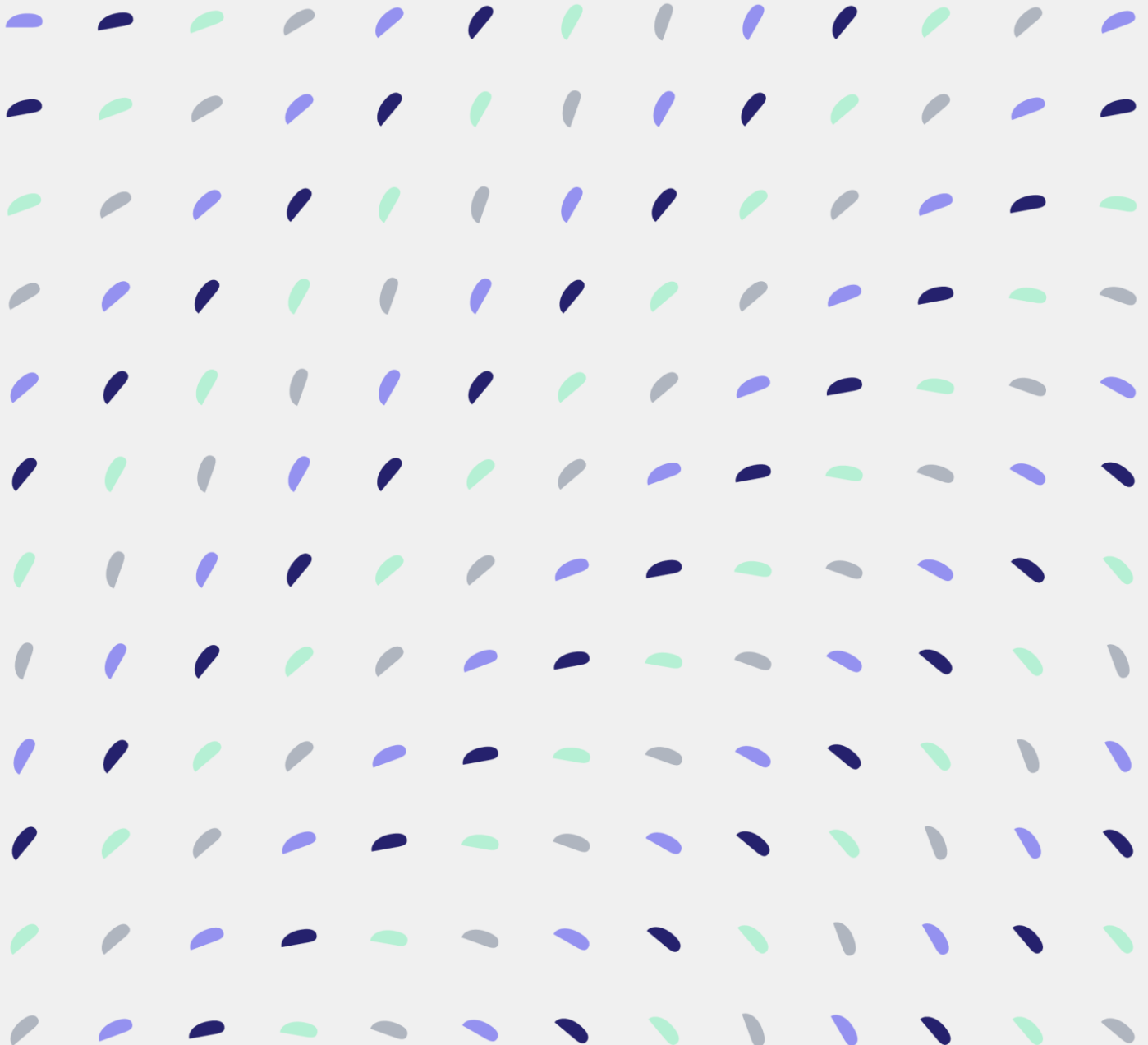


Call for evidence: National Climate Change Risk Assessment (NCCRA)

CLARUS SUBMISSION TO THE CLIMATE CHANGE COMMISSION | 14/01/25





1. Call for evidence: National Climate Change Risk Assessment (NCCRA)

This submission is in response to the Climate Change Commission's call for evidence for the NCCRA 2026. The Commission is seeking high quality and credible evidence about the climate risks that facing the country and what actions can be taken to address those risks.

We draw your attention to the following documents that Clarus businesses have produced or referenced. Clarus owns and operates energy infrastructure businesses, including New Zealand's high-pressure gas transmission system, gas distribution networks throughout the North Island, liquid petroleum gas infrastructure nationwide, and the electricity distribution business in Tairāwhiti and Wairoa (Firstlight Network). There is no confidential information in this submission.

2. Our climate related risk assessment

Our published sustainability report (for all Clarus businesses) includes our climate related risk assessment on pages 43-47. It is published on [this webpage](#) and can be directly downloaded from [here](#).

In summary, the key physical risks facing our businesses are erosion, flooding and wind damaging our network infrastructure. The key actions are aspects of asset management: ensuring network resilience through enhanced monitoring and maintenance.

