Regulation and Enforcement

Regulation and Enforcement: Activities, Rationale and Negative Effects

Activities included in Regulation and Enforcement

- Regulatory Compliance, Licensing and Registration
- Land and property Info services
- Building consenting, inspections and monitoring
- **Building policy**
- Resource consenting
- District Planning

Regulation and Enforcement contributes to these community outcomes

- Minimise risks from natural hazards, including earthquakes, flooding, tsunami and rock fall
- Minimise injuries and risks to public health
- Earthquake demolition waste is safely disposed of with minimal adverse effects
- The transport system provides people with access to economic, social and cultural activities
- Council's statutory obligations are met.
- Christchurch has good quality housing
- The Council is responsive to the demands of the rebuild
- Injuries and risks to public health are minimised
- There is sufficient housing to accommodate residents
- There is adequate and appropriate land for residential, commercial, industrial and agricultural uses
- Decisions are transparent and informed by timely, accurate and robust information and advice.
- Groundwater quality is safeguarded from the effects of land use
- Household location and increased housing density is in line with Urban Development Strategy targets
- Landscapes and natural features are protected and enhanced
- New urban expansion areas are integrated with existing urban land uses and communities
- Sites and places of significance to tangata whenua are protected
- Statutory obligations of the Council are met
- Suburban centres provide a focus for services, employment and social interaction
- The city's natural and cultural heritage and taonga are conserved for future generations
- Urban areas are well-designed and meet the needs of the community

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Regulation and enforcement has these negative effects:

Effect	Council's Mitigation Measure
Continued legislative noncompliance	Some members of our community choose not to adhere to rules and regulations. We will continue to promote and educate our community on the wide range of legislative responsibilities/obligations they have in relation to various activities, e.g. like owning a dog, undertaking building work, having a spa pool. We will continue to utilise a graduated compliance model when considering how each noncompliant situation will be managed including considerations around evidence and public interest. We will use punitive compliance/enforcement tools prudently and responsibly when required.
Increasing compliance costs to regulated sectors	Where people or communities undertake high risk activities, they may likely face increasing costs for compliance. More recent and pending legislative regimes are tailored towards this risk based approach. Requiring local government to more intensely focus on high risk issue for more specific activities will drive increased costs for resourcing and effort. In adopting user pays models, such costs will impact across the regulated sector. Council will continue to benchmark fees and charges with other territorial authorities and focus on streamlining administration to deliver best value for mommy services to each regulated sector.
Poor quality and timeliness of consent and inspection procedures can delay and add additional costs to development	Accreditation as a 'Building Control Authority' ensures our processes are robust, leading to improved services
Poor quality of consent and inspection procedures can put building users at risk	Peer reviewing of some building consent applications will also ensure that our processes are robust
General Litigation and Claims	Database enhancements to deliver greater facility for claims management. Technical experts from areas of weathertightness and general claims litigation will be providing training modules to staff in the near future.
Some members of the community may not agree with the outcome of a resource management application.	Transparent processes and clear public information
Costs of legislative changes may impact on resource management fees.	Continuous review of processes to reduce costs.
Policies objectives and rule may not deliver the efficiencies or outcomes intended.	Maintain an active monitoring program and report every five years in accordance with Section 35 of the RMA.

