

7 August 2026

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## Individual Price-Quality Path Reopener Application - 2026

Dear Matt,

Transpower is applying to the Commerce Commission (the Commission) in relation to its Individual Price-Quality Path (**IPP**) for the period 1 April 2025 to 31 March 2030. Transpower nominates one delivery-risk-adjustment reopener under clauses 3.7.2 and 3.7.9B of the Transpower Input Methodologies Determination:

- 2026 Delivery Reopener Adjustment Mechanism – [Appendix 1](#)

Transpower also provides the information required for the Commission's annual approved-capital expenditure (**capex**) reconsideration under clause 3.7.12 of the Transpower Input Methodologies Determination and clause 33.4 of the Transpower Individual Price-Quality Path Determination 2025. We are providing this information for the following:

- Western Bay of Plenty major capex project – [Appendix 2](#)
- Redclyffe major capex project – [Appendix 3](#)
- Ōtāhuhu – Whakamaru A and B line reconductoring listed project – [Appendix 4](#)
- HVDC Link Upgrade major capex project – [Appendix 5](#)

This application seeks amendments to our price path from the pricing year beginning 1 April 2027. Each of the remaining three pricing years of the IPP will be affected. Transpower forecasts that assets for the major capex projects and the listed project will be commissioned during RCP4. The relevant appendices set out the commissioning schedules.

We also ask the Commission to update Transpower's standard incentive rate base capex and opex allowances for the full amounts available under the delivery risk adjustment mechanism, and to update the relevant allowance for the listed project.

Our compliance against the respective Transpower Input Methodologies (IM) and the IPP requirements is set out in [Appendix 6](#) of this application. Chief Executive certification is provided in [Appendix 7](#).

In total, we seek forecast incremental smoothed maximum allowable revenue (**SMAR**) of \$36.7 million across the remaining years of RCP4. The proposed changes to Schedules A, C2, C4, C5 and C6 of the IPP for the remaining disclosure years in RCP4 are set out in [Appendix 8](#). The table below shows the aggregate incremental updates to forecast maximum allowable revenue (**MAR**) and forecast SMAR.

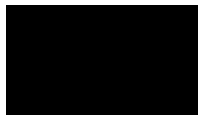
*Table 1: Revenue Impact \$m nominal, by pricing year*

|                  | 2027/28 | 2028/29 | 2029/30 | Total |
|------------------|---------|---------|---------|-------|
| Incremental MAR  | 21.0    | 5.2     | 9.7     | 35.9  |
| Incremental SMAR | 11.7    | 12.2    | 12.8    | 36.7  |

Please contact Joel Cook, Head of Strategy and Regulation, at [joel.cook@transpower.co.nz](mailto:joel.cook@transpower.co.nz) if you wish to discuss this application or require any additional information. In accordance with the IPP, we will publish this information on our website.

Transpower will set prices for the pricing year beginning 1 April 2027. To reflect these adjustments in those prices, we would ideally receive the Commission's decision by the end of September 2026.

Yours sincerely,



James Kipsey  
Chief Executive

## Appendix 1: Delivery Risk Adjustment Mechanism 2026

Our full-time equivalent employees and contractors (collectively, FTEs) as at 30 June 2026 totalled 1,051.7 FTEs, as defined in the IPP. The FTE target in Schedule EA for 30 June 2026 is 1,050 FTEs.

*Table 1.1: Transpower's total FTEs as at 30 June 2026*

|           | Employee FTE | Contractor FTE | Total FTE | Target FTE |
|-----------|--------------|----------------|-----------|------------|
| Total FTE | 936.9        | 114.8          | 1051.7    | 1050       |

Further detail on the 1,051.7 FTEs is provided in the following tables, split between employees and contractors.

