenditure is grouped under the resilience theme. Some resilience expenditure such as network automation and replacement of copper conductors are more to do with reliability

improvement as these activities are not related to HILP events. Improvements in the design of new assets and specifications could be resilience related however the resultant increases in project cost have not been quantified.

Explicit expenditure in improving resilience is only available from a few EDBs, with a majority of EDBs incorporating resilience expenditure within the various capex or opex categories.

3.3.1 Resilience Capex

Some EDBs have included security of supply initiatives under growth capex. While load growth is a trigger for security of supply investment in accordance with EDBs' security of supply standards, IAEngg notes that resilience has also been mentioned as a driver for some security of supply initiatives. Some of these supply security initiatives under resilience, such as re-building/reconfiguring the GXP subtransmission supplies, can be quite costly and would need to be spread over multiple years to reduce the impact on network capex and pass-through cost to customers.

Orion is proposing to replace bulk-supply point spoke-and-hub architecture with a far more resilient interconnected GXP ring architecture to increase its urban 66kV subtransmission network's resilience against the impact of a major seismic event.

Aurora has a 20-year plan to implement a more resilient 33 kV meshed network architecture in Dunedin.

IAEngg notes that the resilience driver has also impacted asset replacement & renewal expenditure in that some assets are going to be replaced or renewed based on resilience considerations and not end-of-life. For example, Orion is proposing to replace more of its higher altitude poles that have been identified as high risk of wind damage. Specific initiatives of replacing assets before end-of-life need to be separately itemised from the general asset replacement if they are to be assessed appropriately.

Some EDBs are proposing to relocate assets due to resilience consideration e.g. moving assets to higher ground to avoid flooding.



The resilience driver is also affecting "non-network assets" expenditure. For example, Marlborough Lines is relocating its control room because the existing building is found to be below earthquake code and has a number of structural issues including water-tightness. Wellington Electricity head office is currently located in a tsunami evacuation zone and they have commenced planning to relocate the headquarters away from the coast in order to mitigate the risk.

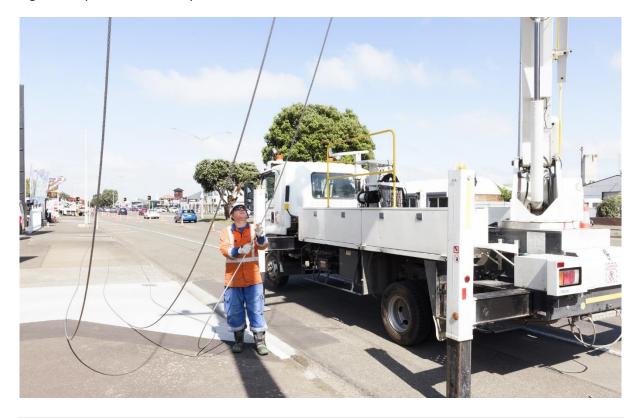
Vector provides the most comprehensive details of its proposed resilience expenditure under the headings of

- Network hardening for floods and inundation \$135M
- Network hardening for increase in wind speeds \$77.14M (total expenditure for crossarm and overhead conductor replacement. An unknown % of this is to do with resilience)
- Network hardening for hot dry summers \$1.53M

3.3.2 Resilience Opex

Resilience considerations have affected vegetation management opex of some EDBs as they found that supply interruptions caused by wind-borne tree branches and debris increased significantly with wind speed. With the

expected increase in storms caused by climate change, these EDBs have amended their vegetation management policy which has led to a cost increase.





3.4 EDB Justification of Expenditure on Resilience

There are not enough details in the AMPs to allow us to determine the reasonableness of proactive resilience expenditure:

Anecdotal evidence gathered from experiences of recent extreme weather events may not be the appropriate basis for investment. For example, if the recent weather event is a 1-in-200-year event but the resilience standard adopted by the EDB is to cater for 1-in-100-year events.

Appropriate risk assessment, option and cost/benefit analyses should accompany any significant resilience investment proposal.

3.5 EDB Performance against Good industry Practice

The following table provides commentary on each EDB against the five characteristics of good resilience planning discussed in section 2.4.3. A negative commentary does not mean that the EDB is not meeting good electricity industry practice, it just means the information cannot be found in the AMP.

EDB	Formal Framework	Resilience Standards	Balance between proactive expenditure and reacting / recovering after an event	Supporting evidences for targeted areas	Cost/Benefit assessment
Alpine Energy	YES	Not stated	No investment proposed	Not applicable	Not applicable
Aurora Energy	YES	Not stated	No	No	No
EA Networks	YES	Not stated	No investment proposed	Not applicable	Not applicable
Electricity Invercargill	YES	Earthquake more than 8 on Richter scale; Others not stated	No	No	No



FirstLight	YES	Learning from Cyclone Gabrielle used as standard for resilience planning	No	No	No
Horizon Energy	YES	Not stated	No	No	No
Nelson Electricity	YES	Not stated	No investment proposed	Not applicable	Not applicable
Network Tasman	YES	Not stated	No	No	No
Orion	YES	Not stated	No	No	No
OtagoNet	YES	Not stated	No	No	No
Powerco	Not sure	Seismic: NZ Society of Earthquake Engineering (NZSEE); Others not stated	No	No	No
The Lines Company	YES	Not stated	No	No	No
Top Energy	YES	Learning from severe weather events in 2022 & 2023 used as standard for resilience planning	No	No	No
Unison	YES	Not stated	Current focus on strategies and modelling	Not applicable	Not applicable
Vector	YES	Flood: 1-in-500- year: Wind: >70km/h: Climate change: Hothouse scenario	No	No	No



Buller Electricity YES Not stated No No No Centralines YES Not stated No No No Counties Energy YES Not stated No No No Electra YES Seismic: based on Richter magnitude 7.5 or greater; Others not stated No No No Mainpower YES flood standard; Others not stated No No No Mariborough Lines YES Not stated No No No Network Waitaki ? Seismic: NZ Society of Earthquake Engineering; Others not stated No No No Northpower YES Not stated No No No Scanpower YES Not stated No No applicable Not applicable The Power Company YES Not stated No No No Well Networks YES Not stated No No No Well Networks YES Not stated No No <td< th=""><th>Wellington Electricity</th><th>YES</th><th>Seismic: NZ Society of Earthquake Engineering; Others not stated</th><th>No</th><th>No</th><th>Resilience initiatives have gone through business case process however not sure if cost/ benefit has been assessed</th></td<>	Wellington Electricity	YES	Seismic: NZ Society of Earthquake Engineering; Others not stated	No	No	Resilience initiatives have gone through business case process however not sure if cost/ benefit has been assessed
Counties Energy YES Not stated No No No Electra YES Seismic: based on Richter magnitude 7.5 or greater; Others not stated No No No Mainpower YES 1-in-500-year flood standard; Others not stated No No No Marlborough Lines YES Not stated No No No Network Waitaki ? Seismic: NZ Society of Earthquake Engineering; Others not stated No No No Northpower YES Not stated No No No No Scanpower YES Not stated No No applicable Not applicable The Power Company YES Not stated No No No Waipa Networks YES Not stated No No No WEL Networks YES Seismic: NZ Society of Earthquake Engineering; Others not stated No No No	Buller Electricity	YES	Not stated	No	No	No
Seismic: based on Richter magnitude 7.5 or No No No No Richter magnitude 7.5 or Greater; Others not stated	Centralines	YES	Not stated	No	No	No
Electra YES Richter magnitude 7.5 or greater; Others not stated No No No Mainpower YES 1-in-500-year flood standard; Others not stated No No No Marlborough Lines YES Not stated No No No Network Waitaki ? Seismic: NZ Society of Earthquake Engineering; Others not stated No No No Northpower YES Not stated No investment proposed for 2024-28 Not applicable Not applicable The Power Company YES Not stated No No No Well Networks YES Not stated No No No WEL Networks YES Not stated No No No WEL Networks YES Seismic: NZ Society of Earthquake Engineering; Others not stated No No No	Counties Energy	YES	Not stated	No	No	No
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Lines YES Not stated No No No Network Waitaki ? Seismic: NZ Society of Earthquake Engineering; Others not stated No No No Northpower YES Not stated No No No Scanpower YES Not stated No investment proposed for 2024-28 Not applicable Not applicable The Power Company YES Not stated No No No Waipa Networks YES Not stated No No No WEL Networks YES Earthquake Engineering; Others not stated No No No	Mainpower	YES	flood standard;	No	No	No
Network Waitaki ? Society of Earthquake Engineering; Others not stated No No No Northpower YES Not stated No No No No Scanpower YES Not stated No investment proposed for 2024-28 Not applicable Not applicable The Power Company YES Not stated No No No Waipa Networks YES Not stated No No No WEL Networks YES Seismic: NZ Society of Engineering; Others not stated No No No		YES	Not stated	No	No	No
Scanpower YES Not stated No investment proposed for 2024-28 Not applicable Not applicable The Power Company YES Not stated No No No Waipa Networks YES Not stated No No No WEL Networks YES Seismic: NZ Society of Earthquake Engineering; Others not stated No No No		?	Society of Earthquake Engineering;	No	No	No
The Power Company YES Not stated 2024-28 Not applicable Not appl	Northpower	YES	Not stated	No	No	No
Company Waipa Networks YES Not stated No No No No No No No No No N	Scanpower	YES	Not stated		Not applicable	Not applicable
Networks Seismic: NZ Society of YES Earthquake Engineering; Others not stated NO		YES	Not stated	No	No	No
WEL Networks YES Earthquake Engineering; Others not stated		YES	Not stated	No	No	No
Westpower YES Not stated No No No	WEL Networks	YES	Society of Earthquake Engineering;	No	No	No
	Westpower	YES	Not stated	No	No	No



3.6 Transpower Resilience Planning

There is one section (Section 3.35) in Transpower's 2022 AMP that addresses network resilience. As part of Transpower's risk-based asset management planning, Transpower reviews its transmission network to identify sites prone to major natural hazards and potential mitigation strategies.

Resilience programmes have been developed as part of the planning for the RCP4:

Seismic strengthening of buildings	Flood – hardening critical and vulnerable towers in braided rivers	
Flood – resilience solutions at substations	Fire – upgrades to fire stopping and detection in buildings	
Volcanic – hardening transmission lines for a volcanic ash event	Slope stability work for towers and poles	
Resilience for bridges and access tracks – washouts, slips, scour	Space weather mitigation for transformers	
Pre-enabling works for major failures of non-air bushings/GIS	Overhead station earthwire elimination to eliminate a common mode failure	
Emergency exercise of deployment of mobile switch room	Emergency exercise for tower restoration as a physical deployment	
HVDC Wind and Flood – strengthening HVDC towers that are vulnerable to high winds and improving flood resilience where towers are in rivers		

The base program of RCP4 includes resilience network capex of \$69.1M which is 3.6% of the total requested capex. It also includes resilience network opex of \$5.5M which is 0.3% of the total requested opex. Transpower intends to undertake consultations to understand customers' appetite for this resilience work to be funded as part of RCP4.

CAPEX OF

\$69.1M

Which is 3.6% of the total requested capex

OPEX OF

\$5.5M

Which is 0.3% of the total requested opex

More details of Transpower's resilience planning can be found in Section 6.







CONCLUSIONS



4 CONCLUSIONS

As a country New Zealand has experienced a number of natural disasters over its history including volcano eruptions, earthquakes, storms, cyclones and flooding. New Zealand is ranked as the second riskiest country in the world when it comes to natural disasters⁷ by Lloyds of London. EDBs operating in this environment have fine-tuned their emergency response capabilities using formal frameworks in emergency management, corporate risk management and asset management planning.

The commonly used 4Rs framework by NZ National Emergency Management Agency focuses on Reduction, Readiness, Response and Recovery. In the past EDB's emergency management has less focus on "Reduction" than the other 3 Rs. Proactive investments in risk reduction, however, have gathered pace and are seen in the 2023 AMPs.

The EDBs give a number of reasons for this transition:

Electricity is already an essential service but its importance has escalated due to forecast increase in electrification as a result of de-carbonisation.

Energy infrastructure is classified as "lifeline" utility so EDBs have existing duties as lifeline utilities under the Civil Defence Emergency Management Act 2002 to "function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency" (s. 60 (a)). While these duties are not new obligations, there is heightened awareness of the impact of extreme weather events from recent experiences in particular in 2023.

Climate change modelling is pointing to an increase in the frequency and severity of droughts, storms and floodings.