3. Firstlight Network's submission to the Commerce Commission on the Default Price-Quality Path Draft Decision

Firstlight Network had the opportunity to consider what lessons had been learned from Cyclone Gabrielle in its [July 2024 submission to the Commerce Commission](#). Most of the report is not specifically relevant for this call for evidence, so we draw your attention to pages 6-7 (under the heading of System Interruptions and Emergencies (SIEs)). In summary, Firstlight Network expects *"With the current condition of the regions and anticipated ongoing weather events, we are expecting to maintain a higher level of SIE due to ongoing ground instability and moisture retention, deploying additional call out staff, installing temporary generation and the extra time it takes to travel the region due to damaged roading networks."*

That section also refers to the [Gisborne Morphometric Landslide Susceptibility and Connectivity Model](#) (prepared by Landcare Research) as relevant evidence.

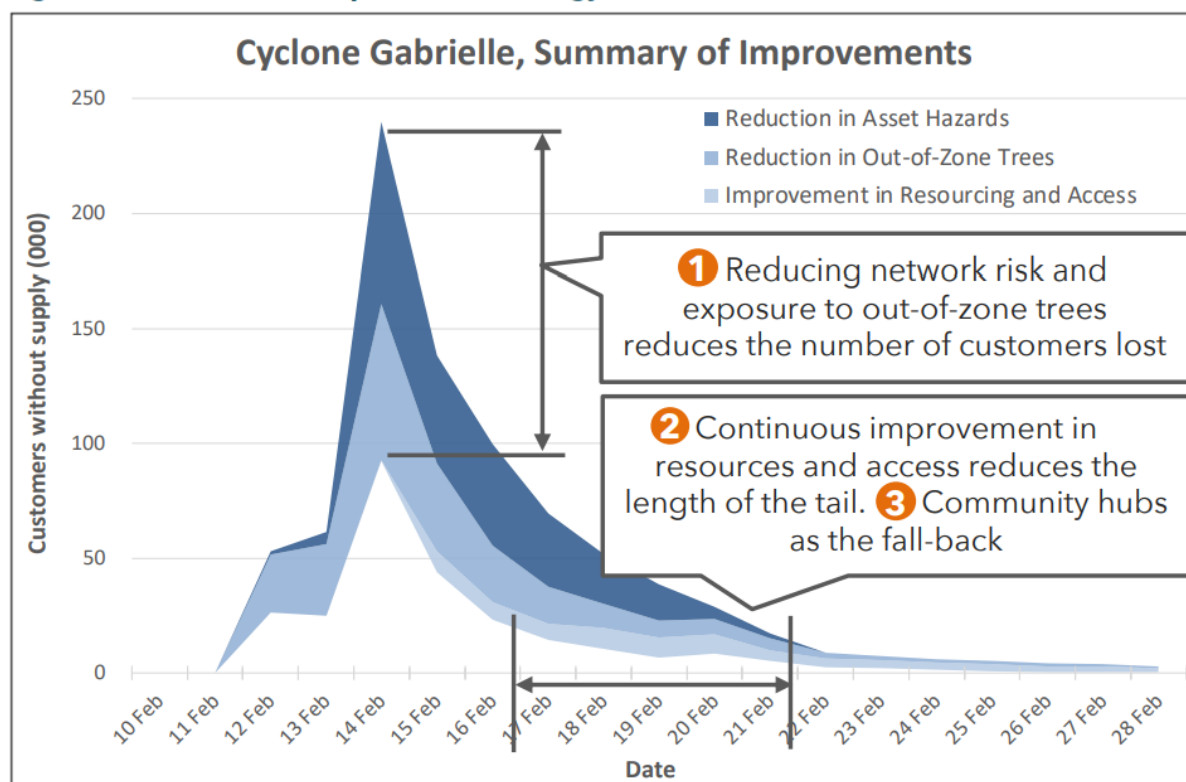


4. Firstlight Network's application to the Commerce Commission for Catastrophic Event Reopener and Allowance

Firstlight Network applied to the Commerce Commission in July 2024 for a Catastrophic Event Reopener and Allowance. The need for [the application](#) and the entire content of it is relevant for this call for evidence. In the application, Firstlight Network stated that "Immediate works in response to Gabrielle totalled \$2.8 million in RY2023. Additional works will continue throughout RY2024 and RY2025 and planned works deferred from RY2023 will need to be undertaken in future years. Forecast expenditures are expected to be \$4.9 million higher across RY2024 and RY2025 as the result of the Catastrophic Event."

A related piece of evidence is the [Electricity Distribution Sector Cyclone Gabrielle Review](#) by Energia Limited (commissioned by Electricity Networks Aotearoa). In particular, section 6.2 sets out what the major vulnerabilities were. In summary, wind, flooding and landslips damaged assets either directly or, more commonly, indirectly (by damaging out-of-zone trees that in turn damaged assets). Energia's three recommendations are superimposed on the following Figure:

Figure 2: EDB resilience improvement strategy





5. Clarus letter to the Department of Internal Affairs responding to the Government Inquiry into the response to the North Island Severe Weather Events

In February 2024, Clarus responded to a request from Department of Internal Affairs about how gas services responded to the severe weather events. This letter has not previously been published, but contains no confidential information. We have attached it to this call for evidence.