Transmission line of business FTEs

*Table 1.2: Transpower's closing employee FTE allocation to the transmission line of business*

| Division                            | 30 June 2025 | Movement    | 30 June 2026 |
|-------------------------------------|--------------|-------------|--------------|
| Corporate Services                  | 82.7         | 9.4         | 92.1         |
| Customer and External Affairs       | 57.2         | -6.5        | 50.7         |
| Future Grid                         | 3.0          | 0.0         | 3.0          |
| Grid Delivery                       | 195.6        | 15.4        | 211.0        |
| Grid Development                    | 172.6        | 3.4         | 176.0        |
| IST                                 | 199.5        | 3.7         | 203.2        |
| Operations                          | 87.5         | 5.2         | 92.7         |
| People                              | 46.8         | 1.8         | 48.6         |
| Graduates                           | 31.0         | -7.0        | 24.0         |
| Strategy, Regulatory and Governance | 35.8         | -0.2        | 35.6         |
| <b>Total</b>                        | <b>911.7</b> | <b>25.2</b> | <b>936.9</b> |

The RCP4 proposal was prepared in 2022/23, during a period of tight labour market conditions. At that time, Transpower assumed an attrition rate of 10%. As at June 2026, Transpower's overall turnover rate was 8.3%. In addition, weaker labour market conditions have supported staff retention and recruitment. However, it remains challenging to recruit engineers in globally skill short disciplines at all levels, particularly in power system and power system dynamics, protection and automation, HVDC and high-voltage substations.

## Transmission line of business contractor FTEs

*Table 1.3: Transpower's closing contractor FTE allocation to the transmission line of business*

| Division                           | 30 June 2025 | Movement     | 30 June 2026 |
|------------------------------------|--------------|--------------|--------------|
| Corporate Services                 | 6.8          | 0.3          | 7.0          |
| Customer and External Affairs      | 1.7          | -0.2         | 1.5          |
| Future Grid                        | 0.0          | 0.0          | 0.0          |
| Grid Delivery                      | 19.6         | 1.6          | 21.2         |
| Grid Development                   | 10.1         | 2.6          | 12.6         |
| IST                                | 85.5         | -22.0        | 63.5         |
| Operations                         | 4.1          | -2.3         | 1.8          |
| People                             | 7.6          | -2.9         | 4.7          |
| Strategy Regulatory and Governance | 3.0          | -0.8         | 2.2          |
| <b>Total</b>                       | <b>138.5</b> | <b>-23.7</b> | <b>114.8</b> |

As with permanent roles, the contractor market has softened significantly. This has generally enabled Transpower to procure resources when required. Overall contractor numbers have decreased, primarily because of a lower June figure for IST following the completion of projects during that month. The average number of contractors over the preceding 12 months was 122.7 FTEs.

For the purposes of the delivery risk adjustment mechanism, a contractor is included if the following criteria are met:

- Is providing extra capacity or backfill for a role that exists within Transpower, or
- acting as an additional resource for a time-limited piece of work; and
- is engaged on a contract for service, either directly (self-employed) or via a third-party (recruitment agency), and is not an employee of Transpower; and
- is paid upon provision of a GST invoice through their own managed entity or third-party recruitment agency; and is not
- an employee of a Service Provider (who is completing agreed work specified in the MSA), or
- if a contractor, meets the definition of (a-c) above, and is employed by a service provider, by is completing work outside of the MSA, then this position should be measured in accordance with the definition of a contractor or a consultant.

Consistent with our initial RCP4 application, the contractor figure includes QualIT (now PlanIT) specialists, who provide IST testing function that Transpower has outsourced. To remain consistent with the submission, we included PlanIT specialists in the actual contractor FTE calculation.

## Revenue adjustment for the delivery risk adjustment mechanism

We are applying to reopen our revenue path under the delivery risk adjustment mechanism after meeting the FTE target described above. The FTE target applies as at 30 June 2026 (DY<sub>n</sub>). The

adjustment applies to the disclosure year ending 30 June 2028 (DY<sub>n+2</sub>) and will be reflected in the pricing year beginning 1 April 2027.

In accordance with Schedule EA of the IPP, we have adjusted our revenue model to include the maximum base capex allowance and maximum opex allowance, totalling \$49,031,578, after meeting 100% of the FTE target. This comprises:

- base capex: \$32,208,568; and
- opex: \$16,823,010.

The table below summarises the revenue impact.