Regulation and Enforcement Statement of Service Provision

Activity	Services	Performance Measures	Performance Targets					
•	provided		Current	2015-16	2016-17	2017-18	2018-2025	
Regulatory compliance, licensing and registration	Animal management	Percent of priority 1 complaints (aggressive behaviour by dogs & wandering stock) responded to within 10 minutes	95%	95%	95%	95%	95%	
		Re-inspect properties of dogs classified as dangerous and high risk or menacing to check for compliance	95%	98% per annum [1]	98% per annum	98% per annum	98% per annum	
	Compliance of legislative breaches including Building Act, Resource Management	Investigations into reports of matters that pose a serious risk to public safety are started within 24 hours (for Building Act and resource management Act matters)	100%	100%	100%	100%	100%	
	Act / City Plan, freedom camping, Local	Minimum percentage of swimming pools and spa pools inspected annually	25%	33% [2]	33%	33%	33%	
	Government Act and bylaws	Monitor all high risk Resource Management Act consents/permits at least once every six months	95%	95%	95%	95%	95%	
	Alcohol licencing	Inspect all high risk alcohol licensed premises at least twice per year (assessed using risk assessment methodology)	95%	100% [3]	100%	100%	100%	
	Food safety and health licencing	Inspect registered food premises once per year	75%	Inspect at least 75% of all registered food premises once per year	Inspect at least 75% of all registered food premises once per year	To be replaced with new KPI relevant to new legislation	To be replaced with new KPI relevant to new legislation	
		All other Health Licenses, e.g. Hairdressers, Funeral Directors and Camping Grounds, are inspected bi- annually	New target	Inspect 100% of these registered premises at least once every 24 months [4]	Inspect 100% of these registered premises at least once every 24 months	Inspect 100% of these registered premises at least once every 24 months	Inspect 100% of these registered premises at least once every 24 months	
	Environmental health, including noise and environmental nuisance	Complaints in relation to excessive noise are responded to within one hour	90%	90%	90%	90%	90%	
	Parking enforcement & administration	Parking officers respond to high priority requests for service	City: 95% response within 15 minutes	City: Respond to 95% of requests for service within an average of 15 minutes	City: Respond to 95% of requests for service within an average of 15 minutes	City: Respond to 95% of requests for service within an average of 15 minutes	City: Respond to 95% of requests for service within an average of 15 minutes	
			Suburbs: 95% response within 20 minutes	Suburbs: Respond to 95% of requests for service within an average of 20 minutes	Suburbs: Respond to 95% of requests for service within an average of 20 minutes	Suburbs: Respond to 95% of requests for service within an average of 20 minutes	Suburbs: Respond to 95% of requests for service within an average of 20 minutes	

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Proposed Changes for regulatory compliance, licensing and registration	Rationale
[1] Increase inspection of properties of dogs classified as dangerous, etc	Enhanced public safety
[2] Increase minimum percentage of swimming pools inspected annually	Enhanced public safety
[3] Increase inspection of high risk alcohol licensed premises	Enhanced public safety; reduction in unacceptable behaviour associated with misuse of alcohol
[4] Disclose inspection activities for other than food and alcohol premises	Make these levels of service visible to the community

Activity	Services	Performance Measures	Performance Targets					
•	provided		Current	2015-16	2016-17	2017-18	2018-2025	
Land and property	Land information	Process Land Information Memorandum	Process 100% of	Process 100% of	Process 100% of	Process 100% of	Process 100% of	
information services	memoranda (LIMs)	applications within statutory timeframes	Land Information	Land Information	Land Information	Land Information	Land Information	
			Memorandum	Memorandum	Memorandum	Memorandum	Memorandum	
			applications within	applications within	applications within	applications within	applications within	
			10 working days	10 working days	10 working days	10 working days	10 working days	
			(excl Christmas	(excl Christmas	(excl Christmas	(excl Christmas	(excl Christmas	
			period of closure)	period of closure)	period of closure)	period of closure)	period of closure)	
	Project information	Process Project Information	Process 100% of	Process 100% of	Process 100% of	Process 100% of	Process 100% of	
	memoranda (PIMs)	Memorandum within statutory	Project Information	Project Information	Project Information	Project Information	Project Information	
		timeframes	Memorandum	Memorandum	Memorandum	Memorandum	Memorandum	
			applications within	applications within	applications within	applications within	applications within	
			20 working days	20 working days	20 working days	20 working days	20 working days	
			(excl Christmas	(excl Christmas	(excl Christmas	(excl Christmas	(excl Christmas	
			period of closure)	period of closure)	period of closure)	period of closure)	period of closure)	
	Issuing property files	Provide residential property files to	Provide 90% of	Provide 90% of	Provide 98% of	Provide 98% of	Provide 98% of	
		customers in electronic format	residential property	residential property	customers with	customers with	customers with	
			files to customers in	files to customers in	access to digitised	access to digitised	access to digitised	
			electronic format	electronic format	residential property	residential property	residential property	
			within three	within three	files via online	files via online	files via online	
			working days of	working days of	portal within 48	portal within 48	portal within 48	
			request	request	hours of request	hours of request	hours of request.	
		Retrieve and provide commercial	Retrieve and	Retrieve and	Retrieve and	Retrieve and	Retrieve and	
		property files in hard copy for customers)	provide 95% of	provide 95% of	provide 95% of	provide 95% of	provide 95% of	
			optional requests	optional requests	optional requests	optional requests	optional requests	
			for scanning of	for scanning of	for scanning of	for scanning of	for scanning of	
			records within five	records within five	records within	records within	records within	
			working days	working days	three working days	three working days	three working days	
			(charges apply)	(charges apply)	(charges apply)	(charges apply)	(charges apply)	
		Provide viewing services to customers	Access to	Access to	Access to	Access to	Access to	
		requesting to view Commercial property	documents	documents	documents	documents	documents	
		files	available between	available between	available between	available between	available between	
			the hours of 8.30am	the hours of 8.00am	the hours of 8.00am	the hours of 8.00am	the hours of 8.00am	
			– 5.00pm, Monday	– 5.00pm, Monday	– 5.00pm, Monday	– 5.00pm, Monday	– 5.00pm, Monday	
			to Friday (excluding	to Friday (excluding	to Friday (excluding	to Friday (excluding	to Friday (excluding	
			public holidays)	public holidays)	public holidays)	public holidays)	public holidays)	

