ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

For

GISBORNE DISTRICT COUNCIL AND MERIDIAN ENERGY

Prepared by: Steve Woods

Date audit commenced: 8 May 2018

Date audit report completed: 24 May 2018

Audit report due date: 01-Jun-18

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EXECUTIVE SUMMARY

This audit of the Gisborne District Council **(GDC)** Unmetered Streetlights DUML database and processes was conducted at the request of Meridian Energy Limited **(Meridian),** in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1, which became effective on 1 June 2017.

The audit found six non-compliances.

The field audit found 25 wattage discrepancies in total. There doesn't appear to be a strong process in place to update the database when changes are made in the field.

The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum.

The future risk rating of 26 indicates that the next audit be completed in six months. The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum Under submission of approx. 5,500 kWh per annum has occurred due to a ballast wattage difference	Weak	Medium	6	Identified
Description and capacity	2.4	11(2)(c) of Schedule 15.3	70 watt SON lamp should have ballast of 13 watts not 12 watts	Strong	Low	1	Identified
All load recorded	2.5	11(2)(c) of Schedule 15.3	One light not recorded in the database.	Strong	Low	1	Identified
Tracking of load changes	2.6	11(3) of Schedule 15.3	Process not in place to track all load changes	Weak	Medium	6	Identified

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Database accuracy	3.1	15.2 and 15.37B(b)	The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum Under submission of approx. 5,500 kWh per annum has occurred due to a ballast	Weak	Medium	6	Identified
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum Under submission of approx. 5,500 kWh per annum has occurred due to a ballast wattage difference.	Weak	Medium	6	Identified
					Future Risk Rating	**26**	

Future risk rating	1-3	4-6	7-8	9-17	18-26	27+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Action
Load description and capacity	2.4	Add lamp description and gear wattage to the database	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

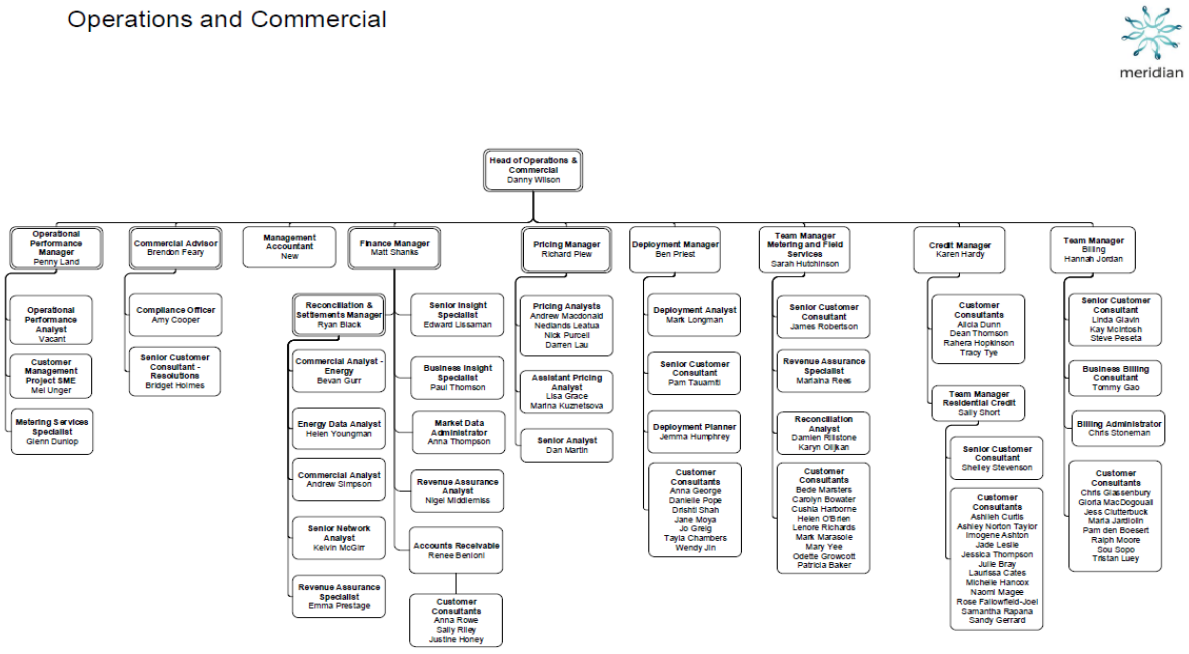
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit commentary

