



Information Disclosure Requirements – Tranche 1: MainPower Customer Service Practices June 2023

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Information Disclosure Requirements – Tranche 1:

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17.1. Notice of Planned and Unplanned Interruptions

MainPower notifies planned service interruptions by sending an electronic file using the Electricity Information Exchange Protocol 5A (EIEP5A) format to Energy Retailers of planned service interruptions with at least 11 days' notice, who in turn advise the affected consumers. We also advise consumers who have an active New Zealand mobile phone number using Short Messaging Services (SMS) text communications. These are sent at the time the EIEP5A communication is sent, and again 24 hours before the planned service interruption is scheduled to begin. In situations where these normal processes are not viable, such as short notice outages, we usually email customers directly using their registered contact email and telephone any who do not provide any email address through their Energy Retailer. We do this at least 48 hours before the outage, in accordance with our Connection Agreement.

MainPower provides notice of unplanned service interruptions, after the fact in most cases, by providing information and a detailed map on our website for consumer to access. In special cases or for consumers with greater reliance on electricity, we occasionally communicate directly using email or phone calls to the affected consumers. In unique cases, such as a national energy or power shortage, we also use social media channels and radio for rapid message distribution. If we have adequate advanced warning of the unplanned service interruption, which is not common, we may also follow the short notice outage process outlined in the paragraph above. We are delivering a project to provide SMS in the event of unplanned service interruptions in winter 2023.

17.2. Voltage Quality

17.2.1 Monitoring Voltage Quality on the LV Network

MainPower currently utilises a few methods to monitor voltage quality on the LV network. Transformer monitors are used across the network to monitor LV bus voltages and end-of-line voltages. We are further exploring LV analytics tools based on smart meter data to better understand and monitor the capability of the low voltage network. Product and data acquisition trials have been running over the past year and continue into FY24 to inform MainPower’s longer term low voltage network strategy. We have a robust customer complaints process that begins further investigation where issues are identified.

MainPower is in talks with the meter providers to obtain smart meter data. The ability to access and use this data will be cost dependent.

17.2.2 Work on the LV Network to Address Known Non-Compliance

As outlined in 17.1.3.

17.2.3 Responding to Reports on Voltage Quality Issues

MainPower actively monitors customer complaints. When an issue is reported, a Power Quality Analysis procedure is started. A Field Operator will visit the location to assess the network assets in the area and perform spot measurements and tests. If this is inconclusive, MainPower will install a logger at the ICP in question and observe the power quality data for any signs of issue that relate to the reported problem. Additionally, the smart meter data will be interrogated where available. From this data, MainPower can determine what is occurring and provide advice to the customer or a solution where appropriate. All complaints are logged in MainPower’s CRM so they can be referred to for any future queries or on-going issues.

17.2.4 Communicating with Affected Consumers regarding Voltage Quality Issues

MainPower engages with any impacted customers as they raise concerns and communicates whenever work is required to mitigate an issue. This can include notification of a required outage, consultation around design solutions or on-going communication about identifying any issues and underlying causes as an investigation proceeds.

17.2.5 Plans for Improvement

MainPower is actively seeking access to power data from ICP smart meters. This will allow better visibility of the LV network to identify problem areas and allow MainPower to focus reinforcement spending on rectifying these issues. Additionally, accurate load information from ICPs will better inform planning and design practices to ensure issues are found early and fixed. This requires access to smart meter data from meter providers at a reasonable cost.

17.3. Customer Services Practices

17.3.1 Customer Engagement Protocols and Customer Service Measures:

Engagement type	Frequency	Numbers	Purpose
Service Monitoring survey	Monthly	Dependant on number of MACK enquiries in previous month. Averages 20-60	To gather feedback from customers who have interacted with MainPower in the previous month. Allows the opportunity to follow up customer feedback sooner and mitigate potential complaints.

