



Information Disclosure

For the Year Ended 31 March 2026

EDB Information Disclosure Requirements Information Templates

Schedules 1–10 excluding 5f–5h

Company Name

Counties Energy Limited

Disclosure Date

26 August 2026

Disclosure Year (year ended)

31 March 2026

Templates for Schedules 1–10 excluding 5f–5h

Prepared 2 June 2026

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SCHEDULE 1: ANALYTICAL RATIOS

This schedule calculates expenditure, revenue and service ratios from the information disclosed. The disclosed ratios may vary for reasons that are company specific and, as a result, must be interpreted with care. The Commerce Commission will publish a summary and analysis of information disclosed in accordance with this ID determination. This will include information disclosed in accordance with this and other schedules, and information disclosed under the other requirements of this determination.

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

1(i): Expenditure metrics

	Expenditure per GWh energy delivered to ICPs (\$/GWh)	Expenditure per average no. of ICPs (\$/ICP)	Expenditure per MW maximum coincident system demand (\$/MW)	Expenditure per km circuit length (\$/km)	Expenditure per MVA of capacity from EDB-owned distribution transformers (\$/MVA)
Operational expenditure	39,364	532	188,270	7,237	55,536
Network	13,711	185	65,574	2,521	19,343
Non-network	25,654	346	122,695	4,717	36,192
Expenditure on assets	83,814	1,132	400,858	15,410	118,245
Network	73,356	991	350,844	13,487	103,492
Non-network	10,457	141	50,014	1,923	14,753

1(ii): Revenue metrics

	Revenue per GWh energy delivered to ICPs (\$/GWh)	Revenue per average no. of ICPs (\$/ICP)
Total consumer line charge revenue	131,625	1,777
Standard consumer line charge revenue	143,463	1,688
Non-standard consumer line charge revenue	51,579	497,923

1(iii): Service intensity measures

Demand density	38	Maximum coincident system demand per km of circuit length (for supply) (kW/km)
Volume density	184	Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)
Connection point density	14	Average number of ICPs per km of circuit length (for supply) (ICPs/km)
Energy intensity	13,503	Total energy delivered to ICPs per average number of ICPs (kWh/ICP)

1(iv): Composition of regulatory income

	(\$000)	% of revenue
Operational expenditure	26,546	29.90%
Pass-through and recoverable costs excluding financial incentives and wash-ups	15,914	17.92%
Total depreciation	22,857	25.74%
Total revaluations	16,499	18.58%
Regulatory tax allowance	5,248	5.91%
Regulatory profit/(loss) including financial incentives and wash-ups	34,728	39.11%
Total regulatory income	88,794	

1(v): Reliability

Interruption rate	25.22	Interruptions per 100 circuit km
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SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii).

EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

2(i): Return on Investment

ROI – comparable to a post tax WACC

Reflecting all revenue earned
Excluding revenue earned from financial incentives
Excluding revenue earned from financial incentives and wash-ups

Mid-point estimate of post tax WACC

25th percentile estimate
75th percentile estimate

ROI – comparable to a vanilla WACC

Reflecting all revenue earned
Excluding revenue earned from financial incentives
Excluding revenue earned from financial incentives and wash-ups

WACC rate used to set regulatory price path

Mid-point estimate of vanilla WACC

25th percentile estimate
75th percentile estimate

CY-2 CY-1 Current Year CY

% % %

5.91%	5.34%	6.13%
5.91%	5.34%	6.13%
5.91%	5.34%	6.13%
6.05%	6.18%	5.90%
5.37%	5.50%	5.17%
6.73%	6.86%	6.62%

6.61%	6.06%	6.77%
6.61%	6.06%	6.77%
6.61%	6.06%	6.77%

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6.75%	6.90%	6.53%
6.07%	6.22%	5.81%
7.43%	7.58%	7.26%

2(ii): Information Supporting the ROI

(\$000)

Total opening RAB value
plus Opening deferred tax

Opening RIV

Line charge revenue

Expenses cash outflow

add Assets commissioned

less Asset disposals

add Tax payments

less Other regulated income

Mid-year net cash outflows

Term credit spread differential allowance

Total closing RAB value

less Adjustment resulting from asset allocation

less Lost and found assets adjustment

plus Closing deferred tax

Closing RIV

ROI – comparable to a vanilla WACC

Leverage (%)
Cost of debt assumption (%)
Corporate tax rate (%)

ROI – comparable to a post tax WACC

541,698	
(30,113)	
	511,585
	88,764
42,460	
31,815	
339	
794	
30	
	74,700
	–
566,816	
0	
–	
(34,567)	
	532,249

6.77%

41%

5.56%

28%

6.13%



SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii).

EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

2(iii): Information Supporting the Monthly ROI

Opening RIV						N/A
	Line charge revenue	Expenses cash outflow	Assets commissioned	Asset disposals	Other regulated income	Monthly net cash outflows
April						–
May						–
June						–
July						–
August						–
September						–
October						–
November						–
December						–
January						–
February						–
March						–
Total	–	–	–	–	–	–
Tax payments						N/A
Term credit spread differential allowance						N/A
Closing RIV						N/A
Monthly ROI – comparable to a vanilla WACC						N/A
Monthly ROI – comparable to a post tax WACC						N/A

2(iv): Year-End ROI Rates for Comparison Purposes

Year-end ROI – comparable to a vanilla WACC	6.58%
Year-end ROI – comparable to a post tax WACC	5.95%

* these year-end ROI values are comparable to the ROI reported in pre 2012 disclosures by EDBs and do not represent the Commission's current view on ROI.

2(v): Financial Incentives and Wash-Ups

IRIS incentive adjustment	
Purchased assets – avoided transmission charge	
Innovation and non-traditional solutions recovered amount	
Quality incentive adjustment	
Other CPP financial incentives	
Financial incentives	–
Impact of financial incentives on ROI	–
Input methodology claw-back	
CPP application recoverable costs	
CPP Urgent project allowance	Not Required before DY
Reopener event allowance	Not Required before DY
Wash-up draw down amount	Not Required before DY
Other CPP wash-ups	
Wash-up costs	–
Impact of wash-up costs on ROI	–



SCHEDULE 3: REPORT ON REGULATORY PROFIT

This schedule requires information on the calculation of regulatory profit for the EDB for the disclosure year. All EDBs must complete all sections and provide explanatory comment on their regulatory profit in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

7	3(i): Regulatory Profit		(\$000)	
8	Income			
9		Line charge revenue	88,764	
10	plus	Gains / (losses) on asset disposals	(120)	
11	plus	Other regulated income (other than gains / (losses) on asset disposals)	150	
12				
13		Total regulatory income	88,794	
14	Expenses			
15	less	Operational expenditure	26,546	
16				
17	less	Pass-through and recoverable costs excluding financial incentives and wash-ups	15,914	
18				
19		Operating surplus / (deficit)	46,334	
20				
21	less	Total depreciation	22,857	
22				
23	plus	Total revaluations	16,499	
24				
25		Regulatory profit / (loss) before tax	39,976	
26				
27	less	Term credit spread differential allowance	–	
28				
29	less	Regulatory tax allowance	5,248	
30				
31		Regulatory profit/(loss) including financial incentives and wash-ups	34,728	
32				
33	3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups		(\$000)	
34	Pass through costs			
35		Electricity lines service charge payable to Transpower	14,138	Not Required before D
36		Transpower new investment contract charges	224	Not Required before D
37		System operator services	–	Not Required before D
38		Rates	1,098	
39		Commerce Act levies	164	
40		Industry levies	213	
41		CPP or DPP specified pass-through costs	–	
42	Recoverable costs excluding financial incentives and wash-ups			
43		Independent engineer costs	–	Not Required before D
44		FENZ levies	77	Not Required before D
45		Extended reserves allowance	–	
46		Other CPP recoverable costs excluding financial incentives and wash-ups	–	
47		Pass-through and recoverable costs excluding financial incentives and wash-ups	15,914	
48				
49	3(iv): Merger and Acquisition Expenditure		(\$000)	
50				
51		Merger and acquisition expenditure	–	
52				
53		Provide commentary on the benefits of merger and acquisition expenditure to the electricity distribution business, including required disclosures in accordance with section 2.7, in Schedule 14 (Mandatory Explanatory Notes)		
54	3(v): Other Disclosures		(\$000)	
55				
56		Self-insurance allowance	–	



SCHEDULE 3a: REPORT ON INCREMENTAL ROLLING INCENTIVE SCHEME

This schedule requires information on the calculation of IRIS incentive amounts. All non-exempt EDBs must complete this section.

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

Please note; only the white cells should be filled in (i.e. F7 - J7, F10 - J12, F15 - J17). Forecast values should be filled in for all years, actual values should be filled in for all years where known.