Meridian confirms that there are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Meridian provided the relevant organisational structure:



1.3. Persons involved in this audit

Auditor:

Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Amy Cooper	Compliance Officer	Meridian
Helen Youngman	Energy Data Analyst	Meridian
Jason Grout	Network GIS and Data Manager	Eastland

1.4. Hardware and Software

The database used for reporting is an Access database hosted and managed by Eastland. Eastland performs a nightly server backup and on a fortnightly basis a tape backup is performed which are stored off-site. These are periodically restored to check readability. A mirrored server also exists in a separate building.

1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000740001EN47C	Gisborne DC	TUI1101	DST	20	884
0000740005EN576	Gisborne DC	TUI1101	DST	3	81
0000740009EN668	Gisborne DC	TUI1101	DST	8	259
0000740011ENED1	Gisborne DC	TUI1101	DST	3	124
0000740015ENFDB	Gisborne DC	TUI1101	DST	27	815
0000740019ENCC5	Gisborne DC	TUI1101	DST	11	383
0000740023EN9AC	Gisborne DC	TUI1101	DST	6	162
0000740025EN823	Gisborne DC	TUI1101	DST	8	259
0000740027EN8A6	Gisborne DC	TUI1101	DST	3	124
0000740031EN384	Gisborne DC	TUI1101	DST	28	842
0000740033EN301	Gisborne DC	TUI1101	DST	44	1565
0000740035EN28E	Gisborne DC	TUI1101	DST	7	189
0000740037EN20B	Gisborne DC	TUI1101	DST	2	54

0000740041EN6D9	Gisborne DC	TUI1101	DST	21	921
0000740043EN65C	Gisborne DC	TUI1101	DST	2	54
0000740045EN7D3	Gisborne DC	TUI1101	DST	23	879
0000740047EN756	Gisborne DC	TUI1101	DST	5	135
0000740049EN4CD	Gisborne DC	TUI1101	DST	1	27
0000740053ENCF1	Gisborne DC	TUI1101	DST	24	1207
0000740057ENDFB	Gisborne DC	TUI1101	DST	4	151
0000740059ENE60	Gisborne DC	TUI1101	DST	7	189
0000740063ENB09	Gisborne DC	TUI1101	DST	3	81
0000740065ENA86	Gisborne DC	TUI1101	DST	6	162
0000740067ENA03	Gisborne DC	TUI1101	DST	17	803
0000740069EN998	Gisborne DC	TUI1101	DST	81	3752
0000740071EN121	Gisborne DC	TUI1101	DST	2	54
0000740075EN02B	Gisborne DC	TUI1101	DST	53	1601
0000740077EN0AE	Gisborne DC	TUI1101	DST	16	649
0000740079EN335	Gisborne DC	TUI1101	DST	40	2094
0000740081EN136	Gisborne DC	TUI1101	DST	12	754
0000740085EN03C	Gisborne DC	TUI1101	DST	2	177
0000740087EN0B9	Gisborne DC	TUI1101	DST	8	216
0000740089EN322	Gisborne DC	TUI1101	DST	4	108
0000740093ENB1E	Gisborne DC	TUI1101	DST	18	1550
0000740095ENA91	Gisborne DC	TUI1101	DST	55	1794
0000740097ENA14	Gisborne DC	TUI1101	DST	6	1400
0000740101END78	Gisborne DC	TUI1101	DST	4	108
0000740103ENDFD	Gisborne DC	TUI1101	DST	24	941
0000740105ENC72	Gisborne DC	TUI1101	DST	3	124
0000740107ENCF7	Gisborne DC	TUI1101	DST	1	150
0000740109ENF6C	Gisborne DC	TUI1101	DST	20	2354