In January 2023, regions across the upper North Island of NZ experienced widespread catastrophic floods caused by heavy rainfall, with Auckland being the most significantly affected. Shortly afterwards, in February 2023 Cyclone Gabrielle caused significant devastation in northern and eastern regions of North Island. A national state of emergency was announced for only the third time in New Zealand's history. At the height of the cyclone's impact, around 225,000 homes were without power, and thousands of people were displaced as flood waters rose. Cyclone Gabrielle was described as NZ's costliest nonearthquake natural disaster.

⁷ Lloyds, "A world at Risk – Closing the Insurance Gap", October 2018 (https://assets.lloyds.com/assets/pdf-lloyds-underinsurance-report-final/1/pdf-lloyds-underinsurance-report-final.pdf)



Natural disasters resulting in large-scale disruption do not occur frequently. These rare events are normally referred to as High Impact Low Probability (HILP). Many EDBs have discussed the approach and framework they use to assess the risk posed by HILP events in their AMP. EDBs also discuss about climate resilience initiatives arising from their HILP risk assessment.

The initiatives can be broadly classified into four categories:

Initiatives to improve supply reliability such as network sectionalisation, installation of reclosers, new Advanced Distribution Management Systems to increase situation awareness and automatic switching order generation.

Modifying existing assets to increase their resilience against floods, earthquakes and strong wind.

Initiatives to rapidly respond and recover after large-scale supply disruptions, mostly to do with ready access to mobile generators, mobile substations & network asset spares, regular emergency exercises and mutual aid arrangements.

Design resilience in new assets and network configuration, making use of the opportunities presented by load growth augmentation, new customer projects and asset renewals.

IAEngg's scope of resilience assessment includes the analysis of expenditure in resilience. Analysis of resilience expenditure has not been possible as the majority of EDBs do not separately itemise the expenditure they define as resilience related. Rather, the expenditure has been grouped into the various capex and opex regulatory categories. For the minority of EDBs who have stated the value of the resilience expenditure, the details can be found in EDB detailed analysis in Section 7.





IAEngg has found that there are differences in how EDBs classify resilience expenditure. We are of the opinion that reliability improvement expenditure should not be included under the resilience theme as their benefits apply to both normal supply interruption as well as HILP events. The expenditure can be justified based on current EDB approach in reliability improvement.

Even though IAEngg cannot determine the quantum of the proposed resilience expenditure, good industry practice for investment planning in a capital constrained industry would require methods to prioritise the expenditure to ensure the appropriate areas are targeted. Little details can be found in the AMPs to justify the areas targeted for resilience expenditure, the standards that have been applied (e.g. is resilience for a 1-in-100-year flood event, and if yes, is the standard appropriate?), cost/benefit assessments for capital rationing, and modelling to support an increase probability/ frequency of occurrence of the HILP events (if required for justification). This is not to say that the background work has not been undertaken, but that the work has not been presented in the AMPs.

In conclusion, IAEngg supports the notion of investing to "harden" the EDB networks against HILP events. Standardisation of the assessment framework, the resilience standards to be used, and approach for cost/benefit assessment is desirable as this will lead more consistency in network resilience and should result in improved decision making. Last but not least, customers should be consulted on the level of resilience they are prepared to pay.

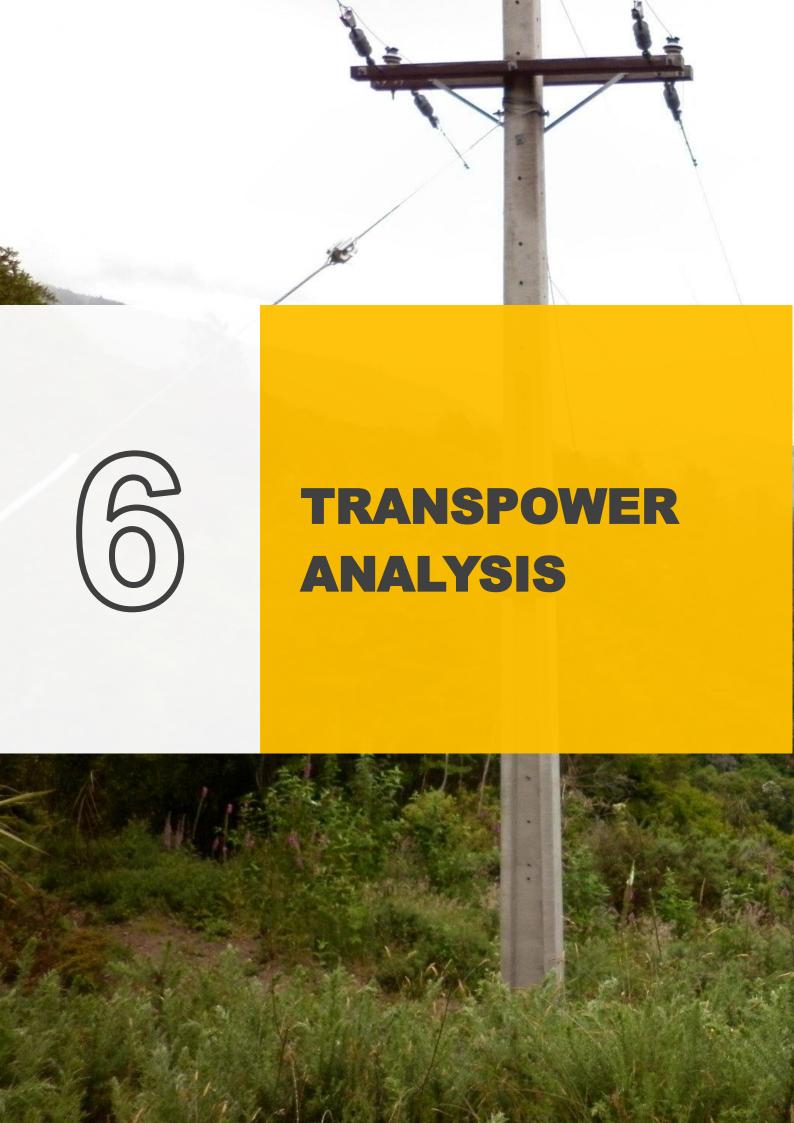






5 Glossary

4R	Reduction, Readiness, Response, Recovery
ADMS	Advanced Distribution Management System
АМР	Asset Management Plan
CAPEX	Capital Expenditure
CBRM	Condition Based Risk Management
CDEM	Civil Defence Emergency Management
ComCom	Commerce Commission
DPP	Default Price-quality Path
DSO	Distribution System Operator
EDB	Electricity Distribution Business
EEA	Electricity Engineers Association
GXP	Grid Exit Point
HILP	High Impact Low Probability
HV	High Voltage
HVDC	High Voltage Direct Current
IT	Information Technology
LV	Low Voltage
OMS	Outage Management System
OPEX	Operational Expenditure
RCP4	Regulatory Control Period 4
REPEX	Replacement Expenditure
RMMAT	Resilience Management Maturity Assessment Tool
RSE	Reliability, Safety & Environment
SCADA	Supervisory Control and Data Acquisition
SoSS	Security of Supply Standard



6 TRANSPOWER ANALYSIS

Name	Transpower
Describe initiatives raised to improve resilience	In Transpower's RCP4 proposal (as documented in Transpower's 2022 AMP): Seismic strengthening of buildings Flood – hardening critical and vulnerable towers in braided rivers Flood – resilience solutions at substations Fire – upgrades to fire stopping and detection in buildings Volcanic – hardening transmission lines for a volcanic ash event Slope stability work for towers and poles Resilience for bridges and access tracks – washouts, slips, scour Space weather mitigation for transformers Pre-enabling works for major failures of non-air bushings/GIS Overhead station earthwire elimination to eliminate a common mode failure HVDC Wind and Flood – strengthening HVDC towers that are vulnerable to high winds and improving flood resilience where towers are in rivers Emergency exercise of deployment of mobile switch room Emergency exercise for tower restoration as a physical deployment



	In Transpower's RCP4, both capex and opex initiatives have been proposed for customer consultation:				
Proposed resilience expenditure in FY26-30 (Capex and Opex)	Outcome area	Base (\$ million constant 2021/22)		Uncertainty mechanisms (\$ million)	
	Reliable and safe network	Capex Opex	1,731.8 1,755.8	Listed projects	137.2
				TransGO – low incentive rate project	88.0
	Resilient network	Capex Opex	69.1 5.5	Resilience uncertainty mechanism	35.0
		Capex Opex	107.0 3.8	Enhancement and development: Reopener	5.0
				Customer capacity	75.0
				Connection anticipatory capacity	25.0



What assessment has Within the overall framework of asset management system and corporate risk assessment framework. been done to ascertain natural disaster risk to As part of Transpower's planning for the RCP4 programme of work, Transpower has developed resilience networks? programmes to manage these risks. What standards are The AMP states that "the resilience planning is based on current research, and specific investigations to identify used for resilience vulnerable and critical assets and then identify credible solutions to reduce the risk". initiatives The decarbonisation of the energy sector will see more reliance on electricity and societal expectations for What are the triggers a resilient service is increasing. for the resilience initiatives? Improve network resilience in the face of climate change. What assessment has The AMP states that "the resilience planning is based on current research, and specific investigations to identify been done to support the resilience vulnerable and critical assets and then identify credible solutions to reduce the risk".



expenditure?



INDIVIDUAL EDB ANALYSIS



7 INDIVIDUAL EDB ANALYSIS

7.1 Alpine Energy

	EDB Name of EDB	ALPINE ENERGY
-	INITIATIVES Describe initiatives raised to improve resilience	Alpine sees significant uncertainty about impact of climate change-related weather events. In 2023/24 Alpine plans to carry out a risk assessment to better inform the future System Interruption and Emergencies (SIE) forecasts and support network resilience projects.
\$ <u></u>	CAPEX / OPEX Proposed resilience expenditure in FY26-30	No specific capex and opex provisions have been made for proactive resilience initiatives.
	RISK ASSESSMENT What assessment has been done to ascertain natural disaster risk to networks?	A risk assessment is planned for 2023/24 to inform climate-related resilience projects. The risk assessment will lead to the development of a network climate resilience strategy.
	STANDARDS What standards are used for resilience initiatives	ISO 31000 Risk Management — Principles and Guidelines is used for risk assessment.





TRIGGERS

What are the triggers for the resilience initiatives?

- Scientific research by Te Herenga Waka Victoria University indicates that there is a 75% probability of an Alpine Fault earthquake occurring in the next 50 years, with an 82% change that it will be a magnitude 8+ event which would likely have a significant impact on Alpine's infrastructure
- Alpine's region experiences cold winters and is subject to weather extremes including snow and high wind events, especially in the Mackenzie District
- The frequency of high wind events in South Canterbury is projected to increase as a result of climate change
- Urban clean air restrictions on solid fuel heating sources across Alpine's region has resulted in an increased reliance on electricity for home heating
- Alpine's network spans several rivers prone to flooding during north-west weather patterns. The frequency and severity of north-west flood events for Canterbury rivers are projected to increase because of climate change
- Parts of Alpine's network, including infrastructure connecting large industrial customers, are within coastal high hazard erosion and inundation areas



ASSESSMENT

What assessment has been done to support the resilience expenditure?

Climate change impact on weather patterns and seismic academic research



7.2 Aurora Energy

	EDB Name of EDB	AURORA
-	INITIATIVES Describe initiatives raised to improve resilience	Accelerated renewals for assets at risk to major events – sea level rise, wind, snow storm and earthquake and fires. Options and solutions for integrated risk quantification and investment optimisation uncertain.
\$	CAPEX / OPEX Proposed resilience expenditure in FY26-30	Apart from the Dunedin project, there was insufficient details to separate out the resilience improvement expenditure.
TARREST STATES OF THE PARTY OF	RISK ASSESSMENT What assessment has been done to ascertain natural disaster risk to networks?	Aurora conducts asset health and risk modelling and included resilience as one of the drivers of their asset replacement program. Opportunities to increase resilience are taken, where cost is comparable to like-for-like replacement.
	STANDARDS What standards are used for resilience initiatives	Aurora's approach is based on the 4 Rs of business continuity – Reduction, Readiness, Response and Recovery, as used by emergency services and other lifeline utility operators in New Zealand. Aurora have added an additional R of Review as part of its business continuity framework.





TRIGGERS

What are the triggers for the resilience initiatives?