Section	Row	Context	Category1	Category2	RY1	RY2	RY3	RY4	RY5	Total over / (under) spend
3a: Incremental Rolling Incentive Scheme	7		Current Year	Current Year	CY-2	CY-1	CY	CY+1	CY+2	

Section	Row	Context	Category1	Category2	RY1 (\$000)	RY2 (\$000)	RY3 (\$000)	RY4 (\$000)	RY5 (\$000)	Total over / (under) spend
3a: Incremental Rolling Incentive Scheme	10		Opex incentive amounts	Forecast opex						
3a: Incremental Rolling Incentive Scheme	11		Opex incentive amounts	Actual opex						
3a: Incremental Rolling Incentive Scheme	12 +		Opex incentive amounts	Plus lease payments						
3a: Incremental Rolling Incentive Scheme	13		Opex incentive amounts	Actual opex for IRIS	-	-	-	-	-	
3a: Incremental Rolling Incentive Scheme	14		Opex incentive amounts	Expenditure variance to opex allowance	-	-	-	-	-	-
3a: Incremental Rolling Incentive Scheme	15		Capex incentive amounts	Forecast aggregate value of commissioned assets						
3a: Incremental Rolling Incentive Scheme	16		Capex incentive amounts	Actual commissioned assets						
3a: Incremental Rolling Incentive Scheme	17 -		Capex incentive amounts	Less right-of-use assets						
3a: Incremental Rolling Incentive Scheme	18		Capex incentive amounts	Actual commissioned assets for IRIS	-	-	-	-	-	
3a: Incremental Rolling Incentive Scheme	19		Capex incentive amounts	Expenditure variance to commissioned assets allowance	-	-	-	-	-	-



SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

4(i): Regulatory Asset Base Value (Rolled Forward)		RAB CY-4 (\$000)	RAB CY-3 (\$000)	RAB CY-2 (\$000)	RAB CY-1 (\$000)	RAB CY (\$000)
	Total opening RAB value	330,036	374,478	427,054	505,781	541,698
less	Total depreciation	12,097	13,441	15,843	17,933	22,857
plus	Total revaluations	22,796	24,806	17,102	12,735	16,499
plus	Assets commissioned	33,968	41,748	78,227	41,939	31,815
less	Asset disposals	225	537	759	824	339
plus	Lost and found assets adjustment	-	-	-	-	-
plus	Adjustment resulting from asset allocation	-	-	(0)	0	0
	Total closing RAB value	374,478	427,054	505,781	541,698	566,816

4(ii): Unallocated Regulatory Asset Base		Unallocated RAB * (\$000)	RAB (\$000)
	Total opening RAB value	543,441	541,698
less	Total depreciation	23,135	22,857
plus	Total revaluations	16,553	16,499
plus	Assets commissioned out of WUC	24,798	24,798
	Assets acquired (other than below)	7,250	7,017
	Assets acquired from a regulated supplier		
	Assets acquired from a related party		
	Assets commissioned	32,048	31,815
less	Asset disposals (other than below)	346	339
	Asset disposals to a regulated supplier		
	Asset disposals to a related party		
	Asset disposals	346	339
plus	Lost and found assets adjustment	-	-
plus	Adjustment resulting from asset allocation		0
	Total closing RAB value	568,561	566,816

* The 'unallocated RAB' is the total value of those assets used wholly or partially to provide electricity distribution services without any allowance being made for the allocation of costs to services provided by the supplier that are not electricity distribution services. The RAB value represents the value of these assets after applying this cost allocation. Neither value includes works under construction.



SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

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4(iii): Calculation of Revaluation Rate and Revaluation of Assets

CPI _t	1,339
CPI _{t-4}	1,299
Revaluation rate (%)	3.08%

	Unallocated RAB *		RAB	
	(\$000)	(\$000)	(\$000)	(\$000)
Total opening RAB value	543,441		541,698	
less Opening value of fully depreciated, disposed and lost assets	5,894		5,894	
Total opening RAB value subject to revaluation	537,547		535,804	
Total revaluations		16,553		16,499

4(iv): Roll Forward of Works Under Construction

	Unallocated works under construction		Allocated works under construction	
Works under construction—preceding disclosure year	4,719		4,719	
plus WUC capital expenditure				
WUC acquired from a regulated supplier				
WUC acquired from a related party				
WUC capital expenditure - other	49,556		49,556	
Total WUC capital expenditure	49,556		49,556	
less WUC capital contributions	20,266		20,266	
less WUC other revenue				
less Assets commissioned out of WUC	24,798		24,798	
plus Adjustment resulting from asset allocation				
Works under construction - current disclosure year	9,211		9,211	
Highest rate of capitalised finance applied				4.55%



SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. EDBs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

4(v): Regulatory Depreciation

	Unallocated RAB *	RAB
	(\$000)	(\$000)
Depreciation - standard	14,507	14,507
Depreciation - no standard life assets	8,628	8,350
Depreciation - modified life assets		
Depreciation - alternative depreciation in accordance with CPP		
Total depreciation	23,135	22,857

4(vi): Disclosure of Changes to Depreciation Profiles

	Reason for non-standard depreciation (text entry)	Depreciation charge for the period (RAB)	Closing RAB value under 'non-standard' depreciation	Closing RAB value under 'standard' depreciation
Asset or assets with changes to depreciation*				

* include additional rows if needed

4(vii): Disclosure by Asset Category

	Subtransmission lines	Subtransmission cables	Zone substations	Distribution and LV lines	Distribution and LV cables	Distribution substations and transformers	Distribution switchgear	Other network assets	Non-network assets	Total
Total opening RAB value	23,314	220	86,416	196,266	73,300	49,170	36,039	8,022	68,951	541,698
less Total depreciation	661	10	2,339	4,860	2,289	2,033	1,365	870	8,430	22,857
plus Total revaluations	718	7	2,661	6,039	2,256	1,511	1,109	243	1,955	16,499
plus Assets commissioned	-	-	1,334	12,182	6,376	3,226	282	1,398	7,017	31,815
less Asset disposals				146	27	93			73	339
plus Lost and found assets adjustment										-
plus Adjustment resulting from asset allocation										-
plus Asset category transfers	(848)			848						-
Total closing RAB value	22,523	217	88,072	210,329	79,616	51,781	36,065	8,793	69,420	566,816
Asset Life										
Weighted average remaining asset life	43.5	20.3	37.6	46.9	39.1	29.9	28.8	8.3	19.4	(years)
Weighted average expected total asset life	59.2	45.0	44.4	59.2	52.1	45.0	35.5	13.6	22.9	(years)



SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section

sch ref

5a(i): Regulatory Tax Allowance		(\$'000)
8	Regulatory profit / (loss) before tax	39,976
9		
10	<i>plus</i> Income not included in regulatory profit / (loss) before tax but taxable	*
11	Expenditure or loss in regulatory profit / (loss) before tax but not deductible	(137) *
12	Amortisation of initial differences in asset values	2,663
13	Amortisation of revaluations	4,091
14	Total	6,617
15		
16	<i>less</i> Total revaluations	16,499
17	Income included in regulatory profit / (loss) before tax but not taxable	*
18	Discretionary discounts and customer rebates	
19	Expenditure or loss deductible but not in regulatory profit / (loss) before tax	*
20	Notional deductible interest	11,351
21	Total	27,850
22		
23	Regulatory taxable income	18,743
24		
25	<i>less</i> Utilised tax losses	
26	Regulatory net taxable income	18,743
27		
28	Corporate tax rate (%)	28%
29	Regulatory tax allowance	5,248

* Workings to be provided in Schedule 14

5a(ii): Disclosure of Permanent Differences

In Schedule 14, Box 5, provide descriptions and workings of items recorded in the asterisked categories in Schedule 5a(i).

5a(iii): Amortisation of Initial Difference in Asset Values		(\$'000)
	Opening unamortised initial differences in asset values	55,923
less	Amortisation of initial differences in asset values	2,663
plus	Adjustment for unamortised initial differences in assets acquired	
less	Adjustment for unamortised initial differences in assets disposed	
	Closing unamortised initial differences in asset values	53,260
	Opening weighted average remaining useful life of relevant assets (years)	21



SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 1.4.

sch ref

44	5a(iv): Amortisation of Revaluations			(\$000)
45				
46	Opening sum of RAB values without revaluations	440,578		
47				
48	Adjusted depreciation	18,766		
49	Total depreciation	22,857		
50	Amortisation of revaluations		4,091	
51				
52	5a(v): Reconciliation of Tax Losses			(\$000)
53				
54	Opening tax losses			
55	plus Current period tax losses			
56	less Utilised tax losses			
57	Closing tax losses			–
58	5a(vi): Calculation of Deferred Tax Balance			(\$000)
59				
60	Opening deferred tax	(30,113)		
61				
62	plus Tax effect of adjusted depreciation	5,254		
63				
64	less Tax effect of tax depreciation	8,961		
65				
66	plus Tax effect of other temporary differences*	(31)		
67				
68	less Tax effect of amortisation of initial differences in asset values	746		
69				
70	plus Deferred tax balance relating to assets acquired in the disclosure year			
71				
72	less Deferred tax balance relating to assets disposed in the disclosure year	(30)		
73				
74	plus Deferred tax cost allocation adjustment	(0)		
75				
76	Closing deferred tax			(34,567)
77				
78	5a(vii): Disclosure of Temporary Differences			
79	<i>In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Schedule 5a(vi) (Tax effect of other temporary differences).</i>			
80				
81	5a(viii): Regulatory Tax Asset Base Roll-Forward			
82				(\$000)
83	Opening sum of regulatory tax asset values	276,195		
84	less Tax depreciation	32,004		
85	plus Regulatory tax asset value of assets commissioned	31,815		
86	less Regulatory tax asset value of asset disposals	233		
87	plus Lost and found assets adjustment			
88	plus Adjustment resulting from asset allocation			
89	plus Other adjustments to the RAB tax value			
90	Closing sum of regulatory tax asset values			275,773



This schedule provides information on the valuation of related party transactions, in accordance with clause 2.3.6 of this ID determination. This information is part of audited disclosure information (as defined in clause 1.4 of this ID determination), and so is subject to the assurance report required by clause 2.8.