0000740111EN7D5	Gisborne DC	TUI1101	DST	3	348
0000740113EN750	Gisborne DC	TUI1101	DST	3	81
0000740115EN6DF	Gisborne DC	TUI1101	DST	15	1740
0000740117EN65A	Gisborne DC	TUI1101	DST	3	348
0000740121EN02D	Gisborne DC	TUI1101	DST	2	300
0000740123EN0A8	Gisborne DC	TUI1101	DST	16	1401
0000740127EN1A2	Gisborne DC	TUI1101	DST	13	851
0000740131ENA80	Gisborne DC	TUI1101	DST	8	2000
0000740135ENB8A	Gisborne DC	TUI1101	DST	5	135
0000740139EN894	Gisborne DC	TUI1101	DST	43	1285
0000740141ENFDD	Gisborne DC	TUI1101	DST	1	70
0000740145ENED7	Gisborne DC	TUI1101	DST	1	27
0000740147ENE52	Gisborne DC	TUI1101	DST	7	189
0000740151EN570	Gisborne DC	TUI1101	DST	13	378
0000740153EN5F5	Gisborne DC	TUI1101	DST	5	258
0000740157EN4FF	Gisborne DC	TUI1101	DST	19	900
0000740501EN179	Gisborne DC	TUI1101	DST	30	3860
0000740503EN1FC	Gisborne DC	TUI1101	DST	56	2835
0000740505EN073	Gisborne DC	TUI1101	DST	13	661
0000740507EN0F6	Gisborne DC	TUI1101	DST	128	9757
0000740509EN36D	Gisborne DC	TUI1101	DST	6	592
0000740511ENBD4	Gisborne DC	TUI1101	DST	40	2960
0000740513ENB51	Gisborne DC	TUI1101	DST	101	9180
0000740515ENADE	Gisborne DC	TUI1101	DST	23	1821
0000740517ENA5B	Gisborne DC	TUI1101	DST	29	2660
0000740519EN9C0	Gisborne DC	TUI1101	DST	24	3280
0000740521ENC2C	Gisborne DC	TUI1101	DST	13	910
0000740523ENCA9	Gisborne DC	TUI1101	DST	2	54

0000740525END26	Gisborne DC	TUI1101	DST	42	5284
0000740527ENDA3	Gisborne DC	TUI1101	DST	62	4340
0000740529ENE38	Gisborne DC	TUI1101	DST	15	1050
0000740531EN681	Gisborne DC	TUI1101	DST	71	6010
0000740533EN604	Gisborne DC	TUI1101	DST	4	280
0000740535EN78B	Gisborne DC	TUI1101	DST	105	10020
0000740537EN70E	Gisborne DC	TUI1101	DST	42	3924
0000740539EN495	Gisborne DC	TUI1101	DST	15	1450
0000740541EN3DC	Gisborne DC	TUI1101	DST	21	1876
0000740543EN359	Gisborne DC	TUI1101	DST	27	1890
0000740545EN2D6	Gisborne DC	TUI1101	DST	4	360
0000740547EN253	Gisborne DC	TUI1101	DST	35	3570
0000740549EN1C8	Gisborne DC	TUI1101	DST	94	8474
0000740551EN971	Gisborne DC	TUI1101	DST	7	628
0000740553EN9F4	Gisborne DC	TUI1101	DST	34	4302
0000740555EN87B	Gisborne DC	TUI1101	DST	33	3560
0000740557EN8FE	Gisborne DC	TUI1101	DST	20	1400
0000740559ENB65	Gisborne DC	TUI1101	DST	12	840
0000740561ENE89	Gisborne DC	TUI1101	DST	12	1800
0000740563ENE0C	Gisborne DC	TUI1101	DST	12	1800
0000740565ENF83	Gisborne DC	TUI1101	DST	40	5306
0000740567ENF06	Gisborne DC	TUI1101	DST	28	3032
0000740569ENC9D	Gisborne DC	TUI1101	DST	13	1950
0000740571EN424	Gisborne DC	TUI1101	DST	4	600
0000740573EN4A1	Gisborne DC	TUI1101	DST	61	5699
0000740575EN52E	Gisborne DC	TUI1101	DST	10	705
0000740577EN5AB	Gisborne DC	TUI1101	DST	4	280
0000740579EN630	Gisborne DC	TUI1101	DST	40	3330