Activity	Services	Performance Measures	Performance Targets					
	provided		Current	2015-16	2016-17	2017-18	2018-2025	
Building consenting, inspections and monitoring	Building consents	Grant building consents within 20 days working days	Grant 95% of all building consents within 20 working days	The minimum is to issue 90% of building consents within 19 working days from the date of lodgement [1]	The minimum is to issue 90% of building consents within 19 working days from the date of lodgement	The minimum is to issue 90% of building consents within 19 working days from the date of lodgement	The minimum is to issue 90% of building consents within 19 working days from the date of lodgement	
		Ensure % satisfaction with building consents process	Ensure 75% of customers satisfied	70% [2]	80%	80%	80%	
Building consenting, inspections and monitoring (continued)	Building inspections and code compliance certificates	Carry out building inspections in a timely manner	Carry out 99% of inspections within 3 working days	Carry out 85% of inspections within three working days [3]	Carry out 85% of inspections within three working days	Carry out 90% of inspections within three working days	Carry out 95% of inspections within three working days	
		Grant Code Compliance Certificates within 20 working days	The minimum level of service is the statutory requirement to issue 100% of CCCs within 20 working day from the date of request (note: once the new processes are in place, new quantitative levels of service will be set with Council)	The minimum is to issue 90% of Code Compliance Certificates within 19 working days from the date of lodgement [4]	The minimum is to issue 90% of Code Compliance Certificates within 19 working days from the date of lodgement	The minimum is to issue 90% of Code Compliance Certificates within 19 working days from the date of lodgement	The minimum is to issue 90% of Code Compliance Certificates within 19 working days from the date of lodgement	
	Building consenting public advice	Provide public advice service to support building consenting customers (First 30 minutes of pre-application meetings is free public advice)	Counter service at Civic Offices between the hours of 8.00am – 5.00pm, Monday to Friday (excluding public holidays)	Between the hours of 9.00am – 5.00pm, Monday to Friday (excluding public holidays) [5]	Between the hours of 9.00am – 5.00pm, Monday to Friday (excluding public holidays)	Between the hours of 9.00am – 5.00pm, Monday to Friday (excluding public holidays)	Between the hours of 9.00am – 5.00pm, Monday to Friday (excluding public holidays)	
	Annual building warrants of fitness	Ensure that Building Warrants of Fitness are accurate through the use of desktop and physical audits	Once the new processes are in place, new quantitative levels of service will be set with Council	240 commercial audits per annum [6]	360 commercial audits per annum	360 commercial audits per annum	360 commercial audits per annum	

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Proposed Changes for building consenting, inspections and monitoring	Rationale
[1] Reduced level of service within a reduced time frame	More realistic expectation considering there are times when a building consent will run over time due to
	factors beyond the Council's control, for example waiting for an MBIE decision.
[2] Reduced level of satisfaction initially, then an increased level	New systems and processes will lead to increased satisfaction once they are bedded in.
[3] Reduce the percentage of inspections carried out within 3 working days	More realistic target considering the high cost of maintaining capacity to cover spikes in demand.
[4] Reduced level of service within a reduced time frame	More realistic expectation considering there are times when processing code compliance certificates will
	run over time due to factors beyond the Council's control
[5] Specify the hours when advice to support building consenting customers is available	The public counter opens earlier than consenting advice is available.
[6] Target set now that new processes are in place	Based on what's achievable with the new processes