sch ref

5b(i): Summary—Related Party Transactions		(\$000)	(\$000)
7			
8	Total regulatory income		18
9			
10	Market value of asset disposals		
11			
12	Service interruptions and emergencies	—	
13	Vegetation management	—	
14	Routine and corrective maintenance and inspection	—	
15	Asset replacement and renewal (opex)	—	
16	Network opex		—
17	Business support	488	
18	System operations and network support	—	
19	Non-network solutions provided by a related party or third party	—	
20	Operational expenditure		488
21	Consumer connection	—	
22	System growth	—	
23	Asset replacement and renewal (capex)	—	
24	Asset relocations	—	
25	Quality of supply	—	
26	Legislative and regulatory	—	
27	Other reliability, safety and environment	—	
28	Expenditure on non-network assets		—
29	Expenditure on assets		—
30	Cost of financing		
31	Value of capital contributions		
32	Value of vested assets		
33	Capital Expenditure		—
34	Total expenditure		488
35			
36	Other related party transactions		
37			
5b(iii): Total Opex and Capex Related Party Transactions			
38			Total value of transactions (\$000)
39	Name of related party	Nature of opex or capex service provided	
40	Director Fees	Business support	488
41			
42			
43			
44			
45			
46			
47			
48			
49			
50			
51			
52			
53			
54	Total value of related party transactions		488
55	* include additional rows if needed		



SCHEDULE 5c: REPORT ON TERM CREDIT SPREAD DIFFERENTIAL ALLOWANCE

This schedule is only to be completed if, as at the date of the most recently published financial statements, the weighted average original tenor of the debt portfolio (both qualifying debt and non-qualifying debt) is greater than five years.
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

7	
8	5c(i): Qualifying Debt (may be Commission only)
9	
10	
11	
12	
13	
14	
15	
16	<i>Total</i>
17	
18	5c(ii): Attribution of Term Credit Spread Differential
19	
20	Gross term credit spread differential
21	
22	Total book value of interest bearing debt
23	Leverage
24	Average opening and closing RAB values
25	Attribution Rate (%)
26	
27	Term credit spread differential allowance



SCHEDULE 5d: REPORT ON COST ALLOCATIONS

This schedule provides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassifications. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5d(i): Operating Cost Allocations		Value allocated (\$000s)			
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total	OVABAA allocation increase (\$000s)
Service interruptions and emergencies					
Directly attributable		3,521			
Not directly attributable				–	
Total attributable to regulated service		3,521			
Vegetation management					
Directly attributable		3,121			
Not directly attributable				–	
Total attributable to regulated service		3,121			
Routine and corrective maintenance and inspection					
Directly attributable		1,734			
Not directly attributable				–	
Total attributable to regulated service		1,734			
Asset replacement and renewal					
Directly attributable		870			
Not directly attributable				–	
Total attributable to regulated service		870			
Non-network solutions provided by a related party or third party					
Directly attributable		–			
Not directly attributable				–	
Total attributable to regulated service		–			
System operations and network support					
Directly attributable		3,763			
Not directly attributable				–	
Total attributable to regulated service		3,763			
Business support					
Directly attributable		749			
Not directly attributable		12,788	1,857	14,645	
Total attributable to regulated service		13,537			
Operating costs directly attributable		13,758			
Operating costs not directly attributable		–	12,788	1,857	14,645
Operational expenditure			26,546		–



SCHEDULE 5d: REPORT ON COST ALLOCATIONS

This schedule provides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassifications. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5d(ii): Other Cost Allocations

	(\$000)
Pass through and recoverable costs	
Pass through costs	
Directly attributable	15,719
Not directly attributable	118
Total attributable to regulated service	15,837
Recoverable costs	
Directly attributable	77
Not directly attributable	—
Total attributable to regulated service	77

5d(iii): Changes in Cost Allocations* †

			CY-1	Current Year (CY)
Change in cost allocation 1				
Cost category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	—	—
Rationale for change				
Change in cost allocation 2				
Cost category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	—	—
Rationale for change				
Change in cost allocation 3				
Cost category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	—	—
Rationale for change				

* a change in cost allocation must be completed for each cost allocator change that has occurred in the disclosure year. A movement in an allocator metric is not a change in allocator or component.

† include additional rows if needed



SCHEDULE 5e: REPORT ON ASSET ALLOCATIONS

This schedule requires information on the allocation of asset values. This information supports the calculation of the RAB value in Schedule 4. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any changes in asset allocations. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5e(i): Regulated Service Asset Values

	Value allocated (\$000s) Electricity distribution services
Subtransmission lines	
Directly attributable	22,523
Not directly attributable	–
Total attributable to regulated service	22,523
Subtransmission cables	
Directly attributable	217
Not directly attributable	–
Total attributable to regulated service	217
Zone substations	
Directly attributable	88,072
Not directly attributable	–
Total attributable to regulated service	88,072
Distribution and LV lines	
Directly attributable	210,329
Not directly attributable	–
Total attributable to regulated service	210,329
Distribution and LV cables	
Directly attributable	79,616
Not directly attributable	–
Total attributable to regulated service	79,616
Distribution substations and transformers	
Directly attributable	51,781
Not directly attributable	–
Total attributable to regulated service	51,781
Distribution switchgear	
Directly attributable	36,065
Not directly attributable	–
Total attributable to regulated service	36,065
Other network assets	
Directly attributable	8,793
Not directly attributable	–
Total attributable to regulated service	8,793
Non-network assets	
Directly attributable	56,437
Not directly attributable	12,983
Total attributable to regulated service	69,420
Regulated service asset value directly attributable	553,833
Regulated service asset value not directly attributable	12,983
Total closing RAB value	566,816

5e(ii): Changes in Asset Allocations* †

			(\$000)	
			CY-1	Current Year (CY)
Change in asset value allocation 1				
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				
Change in asset value allocation 2				
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				
Change in asset value allocation 3				
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

* a change in asset allocation must be completed for each allocator or component change that has occurred in the disclosure year. A movement in an allocator metric is not a change in allocator or compone
† include additional rows if needed



Company Name

Counties Energy Limited

For Year Ended

31 March 2026

SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs. EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

7	6a(i): Expenditure on Assets	(\$000)	(\$000)
8	Consumer connection		14,683
9	System growth		574
10	Asset replacement and renewal		24,910
11	Asset relocations		5,294
12	Reliability, safety and environment:		
13	Quality of supply	3,292	
14	Legislative and regulatory	–	
15	Other reliability, safety and environment	716	
16	Total reliability, safety and environment		4,008
17	Expenditure on network assets		49,469
18	Expenditure on non-network assets		7,052
19			
20	Expenditure on assets		56,521
21	plus Cost of financing		87
22	less Value of capital contributions		20,266
23	plus Value of vested assets		–
24			
25	Capital expenditure		36,342
26	6a(ii): Subcomponents of Expenditure on Assets (where known)		(\$000)
27	Energy efficiency and demand side management, reduction of energy losses		
28	Overhead to underground conversion		1,754
29	Research and development		
30			
31	6a(iii): Consumer Connection		
32	<i>Consumer types defined by EDB*</i>	(\$000)	(\$000)
33	Urban Residential	8,076	
34	Urban Commercial	2,202	
35	Rural Residential	2,937	
36	Rural Commercial	1,468	
37			
38	<i>* include additional rows if needed</i>		
39	Consumer connection expenditure		14,683
40			
41	less Capital contributions funding consumer connection expenditure	12,187	
42	Consumer connection less capital contributions		2,496
43	6a(iv): System Growth and Asset Replacement and Renewal		
44		System Growth	Asset Replacement and Renewal
45		(\$000)	(\$000)
46	Subtransmission	422	1,932
47	Zone substations	109	5,929
48	Distribution and LV lines	7	10,480
49	Distribution and LV cables	36	3,020
50	Distribution substations and transformers	–	2,482
51	Distribution switchgear	–	883
52	Other network assets	–	184
53	System growth and asset replacement and renewal expenditure	574	24,910
54	less Capital contributions funding system growth and asset replacement and renewal	2,479	
55	System growth and asset replacement and renewal less capital contributions	(1,905)	24,910
56			
57	6a(v): Asset Relocations		
58	<i>Project or programme*</i>	(\$000)	(\$000)
59	Various relocations (largely reimbursed by customers)	5,294	
60			
61			
62			
63			
64	<i>* include additional rows if needed</i>		
65	All other projects or programmes - asset relocations		
66	Asset relocations expenditure		5,294
67	less Capital contributions funding asset relocations	5,600	
68	Asset relocations less capital contributions		(306)



Company Name

Counties Energy Limited

For Year Ended

31 March 2026

SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs. EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

69

6a(vi): Quality of Supply

Project or programme*	(\$000)	(\$000)
Reliability Programme	3,292	
* include additional rows if needed		
All other projects programmes - quality of supply		
Quality of supply expenditure		3,292
less Capital contributions funding quality of supply		
Quality of supply less capital contributions		3,292

6a(vii): Legislative and Regulatory

Project or programme*	(\$000)	(\$000)
* include additional rows if needed		
All other projects or programmes - legislative and regulatory		
Legislative and regulatory expenditure		-
less Capital contributions funding legislative and regulatory		
Legislative and regulatory less capital contributions		-

6a(viii): Other Reliability, Safety and Environment

Project or programme*	(\$000)	(\$000)
Other reliability projects	716	
* include additional rows if needed		
All other projects or programmes - other reliability, safety and environment		
Other reliability, safety and environment expenditure		716
less Capital contributions funding other reliability, safety and environment		
Other reliability, safety and environment less capital contributions		716

6a(ix): Non-Network Assets

Project or programme*	(\$000)	(\$000)
IT equipment and software	5,298	
Land & buildings	706	
Vehicles	280	
Other plant & equipment	768	
* include additional rows if needed		
All other projects or programmes - routine expenditure		
Routine expenditure		7,052
Project or programme*	(\$000)	(\$000)
* include additional rows if needed		
All other projects or programmes - atypical expenditure		
Atypical expenditure		-
Expenditure on non-network assets		7,052



Company Name

Counties Energy Limited

For Year Ended

31 March 2026

SCHEDULE 6b: REPORT ON OPERATIONAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of operational expenditure incurred in the disclosure year.