0000740581EN433	Gisborne DC	TUI1101	DST	41	4614
0000740583EN4B6	Gisborne DC	TUI1101	DST	23	1920
0000740585EN539	Gisborne DC	TUI1101	DST	61	6075
0000740587EN5BC	Gisborne DC	TUI1101	DST	34	2931
0000740589EN627	Gisborne DC	TUI1101	DST	43	4721
0000740591ENE9E	Gisborne DC	TUI1101	DST	49	5350
0000740593ENE1B	Gisborne DC	TUI1101	DST	89	10300
0000740595ENF94	Gisborne DC	TUI1101	DST	57	4550
0000740597ENF11	Gisborne DC	TUI1101	DST	72	5520
0000740599ENC8A	Gisborne DC	TUI1101	DST	46	3940
0000740601EN27A	Gisborne DC	TUI1101	DST	5	350
0000740603EN2FF	Gisborne DC	TUI1101	DST	9	630
0000740605EN370	Gisborne DC	TUI1101	DST	7	490
0000740607EN3F5	Gisborne DC	TUI1101	DST	3	210
0000740609EN06E	Gisborne DC	TUI1101	DST	9	630
0000740611EN8D7	Gisborne DC	TUI1101	DST	3	210
0000740613EN852	Gisborne DC	TUI1101	DST	20	1400
0000740615EN9DD	Gisborne DC	TUI1101	DST	11	770
0000740617EN958	Gisborne DC	TUI1101	DST	10	940
0000740619ENAC3	Gisborne DC	TUI1101	DST	21	2380
0000740621ENF2F	Gisborne DC	TUI1101	DST	71	5380
0000740623ENFAA	Gisborne DC	TUI1101	DST	4	520
0000740625ENE25	Gisborne DC	TUI1101	DST	3	450
0000740627ENEA0	Gisborne DC	TUI1101	DST	59	7250
0000740629END3B	Gisborne DC	TUI1101	DST	4	280
0000740631EN582	Gisborne DC	TUI1101	DST	11	770
0000740633EN507	Gisborne DC	TUI1101	DST	5	430
0000740635EN488	Gisborne DC	TUI1101	DST	74	6425

0000740637EN40D	Gisborne DC	TUI1101	DST	90	8120
0000740639EN796	Gisborne DC	TUI1101	DST	43	4930
0000740641EN0DF	Gisborne DC	TUI1101	DST	33	2310
0000740643EN05A	Gisborne DC	TUI1101	DST	40	4320
0000740645EN1D5	Gisborne DC	TUI1101	DST	4	280
0000740647EN150	Gisborne DC	TUI1101	DST	23	1690
0000740649EN2CB	Gisborne DC	TUI1101	DST	5	350
0000740651ENA72	Gisborne DC	TUI1101	DST	1	150
0000740653ENAF7	Gisborne DC	TUI1101	DST	31	2170
0000740655ENB78	Gisborne DC	TUI1101	DST	32	2400
0000740657ENBFD	Gisborne DC	TUI1101	DST	17	1190
0000740659EN866	Gisborne DC	TUI1101	DST	6	660
0000740661END8A	Gisborne DC	TUI1101	DST	39	3050
0000740663END0F	Gisborne DC	TUI1101	DST	15	1050
0000740665ENC80	Gisborne DC	TUI1101	DST	15	1050
0000740667ENC05	Gisborne DC	TUI1101	DST	2	140
0000740669ENF9E	Gisborne DC	TUI1101	DST	24	2677
0000740671EN727	Gisborne DC	TUI1101	DST	24	2978
0000740673EN7A2	Gisborne DC	TUI1101	DST	16	1920
0000740674ENA68	Gisborne DC	TUI1101	DST	20	2694
0000740675EN62D	Gisborne DC	TUI1101	DST	18	2424
0000740677EN6A8	Gisborne DC	TUI1101	DST	20	2422
0000740679EN533	Gisborne DC	TUI1101	DST	22	2574
0000740681EN730	Gisborne DC	TUI1101	DST	6	696
0000740683EN7B5	Gisborne DC	TUI1101	DST	5	534
0000740685EN63A	Gisborne DC	TUI1101	DST	16	1958
0000740687EN6BF	Gisborne DC	TUI1101	DST	6	737
0000740689EN524	Gisborne DC	TUI1101	DST	5	614