*Table 1.4: Revenue Impact, \$m nominal, by pricing year*

|                  | 2027/28 | 2028/29 | 2029/30 | Total |
|------------------|---------|---------|---------|-------|
| Incremental MAR  | 18.5    | 2.2     | 2.5     | 23.2  |
| Incremental SMAR | 7.7     | 8.1     | 8.5     | 24.3  |

## Appendix 2: Western Bay of Plenty major capex project

### Project approval

The Commission approved Transpower's Western Bay of Plenty major capex project on 11 June 2025,<sup>1</sup> with a major capex allowance of \$86.1 million (nominal). The forecast final investment commissioning date is 31 December 2032. Most commissioning is expected to occur in RCP5; however, Transpower forecasts that some assets will be commissioned in June 2029.

This appendix sets out the RCP4 commissioning profile for the approved project and the resulting adjustments to forecast MAR and forecast SMAR sought under clause 33.4 of the IPP. The application is limited to forecast commissioning during RCP4.

### Approved expenditure

Table 2.1 sets out the major capex allowance approved by the Commission.

*Table 2.1: Forecast major capex allowance, \$m*

| Capex (2023/24 \$) | Inflation factors | Interest during construction | NTS (nominal) | MCA (nominal) |
|--------------------|-------------------|------------------------------|---------------|---------------|
| \$67.0             | 7.3               | 8.9                          | 2.9           | 86.1          |

### RCP4 commissioning profile

The RCP4 commissioning profile for the Western Bay of Plenty project has been incorporated into the attached revenue model. The commissioning values reflect Transpower's current forecast of when project assets will enter service and become available for inclusion in the regulatory asset base during RCP4.

*Table 2.2: Commissioning profile, \$m nominal, by disclosure year*

|                             | 2027/28 | 2028/29 | 2029/30 | Total |
|-----------------------------|---------|---------|---------|-------|
| Forecast commissioned value | -       | -       | 1       | 1     |

### Revenue impact

The forecast commissioning profile results in changes to forecast MAR and forecast SMAR. The resulting revenue impacts are calculated in accordance with the IPP. Clause 33 requires the proposed updated forecast MAR and forecast SMAR to be calculated consistently with the approach used for RCP4.

The revenue impacts are calculated using the attached revenue model, with the relevant model references set out in Appendix 6. The model applies the project commissioning profile to calculate the resulting forecast MAR and forecast SMAR for the remaining years of RCP4.

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<sup>1</sup> [Transpowers-Western-Bay-of-Plenty-major-capex-project-Final-decision-reasons-paper](#)

The table below shows the forecast incremental maximum allowable revenue (MAR) and forecast incremental smoothed maximum allowable revenue (SMAR).

*Table 2.3: Revenue impact, \$m nominal, by pricing year*

|                  | 2027/28 | 2028/29 | 2029/30 | Total |
|------------------|---------|---------|---------|-------|
| Incremental MAR  | -       | 0.0     | 0.1     | 0.1   |
| Incremental SMAR | 0.0     | 0.0     | 0.0     | 0.1   |

## Appendix 3: Redclyffe major capex project

### Project approval

The Commission approved Transpower's Redclyffe major capex project on 28 April 2026.<sup>2</sup> The approved project enhances the resilience of the Redclyffe 220kV Switchyard by raising critical high voltage plant, installing new 220kV electrical equipment, and constructing a digital substation control building. The forecast final investment commissioning date for the project is December 2027.

This appendix sets out the adjustments to forecast MAR and forecast SMAR sought under clause 33.4 of the IPP. The application is limited to forecast commissioning during RCP4.

### Approved expenditure

Table 3.1 sets out the major capex allowance approved by the Commission.

*Table 3.1: Approved capex, \$m*

| Capex (2024/25 \$) | Inflation Factors | Financing Costs | MCA (nominal) |
|--------------------|-------------------|-----------------|---------------|
| 43.9               | 1.2               | 2.0             | 47.0          |

### Commissioning profile

The updated commissioning profile for the Redclyffe project has been incorporated into the attached revenue model. The commissioning values reflect Transpower's current forecast of when approved project assets will enter service and become available for inclusion in the regulatory asset base during RCP4.