		responses per month.	
AMP Service Experience survey	Annual	All customers who have interacted with MainPower in the last 12 months are invited to participate. Usually 150-200 responses.	<p>To gather AMP performance statistics on customers who have engaged with MainPower for Customer Initiated Work including new connections, new power supplies or changes to power supplies. Measurements include:</p> <ul style="list-style-type: none"> • Engagement effort – how easy it is to do business with MainPower; • Staff friendliness – to ensure the engagement is proactive and results oriented; • Quality of work – to ensure we deliver a standard of work that is aligned with our consumers’ expectations; • Timeliness – to ensure work is delivered in accordance with our consumers’ expectations; • Communication – to ensure we communicate with our consumers proactively; • Staff reliability – to ensure our staff deliver services to our consumers as agreed; and • Price – to ensure our pricing is fair.
Customer Pulse survey	Annual	Minimum of 200 phone and 200 online survey completions.	To gather customer perceptions of MainPower. Same focus areas each year covering overall satisfaction, brand awareness, outage communications, community support and effectiveness of safety campaigns.
Asset Management Plan Customer Engagement Sessions – World Café style	Every two years with engagement survey (alternates with AMP Future Networks)	20-24 attendees per session (4-6 per group rotating around four stations). Three sessions held – Waimakariri, Hurunui and Kaikoura.	Receiving qualitative feedback from residential, rural and commercial/business customers in each main region (Waimakariri, Hurunui and Kaikoura). Covering reliability, future technology, resilience and safety. Opportunity to include other topical subjects e.g. pricing, environment, community.
Asset Management Plan Engagement Survey	Every two years with World Café sessions (alternates with AMP)	Minimum of 1000 online responses.	Receiving quantitative feedback from residential, rural and commercial/business customers in each main region (Waimakariri, Hurunui and Kaikoura). Covering reliability, future technology, resilience and safety. Opportunity to include other topical subjects e.g. pricing, environment, community.

	Future Networks)		
Asset Management Plan Future Networks Survey	Every two years (alternates with AMP Engagement)	Minimum of 1000 online responses.	To gather information on topics related to future network planning e.g. technology adoption. This information is used to help inform the Asset Management Plan.
EDB Benchmarking survey	Annual	~1000 responses	To gather information on how MainPower is performing in key service areas compared to other EDBs partaking in the benchmarking research. Approximately 8 EDBs participate in this benchmarking which is undertaken by Key Research on behalf of the EDBs.

Customer Pulse Annual Survey

Importance and satisfaction of the following is measured annually from a random selection of the customer roll (they may or may not have had any direct interactions with MainPower) using phone and online methods. These are measured on a scale of 0-10 producing a percentage result once results are collated.

- i. Continuity – keeping the power on.
- ii. Price – keeping costs down.
- iii. Restoration – reducing the length of time when power is off.
- iv. Quality – keeping flickering or dimming lights to a minimum.
- v. Accessibility – easy to contact my provider, if the need arises.
- vi. Communication – keeping you informed of what's happening with the electricity network.

Satisfaction of the following is measured annually:

- i. MainPower's performance and service (similar to Net Promoter Score).
- ii. Perceived reliability of power supply (in relation to power outages experienced).

Asset Management Plan Service Experience Annual Survey

This survey is only conducted with customers who have engaged with MainPower for customer initiated works or new connections. The information on customer interactions to develop the invitation list for the survey is taken from a Salesforce Customer Relationship Management (CRM) report.

Sliding scale: 0=Very difficult, 10=Very easy

Engagement Effort - how much effort was required from you to get the work completed by MainPower?

Sliding scale 0=Very dissatisfied, 10=Very satisfied

- i. Staff Friendliness - How satisfied were you with the friendliness of MainPower Staff?
- ii. Quality of work - How satisfied were you with the quality of work?
- iii. Timelines of service - How satisfied were you with the timeliness of service?
- iv. Communications - How satisfied were you with the communication you have received throughout the job?

- v. Staff reliability - How satisfied were you with the reliability of MainPower staff?
- vi. Price - How satisfied were you with the final price?

Service Monitoring Survey monthly

This survey allows us to gather feedback from customers who have interacted with MainPower in the previous month. This gives us the opportunity to follow up customer feedback sooner and mitigate potential complaints. The customer can provide comments to support their position.

Sliding scale: 0=Very difficult, 10=Very easy

Engagement Effort - how much effort was required from you to get the work completed by MainPower?