0000740691END9D	Gisborne DC	TUI1101	DST	18	2190
0000740693END18	Gisborne DC	TUI1101	DST	57	3973
0000740695ENC97	Gisborne DC	TUI1101	DST	7	391
0000740697ENC12	Gisborne DC	TUI1101	DST	49	5554
0000740699ENF89	Gisborne DC	TUI1101	DST	31	3046
0000740701ENB7E	Gisborne DC	TUI1101	DST	12	2150
0000740703ENBFB	Gisborne DC	TUI1101	DST	11	1330
0000740705ENA74	Gisborne DC	TUI1101	DST	1	70
0000740707ENAF1	Gisborne DC	TUI1101	DST	35	4930
0000740709EN96A	Gisborne DC	TUI1101	DST	24	3280
0000740711EN1D3	Gisborne DC	TUI1101	DST	18	2700
0000740713EN156	Gisborne DC	TUI1101	DST	27	3528
0000740714ENC9C	Gisborne DC	TUI1101	DST	1	150
0004801505EN6D7	Gisborne DC	TUI1101	DST	2	140

1.7. Authorisation Received

All information was provided directly by Meridian or Eastland.

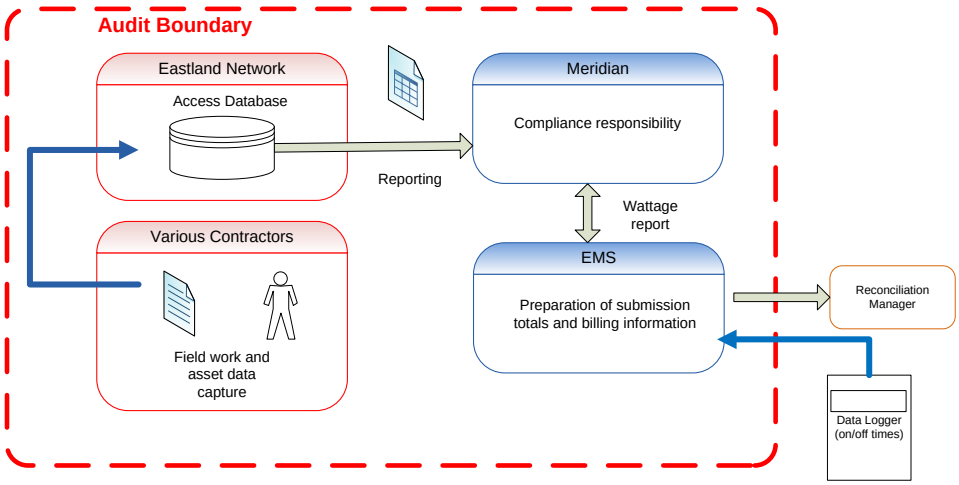
1.8. Scope of Audit

This audit of the GDC DUML database and processes was conducted at the request of Meridian, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1, which became effective on 1 June 2017.

Eastland data is contained in an Access database and Eastland provides reporting to Meridian on a monthly basis, detailing the total kW per ICP and the on/off times are derived by a data logger interrogated by EMS.

The diagram below shows the audit boundary for clarity.



The audit was carried out at Eastland's premises in Gisborne on May 8th 2018. A field audit was conducted of 283 items of load.

1.9. Summary of previous audit

The previous audit was not conducted for Meridian.

1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

1. *by 1 June 2018 (for DUML that existed prior to 1 June 2017)*
2. *within 3 months of submission to the reconciliation manager (for new DUML)*
3. *within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.*

Audit observation

Meridian has requested Veritek to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database within the required timeframe. Compliance is confirmed

2. DUML DATABASE REQUIREMENTS

2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- *DUML database is up to date*
- *methodology for deriving submission information complies with Schedule 15.5.*

Audit observation

The process for calculation of consumption was examined and the application of profiles was checked. The database was checked for accuracy.