*Table 3.2: Updated commissioning profile, \$m nominal, disclosure year*

|                             | 2027/28 | 2028/29 | 2029/30 | Total |
|-----------------------------|---------|---------|---------|-------|
| Forecast commissioned value | 47.0    | -       | -       | 47.0  |

### Revenue impact

The forecast commissioning profile results in changes to forecast MAR and forecast SMAR. The resulting revenue impacts are calculated in accordance with the IPP. Clause 33 requires the proposed updated forecast MAR and forecast SMAR to be calculated consistently with the approach used for RCP4.

The revenue impacts are calculated using the attached revenue model, with the relevant model references set out in Appendix 6. The model applies the project commissioning profile to calculate the resulting forecast MAR and forecast SMAR for the remaining years of RCP4.

The table below shows the forecast incremental MAR and forecast incremental SMAR.

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<sup>2</sup> [Final-decision-Transpowers-Redclyffe-MCP-Reasons-paper-28-April-2026](#)

Table 3.3: Revenue impact, \$m nominal, by pricing year

|                  | 2027/28 | 2028/29 | 2029/30 | Total |
|------------------|---------|---------|---------|-------|
| Incremental MAR  | 2.5     | 2.9     | 3.1     | 8.5   |
| Incremental SMAR | 2.7     | 2.8     | 3.0     | 8.5   |

## Appendix 4: Ōtāhuhu – Whakamaru A and B line reconductoring Listed project

### Project approval

The Commission approved Transpower's Ōtāhuhu–Whakamaru A and B line reconductoring listed project on 2 July 2026. The project was identified in Schedule I of the IPP and subsequently approved by the Commission under clauses 2.2.2(7)–(8) of Transpower's Capex IM. The approved project involves reconductoring the Flatbush-to-Hūnua section of the Ōtāhuhu–Whakamaru A and B transmission lines, including associated tower and foundation strengthening works. The forecast final investment commissioning date is June 2029.

This appendix sets out the commissioning profile for the approved listed project and the resulting adjustments to forecast MAR and forecast SMAR sought under clause 33.4 of the IPP. The application is limited to the forecast commissioning during RCP4.

### Approved expenditure

Table 4.1 sets out the additional base capex allowance approved by the Commerce Commission. The allowance reflects forecast project expenditure, escalation and financing costs calculated using the forecast CPI applied when setting RCP4.

Table 4.1: Approved listed project expenditure \$m

| Capex (2024/25 \$) | Inflation factors | Interest during construction | MCA (nominal) |
|--------------------|-------------------|------------------------------|---------------|
| 45.4               | 2.4               | 2.7                          | 50.5          |

The approved annual allocation of the listed project capex allowance is set out in the table below.

Table 4.2: Approved listed project expenditure profile, \$m nominal, by disclosure year

|                   | 2025/26 | 2026/27 | 2027/28 | 2028/29 | Total |
|-------------------|---------|---------|---------|---------|-------|
| Allowance profile | 2.3     | 9.7     | 27.6    | 10.8    | 50.5  |

### Updated commissioning profile

The commissioning profile for the Ōtāhuhu – Whakamaru A and B line reconductoring project has been incorporated into the attached revenue model. The commissioning values reflect Transpower's current forecast of when approved project assets will enter service and will be included in the regulatory asset base during RCP4.

Table 4.3: Updated commissioning profile, \$m nominal, by disclosure year

|                             | 2027/28 | 2028/29 | 2029/30 | Total |
|-----------------------------|---------|---------|---------|-------|
| Forecast commissioned value | -       | 50.5    | -       | 50.5  |

## Revenue impact

The forecast commissioning profile results in changes to forecast MAR and forecast SMAR. The resulting revenue impacts are calculated in accordance with the IPP. Clause 33 requires the proposed updated forecast MAR and forecast SMAR to be calculated consistently with the approach used for RCP4.

The revenue impacts are calculated using the attached revenue model, with the relevant model references set out in Appendix 6. The model applies the project commissioning profile to calculate the resulting forecast MAR and forecast SMAR for the remaining years of RCP4.

The table below shows the forecast incremental MAR and forecast incremental SMAR.

