



TRANSPOWER

TPM consultation: Brownhill – Pakuranga B Cable Joint Refurbishment proposed starting BBI customer allocations

Consultation paper

Date: 4 August 2026



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1 Executive Summary

1. This consultation seeks feedback on the proposed starting benefit-based investment (**BBI**) customer allocations (**starting allocations**) for the Brownhill-Pakuranga B Cable Joint Refurbishment Benefit-based Investment (**Brownhill Cable Joint Refurbishment BBI**), calculated under the transmission pricing methodology (**TPM**).¹
2. The starting allocations and covered cost for the Brownhill Cable Joint Refurbishment BBI will be used to calculate the BBI's benefit-based charges (**BBCs**).
3. Transpower owns and operates two 220 kV underground cables (named A and B) between Brownhill and Pakuranga substations in Auckland (forming part of the Pakuranga to Whakamaru transmission line, comprising 1 and 2 circuits). These cables are each approximately 11 km in length.
4. The cables were installed in 2012 as part of the North Island Grid Upgrade (**NIGU**) project and form a critical part of the high-capacity transmission system supplying Auckland and Northland.
5. The Brownhill-Pakuranga B cable has 45 cable joints. The condition of these cable joints required investment to reduce failure risk and provide at least another 20 years' of service. The Brownhill Cable Joint Refurbishment involved replacing all existing joints on the Brownhill-Pakuranga B cable with new joints.
6. The cable joints on the Brownhill-Pakuranga A cable do not exhibit the same condition issues, do not present the same failure risk, and therefore do not need to be replaced.
7. We are required to treat the Brownhill Cable Joint Refurbishment as a separate post-2019 BBI because it:
 - a. is a refurbishment investment
 - b. was commissioned after 23 July 2019 (the assets were progressively commissioned during financial year (**FY**) 2025/26),
 - c. is in respect of an Appendix A BBI (the NIGU Appendix A BBI), and
 - d. is not an exempt post-2019 investment (it was commissioned after 30 June 2021).
8. The Brownhill Cable Joint Refurbishment BBI is a high-value post-2019 BBI because the value of the assets comprised in the investment exceed the base capex threshold specified in the Transpower Capital Expenditure Input Methodology (**Capex IM**).² At the date of this consultation package, the estimated capital cost of the Brownhill Cable Joint Refurbishment (fully commissioned) is \$53.85m.

¹ The TPM is in Schedule 12.4 of Part 12 of the Electricity Industry Participation Code 2010 (Code) - [Part 12—Transport | Electricity Authority](#).

² At the time of the investment test for the Brownhill Cable Joint Refurbishment, the base capex threshold was \$20m. This has since increased to \$30m. The fully commissioned asset value of the Brownhill Cable Joint Refurbishment BBI is above both thresholds. The latest version of the Capex IM is [here](#).

9. We are required to apply the price-quantity method in the TPM to calculate the regional net private benefit (**NPB**) of the Brownhill Cable Joint Refurbishment BBI. The price-quantity method must be used for all high-value post-2019 BBIs that are not resiliency BBIs. We consider that the main benefits from investment relate to market benefits assessed under the price-quantity method.
10. Table 1 shows the proposed modelled regions for the Brownhill Cable Joint Refurbishment BBI and the regional allocation each modelled region receives. Table 2 shows the proposed starting allocations and indicative BBCs for pricing year (**PY**) 2041/42 (which is when we expect the BBI's covered cost to peak) for the ten customers with the largest starting allocations.

