

# Nelson Electricity Limited

## **DEFAULT PRICE QUALITY PATH COMPLIANCE STATEMENT**

**FOR THE ASSESSMENT DATE 31 MARCH 2015**

*Pursuant to the Electricity Distribution Services Default Price-Quality  
Path Determination 2012*

15 June 2015

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## 1) Compliance with the Price Path (Clause 11.2(a))

Nelson Electricity Limited does comply with the price path at the assessment date, 31 March 2015, as specified in the *Electricity Distribution Services Default Price-Quality Path Determination 2012*.

**Clause 8.4** - The notional revenue ( $NR_t$ ) of a Non-exempt EDB at any time during the Assessment Period must not exceed the allowable notional revenue ( $R_t$ ) for the Assessment Period.

Compliance is demonstrated in the following tables. The first table demonstrates that notional revenue derived using posted prices at the end of the Assessment Period is less than allowable notional revenue. The second table demonstrates that the maximum notional revenue during the Assessment Period does not exceed allowable notional revenue thus illustrating that at no time during the Assessment Period is the price path breached.

Test:	$\frac{NR_{2015}}{R_{2015}} \leq 1$
$NR_{2015}$ :	\$ 6,716,383
$R_{2015}$ :	\$ 6,930,417
Result:	0.9691 < 1
Result:	Price Path has not been breached

Test:	$\frac{NR_{Max}}{R_{2015}} \leq 1$
$NR_{Max}$ :	\$ 6,716,383
$R_{2015}$ :	\$ 6,930,417
Result:	0.9691 < 1
Result:	Price Path has not been breached

Supporting evidence is presented in Appendices A, B and C.

## 2) Compliance with the Quality Standards (Clause 11.2(a))

Nelson Electricity Limited does not comply with all requirements of the quality standards at the assessment date, 31 March 2015, as specified in the *Electricity Distribution Services Default Price-Quality Path Determination 2012*. Nelson Electricity has complied with the SAIDI Limit but has breached the SAIFI limit. An explanation is included after the tables below.

**Clause 9.2** - A Non-exempt EDB's Assessed Values for an Assessment Period must not exceed its Reliability Limits for that Assessment Period.

Compliance of SAIDI Limit and breach of the SAIFI limit is demonstrated in the following tables.

Supporting evidence is presented in Appendices D and E.

Test:	$\frac{SAIDI_{Assess\ 2015}}{SAIDI_{Limit}} \leq 1$
SAIDI <sub>Assess 2015</sub>	19.940
SAIDI <sub>Limit</sub>	71.536
Result:	0.2787 < 1
Result:	SAIDI Limit has not been breached

Test:	$\frac{SAIFI_{Assess\ 2015}}{SAIFI_{Limit}} \leq 1$
SAIFI <sub>Assess 2015</sub>	1.570
SAIFI <sub>Limit</sub>	1.126
Result:	1.3948 > 1
Result:	SAIFI Limit has been breached

### SAIFI Quality Limit Breach Explanation

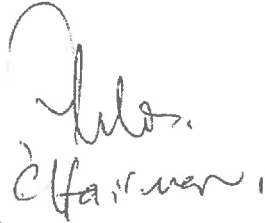
The SAIFI breach is as a result of making changes that will improve the long term security of supply to the Nelson city.

Nelson Electricity replaced its one zone substation in 2014 replacing a 50 year old outdoor substation with a modern indoor substation at the same location. This provided Nelson Electricity the opportunity to install transformers that were of the same vector group as the neighbouring network which would assist in interconnecting at 11kV easily in the event of an emergency. The compromise with changing from vector groups Dyn to Yyn has meant that the supply to consumers had to be cut during the changeover from old to new substation.

The changeover occurred from late March 2013 – end of April 2014. During April 2014 there were 8175 consumers out of the total 9213 that were changed over to the new substation through planned shutdowns (Class B). The average time without supply was 2 minutes. The SAIFI impact was 0.89 out of the total 1.57. Excluding these planned outages (Class B) for the substation cutover, SAIFI would have been 0.68 which is well below the limit of 1.13.