*Table 4.4: Revenue impact, \$m nominal, by pricing year*

|                  | 2027/28 | 2028/2029 | 2029/2030 | Total |
|------------------|---------|-----------|-----------|-------|
| Incremental MAR  | -       | -         | 2.2       | 2.2   |
| Incremental SMAR | 0.7     | 0.7       | 0.7       | 2.1   |

## Appendix 5: HVDC Link Upgrade Stage 1 major capex project

### Project approval

The Commission approved Transpower's HVDC Link Upgrade Stage 1 project on 18 June 2026. The approved project provides for the replacement of existing HVDC transmission assets, including the submarine cables, cable termination stations and cable storage facility, together with investment to increase HVDC transfer capacity from 1,200 MW to 1,400 MW. The approved forecast final investment commissioning date is 31 December 2031, in RCP5; however, we forecast that some assets will be commissioned in June 2030.

This appendix sets out the updated commissioning profile for the approved project and the resulting adjustments to forecast MAR and forecast SMAR sought under clause 33.4 of the IPP. The application is limited to the forecast commissioning during RCP4 and the revenue impacts of the approved project under clause 33.4 of the IPP.

### Approved expenditure

Table 5.1 sets out the Major Capex Allowance approved by the Commerce Commission.

*Table 5.1: Approved expenditure \$m nominal*

| MCA Component                                     | MCA            |
|---------------------------------------------------|----------------|
| Supply and install four new submarine HVDC cables | 871.0          |
| Cable termination stations replacement            | 161.7          |
| Benmore filter bank                               | 23.8           |
| Pole 2 short-term overload scheme                 | 15.6           |
| New submarine cable storage facility              | 14.1           |
| Project investigation costs                       | 26.3           |
| Stage 2 preparatory costs                         | 26.1           |
| <b>Total</b>                                      | <b>1,138.6</b> |

### RCP4 commissioning profile

The updated commissioning profile for the HVDC Link Upgrade Stage 1 project has been incorporated into the attached revenue model. The commissioning values reflect Transpower's current forecast of when approved project assets will enter service and will be included in the regulatory asset base during RCP4. The two project outputs forecast to be commissioned in Disclosure Year 2029/30 are the cable storage facility and the Benmore filter bank.

*Table 5.2: Commissioning profile \$m nominal, by disclosure year*

|                             | 2027/28 | 2028/29 | 2029/30 | Total |
|-----------------------------|---------|---------|---------|-------|
| Forecast commissioned value | -       | -       | 37.9    | 37.9  |

## Revenue impact

The forecast commissioning profile results in changes to forecast MAR and forecast SMAR. The resulting revenue impacts are calculated in accordance with the IPP. Clause 33 requires the proposed updated forecast MAR and forecast SMAR to be calculated consistently with the approach used for RCP4.

The revenue impacts are calculated using the attached revenue model, with the relevant model references set out in Appendix 6. The model applies the project commissioning profile to calculate the resulting forecast MAR and forecast SMAR for the remaining years of RCP4.

The table below shows the forecast incremental MAR and incremental SMAR.

*Table 5.3: Revenue Impact \$m nominal, by pricing year*

| Pricing Year     | 2027/28 | 2028/29 | 2029/30 | Total |
|------------------|---------|---------|---------|-------|
| Incremental MAR  | -       | -       | 1.9     | 1.9   |
| Incremental SMAR | 0.6     | 0.6     | 0.6     | 1.8   |

## Appendix 6: Compliance with the IPP

To meet the requirements of clause 33 of the IPP, we adjusted the revenue model used to determine RCP4 revenue (Transpower RCP4 Revenue Model\_November 2024). This is the same model the Commission used to determine the IPP.

Based on meeting the 100% FTE target in Appendix 1 and the approved projects described in Appendices 2–5, we have calculated the adjustments to forecast MAR and forecast SMAR using the following process:

- Entered the delivery risk adjustment, MCP and listed-project details in columns AA to BC, rows 542-624 of the 'Inputs master' sheet.
- Set the formula in in columns N to R, rows 542-624 to take account of the 2026 delivery risk adjustment, including adjusting the base capex allowance and opex allowance, and entered the approved MCP and listed-project inputs.
- Apportioned the maximum base capex allowance to incremental new-asset regulatory commissioning based on the 2027 forecast new-asset regulatory commissioning values, excluding operating lease assets.
- Allocated 100% of the regulatory commissioning value to the incremental new-asset tax commissioning value because no interest during construction is included for the corresponding capex in the same year.
- On the Cover sheet, entered the incremental i26 update in cell G8 and then ran the iterations in cell M10.
- We also adjusted the Cover Sheet and added tabs for each reopener in order to show the impact of each reopener individually.