EDBs must provide explanatory comment on their operational expenditure in Schedule 14 (Explanatory notes to templates). This includes explanatory comment on any atypical operational expenditure and assets replaced or renewed as part of asset replacement and renewal operational expenditure, and additional information on insurance.

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

		(\$000)	(\$000)
7	6b(i): Operational Expenditure <i>Not Required before DY2026</i>		
8	Service interruptions and emergencies:		
9	Vegetation-related	221	
10	Other	3,300	
11	Total service interruptions and emergencies	3,521	
12	Vegetation management:		
13	Assessment and notification costs	236	
14	Felling or trimming vegetation - in-zone	2,039	
15	Felling or trimming vegetation - out-of-zone	248	
16	Other	598	
17	Total vegetation management	3,121	
18			
19	Routine and corrective maintenance and inspection:	1,734	
20	Asset replacement and renewal	870	
21	Network opex		9,246
22	Non-network solutions provided by a related party or third party	–	
23	System operations and network support	3,763	
24	Business support	13,537	
25	Non-network opex		17,300
26			
27	Operational expenditure		26,546
28	6b(ii): Subcomponents of Operational Expenditure (where known)		
29	Energy efficiency and demand side management, reduction of energy losses		
30	Direct billing*		
31	Research and development		
32	Insurance		749
33	* Direct billing expenditure by suppliers that directly bill the majority of their consumers		



SCHEDULE 7: COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE

This schedule compares actual revenue and expenditure to the previous forecasts that were made for the disclosure year. Accordingly, this schedule requires the forecast revenue and expenditure information from previous disclosures to be inserted.

EDBs must provide explanatory comment on the variance between actual and target revenue and forecast expenditure in Schedule 14 (Mandatory Explanatory Notes).

This information is part of the audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. For the purpose of this audit, target revenue and forecast expenditures only need to be verified back to previous disclosures.

sch ref

7(i): Revenue

	Target (\$000) ¹	Actual (\$000)	% variance
Line charge revenue	87,720	88,764	1%

7(ii): Expenditure on Assets

	Forecast (\$000) ²	Actual (\$000)	% variance
Consumer connection	11,000	14,683	33%
System growth	1,426	574	(60%)
Asset replacement and renewal	24,060	24,910	4%
Asset relocations	384	5,294	1,279%
Reliability, safety and environment:			
Quality of supply	6,794	3,292	(52%)
Legislative and regulatory	—	—	—
Other reliability, safety and environment	473	716	51%
Total reliability, safety and environment	7,267	4,008	(45%)
Expenditure on network assets	44,137	49,469	12%
Expenditure on non-network assets	9,955	7,052	(29%)
Expenditure on assets	54,092	56,521	4%

7(iii): Operational Expenditure

Service interruptions and emergencies	3,313	3,521	6%
Vegetation management	3,219	3,121	(3%)
Routine and corrective maintenance and inspection	2,576	1,734	(33%)
Asset replacement and renewal	852	870	2%
Network opex	9,960	9,246	(7%)
Non-network solutions provided by a related party or third party	—	—	—
System operations and network support	4,234	3,763	(11%)
Business support	15,221	13,537	(11%)
Non-network opex	19,456	17,300	(11%)
Operational expenditure	29,416	26,546	(10%)

7(iv): Subcomponents of Expenditure on Assets (where known)

Energy efficiency and demand side management, reduction of energy losses	—	—	—
Overhead to underground conversion	—	1,754	—
Research and development	—	—	—

7(v): Subcomponents of Operational Expenditure (where known)

Energy efficiency and demand side management, reduction of energy losses	—	—	—
Direct billing	—	—	—
Research and development	—	—	—
Insurance	825	749	(9%)

¹ From the nominal dollar target revenue for the disclosure year disclosed under clause 2.4.3(3) of this determination

² From the CY+1 nominal dollar expenditure forecasts disclosed in accordance with clause 2.6.6 for the forecast period starting at the beginning of the disclosure year (the second to last disclosure of Schedules 11a and 11b)



8 **8(i): Billed Quantities by Price Component**

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This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs. EDBs should feel free to adjust the page break of this schedule to assist with readability if needed.

ch ref

Billed quantities by price component - kWh 000s														
Standardised price component	Daily fixed charge - \$/day		Uncontrolled non-TOU variable charge - \$/kWh			Uncontrolled non-TOU variable charge - \$/kWh			Controlled non-TOU charge - \$/kWh			Uncontrolled non-TOU variable charge - \$/kWh		
EDB defined price component	Daily Price		Peak			Offpeak			Controlled			Uncontrolled		
	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity		Distribution billed quantity	Transmission billed quantity		Distribution billed quantity	Transmission billed quantity		Distribution billed quantity	Transmission billed quantity	
	2,505,187	2,505,187	8,793			21,012			5,347			90,625		
	8,419,544	8,419,544	16,903			41,956			44,214			114,350		
	7,243,190	7,243,190	9,131			23,054			24,697			48,342		
	—	—												
	18,167,921	18,167,921	34,826	—		86,022	—		74,258	—		253,317	—	
	—	—	—	—		—	—		—	—		—	—	
	18,167,921	18,167,921	34,826	—		86,022	—		74,258	—		253,317	—	

Line charge revenues (\$000) by price component															
Standardised price component	Daily fixed charge - \$/day			Uncontrolled non-TOU variable charge - \$/kWh			Uncontrolled non-TOU variable charge - \$/kWh			Controlled non-TOU charge - \$/kWh			Uncontrolled non-TOU variable charge - \$/kWh		
EDB defined price component	Daily Price			Peak			Offpeak			Controlled			Uncontrolled		
	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)
	\$4,783	\$2,728	\$7,511	\$2,814		\$2,814	\$420		\$420	\$599		\$599	\$10,150		\$10,150
	\$12,069	\$5,049	\$17,118	\$5,916		\$5,916	\$1,091		\$1,091	\$332		\$332	\$12,258		\$12,258
	\$2,573	\$2,803	\$5,376	\$3,716		\$3,716	\$1,913		\$1,913	\$1,593		\$1,593	\$7,933		\$7,933
			—			—			—			—			—
			—			—			—			—			—
			—			—			—			—			—
			—			—			—			—			—
			—			—			—			—			—
			—			—			—			—			—
			—			—			—			—			—
	\$19,425	\$10,580	\$30,005	\$12,446	—	\$12,446	\$3,425	—	\$3,425	\$2,524	—	\$2,524	\$30,341	—	\$30,341
	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
	\$19,425	\$10,580	\$30,005	\$12,446	—	\$12,446	\$3,425	—	\$3,425	\$2,524	—	\$2,524	\$30,341	—	\$30,341

SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs. EDBs should feel free to adjust the page break of this schedule to assist with readability if needed.

sch ref

Standardised price component	Export charge - \$/kWh		Power factor charge - \$/kVA		AMD charge - \$/kVA		Seasonal charge - \$/kWh		Seasonal charge - \$/kWh						
	Export/DG		Power Factor		Demand		Summer Night		Summer Peak						
	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity					
EDB defined price component	1,506		366												
	4,233		–												
	3,048		–												
			6,570		456		17,809		28,466						
			1,669												
	8,787	–	6,936	–	456	–	17,809	–	28,466	–					
	–	–	1,669	–		–	–	–	–	–					
	8,787	–	8,605	–	456	–	17,809	–	28,466	–					
Standardised price component	Export charge - \$/kWh			Power factor charge - \$/kVA			AMD charge - \$/kVA			Seasonal charge - \$/kWh			Seasonal charge - \$/kWh		
	Export/DG			Power Factor			Demand			Summer Night			Summer Peak		
	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)
EDB defined price component	\$16		\$16	\$19		\$19			–			–			–
	\$44		\$44	–		–			–			–			–
	\$31		\$31	–		–			–			–			–
			–	\$414		\$414	\$5,366		\$5,366	\$226		\$226	\$857		\$857
			–	–		–			–			–			–
			–	\$95		\$95			–			–			–
			–	–		–			–			–			–
			–	–		–			–			–			–
			–	–		–			–			–			–
			–	–		–			–			–			–
			–	–		–			–			–			–
			–	–		–			–			–			–
	\$91	–	\$91	\$432	–	\$432	\$5,366	–	\$5,366	\$226	–	\$226	\$857	–	\$857
	–	–	–	\$95	–	\$95	–	–	–	–	–	–	–	–	–
	\$91	–	\$91	\$527	–	\$527	\$5,366	–	\$5,366	\$226	–	\$226	\$857	–	\$857

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs. EDBs should feel free to adjust the page break of this schedule to assist with readability if needed.