### 3) Director Certification (Clause 11.3(m))

I Paul Donald LeGros, being director of Nelson Electricity Limited certify that, having made all reasonable enquiry, to the best of my knowledge and belief, the attached Annual Compliance Statement of Nelson Electricity Limited, and related information, prepared for the purposes of the *Electricity Distribution Services Default Price-Quality Path Determination 2012* are true and accurate.



Paul Donald LeGros  
Chairman

15 June 2015

## **INDEPENDENT AUDITOR'S REPORT TO THE DIRECTORS OF NELSON ELECTRICITY LIMITED AND TO THE COMMERCE COMMISSION**

The Auditor-General is the auditor of Nelson Electricity Limited ("the company"). The Auditor-General has appointed me, Paul Bryden, using the staff and resources of Deloitte, to provide an opinion, on her behalf, on whether the Annual Compliance Statement for the year ended on 31 March 2015 on pages 2 to 4, and 8 to 14 complies, in all material respects, with the Electricity Distribution Services Default Price-Quality Path Determination 2012 NZCC 35 (the Determination).

### **Directors' responsibilities for the Annual Compliance Statement**

The directors of the company are responsible for the preparation of the Annual Compliance Statement in accordance with the Determination, and for such internal control as the directors determine is necessary to enable the preparation of an Annual Compliance Statement that is free from material misstatement.

### **Auditor's responsibility for the Annual Compliance Statement**

Our responsibility is to express an opinion on whether the Annual Compliance Statement has been prepared, in all material respects, in accordance with the Determination.

### **Basis of opinion**

We conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000: *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* issued by the External Reporting Board and the Standard on Assurance Engagements 3100: *Compliance Engagements* issued by the External Reporting Board.

These standards require that we comply with ethical requirements and plan and perform our audit to provide reasonable assurance (which is also referred to as 'audit' assurance) about whether the Annual Compliance Statement has been prepared in all material respects in accordance with the Determination.

An audit involves performing procedures to obtain evidence about the amounts and disclosures in the Annual Compliance Statement. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the Annual Compliance Statement, whether due to fraud or error or non-compliance with the Determination. In making those risk assessments, the auditor considers internal control relevant to the company's preparation of the Annual Compliance Statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control.

In relation to the price path set out in clause 8 of the Determination, our audit included examination, on a test basis, of evidence relevant to the amounts and disclosures contained on page 2, and pages 8 to 12 of the Annual Compliance Statement.

In relation to the SAIDI and SAIFI statistics for the Reference Period and the Assessment Period ended on 31 March 2015, including the calculation of the Reliability Limits and the Assessed Values, which are relevant to the quality standards set out in clause 9 of the Determination, our audit included examination, on a test basis, of evidence relevant to the amounts and disclosures contained on pages 3-4, and pages 13 to 14 of the Annual Compliance Statement.

Our audit also included assessment of the significant estimates and judgements, if any, made by the company in the preparation of the Annual Compliance Statement.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

## **Use of this report**

This independent auditor's report has been prepared for the directors of the company and for the Commerce Commission for the purpose of providing those parties with independent audit assurance about whether the Annual Compliance Statement has been prepared, in all material respects, in accordance with the Determination. We disclaim any assumption of responsibility for any reliance on this report to any person other than the directors of the company or the Commerce Commission, or for any other purpose than that for which it was prepared.

## **Scope and inherent limitations**

Because of the inherent limitations of an audit engagement, and the test basis of the procedures performed, it is possible that fraud, error or non-compliance may occur and not be detected.

We did not examine every transaction, adjustment or event underlying the Annual Compliance Statement nor do we guarantee complete accuracy of the Annual Compliance Statement. Also we did not evaluate the security and controls over the electronic publication of the Annual Compliance Statement.

The opinion expressed in this independent auditor's report has been formed on the above basis.

## **Independence**

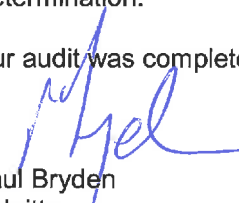
When carrying out the engagement we followed the independence requirements of the Auditor-General, which incorporate the independence requirements of the External Reporting Board. We also complied with the independent auditor requirements specified in the Determination.

The Auditor-General, and her employees, and Deloitte and its partners and employees may deal with the company 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 business, this engagement and the annual audit of the company's financial statements, we have no relationship with or interests in the company.