**Please note, the AMP performance measures was previously measured on a 1-5 satisfaction scale however this has been updated from FY23 to better align with the scale for other research questions.*

Why does MainPower prefer to use a Customer Effort Score over the Net Promoter Score?

As customers do not have a choice as to whether they can change their lines company, we believe the customer effort question better reflects the satisfaction perceptions of the customer compared to the standard NPS question.

17.3.2 Planning and managing customer complaint resolution

Our complaints process is documented within process flow software (Promapp) for all team members to access. MACK is MainPower's Salesforce CRM. A summary of the Promapp process is below:

a) Receive customer complaint.

NOTE: What is a complaint?

A complaint is an expression of dissatisfaction made to or about a provider where a response or resolution is explicitly or implicitly expected.

NOTE: How might you receive a customer complaint?

- Over the phone
- Via email
- Via form on website
- In a letter
- In person (e.g. field services while on job site or customer visits reception)
- Via Call Care (afterhours call centre)

Please remember: A complaint can be explicit or implied.

NOTE: How should a complaint be resolved?

The goal is for a complaint to be addressed or resolved at the initial point of contact where possible and entered into MACK. If not possible, please follow the process below.

NOTE: What is the process for Call Care when receiving a complaint?

Call Care follow the Feedback or Complaint Call Script (attached) and submit details through MainPower website contact form.

b) Report complaint.

Add customer details into MACK.

NOTE: What if I don't have access to MACK?

Contact either the GM - Customer and Corporate Relations, or the Customer Experience Specialist with complaint and customer details. They will add the complaint to MACK.

NOTE: What details are needed?

- Customer contact details (including phone and email address)
- Details about the complaint (when incident occurred, what happened, who was involved etc)
- Copy of customer email (if applicable) that contains the complaint
- Any supporting documentation (e.g. emails, quote documents, images of damage)

Assign MACK ticket to complaints queue.

c) Acknowledge customer complaint.

Email customer within two working days to acknowledge their complaint along with a copy of FS134 Complaint Resolution Process.

[DOCUMENT LINK] FS134 MainPower Complaints Resolution Process

Ensure customer is notified about Utilities Disputes.

NOTE: How should I notify the customer?

Sample text to notify customer of Utilities Disputes: "If you have any concerns about MainPower's service, please call MainPower on 0800 30 90 80 to access our complaint resolution service. If we are unable to resolve a complaint to your satisfaction, Utilities Disputes Ltd (UDL) provides a free and independent service which can review and further investigate the issues for you. UDL can be contacted on 0800 22 33 40, communications@udl.co.nz or visit www.udl.co.nz."

d) Conduct investigation into complaint.

NOTE: What are the targets for resolving a complaint?

Initial target to resolve the complaint is five working days (however the process does allow for up to 20 working days with an additional extension of 20 working days by mutual agreement).

Speak to everyone involved, e.g. NSR, field staff who met with customer.

Gather any documentation and save into MACK ticket.

NOTE: What type of documentation may be required?

- Email correspondence
- Relevant quotes etc.

e) Propose resolution within the business.

Propose resolution to relevant internal stakeholders.

NOTE: Who would internal stakeholders be?

- Manager who has appropriate delegated authority to approve proposed resolution.
- Regulatory Manager to check legality and to consider precedent set by resolution.
- Manager of affected business area (e.g. Vegetation, NSRs)

Gain approval to proceed with resolution.

NOTE: What type of documentation may be required?

Initial target to resolve the complaint is five working days (however the process does allow for up to 20 working days with an additional extension of 20 working days by mutual agreement).

f) Contact customer with proposed resolution.

Email or phone customer to discuss proposed resolution. Email correspondence is always preferred as we are able to keep records of all written conversations in MACK.

NOTE: What are the targets for resolving a complaint?

Initial target to resolve the complaint is five working days (however the process does allow for up to 20 working days with an additional extension of 20 working days by mutual agreement).

Close MACK ticket and include details of agreed resolution.

NOTE: What if no resolution is reached with customer?

The complaint moves to 'deadlock'. Inform the customer that the complaint is in deadlock.

