# ELECTRICITY INDUSTRY PARTICIPATION CODE DISTRIBUTOR AUDIT REPORT



For

## TRUSTPOWER LIMITED (DUNW)

Prepared by: Rebecca Elliot

Date audit commenced: 23 January 2018

Date audit report completed: 21 February 2018

Audit report due date: 21-Feb-18

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#### **EXECUTIVE SUMMARY**

This Distributor audit was performed at the request of **Trustpower Ltd (DUNW)** to encompass the Electricity Industry Participation Code requirement for an annual audit, in accordance with clause 11.10 of part 11. Trustpower is the distributor for Waipori Village, which is a network embedded into Trustpower's Waipori generation scheme. The distributor code is DUNW (as indicated above).

The audit was conducted in accordance with the Guideline for Distributor Audits version 7.1, which was produced by the Electricity Authority.

Aurora Network Limited (having since separated from Delta Utility Services Ltd during the audit period) performs all of the relevant functions for DUNW with the exception of the updating of the network supply point table which is carried out by Trustpower. The Aurora audit report was undertaken within seven months of this audit and should be submitted with this audit. The process of the updating of the network supply point table is covered in this audit.

This audit found five non-compliances and makes one recommendation. The main issue to be resolved is the metering of the unmetered weir. This is proving problematic as DUNW have been unable to install AMI metering at the site due to there being no signal in the area and they haven't been able to identify a site for the meter that meets the health and safety requirements so that a meter reader can safely access. Trustpower are working to resolve this.

The next audit frequency table indicates that the next audit be due in 12 months. I have considered this result in conjunction with DUNW's responses and I agree with the recommendation.

The matters raised are shown in the tables below.

## AUDIT SUMMARY

## **NON-COMPLIANCES**

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Ratin g	Breach Risk Rating	Remedial Action
Provide complete and accurate information	2.1	11.2(1) and 10.6(1) )	All practicable steps not taken to resolve two issues identified in the last audit	Weak	Low	3	Identified
Requirement to correct errors	2.2	11.2(2) and 10.6(2)	Lack of robust processes to correct errors in a timely manner	Weak	Low	3	Identified
Changes to registry information	4.1	8 Schedu le 11.1	One late address update to registry	Strong	Low	1	Cleared
Management of "decommissi oned" status	4.11	20 Schedu le 11.1	One ICP at the "ready for decommissioning" status not managed	Weak	Low	3	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1) and 10.25(3)	Network supply point table not updated with current meter certification expiry date.  Incorrect responsible party recorded on the NSP supply point table.	Weak	Low	3	Identified
Future Risk Rat	ing					12 mont	hs

## RECOMMENDATIONS

Subject	Section	Recommendation	Description
Provide ICP Information to the	4.6	7(1)(m) of schedule 11.1	Remove streetlight load details and update to
Registry manager			indicate DUML

## ISSUES

Subject	Section	Issue	Description
		Nil	

## 1. ADMINISTRATIVE

## 1.1. Exemptions from Obligations to Comply With Code (Section 11)

#### **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**

DUNW has no exemptions in place that are relevant to the scope of this audit.

## **Audit commentary**

Not applicable

## 1.2. Structure of Organisation

Not applicable

## 1.3. Persons involved in this audit

Auditor:

## **Rebecca Elliot**

## **Veritek Limited**

## **Electricity Authority Approved Auditor**

Personnel assisting in this audit were:

Name	Title	Company
Bronwyn Jackson	Assurance and Compliance Specialist	Trustpower
Richard Starkey	Commercial Development Manager	Aurora Energy
Howard Wood	Commercial Manager Wholesale	Trustpower

## 1.4. Use of contractors (Clause 11.2A)

#### **Code reference**

Clause 11.2A

#### **Code related audit information**

A participant who uses a contractor

- remains responsible for the contractors fulfillment of the participants Code obligations
- cannot assert that it is not responsible or liable for the obligation due to the action of a contractor
- must ensure that the contractor has at least the specified level of skill, expertise, experience, or qualification that the participant would be required to have if it were performing the obligation itself

#### **Audit observation**

Aurora performs all DUNW's responsibilities

## 1.5. Supplier list

Aurora performs all DUNW's responsibilities

#### 1.6. Hardware and Software

Aurora provided the following information that details hardware and software used in the processes being audited.