Aurora stated their role is 'to ensure the safety and resilience of the network and deliver a reliable electricity service to over 93,600 homes, farms and businesses throughout the regions we serve'. In line with this corporate mission, Aurora's stated throughout the AMP that ensuring / improving resilience is one of main drivers of their asset management activities, eg. resilience is an asset portfolio objective in Auroa investment planning.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

Aurora stated in 2023 AMP "To improve resiliency, we have created and started a 20-year plan to implement a more resilient 33 kV meshed network architecture in Dunedin...... In RY24 we will replace all pole mounted 11 kV fuses in the Central Otago high risk fire zone with a type that prevents an arc forming when operating. Apart from these two programs, Aurora has not identified explicitly in the AMP other forecast expenditure relating to resilience improvement. There are also no details (qualitative or quantitative) on how Aurora conducts the risk assessments and cost benefit assessments relating to resilience improvement expenditure. Aurora did state in 2023 AMP executive summary "Following our review of resiliency preparedness, we will update our forecasts in our 2024 AMP to reflect the actions and investments we propose are in the long-term interests of consumers."



7.3 EA Networks

EDB Name of EDB	EA NETWORKS
INITIATIVES Describe initiatives raised to improve resilience	EA Network's plan for network resilience is based on the use of emergency response plans and mutual support agreements. Natural disasters are assessed by evaluating the risk cost for each event (probability times the consequences of failure cost) and developing appropriate contingency plans and procedures to ensure business continuation and mitigation of impacts respectively. The recent rapid rate of network development has resolved some of the most critical historical risks that have been identified in the past. During 2024, a complete review of the network risk register will be carried out to ensure the evaluation of risks is consistent with the current version of the EA Networks risk management standard.
\$ CAPEX / OPEX Proposed resilience expenditure in FY26-30	No specific capex and opex provisions have been made for proactive resilience initiatives.



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RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

Assessment carried out as part of the EA Networks' risk management process.

STANDARDS

What standards are used for resilience initiatives

ISO 31000 Risk Management — Principles and Guidelines is used for risk assessment.



TRIGGERS

What are the triggers for the resilience initiatives?

Not applicable



ASSESSMENT

What assessment has been done to support the resilience expenditure?

No specific resilience expenditure has been proposed.



7.4 Electricity Invercargill

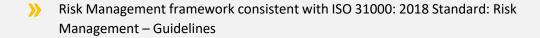
	EDB Name of EDB	ELECTRICITY INVERCARGILL (EIL)
	Projects underway to investigate and improve survivability through large seismic events.	
	INITIATIVES Describe initiatives raised	>> Completion of Seismic strengthening works
	to improve resilience	>> Design of Networks to avoid high event probability areas
		Design Structures and buildings to cater for Seismic events
\$	CAPEX / OPEX Proposed resilience expenditure in FY26-30	Resilience expenditure not identified in the AMP
	RISK ASSESSMENT What assessment has been done to ascertain natural disaster risk to networks?	During planning stages, EIL takes into consideration potential areas of flooding as well as possible long term sea level rises into consideration





STANDARDS

What standards are used for resilience initiatives



- Impact of extreme weather has been identified as a risk and treatment plans are put in place
- For HILP especially earthquake an event of Richter scale measurement >8



TRIGGERS

What are the triggers for the resilience initiatives?

Part of EIL's BAU risk management process involves the assessment of "High Impact Low Probability" (HILP) events which includes earthquake, Tsunami and Liquefaction.

Snow, wind & Flood are also considered under weather related risks



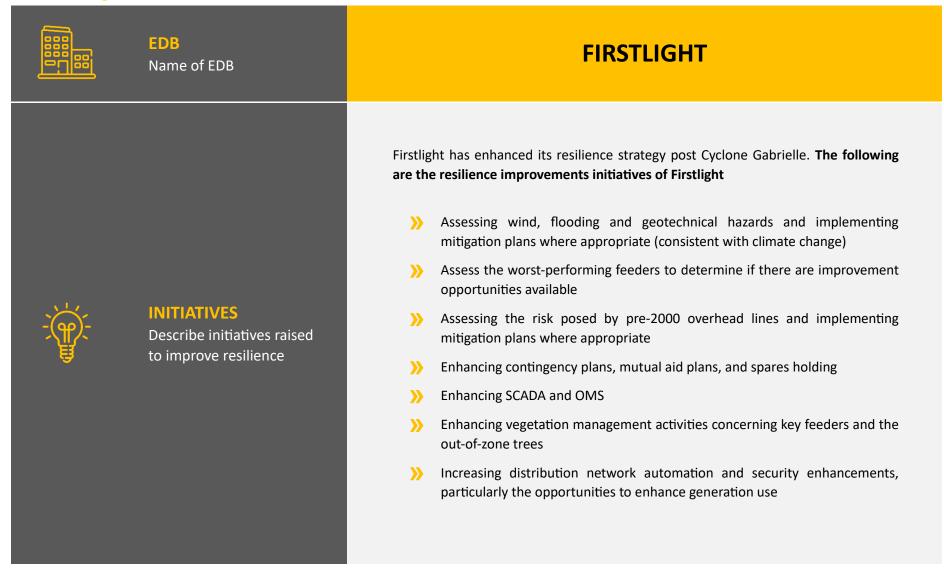
ASSESSMENT

What assessment has been done to support the resilience expenditure?

High risk areas on the network are identified and indicated in EIL GIS system and these areas are avoided as far as possible in the planning phase



7.5 FirstLight







CAPEX / OPEX

Proposed resilience expenditure in FY26-30



- Installation of 3 x new 750 kVAe generators at different locations of the network to enhance supply security at a cost of **\$3.2million**
- The installation of a second transformer at Tolaga Bay to improve the firm 11kV capacity available from Tolaga Bay to support adjacent substation at a cost of \$1.57million
- Replacement of SCADA master station and development of switch-order management and outage management system at a cost of **\$2.6million**



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks? Firstlight uses EEA's Resilience Management Maturity Assessment Tool (RMMAT) to ascertain its strengths and weaknesses in network resilience.

The weaknesses in risk identification and mitigation, design standards, contingency planning and response systems and processes have been considered in developing its resilience strategy.





STANDARDS

What standards are used for resilience initiatives

Firstlight uses the 4R framework defined in the National CDEM Plan – Reduction, Readiness, Response and Recovery, as used by emergency services and other lifeline utility operators in New Zealand.



TRIGGERS

What are the triggers for the resilience initiatives?

Firstlight's main triggers for the resilience initiatives are the effects of extreme weather events brought about by the impact of Climate change. Cyclone Gabrielle is also a major contributing factor to resilience initiatives.

Firstlight has made a material change to the asset management strategy in this AMP. The material change is to enhance the resilience initiative.



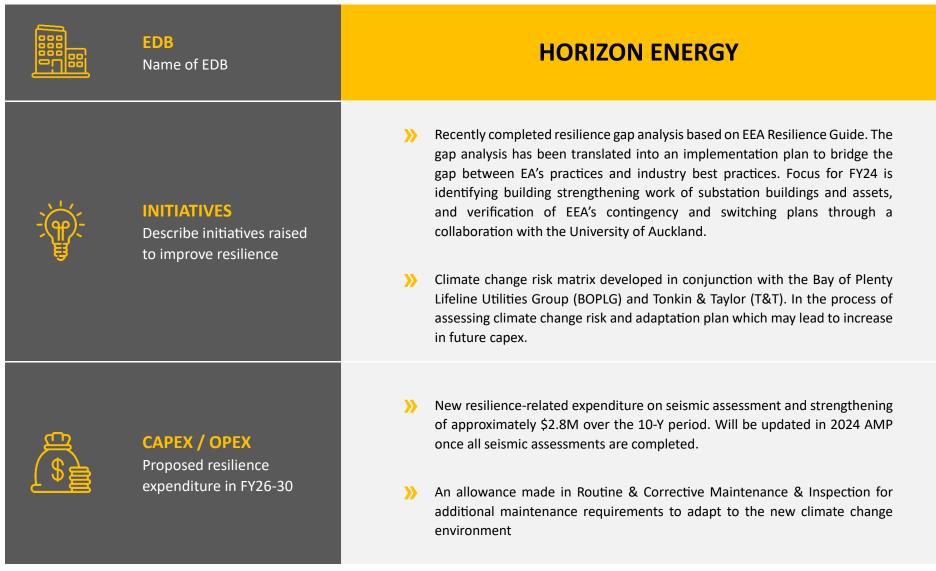
ASSESSMENT

What assessment has been done to support the resilience expenditure?

Each of the resilience initiatives identified has been converted into a project through the investment planning process. Solutions are identified for each issue including alternative options and weighed against each other before an option is finalised and funding approved.



7.6 Horizon Energy





RISK ASSESSMENT What assessment has been done to ascertain natural disaster risk to networks?	Initial self-assessment on EA's Resilience Management Maturity (RMMAT) against the EEA Resilience Guide and New Zealand's 4R approach to hazard management.
STANDARDS What standards are used for resilience initiatives	Not provided
TRIGGERS What are the triggers for the resilience initiatives?	Gap analysis from application of EEA Resilience Guide and Maturity assessment
ASSESSMENT What assessment has been done to support the resilience expenditure?	Building seismic assessment



Electricity

7.7	Nelson
(000)	
-)	
2	\$

EDB

Name of EDB

NELSON ELECTRICITY (NEL)

INITIATIVES

Describe initiatives raised to improve resilience

NEL sees earthquake, liquefactions, tsunami, flooding and sabotage as key risks to the network

NEL, as part of the design process, considers resilience to mitigate catastrophic risks associated with a natural disaster.

CAPEX / OPEX

Proposed resilience expenditure in FY26-30 IAEngg couldn't identify any proposed expenditure specific or related to Resilience in NEL's 2023 AMP



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

NEL being the smallest network in New Zealand has only one substation on the network. A specific risk analysis to assess the impact of incidents like earthquake, liquefaction, tsunami, flooding and sabotage has been undertaken by NEL.

An individual assessment of NEL's substation has been completed for earthquake and, where required, seismic strengthening activities have already been completed.

NEL has conducted an additional study to identify areas of liquefaction risk to NEL. Reports have highlighted that assets are more likely to suffer damage and potentially assist NEL in the future development of the network, but we couldn't identify further details of this in the AMP





STANDARDS

What standards are used for resilience initiatives

NEL approach is based on ISO 31000 Risk Management framework. Exposure to Natural Disasters is assessed and mitigation plans are put in place to manage these risks.



TRIGGERS

What are the triggers for the resilience initiatives?

NEL's risk management process involves the assessment of Earthquake, Liquefaction, Tsunami, Flooding and Sabotage.



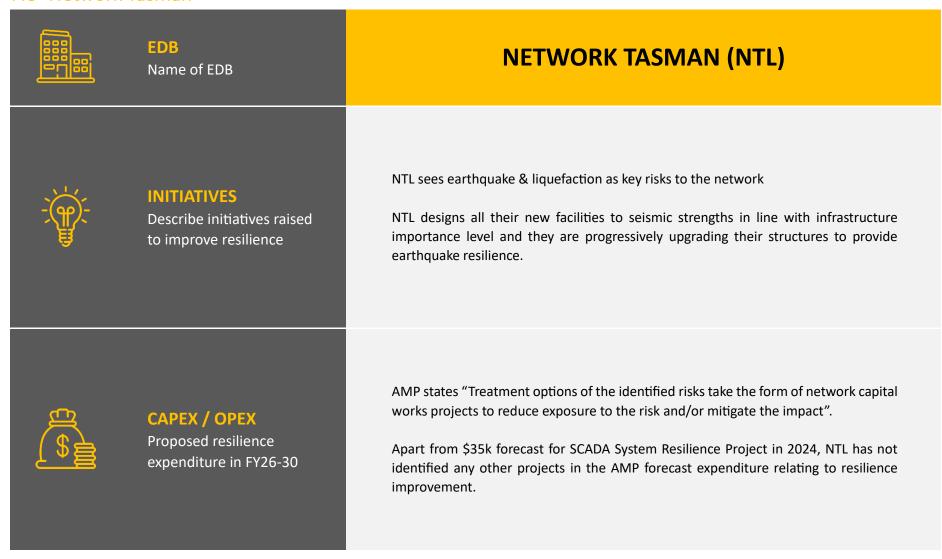
ASSESSMENT

What assessment has been done to support the resilience expenditure?

No forecast spend or assessments related to resilience are detailed in the 2023 AMP.