NOTE: What happens if the complaint reaches deadlock?

Close the MACK ticket and inform that customer that they can submit a dispute to Utilities Disputes.

NOTE: What is Utilities Disputes?

Utilities Disputes (formerly The Office of the Electricity and Gas Complaints Commissioner, or EGCC) provides a free and independent dispute resolution service for electricity complaints. MainPower is a member of this scheme.

g) Receive confirmation of complaint acceptance from Utilities Disputes.

Follow Utilities Disputes complaint process.

17.4. Practices for Connecting New Consumers and Altering Existing Connections

17.4.1 Approach to Planning and Management of New Connections

17.4.1.a “New connections” apply to situations where an electricity distribution network connection is already available at the property boundary, in the location where the connection will take place, with adequate capacity. If no power connection is available at the boundary, a separate process must be followed to extend the distribution network and install a new power supply (distribution network electrical infrastructure build). This process follows a different path and timeline and is not discussed at length in the following answers.

MainPower’s website allows customers to access a range of information about MainPower’s new connection process, including making online applications for new connections (offtake and injection connections). All new connection applications must be made online through our website. New connection applications are normally completed by electricians and/or Distributed Generation (DG) installers who are experienced with the process, on behalf of the customer. MainPower’s team of Network Services Representatives are available during business hours to assist customers and electricians with such applications in person, by phone, or by email.

Offtake-only connections are processed quickly using an integration between the website and our internal systems. The application only needs to be reviewed and approved, at which point the system generates a connection advice sheet which instructs the customer / electrician how to connect to the network. Here we

provide specific advice intended to be read by the electrician, to avoid some common problems like preparing the installation for a connecting to the wrong number of phases, to the wrong supply point, or failing to run cabling close enough to the supply point.

MainPower then updates the registry with the trading information for the Installation Control Point (ICP) to be livened and advises the customer's chosen Energy Retailer. Once the Energy Retailer accepts the customer / new connection and advises the Metering Equipment Provider (MEP), the Livening Agent undertakes the final connection which allows the power to flow. Once MainPower has received the necessary information back from the Livening Agent to confirm the ICP is live, MainPower then updates the registry to show the ICP has been livened by the network.

There are many parties involved, which complicates the process and can lead to delays if one party fails to complete all their responsibilities in a timely way. This also means the overall timeframe for new connections can be variable although each party works quickly. Early new connection applications are important to ensure consumers are connected within a reasonable time,. MainPower works with metering providers and livening agents to ensure this happens and MainPower has contracted with all the willing Livening Agents in our area.

Injection connections, also known as DG connections, are more complex and the processing time varies with the size and compliance considerations of the application. They can only be installed on ICPs which have already completed the above process as a "permanent" connection. Again, all applications must be made online, and assistance is available from our Network Services Representative team. MainPower processes the online DG connection application and confirms it meets the requirements of Part 6 of the Electricity Industry Participation Code (EIPC). Conforming applications then receive a DG Approval Notice, which is sent to the customer and installer. The installer is subsequently required to supply MainPower with the necessary compliance paperwork and must send the Energy Retailer a copy of our notice, so they may upgrade the installation's metering to import / export metering at the correct point in the process. One common issue is DG being connected without following the necessary approval processes with the network. MainPower undertakes weekly and monthly checks of registry and billing information to identify those ICPs with DG installed but without a DG Approval Notice issued. In these situations, we seek retrospective compliance paperwork from the consumer / installer. The one group of DG connections we cannot check for is those where DG is physically installed but no application has been made either to MainPower as distributor or the consumer's retailer.

- 17.4.1.b** Alterations to Existing Connections – Alterations to existing connections generally follow the same practices as outlined above. Typical alterations to a connection include going from a temporary supply to a permanent supply, upgrading a supply to include DG, or decommissioning an ICP which follows a different process to all the others explained above.

Decommissioning (permanently disconnecting an ICP from the electrical network) is only completed on request from the Energy Retailer. Upon request, MainPower dispatches an employee to site, removes the physical electrical connections to the installation, makes those connections safe, and removes the electricity meter. The electricity meter is returned to the MEP. MainPower will then update the registry to show the ICP has been decommissioned, advising the retailer.