Table 1: Proposed modelled regions and regional allocations

Proposed modelled region	Proposed regional allocation (%)
Waikato and Upper North Island (WUNI) (load customers benefitting)	36.98%
South Island (SI) (generation customers benefitting)	33.49%
Rest of North Island (RNI) (generation customers benefitting)	29.53%

Table 2: Proposed starting allocations and indicative BBCs (top 10)

Customer	Proposed starting allocation (%)	Indicative BBC (for this investment) in PY 2041/42 (\$k)
Vector Ltd	25.09%	1574.82
Meridian Energy Ltd	24.49%	1536.81
Contact Energy Ltd	11.90%	746.92
Mercury NZ Ltd	8.16%	512.34
Genesis Energy Ltd	7.22%	453.36
WEL Networks Ltd	3.53%	221.80
Powerco Ltd	2.58%	161.69
Manawa Energy Ltd	2.26%	142.06

Customer	Proposed starting allocation (%)	Indicative BBC (for this investment) in PY 2041/42 (\$k)
Northpower Ltd	1.98%	123.99
Counties Energy Ltd	1.64%	102.85

2 Purpose

11. The purpose of this consultation is to seek feedback on the proposed starting allocations for the Brownhill Cable Joint Refurbishment BBI, calculated under the TPM.
12. The Brownhill Cable Joint Refurbishment BBI is a post-2019 BBI because it was commissioned after 23 July 2019. The Brownhill Cable Joint Refurbishment BBI is a high-value post-2019 BBI because its estimated capital cost (fully commissioned) is more than the base capex threshold specified in the Capex IM, which is now \$30m (the BBI's fully commissioned capital cost is estimated at \$53.85m). Under the TPM, we are required to publicly consult on the proposed starting allocations for high-value post-2019 BBIs.
13. This consultation paper includes:
 - a. background information on the Brownhill Cable Joint Refurbishment, including its approval by the Commerce Commission (**Commission**)
 - b. an overview of how the TPM applies to the Brownhill Cable Joint Refurbishment BBI, including an estimate of its covered cost
 - c. an overview of our application of the price-quantity method to the Brownhill Cable Joint Refurbishment BBI and the resulting proposed regional customer groups (and the regional allocation each receives) and proposed starting allocations, as detailed in the draft record of application of the price-quantity method (**the draft record**) that is published alongside this consultation paper, and
 - d. indicative BBCs for PY 2041/42, which is when we expect the BBCs for the BBI to peak.
14. Following consideration of feedback from this consultation we will make our final calculation of the starting customer allocations for the Brownhill Cable Joint Refurbishment BBI. We are aiming to publish these in August 2026. The first assets of the BBI were commissioned during FY 2025/26, so its BBCs will apply from PY 2027/28.
15. We have defined some terms in this consultation paper for convenience. Please also reference the glossary in the BBC assumptions book (**assumptions book**), which we have applied to calculate the proposed starting allocations.³ Other terms used in this consultation package have the meanings given to them in the TPM. All clause references are to clauses in the TPM, unless stated otherwise.
16. Part D of the TPM and chapter 3 of the assumptions book are relevant to the calculation of covered cost and starting BBI customer allocations. You may wish to refer to our TPM information sheets on covered cost and the standard methods for calculating starting BBI customer allocations.⁴

³ [TPM Determination: BBC Assumptions Book v3.0](#), 30 June 2026.

⁴ "Information sheet on benefit-based charges: Covered cost" and "Information sheet on benefit-based charges: Standard methods" are available [here](#).

3 Consultation process and scope

3.1 Consultation package

17. This consultation package comprises:
 - a. this consultation paper
 - b. the draft record
 - c. technical assurance on aspects of the method and calculations for the proposed starting allocations, from KPMG and Broad Solutions, as explained in section 8 below
 - d. legal assurance on the compliance of this consultation package with the assumptions book and TPM, from Simpson Grierson, as explained in section 8 below
 - e. the post-processing model used for calculating the Brownhill Cable Joint Refurbishment BBI's proposed starting allocations, which includes the intra-regional allocator values, as explained in the draft record, and
 - f. a summary of modelling data outputs and inputs from the wholesale market model, as explained in the draft record.