7.8 Network Tasman







RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks? A specific risk analysis has been completed for each of the Zone Substations to assess the impact of incidents like earthquake, Flood/Tsunami, Coastal inundation/Storm surge, extreme weather, landslip/movement and the expected performance of the network has been undertaken by NTL.

A response plan has been put together for each of these incidents under the Disaster Readiness and Response Plan.

An individual assessment of each of the substations has been completed for earthquake and where required seismic strengthening activities were already completed.



STANDARDS

What standards are used for resilience initiatives

NTL approach is based on ISO 31000 Risk Management framework. Impact of extreme weather events are assessed treatment plans are put in place to mitigate risks.





TRIGGERS

What are the triggers for the resilience initiatives?

Part of NTL's BAU risk management process involves the assessment of "High Impact Low Probability" (HILP) events which includes earthquake, Tsunami, storm, flood and Liquefaction.

Feedback from Consumers for improving power supply infrastructure to increase resilience in case of more weather events.



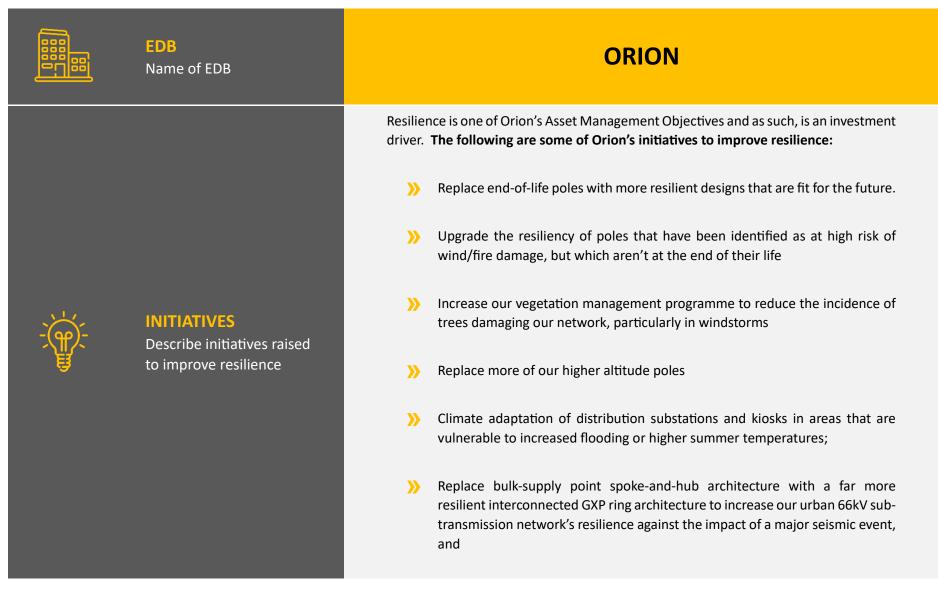
ASSESSMENT

What assessment has been done to support the resilience expenditure?

No assessments are detailed in the AMP to support the new expenditure related to Resilience identified in 2023 AMP.



7.9 Orion





	Replace the remaining 40km of oil filled 66kV cables over ten years or so.
	Region A 66kV subtransmission resilience – HV major projects
	Southwest Christchurch and surrounding areas' growth and resilience – HV major & minor projects
	Lincoln area capacity and resilience improvement – HV major & minor projects
	Rolleston area capacity and resilience – HV major projects
	>> Hororata GXP capacity and resilience – HV major projects
	Enhancing our Advanced Distribution Management System (ADMS) to enable improved grid efficiency and resiliency to allow us to remotely respond to outages and other grid conditions quickly and safely
	Orion is partnering with community groups such as Community Energy Action and engaging with our customers to address energy equity and community resilience.
CAPEX / OPEX Proposed resilience expenditure in FY26-30	IAEngg did not come across the individual costs of these programmes.





RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment undertaken to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

Orion aligns its business continuity responsibilities using Civil Defence's 4Rs approach to resilience planning – reduce, ready, respond and recover. Orion has also set a target by end FY2024 to 'Introduce the methodology of the EEA Resilience Guide (The guide offers advice to electricity providers on how to prepare their networks and their organisations and respond better to disruptions of any kind; be it earthquakes, volcanic events, pandemics or technology change).



TRIGGERS

What are the triggers for the resilience initiatives?

Resilience is an Orion asset management objective and, as such, is considered in most investment cases.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

Not provided in the AMP



7.10 OtagoNet

EDB Name of EDB	OTAGONET
INITIATIVES Describe initiatives raised to improve resilience CAPEX / OPEX Proposed resilience expenditure in FY26-30 RISK ASSESSMENT What assessment has been done to ascertain natural disaster risk to networks? STANDARDS What standards are used	There's very limited resilience related information in Otago Net's AMP, the AMP did indicate improving resilience against seismic activity is the focus within the planning period. For example, Otago Net planned to replace ten buildings during the ten year planning period when outdoor structures are replaced with seismically resilient indoor switchboards. IAEngg did not come across any individual costing of resilience improvement programmes. IAEngg also did not come across details on specific assessment done to ascertain natural disaster risk. OtagoNet did state their design standard specifies wind loading, snow loading resilience levels. OtagoNet (document no AM-STD-0026 EXTERNAL) has
for resilience initiatives TRIGGERS What are the triggers for the resilience initiatives? ASSESSMENT What assessment has been done to support the resilience expenditure?	adopted the methodology of the EEA Resilience Guide (The guide offers advice to electricity providers on how to prepare their networks and their organisations and respond better to disruptions of any kind; be it earthquakes, volcanic events, pandemics or technology change). IAEngg did not come across information indicating whether OtagoNet aligns its resilience planning with the 4Rs approach – reduce, ready, respond and recover.



7.11 Powerco



EDB

Name of EDB

POWERCO

Powerco considers the most efficient way to incorporate climate adaption or resilience is to include it into the design standards, so that resilience and climate adaption planning is "baked in" to Powerco's asset management approach and is not a separate undertaking or consideration.

In 2020 Powerco engaged specialist climate change consultant Tonkin and Taylor to conduct a climate change vulnerability assessment. The initial assessment resulted in further work to develop Powerco's Geographical Information System (GIS) to understand and visualise risk exposure to flooding and coastal inundation.

An in-depth review of network resilience to emerging climate extremes is planned for 2023. Following this, Powerco will consider the architecture of the network and design standards, to ensure appropriate resilience. Re-designing the network of the future to be resilient to climate change impacts will be a core activity going forward.

Powerco's climate change adaptation strategies cover five options:

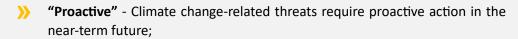
- "Do nothing" Climate change is not considered a threat to this asset class;
- "Organic" The rate of renewal through age or condition is sufficient to allow adaptation with minor evolutionary changes to asset specifications that marginally affect costs;



INITIATIVES

Describe initiatives raised to improve resilience



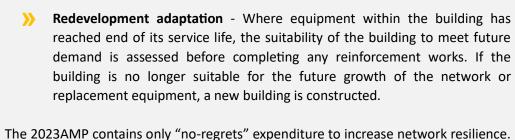


- "Remediation" The asset is at risk. Improvements can be justified against current climate conditions;
- "Redevelopment" while climate change drivers may not render the asset unsuitable, land use or other public infrastructure changes may drive the need to replace the asset. For example, road raising, or relocation works to allow for adaptation to sea level rise.

Examples of these options include:

- Organic adaptation (1) standard LV pillars are vulnerable to coastal inundation as they are not waterproof. A newer submersible design is now used in those areas; (2) as part of the power transformers renewal programme, Powerco undertakes opportunistic review and upgrade transformer foundations to ensure appropriate seismic performance.
- Remediation adaptation In 2012, Powerco started a programme to seismically assess all our substation buildings. 140 of the zone substation buildings were assessed against the New Zealand Society of Earthquake Engineering (NZSEE) grades. Powerco's standard requires all zone substation buildings to be at least 67% of the new building standard (NBS), equivalent to B grade or better. The review indicated 53 of the buildings required seismic strengthening. A programme has been put in place to strengthen these buildings. To date, 17 buildings have been reinforced and the remaining 36 will be reinforced during the next 10 years.





The 2023AMP contains only "no-regrets" expenditure to increase network resilience. Cyclone Gabrielle (12 Feb 2023, considered New Zealand's costliest non-earthquake natural disaster affecting northern and eastern regions of North Island) has had significant impact on the Powerco network - more than 105,000 households and businesses (30% of customer connections) on the network were without power for periods during and after the cyclone. More expenditure could be proposed in the 2024AMP after completion of Cyclone Gabrielle investigation.

General Network risk assessment (Appendix 5) has included the following descriptions on natural disasters and severe weather events:

"Natural disaster which severely impacts the network (likely to be on a regional basis e.g., Palmerston North earthquake or Taranaki eruption)". Existing control measures summarised as "(a) Crisis response plans and business continuity framework (b) Backup network operations facilities in New Plymouth and network triage capability from Tauranga (c) Material damage and business interruption insurance for office / network restoration (d) \$100m revolving facility for non-insured assets (e.g., poles and lines) Scenario analysis of sufficient access to funding. The current risk score is "medium";



"Severe weather event which adversely affects Powerco's ability to respond to network and customer issues". Existing control measures summarised as "(a) Capital programme resources to respond to storms and other events (b) Resource planning and local hub activation to mitigate dependence on control room co-ordination in peak events (c) CIMS Training of Powerco and Downer employees (d) Alternate NOC facilities.

Capex

Whangamata 11kV switchroom has a seismic strength of 15% NBS, which is below the 67% NBS value required for seismic compliance. Seismic strengthening was carried out in 2022-23 at a cost of \$223k (p.417); The Kerepehi switchroom has been seismically strengthened, however, the adjacent crane room has not been seismically strengthened and there are geotechnical issues with the existing switchroom foundations. Proposal to install a new 11kV switchboard in a new Kerepehi switchroom as part of a \$2.6M project planned for 2026-28 (p.413).

Opex

Cut out-of-zone vegetation near critical network sections – cater for severe storm situations



CAPEX / OPEX

Proposed resilience expenditure in FY26-30

It is not clear what capex and opex provisions have been made for proactive resilience initiatives.



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

Seismic assessment of zone substation buildings was carried out against the New Zealand Society of Earthquake Engineering (NZSEE) grades. Powerco's standard requires all zone substation buildings to be at least 67% of the new building standard (NBS)

More expenditure could be proposed in the 2024AMP after completion of full assessment of network damage caused by the Cyclone Gabriele.



STANDARDS

What standards are used for resilience initiatives

Powerco sees the need to enhance reliability and resilience standards to harden the network to meet increasing climate extremes.



TRIGGERS

What are the triggers for the resilience initiatives?

Part of Powerco's BAU asset management and risk management process involves the assessment of "High Impact Low Probability" (HILP) events which includes network resilience.

Powerco considers improving maturity will include new ways to analyse the risk. This includes understanding the impact of natural disasters on vulnerable portions of the network.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

As above



7.12 The Lines Company



EDB

Name of EDB

THE LINES COMPANY (TLC)



INITIATIVES

Describe initiatives raised to improve resilience

TLC recognises that decarbonisation and growing reliance of electricity in future will require networks to be significantly more resilient. In the short to medium term, TLC stated that building resilience in their power transformer fleet is amongst one of their five planning objectives.

TLC analysis indicates the total marginal cost to provide capacity (including increased capacity of regional supply points, zone substations and lines) for its network is \sim \$2.95m per MW increase.



CAPEX / OPEX

Proposed resilience expenditure in FY26-30

IAEngg did not come across sufficient information in the AMP to estimate the amount of investment that can attributed to increasing resilience. For example, TLC indicated they have allocated an average of \$3.1m per annum during the planning period (excluding the Hangatiki GXP upgrade) to increase the reliability and capacity of their 29 substations. Since 2019 TLC have maintained a high annual vegetation expenditure of ~\$1.4m resulting in an improvement of in zone vegetation outages.





RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment undertaken to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

TLC resilience planning is guided by the 4Rs: risk reduction, readiness, response and recovery, Resilience of networks will improve by focusing on the 4Rs: risk reduction, readiness, response and recovery.



TRIGGERS

What are the triggers for the resilience initiatives?

TLC overlays asset resilience, criticality, and fault history with localised weather forecasting to predict where extreme weather is most likely to impact supply on our network.