Activity	Services	Performance Measures	Performance Targets				
	provided		Current	2015-16	2016-17	2017-18	2018-2025
Building policy	Building accreditation review	Achieve Building Consent Authority status	Achieve 'Building Consent Authority' status	'Building Consent Authority' status is achieved			
	Building policy development	CCC building policy meets Building Act requirements	CCC building policy meets Building Act requirements at all times	CCC building policy meets Building Act requirements at all times	CCC building policy meets Building Act requirements at all times	CCC building policy meets Building Act requirements at all times	CCC building policy meets Building Act requirements at all times
	Claim Management – building-related	Notify relevant building related claims to insurer	Notify 100% of building related claims to brokers within 10 working days	Notify 100% of building-related claims to brokers within 10 working days	Notify 100% of building-related claims to brokers within 10 working days	Notify 100% of building-related claims to brokers within 10 working days	Notify 100% of building-related claims to brokers within 10 working days
		Manage the processing of general negligence (building related) claims under the appropriate forum	Settlement contributions are agreed in accordance with Financial Delegation Authority prior to attending negotiations	Processing the general negligence (building related) claims to agreed timeframes to settle or remove Council as a party	Processing the general negligence (building related) claims to agreed timeframes to settle or remove Council as a party	Processing the general negligence (building related) claims to agreed timeframes to settle or remove Council as a party	Processing the general negligence (building related) claims to agreed timeframes to settle or remove Council as a party

Building policy	Claim Management -	Manage the resolution of Weathertight	Assess and process	Assess and process	Assess and process	Assess and process	To be advised
(continued)	building-related	Homes Resolution Services (WHRS)	100% of	95% of	95% of	95% of	
	(continued)	Financial Assistance Package (FAP)	Weathertight	Weathertight	Weathertight	Weathertight	
		Scheme claims	Homes Resolution	Homes Resolution	Homes Resolution	Homes Resolution	
			Service (WHRS)	Service (WHRS)	Service (WHRS)	Service (WHRS)	
			Financial Assistance	Financial Assistance	Financial Assistance	Financial Assistance	
			Package (FAP)	Package (FAP)	Package (FAP)	Package (FAP)	
			claims within	claims within	claims within	claims within	
			timeframes	timeframes	timeframes	timeframes	
			stipulated in the	stipulated in the	stipulated in the	stipulated in the	
			Ministry of	Ministry of	Ministry of	Ministry of	
			Business,	Business,	Business,	Business,	
			Innovation and	Innovation and	Innovation and	Innovation and	
			Employment	Employment	Employment	Employment	
			(MBIE) FAP	(MBIE) FAP	(MBIE) FAP	(MBIE) FAP	
			contracts	contracts [1]	contracts	contracts	

Proposed Changes for building policy	Rationale
[1] Percentage of claims resolved within specified timeframes reduced from 100% to 95%	More realistic expectation considering there are times when the process will run over time due to factors
	beyond the Council's control.

Activity	Services	Performance Measures	Performance Targets				
	provided		Current	2015-16	2016-17	2017-18	2018-2025
Resource consenting	Resource management applications (notified, non-notified and	% of simple land use resource management applications processed within timeframes	100% within 10 working days	99% within 10 working days [1]	99% within 10 working days	99% within 10 working days	99% within 10 working days
	appeals, and temporary accommodation)	% of complex non-notified resource management applications processed within statutory timeframes (including Central City Consents)	100% within the statutory timeframes	99% within statutory timeframes [1]	99% within the statutory timeframes	99% within the statutory time-frames	99% within the statutory timeframes
		% of notified resource consents processed within statutory timeframes	100% within 10 working days	99% within statutory timeframes [1]	99% within the statutory timeframes	99% within the statutory time-frames	99% within the statutory timeframes
		% of subdivision consents processed within statutory timeframes	100% within 10 working days	99% within statutory timeframes [1]	99% within statutory timeframes	99% within statutory timeframes	99% within statutory timeframes
		% satisfaction with resource consenting process	75% satisfaction	75% satisfaction achieved	76% satisfaction achieved	77% satisfaction achieved	78% satisfaction achieved

Proposed Changes for resource consenting	Rationale
[1] Percentage of applications etc processed within 10 days reduced from 100% to 99%	More realistic expectation considering there are times when processing an application will run over time
	due to factors beyond the Council's control, for example waiting for an MBIE decision.