3.2 Consultation process

18. The consultation period will run for three weeks commencing Tuesday 4 August 2026. Submissions are due by 5pm on Tuesday 25 August 2026. If required, this will be followed by a 1-week period for cross-submissions, which would be due by 5pm 1 September 2026.
19. Please send submissions and cross-submissions to tpm@transpower.co.nz. We will acknowledge receipt of all submissions and cross-submissions. Submissions and cross-submissions will be published on our website at <https://www.transpower.co.nz/our-work/industry/grid-pricing/starting-bbi-customer-allocations>.
20. If your submission or cross-submission contains confidential material, please ensure this is clearly identified and provide a version of your submission or cross-submission that can be published.
21. Please note that all information provided to Transpower is subject to potential disclosure under the Official Information Act 1982.
22. If you have any questions about this consultation, please send them to tpm@transpower.co.nz. Your questions and our responses to them will be published on our website for reference by other submitters and stakeholders.

3.3 Feedback sought

23. For the avoidance of doubt, matters relating to the efficacy or merits of the TPM or the Commission's decision to approve the Brownhill Cable Joint Refurbishment are outside the scope of this consultation.
24. We welcome any feedback on our application of the price-quantity method to the Brownhill Cable Joint Refurbishment BBI to calculate its proposed starting allocations, including on the following questions:

- Q1. Do you consider our application of the price-quantity method is consistent with the TPM and the assumptions book?
 - Q2. Is there any aspect of our application of the price-quantity method for which you think there is a better way to achieve consistency with the TPM and the assumptions book?
 - Q3. Do you consider the intra-regional allocators and their values we have used to be correct and accurate?
 - Q4. Do you have any other comments on our application of the price-quantity method?

4 The Brownhill Cable Joint Refurbishment

25. Transpower owns and operates two 220 kV underground cables (A and B) between Brownhill and Pakuranga substations in Auckland (part of the Pakuranga-Whakamaru transmission line, which has two circuits (PAK-WKM 1 and 2)). Each of these cables is approximately 11 km in length. They were installed in 2012 as part of the NIGU project and form a critical part of the high-capacity transmission system supplying Auckland and Northland.
26. Each cable systems comprises three single-core XLPE cables installed in sections of approximately 600 to 700 meters, joined together in a series of underground joint bays along the route.
27. The cable joints on the Brownhill-Pakuranga B cable experienced multiple failures attributable to insulation breakdown. Technical investigations and testing indicated that this issue is systemic, with the remaining joints on the cable at risk of failure.
28. The condition of the cable joints on the Brownhill-Pakuranga B cable required investment to minimise failure risk. The Brownhill Cable Joint Refurbishment involved refurbishing all existing joints on the cable by installing new joints through a coordinated programme of works. The joint replacement enabled the cable to continue to support secure electricity supply to Auckland and Northland over the long term.

4.1 Brownhill Cable Joint Refurbishment approval

29. The funding for this project was approved by the Commission as part of our base capex allowances for regulatory control period (**RCP**) 4.
30. We initially consulted on the need for Brownhill Cable Joint Refurbishment in 2023. The independent verifier report accompanying our RCP4 submission evaluated that our expenditure was likely to be prudent to minimise the risk of asset failure.⁵ The Commission also consulted on the project during its own consultation on our RCP4 proposal. The Commission, after reviewing submissions and the independent verifier's report, approved the project.
31. We also undertook targeted consultation on the project with our customers (Genesis Energy, Contact Energy, Mercury, Meridian Energy, New Zealand Steel, Top Energy, Northpower and Vector), including on the timing of the work and the impact of any outages on their operations, as required under the Capex IM.

