

Independent Assurance Report

**To the directors of GasNet Limited and to the Commerce Commission
on the disclosure information
for the disclosure year ended 30 June 2025 as required by
the Gas Distribution Information Disclosure (amendments related to IM
Review 2023) Amendment Determination 2024 [2024] NZCC 32**

GasNet Limited (the company) is required to disclose certain information under the Gas Distribution Information Disclosure (amendments related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 32 (including any amendments to that Determination) (the Determination) and to procure an assurance report by an independent auditor in terms of section 2.8.1 of the Determination.

The Auditor-General is the auditor of the company. The Auditor-General has appointed me, Debbie Perera, using the staff and resources of Audit New Zealand, to undertake a reasonable assurance engagement, on his behalf, on whether the information prepared by the company for the disclosure year ended 30 June 2025 (the Disclosure Information) complies, in all material respects, with the Determination.

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

- Schedules 1 to 4, 5a to 5g, 6a and 6b, 7, 10a(ii) and 14 (limited to the explanatory notes in boxes 1 to 11) of the Determination.
- The basis for valuation of related party transactions (the Related Party Transaction) in accordance with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the Gas Distribution Services Input Methodologies Determination 2012 (consolidated 23 April 2024) (the IM Determination).

Opinion

In our opinion, in all material respects:

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

- the basis for valuation of related party transactions complies with the Determination and the IM Determination.

Basis of opinion

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

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

Emphasis of matter – amendment to previously disclosed information

As described in Box 16 of Schedule 14, the company identified material errors in previously disclosed Disclosure Information. In line with clause 2.12.1 of the Determination, the company has restated the 2023 and 2024 Disclosure Information to correct the material prior period errors including revising the indirectly affected data and statements.

Without modifying our opinion, we draw attention to Box 16 of Schedule 14 which outlines the errors identified and how the correction of these errors impacted the 2023 and 2024 Disclosure Information.

Key Assurance Matters

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

Key Assurance Matter	How our procedures addressed the key assurance matter
<p>Accuracy of the number and duration of gas outages</p> <p>The Company has systems to identify outages and to record the duration of outages.</p> <p>This is a key assurance matter because information on the frequency and duration of outages is an important measure of the reliability of gas supply. Relatively small inaccuracies can have a significant impact on the reliability</p>	<p>We have obtained an understanding of the Company’s methods by which gas outages and their duration are recorded.</p> <p>Our procedures to assess the adequacy of the Company’s methods to identify and record gas outages and their duration included:</p> <ul style="list-style-type: none"> • reviewing and testing the overall control environment; • obtaining external information, of interruptions to supply, including works orders for contractors, media reports, and requests for gas to be shut off, to gain

<p>thresholds against which Company performance is assessed. There can also be significant consequences if the Company breaches the reliability thresholds.</p>	<p>assurance that all interruptions to supply were recorded;</p> <ul style="list-style-type: none"> • testing a sample of interruptions to supply, to the computer database, and other internal and external information, including media reports, works orders for contractors, contractor invoices, and requests for gas to be shut off, including the allocation between planned and unplanned interruptions, and further classification of interruptions by cause, and the interruptions excluded from those reported; • checking the ratios were correctly calculated in accordance with the Information Disclosure Determination and the Input Methodologies Determination; • obtaining and corroborating explanations for all significant variances to forecast; and • testing the accuracy of the number of connections to the Gas Authority's register. <p>Having carried out these procedures, and in assessing the likelihood of reported gas outages and their duration being materially misstated in the Disclosure Information, we have no matters to report.</p>
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Directors' responsibilities

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

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

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

Auditor's responsibilities

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

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

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

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

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

Inherent limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance with the Determination may occur and not be detected. A reasonable assurance engagement throughout the disclosure year does not provide assurance on whether compliance with the Determination will continue in the future.

Restricted use

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

Independence and quality control

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

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

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



Debbie Perera
Audit New Zealand
On behalf of the Auditor-General
Palmerston North, New Zealand
23 December 2025