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Activity	Services	Performance Measures		Pe	erformance Targe	ets	
	provided		Current	2015-16	2016-17	2017-18	2018-2025
District Planning	Maintain the operative Christchurch City Plan and Banks Peninsula District Plan - including	Prepare the Replacement District Plan in two stages	Ensure both territorial sections of the Plan are fully operative	Phase 2 chapters are publicly notified [1]	Participate in any subsequent High Court proceedings e.g. Judicial reviews	Maintain Operative Plan through LOS categories that follow.	Maintain operative Plan through LOS categories that follow.
I	processing of Councilled plan changes		New target	Evidence prepared and presented to Hearings panel on Stages1 and 2, and legal submissions for any High Court Appeals [2]			
			New target	Ensure Replacement Plan is fully operative [2]			
		Development and processing of all Council-led plan changes complies with statutory processes and timeframes	100% of development and processing of Council-led plan changes comply with statutory processes and timeframes	100% of development and processing of Council-led plan changes comply with statutory processes and timeframes.	100% of development and processing of Council-led plan changes comply with statutory processes and timeframes	100% of development and processing of Council-led plan changes comply with statutory processes and timeframes	100% of development and processing of Council-led plan changes comply with statutory processes and timeframes
		Processing of all privately-requested plan changes complies with statutory processes and timeframes	processing of privately- requested plan changes comply with statutory processes and timeframes	100% of processing of privately- requested plan changes comply with statutory processes and timeframes	100% of processing of privately- requested plan changes comply with statutory processes and timeframes	100% of processing of privately- requested plan changes comply with statutory processes and timeframes	100% of processing of privately- requested plan changes comply with statutory processes and timeframes

Proposed Changes for district planning	Rationale
[1] Work programme has changed to preparing a replacement District Plan	Imposed by Central Government to streamline resource management processes to assist earthquake
	recovery thereby seeking to create market certainty over the Recovery period.
[2] Specific targets in support of preparing the replacement District Plan	As above.

Regulation and enforcement

Plan 2014/15		Plan 2015/16 \$000	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
(Cost of proposed services	4000									
13,477	Licensing and Enforcement	13,088	13,585	13,843	14,353	14,872	15,081	15,520	16,021	16,426	16,929
35,520	Building Consenting	31,890	28,520	27,555	28,234	28,520	28,882	29,612	30,594	31,310	32,286
7,254	Resource Consenting	7,308	7,218	7,243	7,306	7,527	7,593	7,806	8,065	8,255	8,514
4,702	Building Policy	5,108	6,128	3,578	2,167	2,383	2,341	2,495	2,330	2,484	2,461
3,792	Land and Property Information Services	3,490	3,510	3,595	3,670	3,795	3,800	3,906	4,036	4,133	4,263
7,759	District Planning	11,150	2,579	2,670	2,764	2,856	2,963	2,986	3,079	3,158	3,258
72,504		72,034	61,540	58,484	58,494	59,953	60,660	62,325	64,125	65,766	67,711
	Operating revenue from proposed services										
9,092	Licensing and Enforcement	10,205	10,957	11,330	11,548	11,848	12,168	12,521	12,897	13,296	13,736
32,979	Building Consenting	30,177	26,581	25,501	26,110	26,422	27,007	27,816	28,688	29,500	30,519
5,254	Resource Consenting	5,248	5,250	5,239	5,404	5,598	5,651	5,831	6,029	6,182	6,384
400	Building Policy	640	512	419	429	440	452	465	479	494	510
4,299	Land and Property Information Services	4,840	5,081	5,117	5,239	5,376	5,521	5,681	5,851	6,033	6,232
	District Planning	178	660	831	713	738	754	778	805	825	852
52,024		51,288	49,041	48,437	49,443	50,422	51,553	53,092	54,749	56,330	58,233
-	Vested assets	-	-	-	-	-	-	-	-	-	-
20,480	Net cost of services	20,746	12,499	10,047	9,051	9,531	9,107	9,233	9,376	9,436	9,478

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Regulation and enforcement funding impact statement