ch ref

Standardised price component	Seasonal charge - \$/kWh			Seasonal charge - \$/kWh			Seasonal charge - \$/kWh			Seasonal charge - \$/kWh			AMD charge - \$/kVA		
	Summer Offpeak			Winter Night			Winter Peak			Winter Offpeak			Excess Demand		
EDB defined price component	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)
			–			–			–			–			–
			–			–			–			–			–
	\$411		\$411	\$214		\$214	\$2,147		\$2,147	\$378		\$378			–
			–			–			–			–			–
			–			–			–			–			–
			–			–			–			–			–
			–			–			–			–			–
			–			–			–			–			–
			–			–			–			–			–
	\$411	–	\$411	\$214	–	\$214	\$2,147	–	\$2,147	\$378	–	\$378	–	–	–
	–		–	–	–	–	–	–	–	–	–	–	–	–	–
	\$411	–	\$411	\$214	–	\$214	\$2,147	–	\$2,147	\$378	–	\$378	–	–	–

SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs. EDBs should feel free to adjust the page break of this schedule to assist with readability if needed.

sch ref

Standardised price component	Installed capacity charge - \$/kVA		Monthly fixed charge - \$/month		Monthly fixed charge - \$/month		Monthly fixed charge per fixture - \$/fixture/month		Daily fixed charge - \$/day						
	Connection Capacity Price		Transformer Monthly Price		Transformer Capacity Price		Unmetered Distributed Streetlights		Metered Lighting - Daily Price						
	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity	Distribution billed quantity	Transmission billed quantity					
EDB defined price component															
	2,168		1,936		1,985		132	132							
	2,168	–	1,936	–	1,985	–	132	132	–	–					
	–	–	–	–	–	–	–	–	–	–					
2,168	–	1,936	–	1,985	–	132	132	–	–						
Standardised price component	Installed capacity charge - \$/kVA			Monthly fixed charge - \$/month			Monthly fixed charge - \$/month			Monthly fixed charge per fixture - \$/fixture/month			Daily fixed charge - \$/day		
	Connection Capacity Price			Transformer Monthly Price			Transformer Capacity Price			Unmetered Distributed Streetlights			Metered Lighting - Daily Price		
	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)	Distribution line charge revenue	Transmission line charge revenue	Total line charge revenue (distribution and transmission)
EDB defined price component			–			–			–			–			–
			–			–			–			–			–
			–			–			–			–			–
	\$3,073	\$1,901	\$4,974	\$243		\$243	\$287		\$287						
			–			–			–	\$1,117	\$253	\$1,370			–
			–			–			–			–			–
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This schedule requires a summary of the quantity of assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

This schedule requires a summary of the age profile (based on year of installation) of the assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

[illegible]

Company Name

Counties Energy Limited

For Year Ended

31 March 2026

Network / Sub-network Name

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

This schedule requires a summary of the key characteristics of the overhead line and underground cable network. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

9c: Overhead Lines and Underground Cables**Circuit length by operating voltage (at year end)**

> 66kV
50kV & 66kV
33kV
SWER (all SWER voltages)
22kV (other than SWER)
6.6kV to 11kV (inclusive—other than SWER)
Low voltage (< 1kV)

Total circuit length (for supply)

Dedicated street lighting circuit length (km)

Circuit in sensitive areas (conservation areas, iwi territory etc) (km)

Overhead circuit length by terrain (at year end)

Urban
Rural
Remote only
Rugged only
Remote and rugged
Unallocated overhead lines

Total overhead length

Length of circuit within 10km of coastline or geothermal areas (where known)

Number of overhead circuit sites at high risk from vegetation damage

Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end

Category of overhead circuit site

Number of overhead circuit sites at
high risk from vegetation damage at
disclosure year-end

Number of overhead circuit
sites involving critical assets at
disclosure year-end

Private Landowner - First/Free Cut	71	15
Private Landowner - Chargeable Cut	6	—
Private Landowner - No Interest	47	9
Auckland Council - First/Free Cut	8	3
Auckland Council - Chargeable Cut	2	—
Auckland Council - No Interest	18	2
Waikato Council - First/Free Cut	4	1
Waikato Council - Chargeable Cut	—	—
Waikato Council - No Interest	15	2
Hauraki Council - First/Free Cut	3	—
Hauraki Council - Chargeable Cut	—	—
Hauraki Council - No Interest	—	—
Total number of sites	174	32

* Insert new rows in table above Total line as necessary

Overhead (km)	Underground (km)	Total circuit length (km)
66	0	66
—	—	—
55	1	57
—	—	—
619	289	908
886	94	980
666	992	1,657
2,292	1,376	3,668

0	36	36
		2

Circuit length (km)	(% of total overhead length)
152	7%
2,075	91%
—	—
65	3%
—	—
—	—
2,292	100%

Circuit length (km)	(% of total circuit length)
1,674	46%

Total newly identified throughout the disclosure year	Total remaining at high risk at the disclosure year-end
521	174

Not required before DY2026

Not required before DY2026

Not required before DY2026

Not required before DY2026

Not required before DY2026

Not required before DY2026

Not required before DY2026

Not required before DY2026

SCHEDULE 9d: REPORT ON EMBEDDED NETWORKS

This schedule requires information concerning embedded networks owned by an EDB that are embedded in another EDB’s network or in another embedded network.

sch ref

	Location *	Average number of ICPs in disclosure year	Line charge revenue (\$000)
8	Counties Energy has no embedded networks		
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26	* Extend embedded distribution networks table as necessary to disclose each embedded network owned by the EDB which is embedded in another EDB’s network or in another embedded network		

Company Name **Counties Energy Limited**For Year Ended **31 March 2026**

Network / Sub-network Name

SCHEDULE 9e: REPORT ON NETWORK DEMAND

This schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new connections including distributed generation, peak demand and electricity volumes conveyed).

sch ref

9e(i): Consumer Connections and Decommissionings

Number of ICPs connected during year by consumer type

Consumer types defined by EDB*

Urban Residential
Urban Commercial
Rural Residential
Rural Commercial

Number of
connections (ICPs)

228
614
86
292
1,220

Connections total

* include additional rows if needed

Number of ICPs decommissioned during year by consumer type

Consumer types defined by EDB*

Urban Residential
Urban Commercial
Rural Residential
Rural Commercial

Number of
decommissionings

99
76
96
82
353

Decommissionings total

* include additional rows if needed

Distributed generation

Number of connections made in year

Capacity of distributed generation installed in year

228	connections
4.20	MVA

9e(ii): System Demand**Maximum coincident system demand**

plus GXP demand
Distributed generation output at HV and above

Maximum coincident system demand

less Net transfers to (from) other EDBs at HV and above

Demand on system for supply to consumers' connection pointsDemand at time of
maximum
coincident demand
(MW)

133
8
141
141

Electricity volumes carried

Electricity supplied from GXPs
less Electricity exports to GXPs
plus Electricity supplied from distributed generation
less Net electricity supplied to (from) other EDBs
Electricity entering system for supply to consumers' connection points
less Total energy delivered to ICPs

Electricity losses (loss ratio)

Energy (GWh)

638	
70	
708	
674	
34	4.8%

Load factor

0.57

9e(iii): Transformer Capacity

Distribution transformer capacity (EDB owned)
Distribution transformer capacity (Non-EDB owned)

Total distribution transformer capacity

(MVA)

478
85
563

(MVA)

Zone substation transformer capacity (EDB owned)
Zone substation transformer capacity (Non-EDB owned)
Total zone substation transformer capacity

575
575

Company Name **Counties Energy Limited**For Year Ended **31 March 2026**

Network / Sub-network Name

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

10(i): Interruptions**Interruptions by class****Number of
interruptions**

Class A (planned interruptions by Transpower)
Class B (planned interruptions on the network)
Class C (unplanned interruptions on the network)
Class D (unplanned interruptions by Transpower)
Class E (unplanned interruptions of EDB owned generation)
Class F (unplanned interruptions of generation owned by others)
Class G (unplanned interruptions caused by another disclosing entity)
Class H (planned interruptions caused by another disclosing entity)
Class I (interruptions caused by parties not included above)

–
450
398
–
–
–
–
–
77
925

Total**Interruption restoration****≤3Hrs >3hrs**

Class C interruptions restored within

165	233
-----	-----

SAIFI and SAIDI by class**SAIFI SAIDI**

Class A (planned interruptions by Transpower)
Class B (planned interruptions on the network)
Class C (unplanned interruptions on the network)
Class D (unplanned interruptions by Transpower)
Class E (unplanned interruptions of EDB owned generation)
Class F (unplanned interruptions of generation owned by others)
Class G (unplanned interruptions caused by another disclosing entity)
Class H (planned interruptions caused by another disclosing entity)
Class I (interruptions caused by parties not included above)

0.61	190.9
2.26	155.2
0.10	12.2
2.97	358.3

Total**Transitional SAIFI and SAIDI (previous method)****SAIFI SAIDI**

Class B (planned interruptions on the network)
Class C (unplanned interruptions on the network)

N/A	N/A
2.03	155.2

Where EDBs do not currently record their SAIFI and SAIDI values using the 'multi-count' approach, they shall continue to record their SAIFI and SAIDI values on the same basis that they employed as at 31 March 2023 as 'Transitional SAIFI' and 'Transitional SAIDI' values, in addition to their SAIFI and SAIDI values (Classes B & C) using the 'multi-count approach'. This is a transitional reporting requirement that shall be in place for the 2024, 2025, and 2026 disclosure years.