## **Opinion**

In our opinion, the Annual Compliance Statement of Nelson Electricity Limited for the year ended on 31 March 2015, has been prepared, in all material respects, in accordance with the Determination.

Our audit was completed on 15 June 2015 and our opinion is expressed as at that date.



Paul Bryden  
Deloitte  
On behalf of the Auditor-General  
Christchurch, New Zealand

## Appendix A – Price Path Compliance Calculations (Clause 11.2(b))

Notional Revenue for the year ending March 2015		
Term	Description	Value \$
$P_{2015} * Q_{2013}$	Prices at 31 March 2015 multiplied by 31 March 2013 Base Quantities	10,901,161
$K_{2015}$	Transmission Charges for year ending 31 March 2015	3,759,255
	Avoided Transmission Charges for year ending 31 March 2015	-
	Rates for year ending 31 March 2015	27,107
	Electricity Authority Levies for year ending 31 March 2015	35,064
	Clawback	344,446
	EGCC	3,316
	Commerce Act Levies for year ending 31 March 2015	15,588
$NR_{2015}$	Notional Revenue for the year ending 31 March 2015	6,716,383

Supported by P\*Q schedules presented in Appendix B

Maximum Notional Revenue for the year ending March 2015		
Term	Description	Value \$
$P_{Max} * Q_{2015}$	Maximum Prices between 1 April 2014 and 31 March 2015 multiplied by 31 March 2013 Base Quantities	10,901,161
$K_{2015}$	Transmission Charges for year ending 31 March 2015	3,759,255
	Avoided Transmission Charges for year ending 31 March 2015	-
	Rates for year ending 31 March 2015	27,107
	Electricity Authority Levies for year ending 31 March 2015	35,064
	Clawback	344,446
	EGCC	3,316
	Commerce Act Levies for year ending 31 March 2015	15,588
$NR_{Max}$	Notional Revenue for the year ending 31 March 2015	6,716,383

Supported by P\*Q schedules presented in Appendix B



Allowable Notional Revenue 2015		
Term	Description	Value \$
$P_{2014} * Q_{2013}$	Prices at 31 March 2014 multiplied by 31 March 2013 Base Quantities	10,059,139
$K_{2014}$	Transmission Charges for year ending 31 March 2014	3,124,287
	Avoided Transmission Charges for 2014	
	Rates for year ending 31 March 2014	25,594
	Electricity Commission Levies for year ending 31 March 2014	33,483
	Commerce Act Levies for year ending 31 March 2014	15,106
$R_{t-1} - NR_{t-1}$	Allowable notional revenue 2013 less the notional revenue 2014	3,169
$X$	X Factor	-
$(1 + \Delta CPI_{2015})$	Average change in Consumer Price Index	1.0097
$R_{2015}$	Allowable Notional Revenue under the CPI-X Price Path for the year ending 31 March 2015	6,930,417