⁵ [GHD Advisory, Independent verification report RCP4 base expenditure and service measures 2025-30 proposal, 12 September 2023.](#)

5 Applying the TPM to the Brownhill Cable Joint Refurbishment BBI

5.1 The Brownhill Cable Joint Refurbishment BBI is a high-value post-2019 BBI

32. The Brownhill Cable Joint Refurbishment is a refurbishment investment, as defined in the Capex IM and TPM, as it materially extended the Brownhill-Pakuranga B cable's original economic life without improving its original service potential.
33. The cable was installed as part of the NIGU project, which is an Appendix A BBI – one of the seven historic interconnection investments specified in Appendix A of the TPM that are BBIs.
34. The Brownhill Cable Joint Refurbishment was commenced in July 2024, and all assets were commissioned during FY 2025/26. The Brownhill Cable Joint Refurbishment BBI is therefore a post-2019 BBI.
35. We are required to treat the Brownhill Cable Joint Refurbishment BBI as a separate post-2019 BBI because it:
 - a. is a refurbishment investment
 - b. will be commissioned after 23 July 2019
 - c. is in respect of an Appendix A BBI (the NIGU Appendix A BBI),⁶ and
 - d. is not an exempt post-2019 investment (it was commissioned after 30 June 2021).
36. Starting allocations for post-2019 BBIs are calculated by Transpower using a standard method (for a high-value post-2019 BBI) or the simple method (for a low-value post-2019 BBI). The Brownhill Cable Joint Refurbishment BBI is a high-value post-2019 BBI because the value of the assets comprised in the BBI exceeds the base capex threshold under the Capex IM (which is now \$30m). At the date of this consultation package, the estimated capital cost of the Brownhill Cable Joint Refurbishment BBI (fully commissioned) is \$53.85m.

⁶ The cable is part of the PAK-WKM 1 and 2 circuits that were commissioned in 2012 as part of the North Island Grid Upgrade (NIGU) project to strengthen supply into Auckland and improve security of supply to the region. This BBI is therefore in respect to the NIGU Appendix A BBI; one of seven historic (pre-July 2019) grid interconnection investments specified in Appendix A of the TPM.

5.2 Estimated covered cost of the Brownhill Cable Joint Refurbishment BBI

5.2.1 TPM requirements for covered cost

37. The cost recovered through the BBCs for a BBI is referred to in the TPM as the BBI's 'covered cost'. A BBI's covered cost is calculated annually.⁷
38. The covered cost includes capital components (return on and of investment) and an allocation of our total operating costs (including overheads). These components are calculated for each pricing year (1 April N to 31 March N+1) using inputs from the previous financial year (1 July N-2 to 30 June N-1). This means the covered cost of a BBI tracks the actual cost of the BBI, with a lag.

5.2.2 Latest estimate of covered cost

39. The initial annual covered cost of the Brownhill Cable Joint Refurbishment BBI will be confirmed as part of calculating transmission charges for PY 2027/28.
40. Our estimate of the Brownhill Cable Joint Refurbishment BBI's covered cost relies on a number of estimated inputs, including final asset composition and asset values. This section summarises the assumptions and results of our latest estimate of the covered cost for the Brownhill Cable Joint Refurbishment BBI.
41. The key assumptions we have made are:
 - a. the total project cost is \$53.85m. This is below our original estimate of \$84m
 - b. asset depreciation is over 20 years with tax depreciation based on 10% diminishing value
 - c. vanilla WACC (7.10%), cost of debt (5.74%) and leverage (41%) approved for RCP4 are used in the calculation for all later RCPs, and
 - d. the attributed opex ratio for RCP4 is used for all later RCPs.
42. Figure 1 and Table 3 summarise the estimated covered cost for Brownhill Cable Joint Refurbishment BBI.

⁷ For an explanation of covered cost see Transpower's [TPM Information sheet: Benefit-based charges: Covered Cost](#).