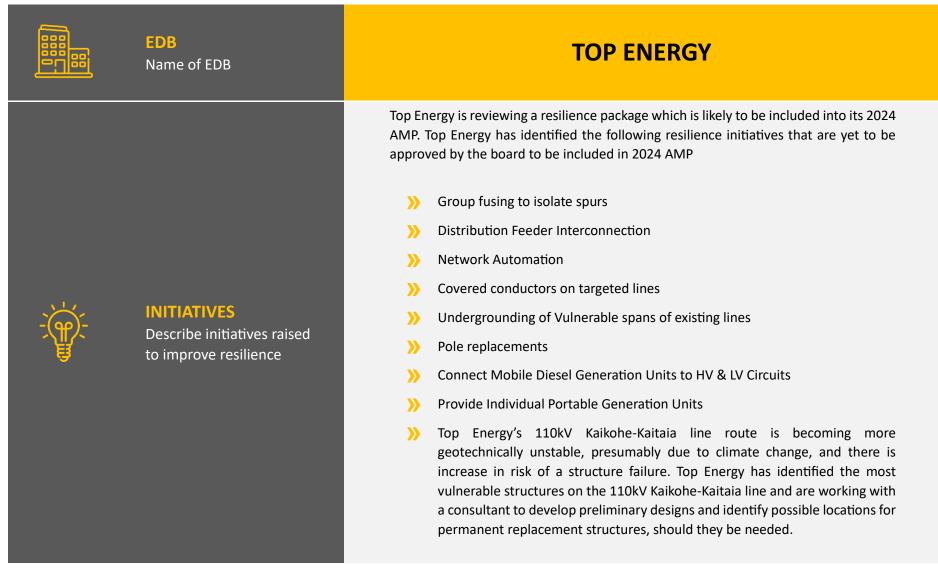
ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across details on specific assessment.



7.13 Top Energy



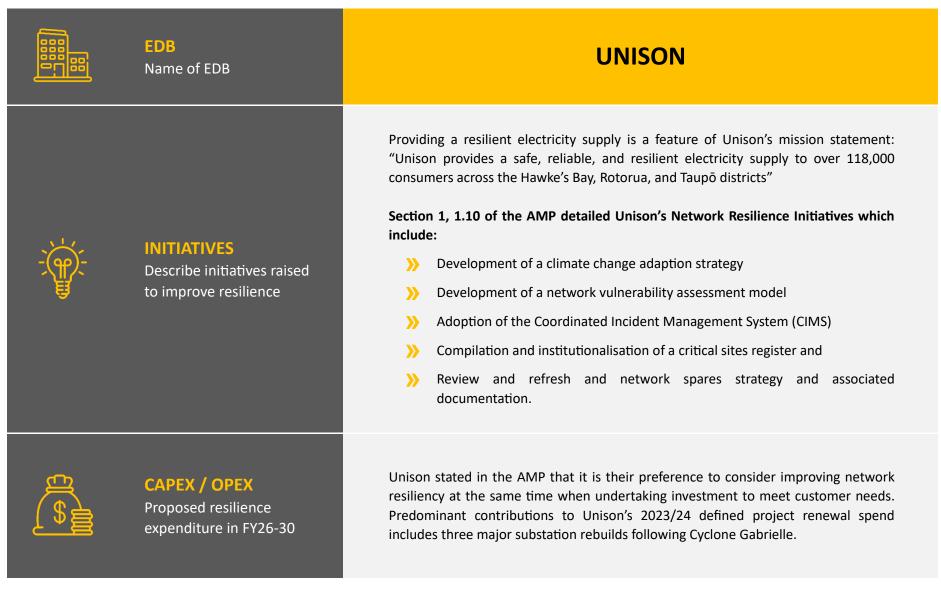


resilience expenditure?

\$ <u></u>	CAPEX / OPEX Proposed resilience expenditure in FY26-30	Top Energy has not made provisions for HILP Resilience type events in the 2023 AMP. Top Energy has completed an assessment which takes into account various HILP scenarios. Top Energy is reviewing a CAPEX resilience package of around \$5million that will feed into the 2024 AMP if approved by Top Energy executive Management.
	RISK ASSESSMENT What assessment has been done to ascertain natural disaster risk to networks?	Top Energy evaluates its network resilience performance on a periodic basis through the use of EEA's Resilience Management Maturity Assessment Tool (RMMAT).
	STANDARDS What standards are used for resilience initiatives	Top Energy's Emergency preparedness and response plan is based on the 4R framework of resilience — Reduction, Readiness, Response and Recovery, as used by emergency services and other lifeline utility operators in New Zealand.
	TRIGGERS What are the triggers for the resilience initiatives?	Top Energy Asset Management policy is to develop a network that is resilient to high impact, low probability events. Top Energy's main triggers for the resilience initiatives are the effects of weather events brought about by Climate change. The recent storms & cyclones between 2022 and 2023 are a major contributing factors to resilience initiatives.
	ASSESSMENT What assessment has been done to support the	No forecast spend related to resilience is detailed in the 2023 AMP.



7.14 Unison







RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

Unison's network resilience maturity is assessed on an annual basis through the EEA's Resilience Management Maturity Assessment Tool (RMMAT).



STANDARDS

What standards are used for resilience initiatives

The Resilience Management Maturity Assessment Spreadsheet Tool (RMMAT) developed by Unison was adopted by the EEA and included in EEA's Resilience Guide. The tool is very similar to the Commerce Commissions, Asset Management Maturity Assessment Tool (AMMAT) which measure EDB's maturity across the "4R's of Resilience Management (Readiness, Reduction, Response & Recovery).

Unison stated in its AMP that in the 2023/24 financial year, Unison will be undertaking a companywide, strategic initiative to better understand the most likely impacts of climate change on its asset portfolio and network, to determine what responses will be required. A specific, climate change adaptation strategy will be developed and include the formulation of proactive, risk mitigation pathways to any identified network vulnerabilities including likely implementation timeframes.

At part of its resilience planning, Unison stated that it is in the process of updating and formalising a comprehensive register of critical sites connected to its electrical network.



TRIGGERS

What are the triggers for the resilience initiatives?

Unison's asset management strategy included "Network resilience should be reviewed based upon climate change projections."



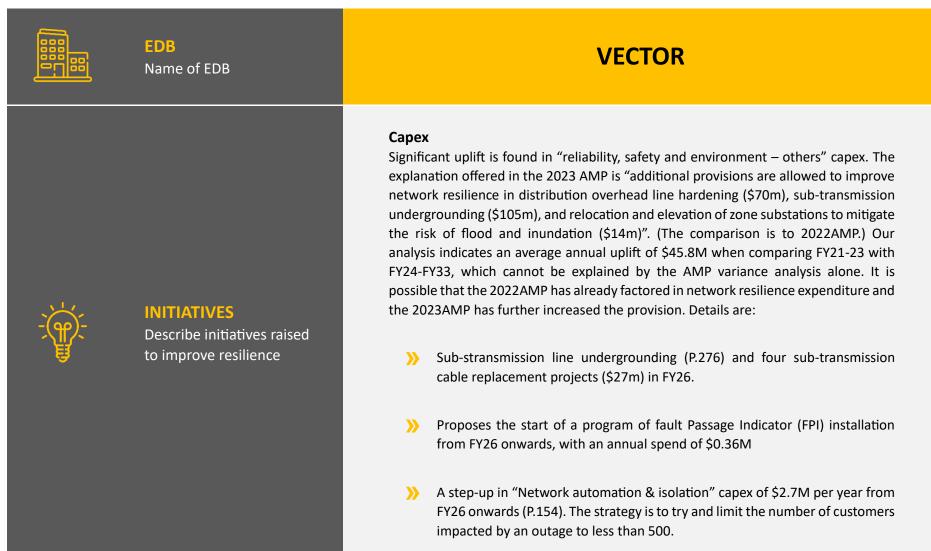
ASSESSMENT

What assessment has been done to support the resilience expenditure?

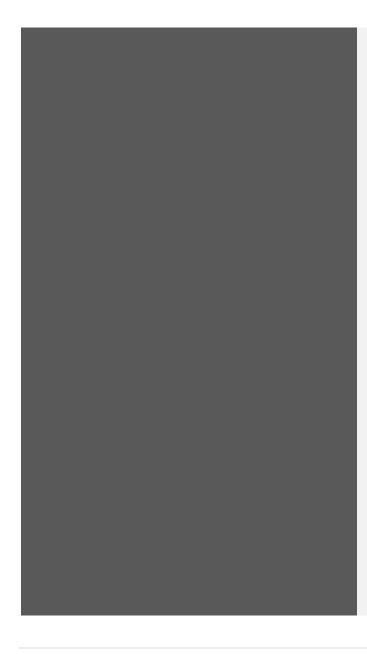
IAEngg did not come across any detailed assessment relating to resilience expenditure



7.15 Vector







- Network hardening for floods & inundation of \$27M per annum starting in FY26.
- Network hardening for increase in wind speed consists of the use of CCT (trials, no \$ for widescale rollout as yet), replacement of wood with composite crossarm (a step-up of around \$2.7M per annum compared with FY24-25 from FY26-33) (P.160), increasing use of lightning arresters (no \$ provided in AMP), overhead conductor renewals (\$74.33M from FY26-FY33) (P.160)
- Network hardening for hot dry summers consists of replacement of expulsion drop-out fuses by the current limiting equivalent (\$300k per annum) (P.162)

These represent capex programs specifically targeting resilience. There are other reliability improvement initiatives that have more focus on reliability but also include a component on resilience e.g. 11kV RMU replacement where opportunity is taken to either rebuild the RMU is an elevated position or relocate to sites less prone to flooding.

Opex

- \$5.5M increase in Service interruptions and Emergencies expenditure is largely attributable to an increase in exceptional maintenance expenditure provided for major weather-related events
- \$15.1M increase in vegetation expenditure including allowance of additional \$1.5m per year from FY26 for network resilience for expected increase in future weather-related events



CAPEX / OPEX

Proposed resilience expenditure in FY26-30

Capex summary

- >> Network hardening for floods and inundation \$135M
- Network hardening for increase in wind speeds **\$77.14M** (total expenditure for crossarm and overhead conductor replacement. An unknown % of this is to do with resilience)
- Network hardening for hot dry summers \$1.53M

Opex summary

- Service interruptions and emergencies \$2.92M
- >> Vegetation management \$10M



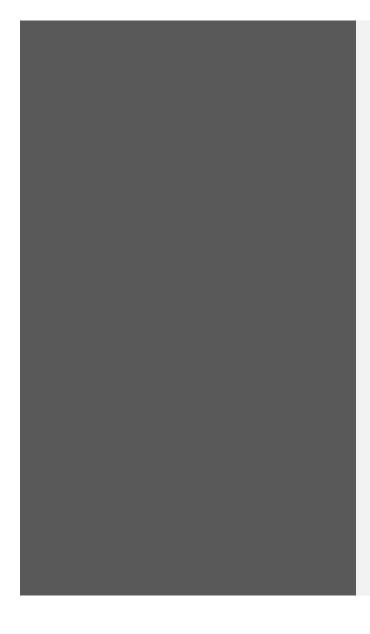
RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

Network hardening for floods and inundation

- The Auckland Region Climate Change Projections and Impacts report from NIWA, and GIS modelling conducted against Vector's asset base provides a base level of knowledge to prepare for the impacts of climate change with regards to floods and inundation.
- From actual experiences from the 2023 floods: Wairau zone substation, that is in an overland flood path, no damage was sustained to the 33 kV/11 kV switchgear room which was constructed at a height well above the flood plain (designed for a 1-in-500-year flood). However, the power transformers at Wairau, that were installed in the 1960's, all sustained damage to their control circuits that were not installed at height, at the time. This resulted in water penetration, damage and outages of transformers at this zone substation.





Network hardening for increase in wind speeds

- Reliability analysis indicates increased supply interruptions for wind speed above 70km/h caused by wind-borne debris. The risk associated with higher wind speeds was shown during the April 2018 storm and the severe winds of the January and February 2023 flood and storm events.
- Climate scenario model (the hothouse represents a worst-case climate change trajectory where the world maintains a business-as-usual trajectory of fossil fuel consumption) provides projections of hours of wind speeds per year greater than 70km/h.
- To manage the impact of vegetation, Vector utilises a risk-based approach to plan and then carry out opex related remediation work. This involves an independent company to scope, plan and package the work using the riskbased approach and also carry out audits of work undertaken, in conjunction with Vector's in house expertise, to ensure work has been undertaken correctly.