Supported by P\*Q schedules presented in Appendix B

## Appendix B – Price and Quantity Schedules (Clause 11.3(a))

Revenue Table using 31 March 2014 Prices and 2012/2013 Quantities

Tariff or Fee	Number of Days		Distribution Charges				Notional Distribution Revenue (\$)		Total Revenue (\$)	
	Number of ICPs at 31/03/2013	kWh at 31/3/2013	kVA at 31/3/2013	Fixed			Variable (c/kWh)	Fixed	Variable	P <sub>2014</sub> Q <sub>2013</sub>
				\$/day	c/kVA/day	Other				
<b>Group 0</b>										
Streetlights	1			273.12			99,689		99,689	
Unmetered Fixed	31			0.06000			679		679	
Unmetered Capacity			2,495		102,000		529		929	
Builders Temp	21			0.60			4,599		4,599	
BT-kWh		6,101				8.66	-	528	528	
<b>Group 1</b>										
Fixed	2301		34,515		1.00		125,980		125,980	
Anytime		7,241,263				8.66	-	627,249	627,249	
Controlled		3,603,306				5.27	-	189,856	189,856	
Nightrate		317,447				3.42	-	10,872	10,872	
<b>Group 2</b>										
Fixed	6669		137,684		5.34		2,683,339		2,683,339	
Anytime		57,984,581				5.15	-	2,986,206	2,986,206	
Controlled		13,063,543				3.10	-	403,110	403,110	
Nightrate		1,435,221				2.10	-	30,140	30,140	
<b>Time of Use</b>										
Metered Installation Charge	93			1.10			37,340		37,340	
Energy		44,393,257				1.70	-	754,685	754,685	
Winter Demand			13,414		21.25		1,040,367		1,040,367	
Capacity Supply Group 3	3			2.02			2,208		2,208	
Capacity Supply Group 4	0			3.31			-		-	
Capacity Supply Group 5	8			5.28			15,418		15,418	
Capacity Supply Group 6	8			6.62			19,342		19,342	
Capacity Supply Group 7	35			10.46			133,678		133,678	
Capacity Supply Group 8	11			14.40			57,816		57,816	
Capacity Supply Group 9	13			24.00			113,880		113,880	
Capacity Supply Group 10	9			36.00			118,260		118,260	
Capacity Supply Group 11	3			48.00			52,560		52,560	
Capacity Supply Group 12	1			72.00			26,280		26,280	
Capacity Supply Group 13	1			96.00			35,040		35,040	
Capacity Supply Group 15	1			115.20			42,048		42,048	
Power Factor			696		72.00		50,112		50,112	
<b>IOU Sealord</b>										
Fixed	1				396.139		396.139		396.139	
Power Factor			11		72.00		792		792	
<b>Σ P<sub>2014</sub> Q<sub>2013</sub></b>										10,059,139

Revenue Table using 31 March 2015 Prices and 2012/2013 Quantities

Number of Days		365		Distnbtion Charges			Notional Distnbtion Revenue (\$)		Total Revenue (\$)	
Tariff or Fee	Number of ICPs at 31/03/2013	kWh at 31/3/2013	kVA at 31/3/2013	Fixed			Variable (c/kWh)	Fixed	Variable	P <sub>2015</sub> Q <sub>2013</sub>
				\$/day	c/kVA/day	Other				
<b>Group 0</b>										
Streetlights	1			295.00				107,675		107,675
Unmetered Fixed	31			0.065				733		733
Unmetered Capacity			2,495		110.00			1,002		1,002
Builders Temp	21			0.650				4,982		4,982
BT-kWh		6,101					9.50	-	580	580
<b>Group 1</b>										
Fixed	2,301		34,515		1.00			125,980		125,980
Anytime		7,241,263					9.50	-	687,920	687,920
Controlled		3,603,306					5.75	-	207,190	207,190
Nightrate		317,447					3.80	-	12,063	12,063
<b>Group 2</b>										
Fixed	6,669		137,684		6.00			3,015,280		3,015,280
Anytime		57,984,581					5.40	-	3,131,167	3,131,167
Controlled		13,003,543					3.35	-	435,619	435,619
Nightrate		1,435,221					2.40	-	34,445	34,445
<b>Time of Use</b>										
Metered Installation Charge	93			1.20				40,734		40,734
Energy		44,393,257					1.80	-	799,079	799,079
<b>Winter Demand</b>										
Capacity Supply Group 3	3			2.10				2,299		2,299
Capacity Supply Group 4	0			3.45				-		-
Capacity Supply Group 5	8			5.50				16,060		16,060
Capacity Supply Group 6	8			6.90				20,148		20,148
Capacity Supply Group 7	35			10.90				139,247		139,247
Capacity Supply Group 8	11			15.00				60,225		60,225
Capacity Supply Group 9	13			25.00				118,625		118,625
Capacity Supply Group 10	9			37.50				123,187		123,187
Capacity Supply Group 11	3			50.00				54,750		54,750
Capacity Supply Group 12	1			75.00				27,375		27,375
Capacity Supply Group 13	1			100.00				36,500		36,500
Capacity Supply Group 15	1			120.00				43,800		43,800
Power Factor			596			78.00		54,288		54,288
<b>TOU Sealord</b>										
Fixed	1					473,244		473,244		473,244
Power Factor			11			78.00		858		858
<b>Σ P<sub>2015</sub> Q<sub>2013</sub></b>										<b>10,901,161</b>