The model, "Transpower RCP4 revenue\_model\_2026 Revenue Adjustments (August 2026)", is attached to this letter. The relevant references for each adjustment are:

- 2026 Delivery Reopener Adjustment Mechanism
  - Sheet i26a
  - Inputs master sheet columns AA to AE
  - Cover Sheet Row 19
- Western Bay of Plenty major capex project
  - Sheet i26b
  - Inputs Master sheet columns AG to AK
  - Cover Sheet Row 20
- Redclyffe major capex project
  - Sheet i26c
- Inputs Master sheet columns AM to AQ  
Cover Sheet Row 21
- Ōtāhuhu – Whakamaru A and B line reconductoring listed project
  - Sheet i26d
- Inputs Master sheet columns AS to AW  
Cover Sheet Row 22

- HVDC Link Upgrade major capex project
  - Sheet i26e
- Inputs Master sheet columns AY to BC  
Cover Sheet – Row 23

### Summary of incremental forecast MAR and forecast SMAR

The following table summarises the revenue impact of the delivery risk adjustment and each approved-capex reconsideration item.

*Table 6.1: Summary of incremental forecast MAR and forecast SMAR, \$m nominal*

| Adjustment                                                                       | Revenue<br>Model Sheet |             | 31 March<br>2028 | 31 March<br>2029 | 31 March<br>2030 |
|----------------------------------------------------------------------------------|------------------------|-------------|------------------|------------------|------------------|
| Appendix 1: Delivery Risk<br>Adjustment Mechanism 2026                           | i26a                   | MAR         | 18.5             | 2.2              | 2.5              |
|                                                                                  |                        | SMAR        | 7.7              | 8.1              | 8.5              |
| Appendix 2: Western Bay of Plenty<br>major capex project                         | i26b                   | MAR         | -                | 0.0              | 0.1              |
|                                                                                  |                        | SMAR        | 0.0              | 0.0              | 0.0              |
| Appendix 3: Redclyffe major capex<br>project                                     | i26c                   | MAR         | 2.5              | 2.9              | 3.1              |
|                                                                                  |                        | SMAR        | 2.7              | 2.8              | 3.0              |
| Appendix 4: Ōtāhuhu – Whakamaru<br>A and B line reconductoring Listed<br>project | i26d                   | MAR         | -                | -                | 2.2              |
|                                                                                  |                        | SMAR        | 0.7              | 0.7              | 0.7              |
| Appendix 5: HVDC Link Upgrade<br>Stage 1 major capex project                     | i26e                   | MAR         | -                | -                | 1.9              |
|                                                                                  |                        | SMAR        | 0.6              | 0.6              | 0.6              |
| <b>2026 Incremental update to forecast</b>                                       |                        | <b>MAR</b>  | <b>21.0</b>      | <b>5.2</b>       | <b>9.7</b>       |
|                                                                                  |                        | <b>SMAR</b> | <b>11.7</b>      | <b>12.2</b>      | <b>12.8</b>      |

## Appendix 7: Chief Executive certification of the revenue adjustments and updated forecast MAR and forecast SMAR

I, James Kilty, being the chief executive officer of Transpower New Zealand Limited, certify that, having made all reasonable enquiries, to the best of my knowledge and belief, the proposed update of the forecast MAR and the forecast SMAR for the pricing period 1 April 2027 to 31 March 2030 complies with the requirements of the Transpower Individual Price Quality Path Determination 2025.