Figure 1: Brownhill Cable Joint Refurbishment BBI forecast (estimated) covered cost

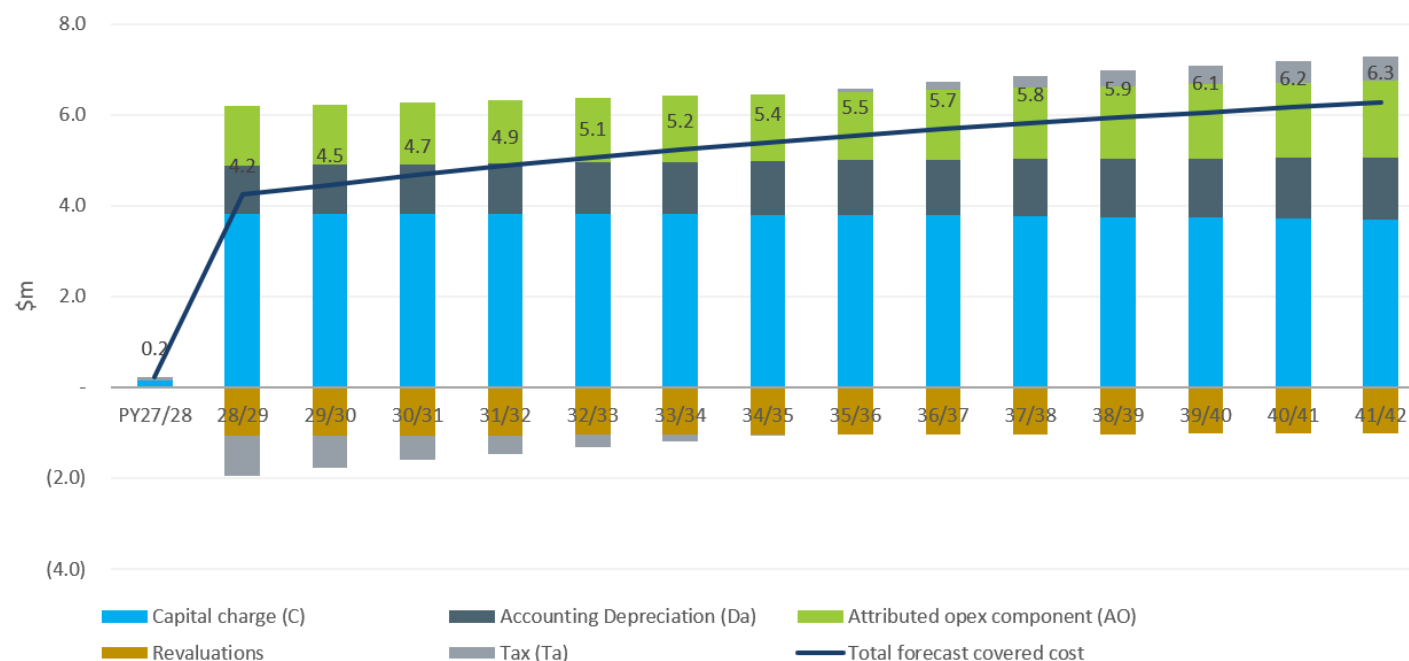


Table 3: Brownhill Cable Joint Refurbishment BBI forecast (estimated) covered cost

	RCP4				RCP5					RCP6					RCP7
Pricing year (ending 31 March)	PY27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42
Accounting Depreciation (Da)	-	1.1	1.1	1.1	1.1	1.1	1.2	1.2	1.2	1.2	1.3	1.3	1.3	1.3	1.4
Capital charge (C)	0.2	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.7	3.7	3.7
Revaluations	-	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
Attributed opex component (AO)	-	1.3	1.3	1.4	1.4	1.4	1.4	1.5	1.5	1.5	1.6	1.6	1.6	1.7	1.7
Sum of Transpower's depreciation tax loss/gain and income tax on the capital charge (Ta)	0.1	(0.9)	(0.7)	(0.6)	(0.4)	(0.3)	(0.1)	(0.0)	0.1	0.2	0.3	0.3	0.4	0.5	0.5
Total forecast covered cost	0.2	4.2	4.5	4.7	4.9	5.1	5.2	5.4	5.5	5.7	5.8	5.9	6.1	6.2	6.3