Hardening for ground geotechnical conditions

Under study

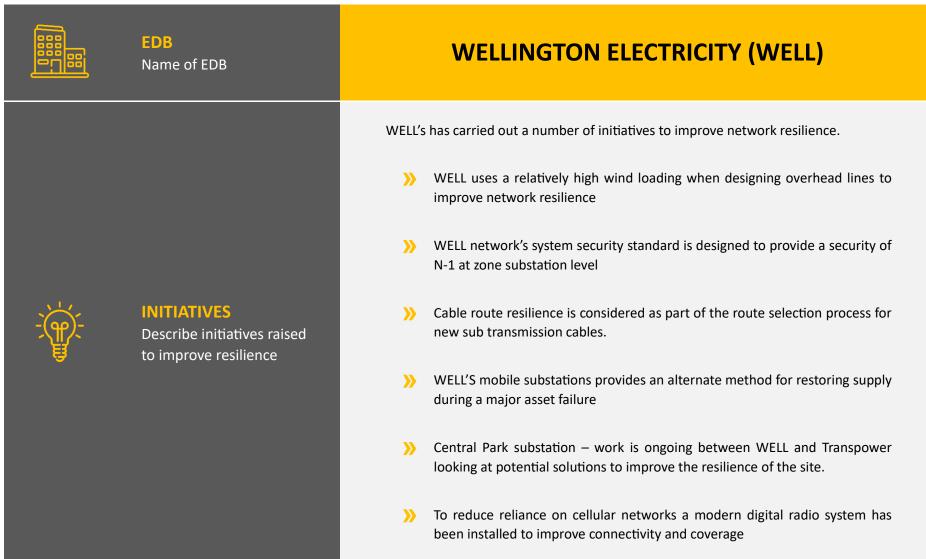
Hardening for hot dry summers

Replacement of expulsion drop-out fuses which can emit molten materials during operation and cause fire ignition. There is well proven experience of utilities in Victoria that such fuses can cause bushfire ignition.

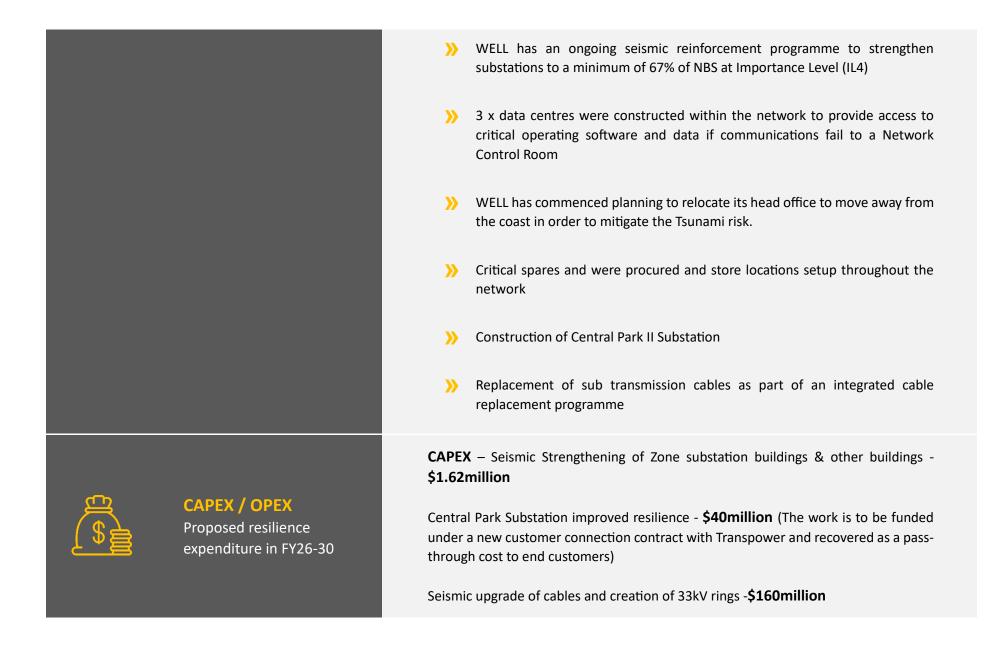
	It is, however, not clear if the sites chosen for fuse replacement have high bushfire ignition risks. At the time of preparing the 2023 AMP, Vector was unable to complete its full assessment of network damage caused by the extreme weather events in January/February 2023.
STANDARDS What standards are used for resilience initiatives	As above
TRIGGERS What are the triggers for the resilience initiatives?	Part of Vector's BAU risk management process involves the assessment of "High Impact Low Probability" (HILP) events which includes network resilience. Concrete proposals for capex and opex are based on experience and investigations performed for those events.
ASSESSMENT What assessment has been done to support the resilience expenditure?	As above



7.16 Wellington Electricity











What assessment has been done to ascertain natural disaster risk to networks? WELL has used different methods to identify HILP events, They categorise these Transmission, distribution & Environmental risk reviews.

Transmission risk reviews – WELL participates in the Connection Asset Risk Review projects undertaken with Transpower every 3-4 years to identify risks on the transmission circuits and substations, and develop mitigation measures

Distribution risk reviews –WELL as part of its network planning process, identifies the HILP events. Contingency response plans have been drawn up to mitigate impacts from such events; and

Environmental risk reviews — WELL engaged GNS and studies were undertaken to understand and identify the risk posed by earthquake and tsunami. WELL has also developed a storm inundation policy.



STANDARDS

What standards are used for resilience initiatives

WELL follows the 4R (Reduction, Readiness, Response & Recovery) approach as described in the EEA resilience guide for hazard management.

WELL has used the resilience maturity measurement tool (RMMAT) to assess its resilience thereby identifying opportunities for improvement.





TRIGGERS

What are the triggers for the resilience initiatives?

WELL has different portfolio strategies under WELL'S Asset Management, Resilience being one of the portfolio strategies.

WELL uses each portfolio strategy to develop Network Standards, work plans and programmes which include the activities and budgets presented in the 10-year AMP and five-year business plan.

WELL has also has a separate resilience framework which covers all aspects of WELL'S network resilience



ASSESSMENT

What assessment has been done to support the resilience expenditure?

All the projects mentioned under proposed resilience expenditure have gone through a proper investment planning process where multiple options have been identified for the issues and solutions are proposed through a business case for management approval prior to being converted into a project. However, IAEngg is not clear if the business cases for chosen resilience initiatives provide positive Net Present Value (NPV).



7.17 Buller Electricity



EDB

Name of EDB

BULLER ELECTRICITY LIMITED (BEL)



INITIATIVES

Describe initiatives raised to improve resilience

IAEngg was only able to identify the Buller Bridge crossing purchase project in the AMP that BEL stated explicitly is to improve resilience. BEL cited, in the AMP, that the shifting of residential load to the western side of the Buller Bridge has the potential to require major development of additional distribution infrastructure. The purchase and connecting of Transpower's Buller River crossing 110kV line to Whareatea and Carters beach 11kV circuits is for resilience and reliability improvements.

Under their risk management policy and framework, BEL examines its physical risk exposure that include earthquake, flood, fire, tsunami and IT systems failure.

BEL stated that remaining outstanding priority items to complete from their 2020 assessment of network resilience status includes network emergency spares, assessment of overhead two pole substations earthquake resilience and, diesel and other fuel supply availability.



CAPEX / OPEX

Proposed resilience expenditure in FY26-30

IAEngg did not come across the individual costs of these programmes.





What assessment has been done to ascertain natural disaster risk to networks?

BEL uses consultants to regularly review various aspects of its AM practices including the AMP, SMS, Resilience and financial system and processes against evolving requirements and compliance is reported to the Board.

In 2020 BEL engaged Mitton Electronet to carry out an independent review of the state of Buller Electricity's existing emergency preparedness plans and overall network resilience status. Although IAEngg did not come across any details on the review, apart from outstanding (priority) items.



STANDARDS

What standards are used for resilience initiatives

BEL's independent review of its existing emergency preparedness plans and overall network resilience status was in the context of the so-called "4 R's" (reduce, ready, respond and recover) of emergency preparedness, relating to electricity networks.



TRIGGERS

What are the triggers for the resilience initiatives?

Although we did not come across the triggers for resilience initiatives, IAEngg believes the trigger points for resilience initiatives might be embedded in BEL's trigger points for planning new capacity which consider asset location, capacity, reliability, security or voltage.



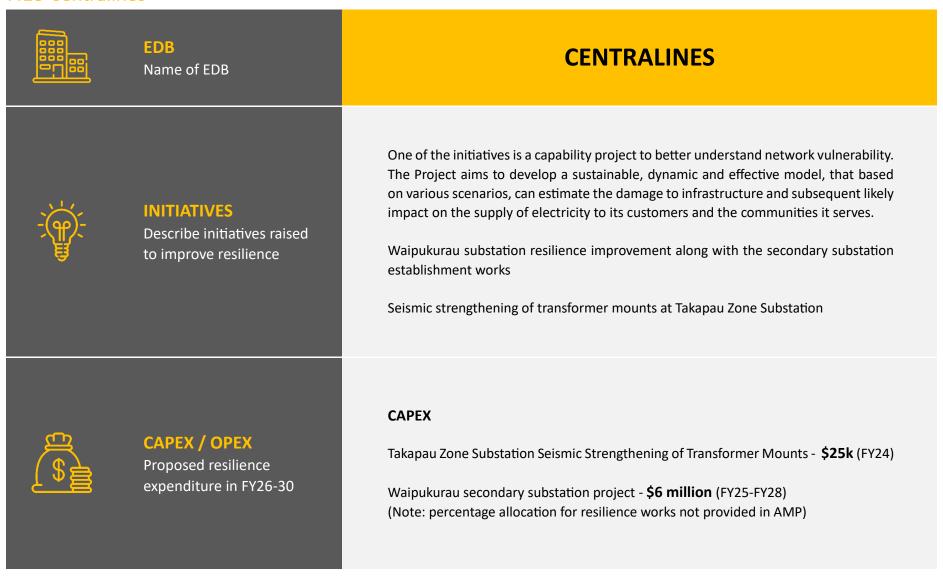
ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across any assessment in the AMP relating to resilience expenditure.



7.18 Centralines







What assessment has been done to ascertain natural disaster risk to networks?

Centralines' network resilience maturity is assessed on an annual basis through the EEA's Resilience Management Maturity Assessment Tool (RMMAT).



STANDARDS

What standards are used for resilience initiatives

Centralines aligns it resilience improvement with EEA's Resilience Guideline and has recently adopted the co-ordinated Incident Management System (CIMS) to manage HILP events.



TRIGGERS

What are the triggers for the resilience initiatives?

Centralines Strategic Asset Management objectives include improving the resilience of the network.

Resilience forms a key part of Centralines approach to asset management; cyclone Gabrielle has reinforced the importance of network resilience for Centralines.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across any detailed assessment relating to resilience expenditure



7.19 Counties Energy

EDB Name of EDB	COUNTIES ENERGY
INITIATIVES Describe initiatives raised to improve resilience	Counties Energy considers flood, wildfires & earthquakes as part of the design process for all critical assets like substations and sub-transmission lines on the network. Counties Energy assets are designed to provide a certain level of resilience under a normal operating environment as defined in the security of supply and planning guidelines. Counties Energy plans to undertake a network-wide zone substation buildings/structure seismic review against the latest New Zealand Society of Earthquake Engineering (NZSEE) seismic grades with a building importance level of 4 (IL4); this includes both indoor and outdoor structures. Replace kiosk buildings with pad-mount transformers to address the seismic risk and ongoing maintenance of the kiosk building itself.
\$ CAPEX / OPEX Proposed resilience expenditure in FY26-30	Seismic Study & Corrective Actions - \$250k (FY24) Seismic Study & Corrective Actions - \$300k (FY25) \$4.1 million in current AMP period for the renewal of transformers and associated equipment due to condition and seismic risk





What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment done to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

Risk Management framework consistent with ISO 31000: 2009 Risk Management – Principles and Guidelines standard

New Zealand Society of Earthquake Engineering (NZSEE) seismic grades with a building importance level of 4 (IL4)



TRIGGERS

What are the triggers for the resilience initiatives?

Counties Energy's main triggers for the resilience initiatives are the effects of weather events brought about by Climate change.

Any changes to Counties Energy plan or expenditure relating to network resilience triggered by the learnings from cyclone Gabrielle will be addressed in the next Asset Management Plan.