17.4.2 Minimising Cost to the Consumer

MainPower aims to encourage a competitive commercial environment in our geographic region for services related to connection and livening. We have authorized a number of different Livening Agents and set few barriers to entry for new parties. We give customers a choice of Livening Agent when they connect to our network, and a choice of contractors if they require a network extension.

We actively encourage the use of local electricians whenever possible, in preference to MainPower doing work on-property. We allow a wide range of parties to access and work upon our electrical network connection points, without access costs, subject to a range of standardized safety measures.

MainPower charges consumers a relatively low fixed fee for new connections, which cover our immediate costs of connection. This fixed fee is most often met by the property developers when a subdivision is created (residential / commercial / industrial) prior to electricity consumers becoming involved. MainPower network avoids charging consumers for modifying a connection or decommissioning a connection.

17.4.3 Communicating with the Consumer about New or Altered Connections

MainPower provides information about the steps involved on our website for consumers to view at their discretion. We provide a team of Network Services Representatives who are available to assist consumers as outlined in our response to 17.4.1.

It is our experience that electricians, DG installers, Energy Retailers, MEPs and Livening Agents engage directly with us about new connections, rather than the consumer.

17.4.4 Commonly Encountered Delays and Potential Timeframes for Different Connections.

We have discussed some of the common issues encountered in our responses to questions 17.4.1.a to 17.4.4, most of these issues can delay new connections. To summarise:

- Where the distribution network must be extended to the prospective consumer's property boundary, timeframes vary greatly depending on the location, size, and complexity of the new power supply build. In these situations, the subsequent new connection process cannot be started until the network extension process has been completed.
- Lack of familiarity with connection process.
- Many parties involved with the new connection process, which creates complexity and opportunities for any party to miss a step.
- Knowledge about the new connection process, including the number of industry participants (eg distributor, retailer, MEP), and the elapsed time required to complete a new connection..
- Livening Agents and MEP are not necessarily the same organisation, which can complicate the scheduling of new connection and livening activities.
- DG being connected without following the complete process and involving the network, resulting in delays to certain aspects of the process or connecting unapproved DG equipment.

New offtake connections typically take a minimum of 15 working days' notice to process from beginning to completion, across all parties.

DG connections applications are processed in accordance with the timeframes required by Part 6 of the EIPC. Typically, it depends on the size and complexity of the application, some take considerably longer. The time the DG installer requires to complete their aspects of the work varies, including providing the necessary compliance paperwork which may arrive up to 20 days after the work is completed.

17.5. Impact of New Connections on Network Operations or Asset Management Priorities

17.5.1 Assessing the Impact of New Demand, Generation or Storage:

17.5.1.a Measuring the Scale and Impact of New Demand:

MainPower observes substation peak measurements to quantify total network load and generation. These coincident peaks are used to forecast energy needs in our community and to reinforce the network as and where appropriate. Measurement of specific point loads can be done with installed LV monitoring equipment. This is typically reserved for areas of the network that MainPower is aware are becoming heavily loaded and distribution transformers may need to be upgraded.

Growth forecasting is completed using a range of information from historic demand figures to council estimated population growth and new technology uptake rates such as electric vehicles. These factors are brought together to give an indication of the expected network growth.

MainPower currently does not forecast or assess the impact of generation or energy storage. As load forecasting gets more mature it is expected that both factors will be taken into consideration.

17.5.1.b Taking Account of the Timing and Uncertainty of New Demand, Generation or Storage Capacity

MainPower uses scenario planning to estimate the impact of variable uptake rates of EVs and population growth. The underlying model assumes correct council predictions for population growth and EV uptake targets to assess the required network growth rates. From there MainPower builds scenarios around this base case to define faster or slower growth.

MainPower currently does not plan for unknown future large point loads or utility scale generation connections due to the uncertainty inherent with this process.

17.5.1.c Taking Account of Other Factors e.g. Network Location of New Demand, Generation or Storage Capacity

MainPower uses regional population figures to determine the expected population growth in the three council regions within our network area. This provides a baseline expected growth that needs to be accounted for. Beyond this, MainPower relies on applications for connection and council planning/consenting information to determine likely areas of significant future growth. For large point loads and utility scale generation, MainPower will begin planning after the application has been received as these types of connections are typically applicant funded.