5.3 We are required to apply the price-quantity method

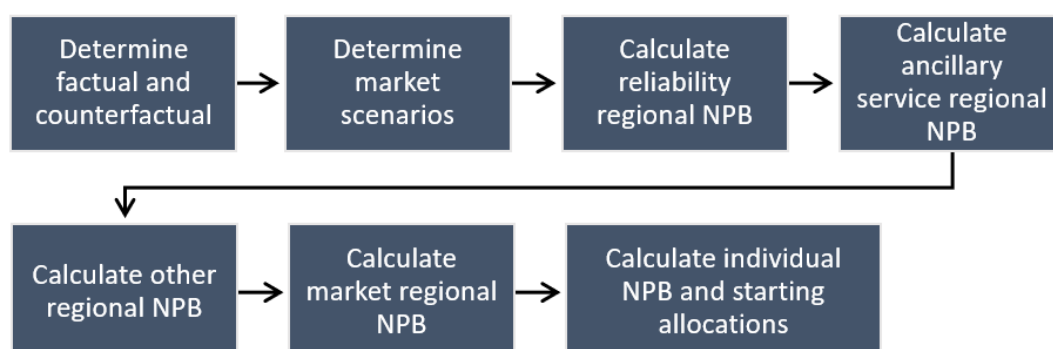
43. We are required to apply the price-quantity method to all high-value post-2019 BBIs that are not resiliency BBIs.
44. We consider market impacts are the most material benefits for this investment and therefore we have assessed it using the price-quantity method. The Brownhill Cable Joint Refurbishment's investment need is not primarily attributable to mitigating a risk of cascade failure or a high impact, low probability event.
45. Therefore, the Brownhill Cable Joint Refurbishment BBI is not a resiliency BBI and we are required to use the price-quantity method to calculate its starting allocations.⁸

⁸ For more information see Transpower's [TPM Information sheet: Benefit-based charges: Standard methods](#).

6 Application of the price-quantity method

46. The draft record contains a detailed description of our application of the price-quantity method to calculate proposed starting allocations for the Brownhill Cable Joint Refurbishment BBI. Our application of the price-quantity method follows the assumptions book. This section contains an overview of the draft record.
47. The price-quantity method involves the following steps, aspects of which are summarised below.

Figure 2: Steps in the price-quantity method



6.1 Types of benefits

48. Our assessment is that the benefits from the Brownhill Cable Joint Refurbishment BBI are wholesale electricity market benefits only:
- Reliability benefits: We have not calculated reliability benefits for the Brownhill Cable Joint Refurbishment BBI (relative to the counterfactual) because:
 - under N-1 security conditions, loss of load is unlikely, and any reliability benefits would primarily arise from low-probability events (e.g. multiple outages or N-security conditions), and
 - given the low likelihood of such events, the expected value of reliability benefits is low.
 - Ancillary service benefits: We do not expect the Brownhill Cable Joint Refurbishment BBI to materially reduce the allocable cost (through changes in price or quantity) of any specified ancillary service relative to the counterfactual.
 - Market benefits: We expect the Brownhill Cable Joint Refurbishment BBI to have a material impact on prices and dispatch quantities in the wholesale electricity market because it significantly alleviates constraints that would apply in the wholesale electricity market in the counterfactual.
 - Other benefits: We do not expect the Brownhill Cable Joint Refurbishment to have any material and measurable benefits other than wholesale electricity market benefits.
49. Accordingly, we calculated market regional NPB for the Brownhill Cable Joint Refurbishment BBI only. We did not calculate reliability, ancillary service, or other regional NPB for the BBI.

6.2 Clause 51 v 52

50. The TPM contains two alternative methods for calculating a BBI's market regional NPB, in clauses 51 and 52.
51. The criteria for choosing between clauses 51 and 52, and the way in which we apply those criteria, are set out in section 3.3.6.7 of the assumptions book. Broadly, we are required to use clause 51 (the default method) to calculate market regional NPB unless certain conditions are met, as specified in clauses 51 and 52.
52. Section 8.5 of the draft record contains more information and sets out our assessment of which clause applies. We have use clause 51 to calculate market regional NPB for the Brownhill Cable Joint Refurbishment BBI.