**Appendix C – Pass Through and Recoverable Costs (Clause 11.3(b) and (c))**

Pass Through and Recoverable Costs for year ending March 2015				
K <sub>2015</sub> and V <sub>2015</sub>	Actual (\$)	Forecast (\$)	Variance (\$)	Variance (%)
Transmission	128,043	128,043	-	-
Indirect Transmission	3,631,212	3,630,913	299	.01%
Rates	27,107	26,106	1,001	3.69%
Electricity Authority Levies	35,064	42,380	(7,316)	(20.86)%
Commerce Act Levies	15,588	15,408	180	1.15%
EGCC	3,316	3,200	116	3.5%
Clawback	344,446	344,446	-	-
<b>Total Pass Through and Recoverable Costs</b>	<b>4,184,776</b>	<b>4,190,496</b>	<b>(5,720)</b>	<b>(.14)%</b>

## Appendix D – Quality Standard Compliance Calculations (Clause 11.3(h))

Year	SAIDI (Interruption Duration)			SAIFI (Interruption Frequency)		
	Class B	Class C	Total	Class B	Class C	Total
2005	12.03	38.63	50.66	0.09	0.75	0.84
2006	12.19	10.16	22.35	0.08	0.16	0.24
2007	9.29	16.46	25.75	0.06	0.21	0.27
2008	4.67	12.27	16.93	0.03	0.16	0.18
2009	28.63	87.18	115.81	0.21	1.68	1.90
	Reference Period Total SAIDI		231.51	Reference Period Total SAIFI		3.43
	Reference Period Average SAIDI		46.30	Reference Period Average SAIFI		0.69
2012	9.18	54.30	63.47	0.05	1.06	1.10
2013	10.21	33.40	43.61	0.05	0.51	0.56
2014	1.77	20.61	22.38	0.29	0.21	0.50
2015	2.55	17.39	19.94	0.90	0.67	1.57

### Reliability Limit Calculations

<b>SAIDI Boundary Calculations</b>		
$\alpha_{SAIDI}$	-1.3132	The average of the natural logarithm (ln) of each daily SAIDI Value in the non-zero data set
$\beta_{SAIDI}$	2.0581	The standard deviation of the natural logarithm (ln) of each daily SAIDI Value in the non-zero data set
$B_{SAIDI} = e^{(\alpha_{SAIDI} + 2.5 \cdot \beta_{SAIDI})}$	46.1580	SAIDI Boundary Value

<b>SAIFI Boundary Calculations</b>		
$\alpha_{SAIFI}$	-6.0552	The average of the natural logarithm (ln) of each daily SAIFI Value in the non-zero data set
$\beta_{SAIFI}$	2.1813	The standard deviation of the natural logarithm (ln) of each daily SAIFI Value in the non-zero data set
$B_{SAIFI} = e^{(\alpha_{SAIFI} + 2.5 \cdot \beta_{SAIFI})}$	0.5477	SAIFI Boundary Value

<b>Event Days exceeding SAIDI Boundary Value within the Reference Dataset</b>				
Date	Pre-Normalised SAIDI	Pre-Normalised SAIFI	Normalised SAIDI	Normalised SAIFI
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-

**SAIDI Limit**

$\mu_{SAIDI}$	46.3026	The average annual SAIDI Value in the Normalised Reference Dataset
$\sigma_{SAIDI}$	25.2338	The standard deviation of daily SAIDI Values in the Normalised Reference Dataset multiplied by $\sqrt{365}$
$SAIDI_{Limit} = \mu_{SAIDI} + \sigma_{SAIDI}$	71.5364	SAIDI Limit Value

**SAIFI Limit**

$\mu_{SAIFI}$	0.6853	The average annual SAIFI Value in the Normalised Reference Dataset
$\sigma_{SAIFI}$	0.4404	The standard deviation of daily SAIFI Values in the Normalised Reference Dataset multiplied by $\sqrt{365}$
$SAIFI_{Limit} = \mu_{SAIFI} + \sigma_{SAIFI}$	1.1256	SAIFI Limit Value

**Reliability Assessment Calculations**

**Event Days exceeding SAIDI Boundary Value within the Assessment Dataset**

Date	Pre-Normalised SAIDI	Pre-Normalised SAIFI	Normalised SAIDI	Normalised SAIFI
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-