Audit commentary

Meridian reconciles this DUML load using the DST profile. The on and off times are derived from a data logger read by EMS. This information is used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was examined during EMS's audit in May 2018 and I confirm compliance. I also checked the figures for March 2018 and I confirm the submission matches the database.

The methodology for deriving submission information is compliant but there is some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance and discussed in **section 3.1** and **3.2**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum Under submission of approx. 5,500 kWh per annum has occurred due to a ballast wattage difference. Potential impact: High Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as weak, because updates to the database are only occurring due to "local knowledge" by Eastland staff, not through a formal update process. The impact is assessed to be medium, based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
We are currently assessing whether GDC's RAMM database is a more accurate source of DUML information and whether reporting is available for calculation of DUML volumes. Depending on the outcome of this we will either work with GDC to ensure their database contains all information required by the Code (ICP etc) and use this database for calculation of DUML volumes or work with both GDC and Eastland Network to ensure Eastland's database is up to date and a robust process is in place for notification of changes.	31 July 2018 01 Feb 2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above		

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUML database must contain:

- *each ICP identifier for which the retailer is responsible for the DUML*
- *the items of load associated with the ICP identifier.*

Audit observation

The database was checked to confirm the correct ICP was recorded against each item of load.

Audit commentary

The database has the ICP identifier recorded against all items of load.

Audit outcome

Compliant

2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

The DUML database must contain the location of each DUML item.

Audit observation

The database was checked to confirm the location is recorded for all items of load.

Audit commentary

The database contains a unique identifier for each item of load and GPS coordinates are present for all items of load. This achieves compliance with this clause.

Audit outcome

Compliant

2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

Code reference

Clause 11(2)(c) and (d) of Schedule 15.3

Code related audit information

The DUML database must contain:

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity, and included any ballast or gear wattage. Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority.

Audit commentary

Fields exist in the database for lamp make and model. I analysed the database and I found the lamp model field was "unknown" for all fields. The lamp model is added in a spreadsheet prior to a report being sent to Meridian.

Lamp wattage is populated and is correct. Gear wattage is added in the spreadsheet.

I recommend the lamp description and gear wattage is added to the database to ensure all information is in one location.

The Electricity Authority has published a schedule of ballast wattages for each make and model of lamp. The 70 watt high pressure sodium ballast is recommended as 13 watts. Eastland has used 12 watts and this needs to be updated to meet the schedule. There are 1,750 of these lights and under submission of approx. 5,500 kWh per annum will be occurring due to this wattage difference.

Recommendation	Description	Audited party comment	Remedial action
Regarding Clause 11(2)(c) and (d) of Schedule 15.3	Add lamp description and gear wattage to the database	We will ask Eastland to add this information to their database if it is determined we will continue to use it in the long term.	Identified

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.4 With: Clause 11(2)(c) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	70 watt SON lamp should have ballast of 13 watts not 12 watts Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as strong because there was no published schedule previously and some published information contains 12 watts for 70SON ballasts. The impact on settlement is low because under submission has occurred by approximately 5,500 kWh per annum.

Actions taken to resolve the issue	Completion date	Remedial action status
We will ask Eastland to amend the ballast they are adding for this light type to 13W as per the published schedule.	15 June 2018	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We will provide the published schedule of wattages to both GDC and Eastland.	30 June 2018	

2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.

Audit observation

The field audit was undertaken of 283 lights using the statistical sampling methodology. The population was divided into the following strata:

1. New
2. Urban
3. Rural

Audit commentary

The field audit findings are detailed in the table below and show some discrepancies.