Plan 2014/15		Plan 2015/16 \$000	20	16/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
19,701	Sources of operating funding General rates, uniform annual general charges, rates penalties	19,5	561 1	2,491	10,080	9,070	9,494	9,131	9,246	9,386	9,455	9,518
-	Targeted rates		-	-	-	-	-	-	-	-	-	-
47,000	Subsidies and grants for operating purposes	4E G	-	2 021	44.920	- 42.070	-	-	- 45.060	- 47 410	40.760	- - FO 421
47,009	Fees and charges Internal charges and overheads recovered	45,6	-	2,821	41,839	42,878	43,679	44,632	45,969 -	47,410 -	48,768	50,421 -
5,015	Local authorities fuel tax, fines, infringement fees, and other receipts (a	a) 5,6	313	6,220	6,599	6,565	6,742	6,920	7,123	7,340	7,562	7,812
71,725	Total operating funding	70,8	349 6	1,532	58,518	58,513	59,915	60,683	62,338	64,136	65,785	67,751
	Applications of operating funding											
67,952	Payments to staff and suppliers	68,5	522 5	8,263	55,474	55,501	56,730	57,568	59,157	60,698	62,432	64,309
-	Finance costs		-	-	-	-	-	-	-	-	-	-
3,667	Internal charges and overheads applied	2,6		2,323	2,030	1,986	2,189	2,031	2,080	2,313	2,186	2,239
820	Other operating funding applications		320	839	859	880	902	927	954	982	1,013	1,046
72,439	Total applications of operating funding	71,9	152 6	1,425	58,363	58,367	59,821	60,526	62,191	63,993	65,631	67,594
(714)	Surplus (deficit) of operating funding	(1,1	03)	107	155	146	94	157	147	143	154	157
	Sources of capital funding											
-	Subsidies and grants for capital expenditure		-	-	-	-	-	-	-	-	-	-
- 676	Development and financial contributions	4.4	-	-	- (0)	- (45)	-	(00)	(22)	(24)	(05)	(26)
676	Increase (decrease) in debt Gross proceeds from sale of assets	1,1	187	/	(9)	(15)	36	(23)	(23)	(24)	(25)	(26)
-	Lump sum contributions		-	-	-	-	-	-	-	-	-	-
_	Other dedicated capital funding		_	_	_	_	_	_	_	_	_	_
676	Total sources of capital funding	1,1	87	7	(9)	(15)	36	(23)	(23)	(24)	(25)	(26)
	Applications of capital funding Capital expenditure											
56	- to replace existing assets (b)		6	27	12	6	58	-	-	-	-	-
161	- to improve the level of service	4	115	-	-	-	-	-	-	-	-	-
-	- to meet additional demand		-	-		-	-	-	-	-	-	-
(255)		(3	337)	87	134	125	72	134	124	119	129	131
(38)	Increase (decrease) of investments Total applications of capital funding	-	84	114	146	131	130	134	124	119	129	131
	Surplus (deficit) of capital funding	1.1	103	(107)	(155)	(146)	(94)	(157)	(147)	(143)	(154)	(157)
714	- Surplus (deficit) of capital funding		103	(107)	(133)	(140)	(94)	(137)	(147)	(143)	(134)	(137)
-	Funding balance		-	-	-	-	-	-	-	-	-	-
	Reconciliation to net cost of services											
(714)	Surplus (deficit) of operating funding from funding impact statement	(1,1	03)	107	155	146	94	157	147	143	154	157
(19,701)	Remove rates funding	(19,5		2,491)	(10,080)	(9,070)	(9,494)	(9,131)	(9,246)	(9,386)	(9,455)	(9,518)
(65)		((82)	(115)	(122)	(127)	(131)	(133)	(134)	(133)	(135)	(117)
-	Add capital revenues		-	-	-	-	-	-	-	-	-	-
(20,480)	Add vested assets / non cash revenue Net cost of services per activity statement surplus/(deficit)	(20,7	- 746) /1	2,499)	(10,047)	(9,051)	(9,531)	(9,107)	(9,233)	(9,376)	(9,436)	(9,478)
(20,400)	state the cost of services per activity statement surplus/(deficit)	(20,1	70) (1	<u>_,-33j</u>	(10,041)	(3,031)	(3,331)	(3,107)	(3,233)	(3,310)	(3,430)	(3,713)
-	Footnotes (a) Earthquake related operating recoveries (b) Earthquake rebuild application of capital funding		-	- -	-			-	-	-	-	-