17.5.2 Assessing and Managing the Risk to the Network Posed by Uncertainty regarding New Demand, Generation or Storage Capacity

MainPower uses load forecasting tools with scenario planning to minimise the likelihood of unexpected demand increases. This forecasting is used to assess the timing of significant network upgrades to ensure they are completed before issues arise. The suitability of load forecasts are regularly monitored to ensure any significant load or generation changes in the network are captured.

MainPower does not currently forecast or attempt to anticipate new generation or storage on the network as this is likely to result in increased costs to our customers.

17.6. Innovation Practices

17.6.1 Innovation Practices Planned or Undertaken since the last AMP

As MainPower is an exempt EDB under the Commerce Act we do not identify Innovation Projects as defined by the Commerce Commission. We do however undertake innovative projects to ensure our customers are getting the best outcomes. Listed below are examples of these:

LV Network Visibility – MainPower is actively working to secure access to LV smart meter data to create better visibility and understanding of our LV network. This data can be used in conjunction with the third-party software platforms to provide this visibility and understanding. The platform also offers the ability to identify locations with DER connected, including electric vehicles. The knowledge provided by this platform, and smart meter data, will allow MainPower to better prepare the LV network for increased DER penetration and enable us to identify and rectify any power quality issues much faster.

SINCAL Integration – MainPower has integrated our Geographic Information System (GIS) with Sincal, our network modelling and load flow software. This provides MainPower with an entire network model, down to the distribution level, which is used to simulate the impact of network changes, load growth patterns and new loads/generation on the network. This allows us to direct funding at the weakest areas of the network to ensure the best service levels for consumers.

Weather Data Integration – MainPower is working with providers of weather and climate data to better inform fault response and reliability investigations. By having weather data in real time and forecasting, MainPower will be able to better plan resources for storm response and identify any reoccurring weather phenomena that result in outages on certain parts of the network that currently have no identified cause.

17.6.2 Desired Outcomes of any Innovation Practices, and how they may Improve Outcomes for Consumers

All innovation projects undertaken by MainPower strive to increase network visibility to minimise long term capital expenditure. This improves outcomes for consumers through lower energy costs and potentially increased rebates. Additionally, the network visibility will enhance MainPower’s ability to target weaker network areas with reinforcement spending resulting in easier facilitation of customer energy choices, whether it be EVs, DG or any other new technology.

17.6.3 Measuring the Success and Making Decisions regarding innovation practices

For a new project to be successful it must provide more economic benefit to our customers than it costs them to implement. MainPower will commence a project when it makes operating, controlling, or observing the network simpler, easier or safer. A scope will be written with specific deliverables and expected outcomes or improvements from each project and a trial undertaken. If this trial fails to meet the expectations laid out in the scope, MainPower will discontinue the project. If the scope is met, MainPower will move forward with the project.

17.6.4 How the Decision-Making and Innovation Practices depend on the work of other companies

MainPower relies on both internal resource and third parties to provide innovative solutions to identified problems. When looking at network reinforcement projects MainPower will consider non-network solutions and, where appropriate, will go out to market for these.

In relation to the identified innovation projects above, MainPower has utilized internal resources where available to determine the best outcomes. Following this, third parties are engaged to offer solutions to the identified problems. MainPower relies on these third-party companies to provide data and software to be used internally for better network visibility and decision making.

17.6.5 The Types of Information used to Inform or Enable any Innovation Practices, and the Approach to seeking that Information.

MainPower is actively seeking ICP smart meter data to improve network visibility and investment decision making. The current approach to seeking this data is to talk directly to the smart meter owners and attempt to enter commercial agreements for access to this data.

MainPower is also seeking weather data from NIWA to better plan resource allocations around storm events and to find trends in weather and outages. This will inform network reinforcement work to improve customer reliability.

Data is a key asset to MainPower and will continue to grow in importance. As a result, MainPower is attempting to invest in the data where appropriate and justified to get the best returns for our customers.