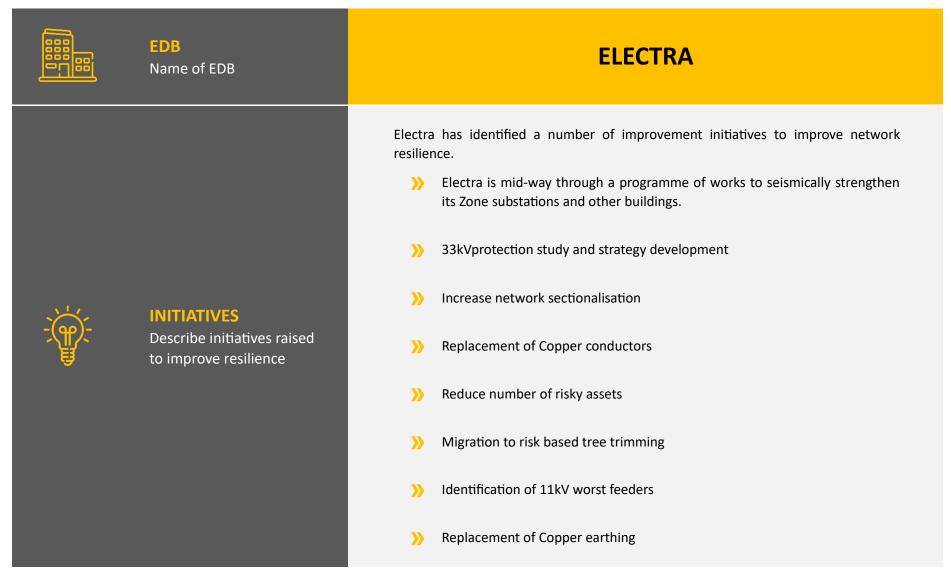
ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across any detailed assessment relating to resilience expenditure



7.20 Electra







CAPEX / OPEX

Proposed resilience expenditure in FY26-30

CAPEX – Seismic Strengthening of Zone substation buildings & other buildings - **\$2.51million**

IAEngg did not come across the individual costs of the programmes listed above except for seismic strengthening.



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

Electra has completed a flood risk analysis of its assets, Electra obtained flooding datasets from the two local councils and details have been overlaid onto the GIS systems to provide insights of the assets at risk.



STANDARDS

What standards are used for resilience initiatives

- An earthquake of Richter magnitude 7.5 or greater on a major Wellington fault
- Volcanic activity at Ruapehu resulting in ash coverage of about 10mm throughout the Northern part of Electra's area
- A one in 100-year flood of the Ōtaki, Waikanae or Manawatu rivers
- A tsunami impacting on the West Coast that could inundate up to 2km inland.



Electra follows the 4R's of robustness, resourcefulness, recovery and redundancy to improve the resilience of its network.

Electra has also adopted a Climate Resilience Framework and adapted its existing governance and risk practices to ensure climate opportunities and risks are systematically identified, quantified and mitigated within Electra's existing framework of strategies, asset management plans and business plans. Electra has strategically aligned its governance, strategy and risk activities with the Task Force on Climate-related Financial Disclosures (TCFD) framework.



TRIGGERS

What are the triggers for the resilience initiatives?

Resilience is an important objective of the Electra's Asset Management policy and strategy and is considered during investment planning process.



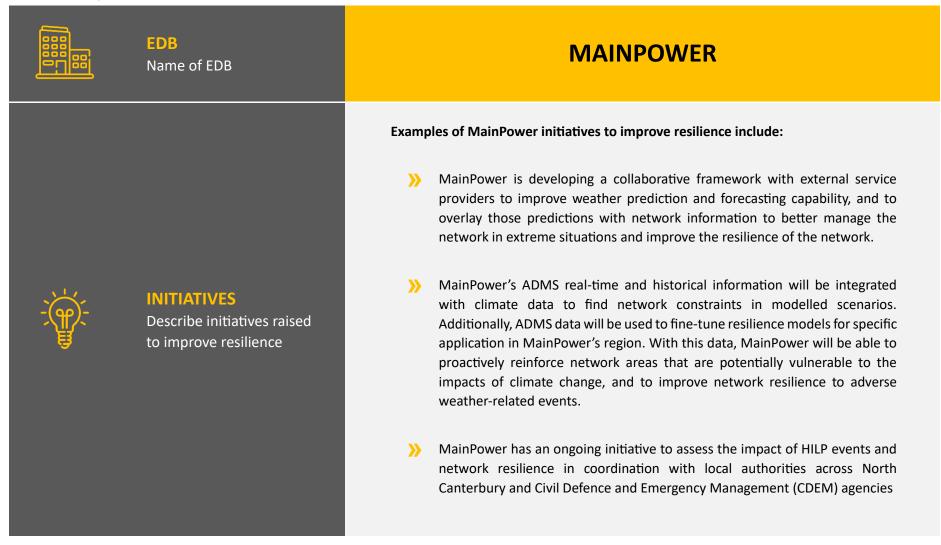
ASSESSMENT

What assessment has been done to support the resilience expenditure?

Other than Seismic Strengthening of Zone substations, IAEngg did not come across details on specific assessment done to support the resilience expenditure.



7.21 Mainpower







- Kaiapoi-Island Road Upgrade Installation of an additional 11 kV cable section between a previously installed cable section and Neeve Street to improve network resiliency.
- The 33 kV radial spur line supplying Hanner zone substation is being upgraded with stronger conductor and structures to minimise the risk of prolonged outages during extreme weather events over FY20–FY25 to improve resilience and reliability.
- MainPower's sub-transmission line between Oaro and Kaikōura, along the Kaikōura coast, was affected by the 2016 Kaikōura earthquake. Short-term repairs were performed on the line section that crosses over the Raramai Tunnel; however, these require review and replacement to provide a long-term resilient solution for this section of the sub-transmission network.
- MainPower has invested in a LiDAR capture survey of its entire overhead network, which was completed in August 2022. This overhead network LiDAR survey will provide a dynamic virtual network representation that will allow MainPower to leverage accurate, up-to-date data for assessment of network clearances, identification of defects, and to model environmental scenarios to gauge network resilience.
- MainPower has five power transformers held as strategic spares. These are surplus units are held to support network resilience and emergency responses.





CAPEX / OPEX

Proposed resilience expenditure in FY26-30

IAEngg did not come across the individual costs of these programmes.



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment done to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

MainPower designs substations for a 1-in-500-year flood event.

MainPower is taking part in a pilot programme to model network vulnerability to hazard events and climate change using nationally accepted impact assessment modelling tools (MainPower did not disclose the name of this tool). The outputs from this vulnerability assessment will inform MainPower's resilience planning and the Network Regional Plans.



TRIGGERS

What are the triggers for the resilience initiatives?

Although not explicitly stated, most resilience improvement initiatives are triggered by renewal needs or security/reliability of supply such as radial supply.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across details on any specific assessment done to support resilience expenditure.



7.22 Marlborough Lines



EDB

Name of EDB

INITIATIVES

Describe initiatives raised

to improve resilience

MARLBOROUGH LINES (MLL)

Examples of initiatives sighted in the AMP include:

- For the ten-year planning period covered by this AMP (1 April 2023 to 31 March 2033 = RY2024 to RY2033), investment will focus on renewal of areas of the 11kV and Low Voltage (LV) network driven by Asset Health Indicator (AHI) ratings and type-based replacement, to further build resilience of the network and to maintain a high level of network reliability.
- Vegetation control is a key requirement for storm resilience.
- MLL commissioned seismic strengthening programme of works involving structural assessments of the zone substation buildings, and strengthening works to the buildings that were deemed earthquake prone
- To improve resilience to major seismic events, pole-mounted transformers 200kVA and above are, where practical, replaced with a ground-mounted transformer of equivalent or greater size. Smaller pole mounted transformers are replaced like-for-like.



CAPEX / OPEX

Proposed resilience expenditure in FY26-30 IAEngg did not come across the individual costs of these programmes. A significant proportion of Marlborough Lines asset renewal expenditure has resilience benefits.





What assessment has been done to ascertain natural disaster risk to networks?

MLL considers improved resilience for new assets and is currently considering whether a 1:100 year flood level standard is appropriate for critical assets or whether 1:250 or 1:450 (such as Transpower now use) is appropriate. IAEngg did not come across details on specific assessments done to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

IAEngg did not come across any statements on standards used for resilience initiatives.



TRIGGERS

What are the triggers for the resilience initiatives?

Continuous review of network security and resilience to extreme natural events is undertaken by MLL, which feeds into MLL's asset management planning.

Apart from seismic or extreme weather events, MLL also has resilience concerns for areas with only a single source of supply eg GXP station with only one transformer or an area with a single HV feeder supply.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

Further work undertaken by GNS, and other experts has identified that Marlborough is at risk from the Hikurangi subduction zone which runs under the sea out from the east coast of the North Island to Marlborough. This subduction zone has the potential to generate a major earthquake and/or tsunami.



7.23 Network Waitaki

7.23 Network Waltaki		
	EDB Name of EDB	NETWORK WAITAKI
	INITIATIVES Describe initiatives raised to improve resilience	 Lessons learnt from previous HILP prevents are fed back into the operational procedures, design standards & procurement standards to make Network Waitaki more resilient Reinforcement of Zone Substations to meet new building standard for IL4
		 (%NBS IL4) rating by 2024 Collaboration with other South Island EDBs' to review Overhead Design Standards Chelmer St Substation 33kV line replacement with Underground cable to
		improve resilience of the substation.Construction of a new earthquake rated (IL4) operations building and control room (Increase resilience operations of operations)
		Non-Network CAPEX - FY 24 – FY 26 - \$7.8million Chelmer Street site (Network Waitaki Admin & Operations Site)
\$	CAPEX / OPEX Proposed resilience expenditure in FY26-30	Network CAPEX - Chelmer St Substation 33kV line replacement with Underground cable FY24 – FY25 - \$417K
		Network Waitaki expenditure forecasts does not include any additional allowances for resilience in 2023 AMP.





What assessment has been done to ascertain natural disaster risk to networks?

Network Waitaki has assessed the Seismic capacity of all the Zone Substations on the network against the new building standard for IL4 (% NBS IL4).



STANDARDS

What standards are used for resilience initiatives

As above



TRIGGERS

What are the triggers for the resilience initiatives?

One of Network Waitaki's goals is to ensure during and after an HILP event the network and business systems are able to return to "business as usual" mode of operations as quickly and as efficiently as practicable after an event.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

No forecast spend related to resilience is detailed in the 2023 AMP.



7.24 Northpower



EDB

Name of EDB

NORTHPOWER



INITIATIVES

Describe initiatives raised to improve resilience

Northpower believes that ensuring appropriate renewal and modernisation (refurbishment) of existing assets is a critical foundational element for delivering resilient infrastructure, and they have included a material uplift in expenditure in this area. In addition, Northpower also believes improving resilient to external threats such as cyberattack is important.

Example of resilient initiatives include:

- Increase network resilience in the Whangārei area and make opportunistic improvements during renewal works, e.g. raising assets at flood-prone sites.
- A future zone substation in the Waipu area to allow for future anticipated load growth and development, improve supply resilience in the area and provide greater backstop capability to Mangawhai and Ruakākā substations.

Northpower has introduced a number of strategies designed to mitigate storm impact and increase the resilience of the network to adverse weather.

These include:

The introduction of new design standards for network assets aimed at reducing the risk of failure related to wind damage,









What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment done to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

Northpower's risk management is carried out in accordance with, or informed by, a number of standards and guides that include EEA Resilience Guide (2022) and EEA Asset Criticality Guide (2019).

Northpower also carrys out HILP analysis to increase its understanding of their relative risk exposure to major events, and supports good engineering judgement when making decisions about network resiliency improvements.



TRIGGERS

What are the triggers for the resilience initiatives?

Northpower defines network resilience as the ability to adapt and respond quickly to external impacts.



ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across any project that targets resilience only. Resilience and reliability are inextricably tied together.



7.25 Scanpower

EDB Name of EDB	SCANPOWER
INITIATIVES Describe initiatives raised to improve resilience	Scanpower is planning to undertake the following resilience initiatives Neinforce the low voltage network Reinforce the high voltage network Install more Air break switches to help improve the security and reliability of the network
\$ CAPEX / OPEX Proposed resilience expenditure in FY26-30	No forecast spend for FY26-30 (Capex and Opex) in 2023 AMP Forecast Resilience Expenditure for 2032 - \$260k Forecast Resilience Expenditure for 2033 - \$260k





What assessment has been done to ascertain natural disaster risk to networks?

