Company Name	Marlborough Lines Limited
For Year Ended	31 March 2020

Schedule 14 Mandatory Explanatory Notes

(Guidance Note: This Microsoft Word version of Schedules 14, 14a and 15 is from the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018. Clause references in this template are to that determination)

1. This schedule requires EDBs to provide explanatory notes to information provided in accordance with clauses 2.3.1, 2.4.21, 2.4.22, and subclauses 2.5.1(1)(f),and 2.5.2(1)(e).

2. This schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.1. Information provided in boxes 1 to 11 of this schedule is part of the audited disclosure information, and so is subject to the assurance requirements specified in section 2.8.

3. Schedule 15 (Voluntary Explanatory Notes to Schedules) provides for EDBs to give additional explanation of disclosed information should they elect to do so.

Return on Investment (Schedule 2)

4. In the box below, comment on return on investment as disclosed in Schedule 2. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 1: Explanatory comment on return on investment

MLL achieved a post tax return on investment (ROI) of 3.30% and an ROI comparable to the vanilla WACC of 3.72%. These are both well below the mid-point regulated WACC of 4.27% and 4.69% respectively.

This low result is in part due to the manner in which the ROI is calculated, which treats posted discounts (such as MLLs) as a deduction to revenue (line charge revenue is net of discounts) whereas if the company's discount was discretionary, like many other EDBs in the industry, then the discount is not included in the calculation. If the company's discount was discretionary, rather than posted, then the ROI result would have been 7.17% (post tax) or 7.59% (vanilla).

Schedule 2 (iii) has not been completed as the value of assets commissioned for 2020 is less than 10% of our total opening RAB value (IDD 2.3.3).

No items were reclassified in the disclosure year.

Regulatory Profit (Schedule 3)

5. In the box below, comment on regulatory profit for the disclosure year as disclosed in Schedule 3. This comment must include-

5.1 a description of material items included in other regulated income (other than gains / (losses) on asset disposals), as disclosed in 3(i) of Schedule 3

5.2 information on reclassified items in accordance with subclause 2.7.1(2).

Box 2: Explanatory comment on regulatory profit

The operating surplus for 2020 of $14.481m is 0.6% below the company's 2019 result of $14.573m largely as a result of the increased operating costs.

The overall regulatory profit for 2020 of $8.376m is up on last year's 2019 result of $6.487m largely due to higher revaluation income due to higher CPI in 2020 (2.53%) compared to 2019 (1.48%).

Other regulated income includes:

- Capacity and development charges
- Recoveries from fault work
- Sales of scrap (relating to the disposal of assets from the RAB)

No items have been reclassified in the disclosure year.

Merger and acquisition expenses (3(iv) of Schedule 3)

6. If the EDB incurred merger and acquisitions expenditure during the disclosure year, provide the following information in the box below-

6.1 information on reclassified items in accordance with subclause 2.7.1(2)

6.2 any other commentary on the benefits of the merger and acquisition expenditure to the EDB.

Box 3: Explanatory comment on merger and acquisition expenditure

No merger and acquisition expenditure has been included in these information disclosure accounts.

Value of the Regulatory Asset Base (Schedule 4)

7. In the box below, comment on the value of the regulatory asset base (rolled forward) in Schedule 4. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 4: Explanatory comment on the value of the regulatory asset based (rolled forward)

The company's RAB has increased by $11.7m during the disclosure year. This increase is above the previous year's increase, due to a higher commissioned assets ($17.2m) and higher revaluation gain ($5.7m).

The company's Works under construction balance has decreased from $9.0m to $3.9m as the new Zone Substation in Renwick was commissioned in August 2019.

No items were reclassified in the disclosure year.

Regulatory tax allowance: disclosure of permanent differences (5a(i) of Schedule 5a)

8. In the box below, provide descriptions and workings of the material items recorded in the following asterisked categories of 5a(i) of Schedule 5a-

8.1 Income not included in regulatory profit / (loss) before tax but taxable;

8.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible;

8.3 Income included in regulatory profit / (loss) before tax but not taxable;

8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax.

Box 5: Regulatory tax allowance: permanent differences

8.1 Nil

8.2 Non-deductible expenditure of $73k

8.3 Nil

8.4 Nil

Regulatory tax allowance: disclosure of temporary differences (5a(vi) of Schedule 5a)

9. In the box below, provide descriptions and workings of material items recorded in the asterisked category 'Tax effect of other temporary differences' in 5a(vi) of Schedule 5a.