- Aurora connection application database for tracking connection applications
- GTV for ICP creation, line charge billing and source for Registry updates.

Aurora's backup arrangement processes are documented under Delta's Quality Management System – ISO9001:2008. All data is backed-up daily and a copy is held in a fireproof safe at a secure off-site location. Back-up tapes are restored and tested for readability on a three monthly basis.

## 1.7. Breaches or Breach Allegations

DUNW has not had any breach allegations recorded by the Electricity Authority within the scope of this audit.

## 1.8. ICP and NSP Data

DUNW has responsibility for the one NSP in the table below.

Distrib utor	NSP POC	Description	Parent POC	Paren t Netw ork	Balancing Area	Netwo rk type	Start date	No of ICPs
DUNW	WPV0061	WAIPORI VILLAGE	WPG0331	TRPG	WPV0061DUNWE	E	1/05/2008	

DUNW provided a list of all ICPs as at January. A summary of this data by "ICP status" is as follows:

Status	Number of ICPs 2018	Number of ICPs 2017	Number of ICPs 2016
New (999,0)	0	0	0
Ready (0,0)	0	0	0
Active (2,0)	38	38	38
Distributor (888,0)	0	0	0
Inactive – new connection in progress (1,12)	0	0	0
Inactive – electrically disconnected vacant property (1,4)	4	5	4
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	0
Inactive – electrically disconnected at pole fuse (1,8)	0	0	0
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	0
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	1	1	1
Inactive – reconciled elsewhere (1,5)	0	0	0
Decommissioned (3)	1		

## 1.9. Authorisation Received

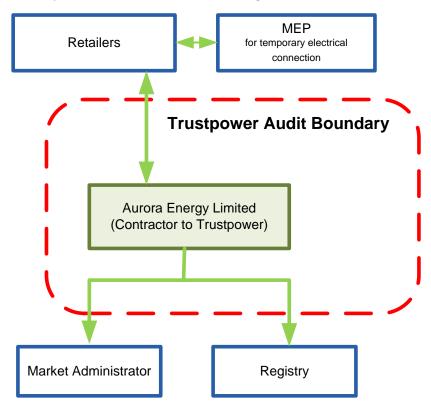
DUNW provided authorisation to Veritek, permitting the collection of data from other parties for matters directly related to the audit.

## 1.10. Scope of Audit

This Distributor audit was performed at the request of **Trustpower Ltd (DUNW)** to encompass the Electricity Industry Participation Code requirement for an annual audit, in accordance with clause 11.10 of part 11.

Trustpower subcontracts Aurora to manage all activities covered by the scope of this audit.

The scope of the audit is shown in the diagram below, with the Delta audit boundary shown for clarity.



All activities covered by this audit are conducted at Aurora's head office in Dunedin.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.1, which was produced by the Electricity Authority.

## 1.11. Summary of previous audit

DUNW provided a copy of the previous audit report, conducted in January 2017 by Rebecca Elliot of Veritek Limited. The findings are detailed in the table below:

## **Table of Non-Compliance**

Subject	Section	Clause	Non compliance	Status
Changes to registry information	3.1 now 4.1	8 of schedule 11.1	One late pricing event.	Still existing
ICP Location Address	3.6 now 4.4	2 & 7(1)(a) of schedule 11.1	ICP addresses not readily locatable.	Cleared
Responsibility for NSP Metering Information	5.2 now 6.8	10.25 of part 10	Late notification of the gate meter certification expiry date.	Cleared

## **Table of Recommendations**

Subject	Section	Clause	Recommendation for Improvement	Status
Decommissioned status	3.11 now 4.6	Clause 20 of Schedule 11.1	Check ICP 0000031712DE94F to see if it can be decommissioned.	Cleared

## 2. OPERATIONAL INFRASTRUCTURE

#### 2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1))

#### **Code reference**

Clause 11.2(1) and 10.6(1)

#### **Code related audit information**

A participant must take all practicable steps to ensure that information that the participant is required to provide to any person under Parts 10 or 11 is:

- a) complete and accurate
- b) not misleading or deceptive
- c) not likely to mislead or deceive.