Company Name **Counties Energy Limited**For Year Ended **31 March 2026**

Network / Sub-network Name

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

10(ii): Class C Interruptions and Duration by Cause**Cause****SAIFI****SAIDI**

Lightning

0.04

2.3

Vegetation

0.52

48.1

Adverse weather

Adverse environment

Third party interference

0.28

20.9

Wildlife

0.05

1.3

Human error

0.14

0.9

Defective equipment

0.86

65.8

Other cause

Unknown

0.38

15.9

Breakdown of third party interference**SAIFI****SAIDI**

Dig-in

0.04

2.3

Overhead contact

0.03

1.7

Vandalism

0.00

0.0

Vehicle damage

0.21

16.9

Other

0.00

0.0

Breakdown of vegetation interruptions (vegetation cause)**SAIFI****SAIDI**

In-zone

0.08

10.3

Not required before DY2026

Out-of-zone

0.44

37.8

Not required before DY2026

10(iii): Class B Interruptions and Duration by Main Equipment Involved**Main equipment involved****SAIFI****SAIDI**

Subtransmission lines

Subtransmission cables

Subtransmission other

Distribution lines (excluding LV)

0.41

148.9

Distribution cables (excluding LV)

0.03

11.6

Distribution other (excluding LV)

0.17

30.4

10(iv): Class C Interruptions and Duration by Main Equipment Involved**Main equipment involved****SAIFI****SAIDI**

Subtransmission lines

0.07

2.6

Subtransmission cables

Subtransmission other

Distribution lines (excluding LV)

1.98

144.8

Distribution cables (excluding LV)

0.05

3.6

Distribution other (excluding LV)

0.15

4.3

10(v): Fault Rate**Main equipment involved****Number of Faults****Circuit length
(km)****Fault rate (faults
per 100km)**

Subtransmission lines

13

122

10.68

Subtransmission cables

1

-

Subtransmission other

Distribution lines (excluding LV)

375

1,505

24.92

Distribution cables (excluding LV)

6

383

1.57

Distribution other (excluding LV)

18

Total

412



SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

10(vi): Worst-performing feeders (unplanned)

SAIDI

Rank	Feeder name	Unplanned SAIDI values	Number of Unplanned Interruptions	Most Common Cause of Unplanned Interruptions	Circuit Length of Feeder	Number of ICPs	% of Feeder Overhead (optional)
1	Kaiaua	16.17	22	Defective Equipment	102.24 km	1074	94%
2	Te Toro	13.64	38	Defective Equipment	98.25 km	1183	93%
3	Hunua	11.96	22	Defective Equipment	71.97 km	1016	87%
4	Anchor Factory	8.70	13	Third Party Interference	49.70 km	1285	76%
5	Waikuku South	7.55	13	Defective Equipment	57.85 km	799	97%
6	Railway	7.22	7	Defective Equipment	42.72 km	1003	88%

¹ Extend table as necessary to disclose all worst-performing feeders

SAIFI

Rank	Feeder name	Unplanned SAIFI values	Number of Unplanned Interruptions	Most Common Cause of Unplanned Interruptions	Circuit Length of Feeder	Number of ICPs	% of Feeder Overhead (optional)
1	Te Toro	0.287	38	Defective Equipment	98.25 km	1183	93%
2	Kaiaua	0.220	22	Defective Equipment	102.24 km	1074	94%
3	Hunua	0.150	22	Defective Equipment	71.97 km	1016	87%
4	Manukau Heads	0.105	45	Defective Equipment	107.24 km	949	98%
5	Waiau Pa	0.103	11	Defective Equipment	34.04 km	1351	74%
6	Drury	0.087	12	Defective Equipment	38.32 km	1691	51%

¹ Extend table as necessary to disclose all worst-performing feeders

Customer Impact

Rank	Feeder name	Customer Impact Ratio	Number of Unplanned Interruptions	Most Common Cause of Unplanned Interruptions	Circuit Length of Feeder	Number of ICPs	% of Feeder Overhead (optional)
1	Kaiaua	750.37	22	Defective Equipment	102.24 km	1074	94%
2	Drury Hills	600.45	16	Defective Equipment	20.89 km	400	73%
3	Hunua	387.74	22	Defective Equipment	71.97 km	1016	87%
4	Pukekohe	585.60	23	Defective Equipment	47.00 km	434	97%
5	Te Toro	574.16	38	Defective Equipment	98.25 km	1183	93%
6	Waikuku South	471.04	13	Defective Equipment	57.85 km	799	97%

¹ Extend table as necessary to disclose all worst-performing feeders



Company Name	Counties Energy Limited
For Year Ended	31 March 2026

Schedule 14 Mandatory Explanatory Notes

(Guidance Note: This Microsoft Word version of Schedules 14, 14a and 15 is from the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024. 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

Classification is consistent with previous treatment.

ROI comparable to a post tax WACC increased from 5.34% in FY25 to 6.13% in FY26 with the following items of note:

- Revenue increased by 14% in FY26 to \$88.8m (FY25 - \$78.0m);
- Operational costs decreased from 32% of lines revenue in FY25 to 30% of lines revenue in FY26 (Network Spend – 1% down, Business Support down 1%);
- Revaluations increased from \$12.7m in FY25 (2.5% CPI) to \$16.5m in FY26 (3.1% CPI); and
- Depreciation increased from \$17.9m in FY25 to \$22.9m in FY26 reflecting continued high network growth.

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-



6. 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
7. information on reclassified items in accordance with subclause 2.7.1(2).

Box 2: Explanatory comment on regulatory profit

Line charge revenue and operational expenditure excludes non-regulated Smart Meters. Other regulated income includes only standard recoveries relating to the regulated business (eg electricity reserve market).

There were no changes in classification within regulatory profit this disclosure year.

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

8. If the EDB incurred merger and acquisitions expenditure during the disclosure year, provide the following information in the box below-
9. information on reclassified items in accordance with subclause 2.7.1(2)
 - 9.1 any other commentary on the benefits of the merger and acquisition expenditure to the EDB.

Box 3: Explanatory comment on merger and acquisition expenditure

There were no mergers or acquisitions during the disclosure year.

Value of the Regulatory Asset Base (Schedule 4)

10. 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)

There were no changes to RAB classifications from the prior year.

The revaluation uplift was \$16.5m reflecting the CPI of 3.1% in FY26.

Commissioned assets in FY26 were \$31.8m (FY25 - \$41.9m).

Assets being disposed of comprise non-system vehicles and IT equipment/software (\$73k), transformers sold as scrap (\$93k) and network assets damaged by third party incidents (\$172k). A loss of \$120k was recorded for these disposals.

Higher depreciation in FY26 reflects continued high network growth and investment in IT related assets to support the network.

An asset category transfer of \$848k between Subtransmission lines and Distribution and LV lines was recorded with the re-categorisation on close-out of jobs.



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

11. In the box below, provide descriptions and workings of the material items recorded in the following asterisked categories of 5a(i) of Schedule 5a-
- 11.1 Income not included in regulatory profit / (loss) before tax but taxable;
 - 11.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible;
 - 11.3 Income included in regulatory profit / (loss) before tax but not taxable;
 - 11.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax.

Box 5: Regulatory tax allowance: permanent differences

Items included in permanent differences are the difference between gain/loss on sale of regulatory assets used for the regulatory P&L and the equivalent calculation for tax purposes and permanent differences (eg non-deductible entertainment).

- 8.1 Income not included in regulatory profit before tax but taxable (Nil).
- 8.2 Expenditure or loss in regulatory profit before tax but not deductible - accounting vs tax loss on disposal (\$105k), entertainment expense (\$28k) and other (\$4k).
- 8.3 Income included in regulatory profit before tax but not taxable (Nil).
- 8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax (Nil).

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

12. 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)

Temporary differences relate to holiday pay provisions, gratuity and sick leave provisions and doubtful debt provisions as they related to the regulated business. The movement in these provisions has been multiplied by the tax rate to calculate the deferred tax figure (\$31k).

Cost allocation (Schedule 5d)

13. 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 allocations were calculated using ABAA methodology as per the IM Determination for business support. In particular:

- Property identified space usage as the proxy allocator; and
- Finance, IT and Corporate costs allocated costs using resource as the proxy allocator.

Proxy allocators were used as causal relationships could not be reasonably established. Property costs were allocated as a proportion of space used. IT, Finance and Corporate costs were allocated based on the level of resource allocated to the regulated business.

Asset allocation (Schedule 5e)

14. 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

Asset allocations were calculated using ABAA methodology as per the IM Determination.

In particular:

- Property identified space usage as the proxy allocator where costs could not be directly allocated; and
- Finance, IT and Corporate costs used resource as the proxy allocator.

No items have been reclassified during the disclosure year.

Capital Expenditure for the Disclosure Year (Schedule 6a)

15. In the box below, comment on expenditure on assets for the disclosure year, as disclosed in Schedule 6a. This comment must include-
16. a description of the materiality threshold applied to identify material projects and programmes described in Schedule 6a;
- 16.1 information on reclassified items in accordance with subclause 2.7.1(2).

Box 9: Explanation of capital expenditure for the disclosure year

12.1: Consumer types are based on historical AMP descriptions. Treatment for all other categories was to sum the many small projects (>\$50k) by significant core drivers.

12.2: Classification is consistent with treatment in prior years.



Operational Expenditure for the Disclosure Year (Schedule 6b)

17. In the box below, comment on operational expenditure for the disclosure year, as disclosed in Schedule 6b. This comment must include-
18. Commentary on assets replaced or renewed with asset replacement and renewal operational expenditure, as reported in 6b(i) of Schedule 6b;
19. Information on reclassified items in accordance with subclause 2.7.1(2);
20. 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

Operational expenditure includes items such as cable and conductor repairs, insulator replacements, transformer and switch repairs, and other work of a non-capital nature.

Classification is consistent with previous treatment.

There is no atypical expenditure.

Variance between forecast and actual expenditure (Schedule 7)

21. 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

7(i): Line charge revenue finished near to target.