Street/Area	Database Count	Field Count	Lamp no. difference	No of incorrect lamp wattage	Comments
Urban					
1295;11.5;S\LIGHTS CITY - AREA 103A	7	7	-	1	One LED recorded as 70 SON
1504;11.5;S\LIGHTS CITY - AREA 108	11	11	-	-	
410;11.5;S\LIGHTS CITY - AREA 51	5	5	-	2	One LED and one 70 SON recorded as 100 SON
504;11.5;S\LIGHTS CITY - AREA 65	3	3	-	-	
5084;11.5;S\LIGHTS CITY - AREA 15	46	46	-	-	
546;11.5;S\LIGHTS CITY - AREA 98	5	5	-	1	1 150 SON recorded as 70 SON
738;11.5;S\LIGHTS CITY - AREA 57	9	9	-	-	
7637;11.5;S\LIGHTS CITY - AREA 104	49	49		22	22 LEDs recorded as 100 or 150 SON
7637;11.5;S\LIGHTS CITY - AREA 105	0	1	+1		One additional light
9696;11.5;S\LIGHTS CITY - AREA 23	94	94		1	1 150 SON recorded as 70 SON
Rural					
1585;11.5;S\LIGHTS ORMOND AREA 2	16	15	-1	1	1 100 SON recorded as 150 SON 1 light missing
1740;11.5;S\LIGHTS MAK-GIS AREA 4	15	15	-	-	
189;11.5;S\LIGHTS MURIWAI AREA 2	7	7	-	-	
418;11.5;S\LIGHTS ORMOND AREA 1	2	2	-	-	
82;11.5;S\LIGHTS PATUTAHI AREA 2	1	1	-	-	

Street/Area	Database Count	Field Count	Lamp no. difference	No of incorrect lamp wattage	Comments
New					
10632;11.5;S\LIGHTS CITY - AREA 11	2	2	-	-	
10789;11.5;S\LIGHTS CITY - AREA 3	2	2	-	-	
1619;11.5;S\LIGHTS WAINUI AREA 1	1	1	-	-	
2134;11.5;S\LIGHTS CITY - AREA 20	1	1	-	-	
2706;11.5;S\LIGHTS CITY - AREA 71B	1	1	-	1	
3520;11.5;S\LIGHTS CITY - AREA 111	1	1	-	-	
5276;11.5;S\LIGHTS CITY - AREA 49	2	2			
5804;11.5;S\LIGHTS CITY - AREA 33	1	1			
6082;11.5;S\LIGHTS CITY - AREA 47	1	1			
6272;11.5;S\LIGHTS CITY - AREA 63	1	1			
TOTAL	283	283	2	25	

The field audit found some lamp wattage discrepancies. One light found in the field was not recorded in the database, so non-compliance is recorded for this clause.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2)(c) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	One light not recorded in the database. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as strong because all new connections are metered; this appears to be an historic issue. The impact on settlement is low because under submission has occurred by approximately 427 kWh per annum.

Actions taken to resolve the issue	Completion date	Remedial action status
We will pass the details of the missing light on to Eastland to validate and add to their database.	30 June 2018	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We are currently assessing whether GDC's RAMM database is a more accurate source of DUML information and whether reporting is available for calculation of DUML volumes.	31 July 2018	
Depending on the outcome of this we will either work with GDC to ensure their database contains all information required by the Code (ICP etc) and use this database for calculation of DUML volumes or work with both GDC and Eastland Network to ensure Eastland's database is up to date and a robust process is in place for notification of changes.	01 Feb 2019	

2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

Audit observation

The process for tracking of changes in the database was examined.

Audit commentary

Any changes that are made during any given month take effect from the beginning of that month. The information is available which would allow for the total load in kW to be retrospectively derived for any day. On September 20th 2012, the Authority sent a memo to Retailers and auditors advising that tracking of load changes at a daily level was not required as long as the database contained an audit trail. I have interpreted this to mean that the production of a monthly "snapshot" report is sufficient to achieve compliance.

All new streetlight circuits are required to be metered; therefore, the tracking of load changes is only relevant to the existing unmetered circuits. As changes occur, Eastland becomes aware due to local knowledge, which leads to database updates.