6.3 Key modelling inputs

53. The default position is that the assumptions and other inputs used for a BBI's investment test under the Capex IM are also used to calculate the BBI's starting allocations.
54. Except as otherwise stated in the draft record, the assumptions and other inputs we used for modelling the benefits of the Brownhill Cable Joint Refurbishment BBI are either consistent with the investment test for the Brownhill Cable Joint Refurbishment or had no equivalent in that investment test.
55. Some key modelling assumptions and inputs we have used in our application of the price-quantity method to the Brownhill Cable Joint Refurbishment BBI are as follows:
 - a. The market scenarios are from the assumptions book, which include five market scenarios based on MBIE's 2024 EDGS, each with different generation and demand assumptions.
 - b. Expected market benefits and disbenefits have been discounted at a rate of 5% per annum (the standard method discount rate).
 - c. The assets that make up the Brownhill Cable Joint Refurbishment BBI are expected to have useful lives of greater than 20 years. Therefore, we used a 20-year standard method calculation period (the maximum possible standard method calculation period), beginning on 1 January 2027 – the first 1 January after the Brownhill Cable Joint Refurbishment BBI's expected effective full commissioning date (30 June 2026).
56. The modelling inputs we have used are consistent with chapter 2 of the assumptions book unless otherwise stated in the draft record.

7 Proposed starting allocations for the Brownhill Cable Joint Refurbishment BBI

7.1 Proposed regional customer groups

57. We applied the process described in sections 3.3.6.9 to 3.3.6.13 of the assumptions book to determine the proposed regional customer groups for the Brownhill Cable Joint Refurbishment BBI.
58. Modelled regions are determined using the points of modelled constraint and the HVDC link constraints. The modelled constraints in this case are between demand in the Waikato and Upper North Island (**WUNI**) region and generation in the remainder of the grid. Accordingly, we determined three modelled regions for the Brownhill Cable Joint Refurbishment, WUNI (for demand) and rest of North Island (**RNI**) and South Island (**SI**) (for supply).
 - a. The Brownhill Cable Joint Refurbishment allows both Brownhill-Pakuranga cables to remain in service. Without the investment, only one cable would remain available. Under this scenario, contingencies affecting the remaining Whakamaru-Pakuranga circuit or at Huntly Unit 5 can result in voltage instability under some load and generation conditions. In addition, unplanned outages elsewhere on the 220 kV network can overload the remaining parallel circuits. To maintain system security, the System Operator must manage these risks pre-contingency by constraining network flows and generation.
 - b. Without the Brownhill Cable Joint Refurbishment, these pre-contingency security constraints are expected to bind more frequently, reducing transfer capacity into the WUNI region. When these transmission constraints bind, wholesale electricity prices are suppressed upstream of the constraint and elevated downstream. Upstream generation is constrained down in favour of high-cost downstream generation, resulting in lower prices for upstream generators and higher prices for downstream load.
 - c. By reducing the likelihood of binding transmission constraints into the WUNI region, the Brownhill Cable Joint Refurbishment is expected to deliver private benefits to load in the WUNI region and generation elsewhere in the grid. This is because WUNI load avoids paying elevated electricity prices resulting from constrained transfers, while upstream generation avoids receiving suppressed wholesale electricity prices. Similarly, load will disbenefit in a region where generation benefits, and vice versa.
59. Table 4 shows the proposed modelled regions and the proposed regional allocation each modelled region receives.