7(ii): Variances above 10% and >\$0.5m listed by category:

- Consumer connections were \$3.7m (33%) above target due to the continued high number of residential and large commercial connections;
- System growth was \$0.9m (60%) below target primarily related to delays on a single large Developer driven project that proceeded slower than initially advised;
- Asset relocations were \$4.9m (1,279%) above target due to significant customer asset relocation works;
- Quality of Supply was \$3.5m (52%) below target with lower than forecast costs for delivery of the largest associated programme, with some other projects delayed to FY27 due to timing of consenting approvals;
- Expenditure on non-network assets was \$2.9m (29%) lower than forecast due to phasing into outlying years.

7(iii): Variances above 10% and >\$0.5m listed by category:

- Routine and corrective maintenance was \$0.8m (22%) below target due to efficient delivery and to a lesser extent rephasing of non-urgent works; and
- Business support costs were \$1.6m (11%) below target due largely to timing for commissioning of Digital projects with subscription and related costs flowing through later than initially estimated.



Information relating to revenues and quantities for the disclosure year

22. In the box below provide-
23. 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
- 23.1 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

Total billed line charge revenue was within 1% of target for the year.

Network Reliability for the Disclosure Year (Schedule 10)

24. 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

Consistent with prior years, Counties Energy has reallocated SAIFI / SAIDI arising from events initiating from privately owned network assets to Class I (0.09 successive SAIFI / 10.21 SAIDI has been reallocated from Class C with the balance in Class I moving from Class B where planned requests on privately owned networks impact more than one ICP).

For schedule 10(vi), the following interpretations of the ID requirements have been applied:

- a) 'Unplanned SAIDI', 'Unplanned SAIFI' and 'Customer Impact Ratio' includes class C interruptions only (and does not include other classes such as D, G or I).
- b) 'Unplanned Interruptions' has also been assumed to only include class C – which makes the values consistent with the measures reported but is inconsistent with the definition in the ID determination.
- c) 'Most Common Cause' has been determined by the modal cause within the list of unplanned interruptions. It is understood this is the requirement but isn't reflective of the measure being reported (e.g. SAIDI, SAIFI or Customer Impact Ratio).
- d) Where there are two modal causes (equal counts), the cause with the largest measure (SAIDI/SAIFI/Customer Minutes) has been reported.

Refer to schedule 15 for commentary on "Successive Interruptions".

Insurance cover

25. In the box below, provide details of any insurance cover for the assets used to provide electricity distribution services, including-
26. The EDB's approaches and practices in regard to the insurance of assets used to provide electricity distribution services, including the level of insurance;

- 26.1 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

Essential equipment is insured under a materials damage policy that is reviewed annually. The material damage cover is for physical loss or damage including earthquake and natural disaster cover.

Other than key substations and essential equipment, the bulk of the Network system is not covered by insurance due to the inability to get sufficient cover from the insurance industry for such assets, at an acceptable cost.

Amendments to previously disclosed information

27. 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:
- 27.1 a description of each error; and
28. 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 material amendments to previously disclosed information pursuant to clause 2.12.1 disclosed in the last 10 years.

Company Name	<u>Counties Energy Limited</u>
For Year Ended	<u>31 March 2026</u>

Schedule 14a Mandatory Explanatory Notes on Forecast Information

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024.

29. This Schedule requires EDBs to provide explanatory notes to reports prepared in accordance with clause 2.6.6.
30. 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)

31. 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
The difference between nominal and constant prices reflects inflation of 3% per annum.

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

32. 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
The difference between nominal and constant prices reflects inflation of 3% per annum.

Company Name	Counties Energy Limited
For Year Ended	31 March 2025

Schedule 15 Voluntary Explanatory Notes

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024.

1. This schedule enables EDBs to provide, should they wish to-
2. additional explanatory comment to reports prepared in accordance with clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1, 2.5.2 and 2.6.6;
3. information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.
4. 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.
5. Provide additional explanatory comment in the box below.

Box 1: Voluntary explanatory comment on disclosed information

Schedule 9a – [54] LV Connections

In previous years, the total number of ICPs was disclosed with no age profile information. This has now updated to report on the LV connection points of which only ground mount/UG “pillar” connections are recorded. This accounts for the large decrease for the current year. The corresponding age profile is disclosed in schedule 9b. This change is consistent with Schedule 12a in the 2026 AMP.

Schedule 9a – [59] Load Control Relays

These are now recognised as being owned by the Metering (MEP) business as part of the revenue meter installation, and not part of our Network equipment. They have therefore been excluded from the schedules.

Schedule 10 - Successive Interruptions:

For FY26, “Successive Interruption” is covered by the updates to schedule 10(i):

- Class B (planned) disclosure in Schedule 10 includes the full impact of “Successive Interruptions”. This is consistent with disclosures since FY21 (inclusive), with the enabling change to reporting for planned events having been implemented part way through FY20. Consequently, there are no ‘Transitional’ numbers reported for Class B.
- Class C (unplanned) disclosure in Schedule 10 (i) is now updated to reflect SAIFI, including successive interruptions within a single outage event. This is inconsistent with reporting prior to FY24, and the calculation as per the prior method is reported as ‘Transitional’ for Class C. The change in interpretation has resulted in Class C (unplanned) SAIFI result for FY26 increasing by 12.0% from 2.03 to 2.26. There is no change to the SAIDI number.



Schedule 18 Certification for Year-end Disclosures

Clause 2.9.2

We, Keith Watson and Hamish Stevens, being directors of Counties Energy Limited, certify that, having made all reasonable enquiry, to the best of our knowledge -

- a) the information prepared for the purposes of clauses 2.3.1, 2.3.2, 2.3.8 – 2.3.18, 2.4.21, 2.4.22, 2.5.1 (1)(a)-(f), 2.5.2, 2.5.2A and 2.7.1 of the Electricity Distribution Information Disclosure Determination 2012 in all material respects complies with that determination; and
- b) the historical information used in the preparation of Schedules 8, 9a, 9b, 9c, 9d, 9e, 10, 10a and 14 has been properly extracted from Counties Energy Limited's accounting and other records sourced from its financial and non-financial systems, and that sufficient appropriate records have been retained; and
- c) in respect of information concerning assets, costs and revenues valued or disclosed in accordance with clause 2.3.6 of the Electricity Distribution Information Disclosure Determination 2012 and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012, we are satisfied that -
 - i. the costs and values of assets or goods or services acquired from a related party comply, in all material respects, with clauses 2.3.6(1) and 2.3.6(3) of the Electricity Distribution Information Disclosure Determination 2012 and clauses 2.2.11(1)(g) and 2.2.11(5)(a)-2.2.11(5)(b) of the Electricity Distribution Services Input Methodologies Determination 2012; and
 - ii. the value of assets or goods or services sold or supplied to a related party comply, in all material respects, with clause 2.3.6(2) of the Electricity Distribution Information Disclosure Determination 2012.

A handwritten signature in black ink, appearing to read "Keith Watson", written over a horizontal line.

Keith Watson
26 August 2026

A handwritten signature in black ink, appearing to read "Hamish Stevens", written over a horizontal line.

Hamish Stevens
26 August 2026

Independent Assurance Report

**To the directors of Counties Energy Limited and to the Commerce Commission
on the disclosure information
for the disclosure year ended 31 March 2026
as required by the
Electricity Distribution Information Disclosure (Amendments related to IM Review
2023) Amendment Determination 2024 [2024] NZCC 31 (as amended)**

Counties Energy Limited (the company) is required to disclose certain information under the Electricity Distribution Information Disclosure (Amendments related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31 (as amended) (the Determination) and to procure an assurance report by an independent auditor in terms of section 2.8.1 of the Determination.

The Auditor-General is the auditor of the company.

The Auditor-General has appointed me, Matthew White, using the staff and resources of PricewaterhouseCoopers, to undertake a reasonable assurance engagement, on his behalf, on whether the information prepared by the company for the disclosure year ended 31 March 2026 (the Disclosure Information) complies, in all material respects, with the Determination.

The Disclosure Information that falls within the scope of the assurance engagement are:

- Schedules 1, 2, 3, 3a, 4, 5a to 5h, 6a and 6b (except for information required to be disclosed in Schedule 6(b)(i) under the “Vegetation-related” and “Other” sub-categories of the “Service interruptions and emergencies” category, and the “assessment and notification costs”, “Felling or trimming vegetation – in-zone”, “Felling or trimming vegetation – out-of-zone”, and “Other” sub-categories of the “Vegetation management” category), 7, 10 and 10a (limited to the SAIDI and SAIFI information) and 14 (limited to the explanatory notes in boxes 1 to 11) of the Determination.
- The basis for the valuation of related party transactions (the Related Party Transaction Information) in accordance with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g), 2.2.11(5) and 2.2.11(6) of the Electricity Distribution Services Input Methodologies Determination 2012 (as amended) (the IM Determination); and the information disclosed under clauses 2.3.8.

Opinion

In our opinion, in all material respects:

- as far as appears from an examination, proper records to enable the complete and accurate compilation of the Disclosure Information have been kept by the company;
- as far as appears from an examination, the information used in the preparation of the Disclosure Information has been properly extracted from the company's accounting and other records, sourced from the company's financial and non-financial systems;
- the Disclosure Information complies, with the Determination; and
- the basis for valuation of related party transactions complies with the Determination and the IM Determination.

Basis for opinion

We conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised) Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE (NZ) 3000 (Revised)") and the Standard on Assurance Engagements (SAE) 3100 (Revised) Compliance Engagements ("SAE 3100 (Revised)"), issued by the New Zealand Auditing and Assurance Standards Board.