**Assessed SAIDI Value**

$SAIDI_{2015}$	19.94	The sum of daily SAIDI Values in the 1 April 2014 - 31 March 2015 Normalised Assessment Dataset
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**Assessed SAIFI Value**

$SAIFI_{2015}$	1.57	The sum of daily SAIFI Values in the 1 April 2014 - 31 March 2015 Normalised Assessment Dataset
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## **Appendix E – Policies and Procedures for Recording SAIDI and SAIFI (Clause 11.3(i))**

Nelson Electricity Limited follows the procedure “NEL Network System Outage Statistics” to record SAIDI and SAIFI statistics. The procedure covers the collection of customer numbers, the assessments required to assess the numbers of customers affected, the times outages occur and where the data is to be stored.

Wherever possible outage times are collected from an accurate electronic source, the SCADA being the preferred source, other sources are from phone records from the Nelson Electricity call centre, fault forms received from the Nelson Electricity fault contractor or referring to written switching instructions.

Calculations of customer minutes are prepared on the switching record for each individual outage based on switching times and ICP records. The customer minutes for each event are then added to the SAIDI/SAIFI Spreadsheet which summarises all events for the year and is used to calculate the annual SAIDI and SAIFI. The numbers of outages on the Nelson Electricity network are low compared to other Electricity Line Companies and so it is a relatively easy task to manage these data requirements. A hard copy summary of each outage is held on file.



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## **NEL Network System Outage Statistics Procedure**

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### **Background:**

Nelson Electricity has to collect and record accurate information regarding all transmission, sub-transmission and 11kV outages. The methods and information used has to be robust as the information is used in the disclosure of both SAIDI and SAIFI statistics as part of the Quality Threshold disclosure.

### **Purpose:**

To ensure all information used in the outage statistic information is as accurate as possible. Evidence of outage times and consumer numbers must also be collected.

### **Scope:**

Applies to all outages both planned and unplanned regarding transmission, sub-transmission and 11kV.

### **Procedure:**

The Asset Manager is responsible for the collection, assessment and reporting of all network outage statistics. The information used in the assessments can be from many sources:

- ICP Database
- New Connections
- SCADA system
- Fault forms
- Call Care (fault call reports)
- Control room switching instructions

These sources of information are all valid and defensible sources of information.

### **ICP Database and New Connections:**

The ICP Database and New Connections are updated as ICPs are added and removed from the network. The Business Systems Administrator ensures that these databases are maintained and accurate.

### **SCADA System:**

The SCADA System installed in 2004 has a detailed reporting function. All reports are time stamped. This gives accurate timings of any 33kV or 11kV feeder outages and restoration times.

### **Fault Forms:**

Fault forms provided by the NEL fault provider contain times of fault and restoration times recorded from the contractors who were working on the fault. This source of information is used if there are no other sources.



**Call Care:**

All fault calls are initially answered by the NEL answer phone service provided by Call Care. All calls are logged and time stamped and all faults reported to NEL the next day. This source of information is used as NEL receives calls as soon as an outage occurs.

**Control Room Switching Instructions:**

The switching instructions are a valuable source of information. This is used mainly for the restoration times especially when backfeeding areas in the restoration phase.

The Asset Manager uses all these sources to evaluate the outage statistics in the SAIDI Stats Spreadsheet.

Calculations of customer minutes are prepared on the switching record for each individual outage based on switching times and ICP records. The customer minutes for each event are then added to the SAIDI/SAIFI Spreadsheet which summarises all events for the year and is used to calculate the annual SAIDI and SAIFI. The numbers of outages on the Nelson Electricity network are low compared to other Electricity Line Companies and so it is a relatively easy task to manage these data requirements. A hard copy summary of each outage is held on file.

The Asset Manager reports to the General Manager all individual unplanned outage statistics and provides monthly summaries, which are used and reported to NEL Directors.

The outage statistics are also collected and accumulated for the year from 1 April – 31 March the following year. This accumulated result is used in all the information disclosures including the Quality Threshold disclosure.

The Business System Administrator audits the results to ensure process and results are accurate.

# Outage Statistics Reporting Flow Chart