James Kilty

7 August 2026

## Appendix 8: Schedules for the IPP

### Schedule A: Summary of forecast MAR and forecast SMAR

| Forecast MAR applied to pricing years in RCP4 ending | Forecast MAR is calculated based on building block values for the disclosure year ending | Initial determined value of forecast MAR for pricing year | Incremental update to forecast MAR determined in 2025 | Incremental update to forecast MAR determined in 2026 | Incremental update to forecast MAR determined in 2027 | Incremental update to forecast MAR determined in 2028 | Total forecast MAR applicable to the pricing year (sum of amounts in columns 3 to 7) | Forecast SMAR applicable to the pricing years in RCP4 |
|------------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------------|
| 31 March 2026<br>(Year 1)                            | 30 June 2026                                                                             | \$1,076.0 million                                         | N/A                                                   | N/A                                                   | N/A                                                   | N/A                                                   | \$1,076.0 million                                                                    | \$976.7 million                                       |
| 31 March 2027<br>(Year 2)                            | 30 June 2027                                                                             | \$1,112.9 million                                         | \$17 million                                          | N/A                                                   | N/A                                                   | N/A                                                   | \$1,129.9 million                                                                    | \$1,141.4 million                                     |
| 31 March 2028<br>(Year 3)                            | 30 June 2028                                                                             | \$1,161.7 million                                         | \$2.1 million                                         | \$21.0 million                                        | N/A                                                   | N/A                                                   | \$1,184.8 million                                                                    | \$1,210.1 million                                     |
| 31 March 2029<br>(Year 4)                            | 30 June 2029                                                                             | \$1,230.4 million                                         | \$2.4 million                                         | \$5.2 million                                         | N/A                                                   | N/A                                                   | \$1,238.0 million                                                                    | \$1,270.6 million                                     |
| 31 March 2030<br>(Year 5)                            | 30 June 2030                                                                             | \$1,271.6 million                                         | \$2.6 million                                         | \$9.7 million                                         | N/A                                                   | N/A                                                   | \$1,283.9 million                                                                    | \$1,334.1 million                                     |

Schedule C2: Standard incentive rate base capex summary – commissioned basis (including capitalised operating leases)

| Disclosure year ending | Standard incentive rate base capex allowance as determined 29 August 2024 | Incremental standard incentive rate base capex allowance determined in 2025 | Incremental standard incentive rate base capex allowance determined in 2026 | Incremental standard incentive rate base capex allowance determined in 2027 | Incremental standard incentive rate base capex allowance determined in 2028 | Standard incentive rate base capex allowance for purposes of forecast MAR in the disclosure year (sum of columns 2 to 6) |
|------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| 30 June 2026           | \$460.5 million                                                           | N/A                                                                         | N/A                                                                         | N/A                                                                         | N/A                                                                         | \$460.5 million                                                                                                          |
| 30 June 2027           | \$585.4 million                                                           | \$29.4 million                                                              | N/A                                                                         | N/A                                                                         | N/A                                                                         | \$614.8 million                                                                                                          |
| 30 June 2028           | \$437.0 million                                                           | \$0.0 million                                                               | \$32.2 million                                                              | N/A                                                                         | N/A                                                                         | \$469.2 million                                                                                                          |
| 30 June 2029           | \$437.2 million                                                           | \$0.0 million                                                               | \$0.0 million                                                               | N/A                                                                         | N/A                                                                         | \$437.2 million                                                                                                          |
| 30 June 2030           | \$630.4 million                                                           | \$0.0 million                                                               | \$50.9 million                                                              | N/A                                                                         | N/A                                                                         | \$681.3 million                                                                                                          |

Refer to:

- *Appendix 1:* Delivery Risk Adjustment Mechanism capex allowance 2026
- *Appendix 4:* Ōtāhuhu – Whakamaru A and B line reconductoring Listed Project

Schedule C4: Standard incentive rate base capex summary - expenditure basis (excluding capitalised operating leases)