We have obtained sufficient recorded evidence and explanations that we required to provide a basis for our opinion.

Key Assurance Matters

Key assurance matters are those matters that, in our professional judgement, required significant attention when carrying out the assurance engagement during the current disclosure year. These matters were addressed in the context of our compliance engagement, and in forming our opinion. We do not provide a separate opinion on these matters.

Key Assurance Matter	How our procedures addressed the key assurance matter
Regulatory Asset Base (RAB): The Regulatory Asset Base (RAB), as set out in Schedule 4, reflects the value of the Company's electricity distribution assets. These are valued using an indexed historic cost methodology prescribed by the Determination. It is a measure which is used widely and is key to measuring the Company's return on investment and therefore important when monitoring financial performance or setting electricity distribution prices. The RAB inputs, as set out in the IM Determination, are similar to those used in the measurement of fixed assets in the financial statements, however, there are a number of different requirements and complexities which require careful consideration. Due to the importance of the RAB within the regulatory regime, the incentives to overstate the RAB value, and complexities within the regulations, we have considered it to be a key area of focus. The Regulatory Asset Base (RAB), as set out in Schedule 4, reflects the value of the Company's electricity distribution assets. These are valued using an indexed historic cost methodology prescribed by the Determination. It is a measure which is used widely and is key to measuring the Company's return on investment and therefore important when monitoring financial performance or setting electricity distribution prices. The RAB inputs, as set out in the IM Determination, are similar to those used in the measurement of fixed assets in the financial statements, however, there are a number of different requirements and complexities which require careful consideration. Due to the importance of the RAB within the regulatory regime, the incentives to overstate the RAB value, and complexities within the regulations, we have considered it to be a key area of focus.	We have obtained an understanding of the compliance requirements relevant to the RAB as set out in the Determination and the IM Determination. Our procedures over the regulatory asset base included the following: Assets commissioned • We considered the nature of the assets commissioned during the period, as per the regulatory fixed asset register, to identify any specific cost or asset type exclusions, as set out in the Determination, which are required to be removed from the RAB; • We inspected the assets commissioned during the period, as per the regulatory fixed asset register, to identify any specific cost or asset type exclusions, as set out in the Determination, which are required to be removed from the RAB; • We reconciled the assets commissioned, as per the regulatory fixed asset register, to the asset additions disclosed in the audited annual financial statements and investigated any material reconciling items; and • We tested a sample of assets commissioned during the disclosure period for appropriate asset category classification. Depreciation • For assets with no standard asset lives we assessed the reasonableness of the lives used by reference to the accounting depreciation rates used in preparing the financial statements; • We have performed a reasonableness test to ensure regulatory depreciation expense is calculated in line with IM Determination clause 2.2.5 • We compared the standard asset lives by asset category to those set out in the IM Determination. Revaluation • We recalculated the revaluation rate set out in the IM Determination using the relevant Consumer Price Index indices taken from the Statistics New Zealand website; and • We tested the mathematical accuracy of the revaluation calculation performed by management.

Key Assurance Matter	How our procedures addressed the key assurance matter
Cost & Asset Allocation: The Determination relates to information concerning the supply of electricity distribution services. In addition to the regulated supply of electricity, the Company also supplies customers with other unregulated services such as contracting services. As set out in schedules 5d, 5e, 5f and 5g, costs and asset values that relate to electricity distribution services regulated under the Determination should comprise: All of the costs directly attributable to the regulated goods or services; and An allocated portion of the costs that are not directly attributable. The IM Determination set out rules and processes for allocating costs and assets which are not directly attributable to either regulated or unregulated services. A number of screening tests apply which must be considered when deciding on the appropriate allocation method. The Company has applied the Accounting-Based Allocation Approach Methodology (ABAA) utilising proxy cost and asset allocators to allocate the asset values and operating costs that are not directly attributable where causal relationships could not be identified. Given the judgement involved in the application of the cost and asset allocation methodologies we consider it a key assurance matter.	We obtained an understanding of the Company's cost and asset allocation processes and the methodologies applied. Our procedures over cost and asset allocation included: • Reconciling the regulated and unregulated financial information to the audited financial statements; Classification as directly/not directly attributable • Considering the appropriateness of the costs allocated as directly attributable, based on the nature and our understanding of the business to determine the reasonableness of the directly attributable classification; • Testing a sample of transactions to ensure their classification as either directly attributable or not directly attributable costs are appropriate and in line with the Determination; • Inspecting the fixed asset register to identify any asset classes which based on their nature and our understanding of the business could be considered assets directly attributable to a specific business unit; • Testing a sample of assets commissioned to ensure their classification as either directly attributable or not directly attributable are appropriate and in line with the Determination; Appropriateness of the allocators used for not directly attributable costs and assets • Considering the appropriateness of the cost and asset causal and proxy allocators used in applying the ABAA to not directly attributable costs including inspecting supporting documentation and recalculating proxy allocators; • Understanding why causal relationships could not be identified in allocating some costs or assets and ensuring appropriate disclosure has been included outlining these in Schedule 14; • Recalculating the split between not directly attributable costs and asset values allocated to electricity distribution services and non-electricity distribution services.

Key Assurance Matter	How our procedures addressed the key assurance matter
SAIDI and SAIFI Reliability Measures SAIDI (System Average Interruption Duration Index) and SAIFI (System Average Interruption Frequency Index) as disclosed in Schedule 10 and 10a are non-financial network reliability measures. These are considered key measures when assessing the performance of the network against the annual targets set. Due to the nature of the unplanned interruptions there are inherent limitations in capturing complete and accurate data for all interruptions. The calculations of the disclosed information are also complex and require careful consideration. Due to the importance of the SAIDI and SAIFI measures within the Disclosure Information, inherent limitations in capturing unplanned interruption data and complexities within the regulations, we have considered the reliability measures to be a key area of focus.	We obtained an understanding of the Company's control environment and processes around capturing, recording and reviewing interruption data. Our procedures over the non-financial network reliability measures included: • Testing a sample of planned and unplanned outages from the interruptions output to supporting documentation including internally generated work orders and notifications to test the duration and cause of the interruption ensuring appropriate classification within the Information Disclosure schedules. • Recalculated a sample of the outage minutes that are calculated by the outage management system; • Assessed completeness of the interruption information by performing a media search for significant events that should result in an interruption being recorded, performing a sequential number check on the interruption information and detailed testing of call records and the GIS database; and • Assessed the accuracy and completeness of the ICPs ('Installation Control Points') affected by an interruption through testing a sample of interruptions to underlying GIS database information.

Directors' responsibilities

The directors of the company are responsible in accordance with the Determination for:

- the preparation of the Disclosure Information; and
- the Related Party Transaction Information.

The directors of the company are also responsible for the identification of risks that may threaten compliance with the schedules and clauses identified above and controls which will mitigate those risks and monitor ongoing compliance.

Auditor's responsibilities

Our responsibilities in terms of clauses 2.8.1(1)(b)(vi) and (vii), 2.8.1(1)(c) and 2.8.1(1)(d) are to express an opinion on whether:

- as far as appears from an examination, the information used in the preparation of the audited Disclosure Information has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems;

- as far as appears from an examination, proper records to enable the complete and accurate compilation of the audited Disclosure Information required by the Determination have been kept by the company and, if not, the records not so kept;
- the company complied, in all material respects, with the Determination in preparing the audited Disclosure Information; and
- the company's basis for valuation of related party transactions in the disclosure year has complied, in all material respects, with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g), 2.2.11(5) and 2.2.11(6) of the IM Determination.

To meet these responsibilities, we planned and performed procedures in accordance with ISAE (NZ) 3000 (Revised) and SAE 3100 (Revised), to obtain reasonable assurance about whether the company has complied, in all material respects, with the Disclosure Information (which includes the Related Party Transaction Information) required to be audited by the Determination.

An assurance engagement to report on the company's compliance with the Determination involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the requirements. The procedures selected depend on our judgement, including the identification and assessment of the risks of material non-compliance with the requirements.

Inherent limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance with the Determination may occur and not be detected.

A reasonable assurance engagement throughout the disclosure year does not provide assurance on whether compliance with the Determination will continue in the future.

Restricted use

This report has been prepared for use by the directors of the company and the Commerce Commission in accordance with clause 2.8.1(1)(a) of the Determination and is provided solely for the purpose of establishing whether the compliance requirements have been met. We disclaim any assumption of responsibility for any reliance on this report to any person other than the directors of the company and the Commerce Commission, or for any other purpose than that for which it was prepared.

Independence and quality control

We complied with the Auditor-General's independence and other ethical requirements, which incorporate the requirements of Professional and Ethical Standard 1 International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand) as applicable for audits of public interest entities (PES 1) issued by the New Zealand Auditing and Assurance Standards Board. PES 1 is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We have also complied with the Auditor-General's quality management requirements, which incorporate the requirements of Professional and Ethical Standard 3 Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements (PES 3) issued by the New Zealand Auditing and Assurance Standards Board. PES 3 requires our firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The Auditor-General, and his employees, PricewaterhouseCoopers and its partners and employees may deal with the company and its subsidiaries, on normal terms within the ordinary course of trading activities of the company. Other than any dealings on normal terms within the ordinary course of trading activities of the company, this engagement, and the annual audit of the company's financial statements and performance information, we have no relationship with, or interests in, the company and its subsidiaries.

A handwritten signature in black ink, appearing to read 'M White', with a stylized flourish at the end.

Matthew White
PricewaterhouseCoopers
On behalf of the Auditor-General
Hamilton, New Zealand
27 August 2026