It appears this process is not always successful because there are several incorrect lamp wattages.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.4 With: Clause 11(3) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	Process not in place to track all load changes Potential impact: High Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as weak, because updates to the database are only occurring due to "local knowledge" by Eastland staff, not through a formal update process. The impact is assessed to be medium, based on the kWh differences described in Section 2.1

Actions taken to resolve the issue	Completion date	Remedial action status
We are currently assessing whether GDC's RAMM database is a more accurate source of DUML information and whether reporting is available for calculation of DUML volumes. Depending on the outcome of this we will either work with GDC to ensure their database contains all information required by the Code (ICP etc) and use this database for calculation of DUML volumes or work with both GDC and Eastland Network to ensure Eastland's database is up to date and a robust process is in place for notification of changes.	31 July 2018 01 Feb 2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above		

2.7. Audit trail (Clause 11(4) of Schedule 15.3)

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

The DUML database must incorporate an audit trail of all additions and changes that identify:

- *the before and after values for changes*
- *the date and time of the change or addition*
- *the person who made the addition or change to the database*

Audit observation

The database was checked for audit trails.

Audit commentary

Eastland demonstrated a complete audit trail of all additions and changes to the database information.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

3.1. Database accuracy (Clause 15.2 and 15.37B(b))

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

Audit observation

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

Plan Item	Comments
Area of interest	Gisborne District Council
Strata	The database contains items of load in the Gisborne District Council area. The processes for the management of items of load are the same, but I decided to place the items of load into three strata, as follows: 1. New 2. Urban 3. Rural
Area units	I created a pivot table of the ICP in each area and I used a random number generator in a spreadsheet to select a total of 19 subunits.
Total items of load	283 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority.

Audit commentary

The DUML database auditing tool provided a result indicating the field data was 96.6% of the database data. This will result in an estimated over submission by 44,900 kWh per annum.

The field audit found 25 incorrect wattages.

The Electricity Authority has published a schedule of ballast wattages for each make and model of lamp. The 70 watt high pressure sodium ballast is recommended as 13 watts. Eastland has used 12 watts and this needs to be updated to meet the schedule. Under submission of approx. 5,500 kWh per annum will be occurring due to this wattage difference.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Apr-17 To: 30-Apr-18	The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum Under submission of approx. 5,500 kWh per annum has occurred due to a ballast Potential impact: High Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as weak, because updates to the database are only occurring due to "local knowledge" by Eastland staff, not through a formal update process. The impact is assessed to be medium, based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
We are currently assessing whether GDC's RAMM database is a more accurate source of DUML information and whether reporting is available for calculation of DUML volumes.	31 July 2018	Identified
Depending on the outcome of this we will either work with GDC to ensure their database contains all information required by the Code (ICP etc) and use this database for calculation of DUML volumes or work with both GDC and Eastland Network to ensure Eastland's database is up to date and a robust process is in place for notification of changes.	01 Feb 2019	
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above		

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- *volume information for the DUML is being calculated accurately*
- *profiles for DUML have been correctly applied.*

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that the ICP has the correct profile and submission flag
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Meridian reconciles this DUML load using the DST profile. The on and off times are derived from a data logger read by EMS. This information is used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was examined during EMS's audit in May 2018 and I confirm compliance. I also checked the figures for March 2018 and I confirm the submission matches the database.

The methodology for deriving submission information is compliant but there is some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance and discussed in **section 3.1** and **3.2**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 15.2 and 15.37B(c) From: 01-Apr-17 To: 30-Apr-18	The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum Under submission of approx. 5,500 kWh per annum has occurred due to a ballast wattage difference. Potential impact: High Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6		
Audit risk rating	**Rationale for audit risk rating**		
Medium	The controls are rated as weak, because updates to the database are only occurring due to "local knowledge" by Eastland staff, not through a formal update process. The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**

We are currently assessing whether GDC's RAMM database is a more accurate source of DUML information and whether reporting is available for calculation of DUML volumes. Depending on the outcome of this we will either work with GDC to ensure their database contains all information required by the Code (ICP etc) and use this database for calculation of DUML volumes or work with both GDC and Eastland Network to ensure Eastland's database is up to date and a robust process is in place for notification of changes. Revisions of historic submission information will be conducted where more accurate data is available.	31 July 2018 01 Feb 2019 28 Feb 2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above		

CONCLUSION

The audit found six non-compliances.

The field audit found 25 wattage discrepancies in total. There doesn't appear to be a strong process in place to update the database with changes in the field.

The database accuracy is assessed to be 96.6% indicating an estimated over submission of 44,900 kWh per annum.

PARTICIPANT RESPONSE