Table 4: Proposed modelled regions and regional allocations

Proposed modelled regions	Proposed regional allocation (%)
Waikato and Upper North Island (WUNI) (load customers benefitting)	36.98%
South Island (SI) (generation customers benefitting)	33.49%
Rest of North Island (RNI) (generation customers benefitting)	29.53%

7.2 Proposed starting allocations

60. We calculated each customer's proposed starting allocation for the Brownhill Cable Joint Refurbishment BBI as the customer's individual NPB divided by the sum of all customers' individual NPBs. This results in the proposed starting allocations set out in Table 5.
61. We note the starting allocations for a BBI are fixed over the lifetime of the BBI, subject to specific adjustment events such as customer or large plant entry or exit.
62. Table 5 also shows indicative BBCs for PY 2041/42 for the Brownhill Cable Joint Refurbishment BBI, which is when we expect the BBI's covered cost to peak (at approximately \$6.3m). These indicative BBCs have been calculated by allocating the estimated covered cost in accordance with the proposed starting allocations.
63. These BBCs are indicative only. The BBCs for the Brownhill Cable Joint Refurbishment BBI, which will apply from PY 2027/28 onwards, will be calculated annually based on actual covered cost.

Table 5: Proposed starting allocations and indicative BBCs

Customer Name	Proposed starting allocation (%)	Indicative BBC in PY 2041/42 (\$k)
Vector Ltd	25.09%	1574.82
Meridian Energy Ltd	24.49%	1536.81
Contact Energy Ltd	11.90%	746.92
Mercury NZ Ltd	8.16%	512.34
Genesis Energy Ltd	7.22%	453.36
WEL Networks Ltd	3.53%	221.80
Powerco Ltd	2.58%	161.69
Manawa Energy Ltd	2.26%	142.06
Northpower Ltd	1.98%	123.99
Counties Energy Ltd	1.64%	102.85
Nga Awa Purua Joint Venture	1.61%	101.34
MEL (West Wind) Ltd	1.21%	75.66
Kawerau Geothermal Ltd	1.16%	72.69
Waipa Networks Ltd	1.08%	67.81
Ngatamariki Geothermal Ltd	1.01%	63.29
Tararua Wind Power	0.98%	61.40
MEL (Te Apiti) Ltd	0.61%	38.17
Waverly Wind Farm Ltd	0.57%	35.69
Mercury SPV Ltd	0.42%	26.67
New Zealand Steel Ltd	0.40%	24.98

Customer Name	Proposed starting allocation (%)	Indicative BBC in PY 2041/42 (\$k)
The Lines Company Ltd	0.32%	20.24
Oji Fibre Solutions (NZ) Ltd	0.29%	18.13
Southern Generation Ltd	0.29%	17.94
Unison Networks Ltd	0.26%	16.51
Nova Energy Ltd	0.21%	13.21
Top Energy Ltd	0.19%	11.90
KiwiRail Holdings Ltd	0.17%	10.96
Horizon Energy Distribution Ltd	0.11%	7.03
Aurora Energy Ltd	0.09%	5.78
Whareroa Cogeneration Ltd	0.07%	4.21
Westpower Ltd	0.07%	4.15
Alpine Energy Ltd	0.03%	1.93
Southpark Utilities Ltd	0.001%	0.09

8 Assurance of the consultation package

64. The contents of this consultation package have been subject to independent assurance.
65. This consultation package contains assurance for the technical aspects of the consultation package (e.g. data inputs and sources).
 - a. KPMG was engaged by Transpower to assure our determination of the proposed starting allocations for the Brownhill Cable Joint Refurbishment BBI, and associated disclosures in the draft record, are in accordance with the assumptions book and the requirements of the TPM.
 - b. Broad Solutions was engaged by Transpower to review the outputs of our market model, and to review the decisions we made in post-processing in accordance with the assumptions book and the requirements of the TPM.
66. This consultation package contains assurance for the legal aspects of this consultation package. Simpson Grierson assessed legal compliance of this consultation package, specifically whether our draft record complies with the TPM, and whether it is consistent with particular aspects of the assumptions book.
67. Through this consultation process we will consider all submissions and cross-submissions. The assurance letters provided with respect to this consultation package do not limit this in any way.