| Disclosure year ending | Standard incentive rate base capex allowance as determined 29 August 2024 | Incremental standard incentive rate base capex allowance determined in 2025 | Incremental standard incentive rate base capex allowance determined in 2026 | Incremental standard incentive rate base capex allowance determined in 2027 | Incremental standard incentive rate base capex allowance determined in 2028 | Standard incentive rate base capex allowance for purposes of forecast MAR in the disclosure year (sum of columns 2 to 6) |
|------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| 30 June 2026           | \$490.2 million                                                           | N/A                                                                         | 2.3 million                                                                 | N/A                                                                         | N/A                                                                         | \$492.5 million                                                                                                          |
| 30 June 2027           | \$508.8 million                                                           | \$29.5 million                                                              | 9.7 million                                                                 | N/A                                                                         | N/A                                                                         | \$548.0 million                                                                                                          |
| 30 June 2028           | \$449.4 million                                                           | \$0.0 million                                                               | \$59.8 million                                                              | N/A                                                                         | N/A                                                                         | \$509.2 million                                                                                                          |
| 30 June 2029           | \$451.1 million                                                           | \$0.0 million                                                               | \$10.8 million                                                              | N/A                                                                         | N/A                                                                         | \$461.9 million                                                                                                          |
| 30 June 2030           | \$466.6 million                                                           | \$0.0 million                                                               | \$0.0 million                                                               | N/A                                                                         | N/A                                                                         | \$466.6 million                                                                                                          |

Refer to:

- *Appendix 1:* Delivery Risk Adjustment Mechanism capex allowance 2026
- *Appendix 4:* Ōtāhuhu – Whakamaru A and B line reconductoring Listed Project

Schedule C5: Summary of opex allowances (excluding capitalised operating leases)

| Disclosure year ending | Base opex allowance as determined 29 August 2024 | Base opex allowance determined in 2025 | Base opex allowance determined in 2026 | Base opex allowance determined in 2027 | Base opex allowance determined in 2028 | Base opex allowance for purposes of forecast MAR in the disclosure year (sum of columns 2 to 6) |
|------------------------|--------------------------------------------------|----------------------------------------|----------------------------------------|----------------------------------------|----------------------------------------|-------------------------------------------------------------------------------------------------|
| 30 June 2026           | \$421.1 million                                  | N/A                                    | N/A                                    | N/A                                    | N/A                                    | \$421.1 million                                                                                 |
| 30 June 2027           | \$419.3 million                                  | \$15.5 million                         | N/A                                    | N/A                                    | N/A                                    | \$434.7 million                                                                                 |
| 30 June 2028           | \$440.8 million                                  | \$0.0 million                          | \$16.8 million                         | N/A                                    | N/A                                    | \$457.6 million                                                                                 |
| 30 June 2029           | \$445.0 million                                  | \$0.0 million                          | \$0.0 million                          | N/A                                    | N/A                                    | \$445.0 million                                                                                 |
| 30 June 2030           | \$437.6 million                                  | \$0.0 million                          | \$0.0 million                          | N/A                                    | N/A                                    | \$437.6 million                                                                                 |

*Refer to Appendix 1 Delivery Risk Adjustment Mechanism opex allowance 2026*

Schedule C6: Summary of forecast opex for IRIS (including capitalised operating leases)

| Disclosure year ending | Base opex allowance as determined 29 August 2024 | Base opex allowance determined in 2025 | Base opex allowance determined in 2026 | Base opex allowance determined in 2027 | Base opex allowance determined in 2028 | Base opex allowance for purposes of forecast MAR in the disclosure year (sum of columns 2 to 6) |
|------------------------|--------------------------------------------------|----------------------------------------|----------------------------------------|----------------------------------------|----------------------------------------|-------------------------------------------------------------------------------------------------|
| 30 June 2026           | \$432.4 million                                  | N/A                                    | N/A                                    | N/A                                    | N/A                                    | \$432.4 million                                                                                 |
| 30 June 2027           | \$432.2 million                                  | \$15.5 million                         | N/A                                    | N/A                                    | N/A                                    | \$447.6 million                                                                                 |
| 30 June 2028           | \$460.1 million                                  | \$0.0 million                          | \$16.8 million                         | N/A                                    | N/A                                    | \$476.9 million                                                                                 |
| 30 June 2029           | \$457.0 million                                  | \$0.0 million                          | \$0.0 million                          | N/A                                    | N/A                                    | \$457.0 million                                                                                 |
| 30 June 2030           | \$448.7 million                                  | \$0.0 million                          | \$0.0 million                          | N/A                                    | N/A                                    | \$448.7 million                                                                                 |

*Refer to Appendix 1 Delivery Risk Adjustment Mechanism opex allowance 2026*