During network planning stages, Scanpower takes into consideration the resilience aspect of the network.



STANDARDS

What standards are used for resilience initiatives

Scanpower's approach is based on ISO 31000 Risk Management framework. The possible impact of major natural disasters and hazards are assessed and treatment plans are put in place to mitigate risks.



TRIGGERS

What are the triggers for the resilience initiatives?

Part of Scanpower's BAU risk management process involves the assessment of "High Impact Low Probability" (HILP). No other triggers have been highlighted in the AMP.



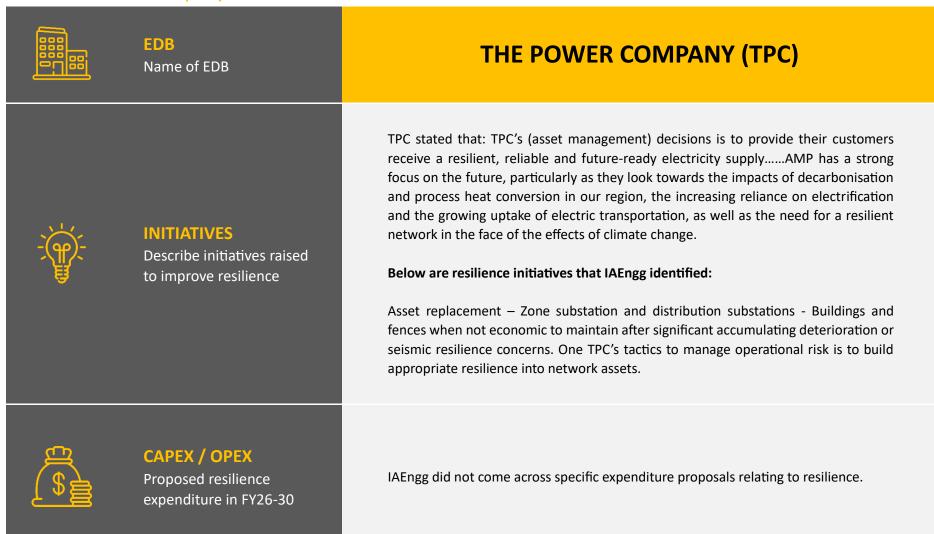
ASSESSMENT

What assessment has been done to support the resilience expenditure?

No forecast spend for FY26-30 (Capex and Opex) in 2023 AMP.



7.26 The Power Company







What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment done to ascertain natural disaster risk.

TPC cited that they have received proposals to connect data centre in Southland and this will take up the spare capacity at the GXPs and on the sub-transmission networks, decreasing the overall resilience of the network.



STANDARDS

What standards are used for resilience initiatives

'AM-STD-0026 EXTERNAL - EEA Resilience Guide 2022' is one of TPC's Asset Management and Operating Standards.

TPC's design standard specifies wind and snow loading resilience levels, and their Inspections recognise asset criticality and resilience requirements.



TRIGGERS

What are the triggers for the resilience initiatives?

TPC stated its general approach of monitoring network demand, and initiating projects when standardised development triggers are reached, serves to maintain existing service levels. Where a change in service level is desirable, this may be undertaken directly (e.g. targeted seismic remediation program to improve safety and resilience under earthquake conditions).



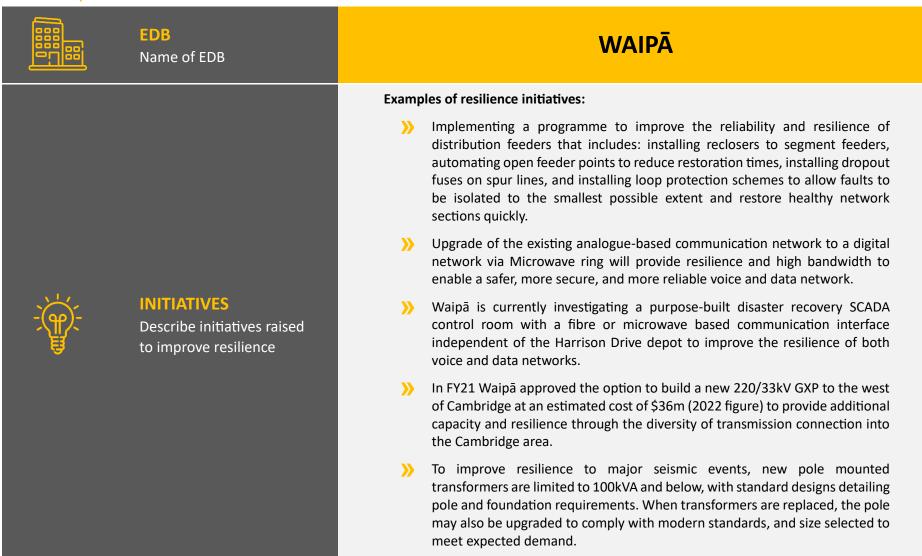
ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across details on specific assessments done to support resilience expenditure.



7.27 Waipa Networks







CAPEX / OPEX

Proposed resilience expenditure in FY26-30

The 2024 AMP will provide visibility on our resilience maturity and set out the results of our assessments completed and the potential implication of our resilience improvement programme on network expenditure.

One example found: In FY21 Waipā approved an option to build a new 220/33kV GXP to the west of Cambridge at an estimated cost of \$36m (2022 figure) to provide additional capacity and resilience through the diversity of transmission connection into the Cambridge area. Other than this projects, IAEngg did not come across the individual costs of these programmes.



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

IAEngg did not come across details on specific assessment done to ascertain natural disaster risk.



STANDARDS

What standards are used for resilience initiatives

Waipā defines Resilience as "the ability of assets, networks, systems, organisations, and people to anticipate, prepare, absorb, adapt to and / or rapidly recover from a disruptive extreme event."



TRIGGERS

What are the triggers for the resilience initiatives?

Resilience is considered during risk assessments.



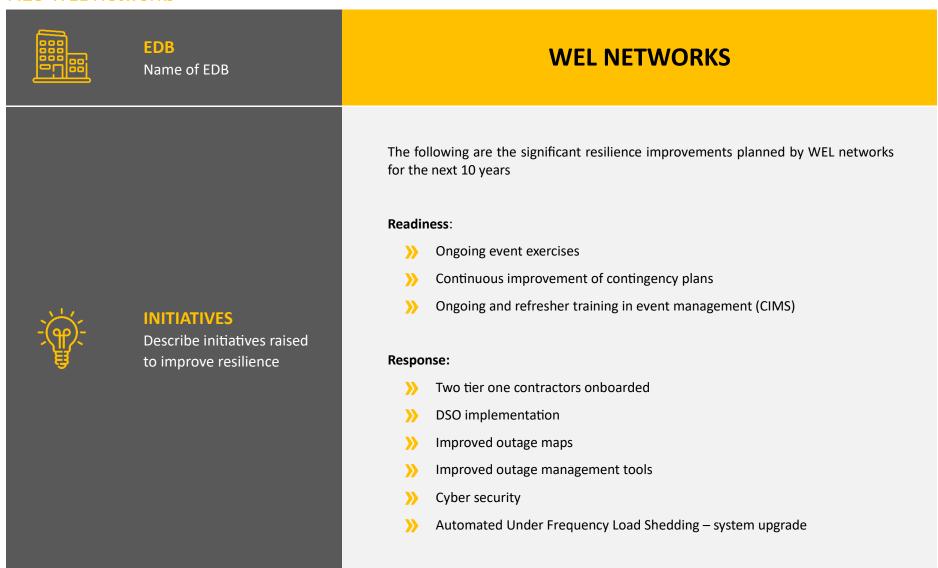
ASSESSMENT

What assessment has been done to support the resilience expenditure?

As part of Waipā network resilience path, Waipā networks has changed from traditional hardwood crossarms to steel cross arms. The existing hardwood crossarms are coming up for renewal and failures have increased in the last three years (compared to the previous 10). This analysis is also confirmed by the inspections completed in FY22, with a large number of crossarms in the H1 an H2 categories.



7.28 WEL Networks





CAPEX / OPEX

Proposed resilience expenditure in FY26-30

Reduction:

- Huntly area resilience projects to address potential liquefaction issues
- >> Raglan and Te Uku area resilience
- >> Seismic upgrade of substations
- Network reliability projects
- Security of supply projects (including a GXP review)

Legislative & Regulatory

>> Seismic Strengthening of Substations & Switching Stations - \$2.62 million

Other Reliability, Safety and Environment

- >> Raglan Area Resilience work \$5 million
- Weavers Zone Substation Relocation \$3.63 million
- Network Reliability projects \$3.25 million



RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

To align with industry practice, WEL network is planning to conduct an assessment against the 4R framework in EEA Resilience guide 2022. The 4R framework defined in the National CDEM Plan – Reduction, Readiness, Response and Recovery, as used by emergency services and other lifeline utility operators in New Zealand.





STANDARDS

What standards are used for resilience initiatives

WEL networks has assessed all of its substations and buildings for seismic strength. New Building Standard (NBS) has been used for building all new network buildings. The buildings are built to meet the IL4 standards



TRIGGERS

What are the triggers for the resilience initiatives?

WEL networks network development investment is driven by three main factors & climate change driven is one of them.

Network resilience is one of the key aspects of WEL's network planning.



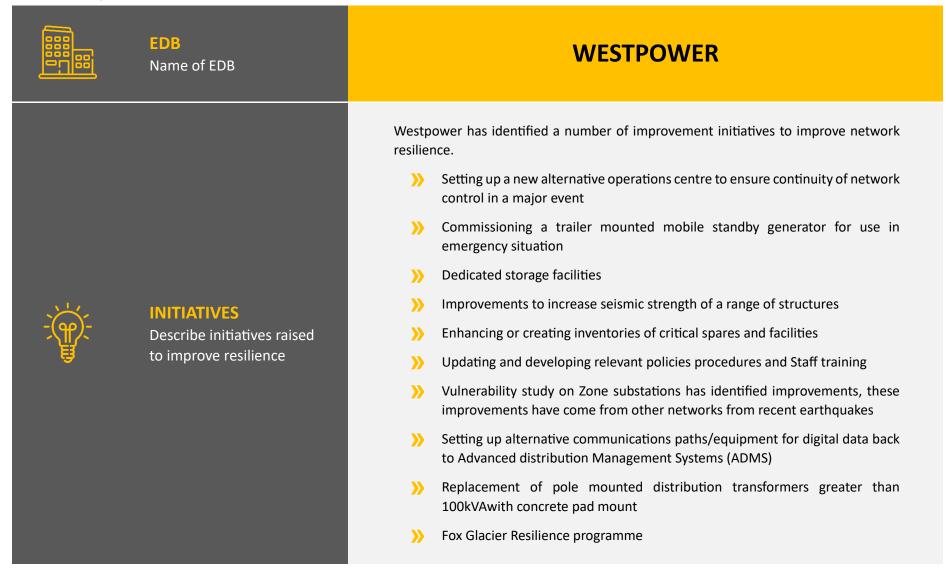
ASSESSMENT

What assessment has been done to support the resilience expenditure?

Each of the resilience initiatives identified has been converted into a project through the investment planning process. Solutions are identified for each issue, including alternative options, and weighed against each other before an option is finalised and funding approved.



7.29 Westpower





\$
6.

CAPEX / OPEX

Proposed resilience expenditure in FY26-30

CAPEX - \$1.95 million

RISK ASSESSMENT

What assessment has been done to ascertain natural disaster risk to networks?

Westpower has completed an assessment using the EEA Resilience Management Maturity Assessment Tool (RMMAT) to arrive at a baseline score against which Westpower can monitor future resilience improvements.

STANDARDS

What standards are used for resilience initiatives

Westpower has adapted the principles outlined in the National CDEM Act 2002 the 4R framework – Reduction, Readiness, Response and Recovery, (as used by emergency services and other lifeline utility operators in New Zealand) to establish and implement a resilience improvement strategy.

TRIGGERS

What are the triggers for the resilience initiatives?

Westpower is committed to ensuring an appropriate level of network resilience to major emergency events. It is one of the Key Asset Management drivers.

Westpower's Asset Management objective is to plan and provide a resilient network operation which is capable of meeting major emergency situations as a Lifeline Utility, as required by the Civil Defence Emergency Management Act 2002 (CDEM 2002).



ASSESSMENT

What assessment has been done to support the resilience expenditure?

IAEngg did not come across details on specific assessments done to support the resilience expenditure.

