

Company Name Marlborough Lines Limited

For Year Ended 31 March 2019

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 2.5.1(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 2.44% and an ROI comparable to the vanilla WACC of 2.95%. These are both well below the mid-point regulated WACC of 4.75% and 5.26% 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 6.38% (post tax) or 6.89% (vanilla).

Schedule 2 (iii) has not been completed as the value of assets commissioned for 2019 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-



Box 6: Tax effect of other temporary differences (current disclosure year)

The tax effect of temporary differences includes the following:

Increase in employee provisions	\$34k
Decrease in bad debts provisions	(\$2k)
Amortisation of capital contributions	\$50k
Deductible expenditure	(\$188k)

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, 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 11%. Expenditure on assets was 18% greater than forecast, with operating expenditure 5% higher than that forecast.

Our capital expenditure variance largely relates to the timing of projects and enhancements to project scope.

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 2019 of \$37.176m (net of our posted discount of \$8.412m) is 1.7% above target revenue of \$36.556m as a result of improved volumes. Volumes are 3.5% 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 129 minutes, slightly up on last year's result of 121 minutes which was our lowest SAIDI result on record. The result was below the Company's forecast total SAIDI of 145 minutes from the Company's 2018 Asset Management Plan.

Unplanned SAIDI for the year was 81.2 minutes, above the Company's forecast of 80 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.

Normalised SAIFI of 1.02 is in line with our 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

Insurance cover has been maintained across all aspects of the business.

The property insurance programme does not include cover 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 2019

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 2018 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 2018 Asset Management Plan.

Company Name Marlborough Lines Limited

For Year Ended 31 March 2019

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 \$8.412m.

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.

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 2019, 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.