Box 6: Tax effect of other temporary differences (current disclosure year)	
The tax effect of temporary differences includes the following:	
Decrease in employee provisions	$2k
Decrease in bad debts provisions	($1k)
Amortisation of capital contributions	$52k
Deductible expenditure	($401k)

Cost allocation (Schedule 5d)

10. In the box below, comment on cost allocation as disclosed in Schedule 5d. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 7: Cost allocation

Cost allocation is based on Marlborough Lines Contracting business unit being fully absorbed into the regulatory business as a consolidated group entity.

Non-directly attributable cost from the contracting business unit has been allocated to the regulatory business based on the proportion of labour used for that category of work.

No items have been reclassified in the disclosure year.

Asset allocation (Schedule 5e)

11. In the box below, comment on asset allocation as disclosed in Schedule 5e. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 8: Commentary on asset allocation

All costs incurred are directly attributable. All costs (time, plant and materials) are directly coded to the particular asset capital project and no cost allocation has taken place.

No items were reclassified in the disclosure year.

Capital Expenditure for the Disclosure Year (Schedule 6a)

12. In the box below, comment on expenditure on assets for the disclosure year, as disclosed in Schedule 6a. This comment must include-

    12.1 a description of the materiality threshold applied to identify material projects and programmes described in Schedule 6a;

12.2 information on reclassified items in accordance with subclause 2.7.1(2).

Box 9: Explanation of capital expenditure for the disclosure year
No general threshold has been applied to identify which programme a capital job has been placed in, however each job has been looked at and placed in the programme or project that was the main driver for that project. There have been no reclassifications in accordance with clause 2.7.1(2).

Operational Expenditure for the Disclosure Year (Schedule 6b)

13. In the box below, comment on operational expenditure for the disclosure year, as disclosed in Schedule 6b. This comment must include-

13.1 Commentary on assets replaced or renewed with asset replacement and renewal operational expenditure, as reported in 6b(i) of Schedule 6b;

13.2 Information on reclassified items in accordance with subclause 2.7.1(2);

13.3 Commentary on any material atypical expenditure included in operational expenditure disclosed in Schedule 6b, a including the value of the expenditure the purpose of the expenditure, and the operational expenditure categories the expenditure relates to.

Box 10: Explanation of operational expenditure for the disclosure year
Asset replacement and renewal opex relates to where assets are replaced as part of a larger line asset, where the service potential is not improved. For example this may include items where crossarms are replaced but the pole is not. There have been no reclassifications in accordance with clause 2.7.1(2). There have been no items of atypical expenditure.

Variance between forecast and actual expenditure (Schedule 7)

14. In the box below, comment on variance in actual to forecast expenditure for the disclosure year, as reported in Schedule 7. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 11: Explanatory comment on variance in actual to forecast expenditure

Overall, total expenditure was greater than forecast by 6.8%. Expenditure on assets was 4% greater than forecast, with operating expenditure 9% higher than that forecast.

Our operational expenditure variance largely relates to the increased routine and corrective maintenance and inspection.

No items have been reclassified in the disclosure year.

Information relating to revenues and quantities for the disclosure year

15. In the box below provide-

15.1 a comparison of the target revenue disclosed before the start of the disclosure year, in accordance with clause 2.4.1 and subclause 2.4.3(3) to total billed line charge revenue for the disclosure year, as disclosed in Schedule 8; and

15.2 explanatory comment on reasons for any material differences between target revenue and total billed line charge revenue.

Box 12: Explanatory comment relating to revenue for the disclosure year

Line charge revenue for 2020 of $38.023m (net of our posted discount of $8.500m) is 3% above target revenue of $37.028m as a result of improved volumes. Volumes are 0.3% greater than last year.

Network Reliability for the Disclosure Year (Schedule 10)

16. In the box below, comment on network reliability for the disclosure year, as disclosed in Schedule 10.

Box 13: Commentary on network reliability for the disclosure year

Normalised SAIDI for the year was 174 minutes, above last year's result of 129. The result was above the Company's forecast total SAIDI of 145 minutes from the Company's 2019 Asset Management Plan.

Unplanned SAIDI for the year was 118 minutes, above the Company's forecast of 80 minutes. This result was negatively impacted by a number of storms in December 2019 impacting the network located in the Marlborough Sounds, responsible for 23 SAIDI minutes. In some instances restoration of supply was delayed to ensure the safety of the public where there was extreme fire risk or reported potential hazards, such as lines down, contributing 9 SAIDI minutes.

Normalised SAIFI of 1.84 is above the Company's five year trend.

Insurance cover

17. In the box below, provide details of any insurance cover for the assets used to provide electricity distribution services, including-

    17.1 The EDB's approaches and practices in regard to the insurance of assets used to provide electricity distribution services, including the level of insurance;

    17.2 In respect of any self insurance, the level of reserves, details of how reserves are managed and invested, and details of any reinsurance.

Box 14: Explanation of insurance cover
The property insurance programme does not include cover for subtransmission and distribution lines. In the prevailing insurance market conditions, coverage for subtransmission and distribution lines is difficult to obtain and very expensive.

Amendments to previously disclosed information

18. In the box below, provide information about amendments to previously disclosed information disclosed in accordance with clause 2.12.1 in the last 7 years, including:

    18.1 a description of each error; and

    18.2 for each error, reference to the web address where the disclosure made in accordance with clause 2.12.1 is publicly disclosed.

Box 15: Disclosure of amendment to previously disclosed information
There have been no amendments to previously disclosed information.

Company Name	Marlborough Lines Limited
For Year Ended	31 March 2020

Schedule 14a Mandatory Explanatory Notes on Forecast Information

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018.)

1. This Schedule requires EDBs to provide explanatory notes to reports prepared in accordance with clause 2.6.6.

2. This Schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.2. This information is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.

Commentary on difference between nominal and constant price capital expenditure forecasts (Schedule 11a)

3. In the box below, comment on the difference between nominal and constant price capital expenditure for the current disclosure year and 10 year planning period, as disclosed in Schedule 11a.

Box 1: Commentary on difference between nominal and constant price capital expenditure forecasts
Please refer to Section 10.1.1 of the 2020 Asset Management Plan.

Commentary on difference between nominal and constant price operational expenditure forecasts (Schedule 11b)

4. In the box below, comment on the difference between nominal and constant price operational expenditure for the current disclosure year and 10 year planning period, as disclosed in Schedule 11b.

Box 2: Commentary on difference between nominal and constant price operational expenditure forecasts
Please refer to Section 10.1.1 of the 2020 Asset Management Plan.

Company Name Marlborough Lines Limited

For Year Ended 31 March 2020

Schedule 15 Voluntary Explanatory Notes

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018.)

1. This schedule enables EDBs to provide, should they wish to-

    1.1 additional explanatory comment to reports prepared in accordance with clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1 and 2.5.2;

    1.2 information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.

2. Information in this schedule is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.

3. Provide additional explanatory comment in the box below.

Box 1: Voluntary explanatory comment on disclosed information

Line charge revenue

Schedule 3: Line charge revenue has been calculated post discount. The discount amount is specified in Schedule 8(ii) at $8.500m.

Weighted average remaining lives

Schedule 4(vii) provides weighted average remaining lives as well as average expected total life. The required method of calculation weights the lives using the opening RAB value of the asset. As this value is a depreciated value it skews the weighted average remaining useful life towards the newer assets providing an indication that the overall network is much younger than it actually is. It is therefore not a good indicator of the average life of our network. Further information on the age of our assets is available in our published Asset Management Plan.

Reliability Information

In accordance with the notification issued by the Commerce Commission on 22 August 2019 the Company discloses the following:

- The reliability information disclosed in Schedule 10 has been prepared on a basis consistent with the previous year's disclosure.
- The Company's outage recording software recognises successive interruptions following an initial outage by recording separate interruptions due to restoration and isolation of the initial outage, with the SAIFI value higher as a result.

Related Party Information

For the year ended 31 March 2020, the Company has determined that their contracting business unit is not a related party. The Company has determined this on the basis that the contracting business unit does not fall within the definition of a related party because it (a) does not meet the definition of a 'related party' in NZ IAS 24, and (b) is deemed to not be a 'part' of the EDB that supplies electricity distribution services, as its activity is closely associated with that of the regulated company and its external sales do not exceed the level of internal sales.