#### **Audit observation**

Aurora's data management processes were examined. DUNW's list file as at 15/1/18, was examined to confirm compliance.

#### **Audit commentary**

Aurora has processes in place to ensure that information is complete and accurate and is not misleading or deceptive.

This audit found two areas that were identified in the last audit that have not been resolved. These relate to the updating of the network supply point discussed in **section 6.8** and the ICP that has been at "inactive ready for decommissioning" for the past three audits discussed in **section 4.11**. The updating of the network supply point table is managed by Trustpower and the decommissioning of ICPs is managed by Aurora/ Delta. These are minor issues but highlights the lack of controls in relation to the management of the DUNW network.

## **Audit outcome**

Non-compliant

Non-compliance	Description					
Audit Ref: 2.1 With: 11.2(1) and	All practicable steps not taken to resolve two issues identified in the last audit.					
10.6(1))	Potential impact: None					
	Actual impact: None					
From: 01-Feb-17	Audit history: None					
To: 31-Jan-18	Controls: Weak					
	Breach risk rating: 3					
Audit risk rating	Rationale for	audit risk rating	g			
Low	The controls are recorded as weak as audit have yet to be resolved.	s two of the issu	es identified in the last			
	This has no direct impact on reconciliation therefore the audit risk rating i low.					
Actions ta	ken to resolve the issue	Completion date	Remedial action status			
decommissioned. The sinstallation of a new me	olved ICP 0000031712DE94F is now second issue involving the etering point will be resolved once oncerns around access to read the solved	20/2/2018	Identified			
Preventative actions to	aken to ensure no further issues will occur	Completion date				
Commercial Manager f	ought to the attention of the or Wholesale so that the appropriate f the Network can be put in place	20/02/2018				

## 2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2))

## **Code reference**

Clause 11.2(2) and 10.6(2)

## **Code related audit information**

If the participant becomes aware that in providing information under this Part, the participant has not complied with that obligation, the participant must, as soon as practicable, provide such further information as is necessary to ensure that the participant does comply.

## **Audit observation**

Aurora's data management processes were examined. DUNW's list file as at July 2017 was examined to confirm compliance.

## **Audit commentary**

Aurora has a comprehensive suite of discrepancy reports in place. These are managed on a daily basis to ensure that information is complete and accurate and is not misleading or deceptive. Any incorrect data is corrected upon discovery.

This audit found two areas that were identified in the last audit that have not been resolved. These relate to the updating of the network supply point discussed in **section 6.8** and the ICP that has been at "inactive ready for decommissioning" for the past three audits discussed in **section 4.11**. The updating of the network supply point table is managed by Trustpower and the decommissioning of ICPs is managed by Aurora/ Delta. These are minor issues but highlights. highlights the lack of a robust process to correct errors in relation to the DUNW network.

#### **Audit outcome**

#### Non-compliant

Non-compliance	Desc	cription			
Audit Ref: 2.2	Lack of robust processes to correct errors in a timely manner.				
With: 11.2(2) and	Potential impact: None				
10.6(2)	Actual impact: None				
	Audit history: None				
From: 01-Feb-17	Controls: Weak				
To: 31-Jan-18	Breach risk rating: 3				
Audit risk rating	Rationale for	audit risk rating	g		
Low	The controls are recorded as weak as audit have yet to be corrected or res		es identified in the last		
	This has no direct impact on reconciliation therefore the audit risk rating is low.				
Actions ta	ken to resolve the issue	Completion date	Remedial action status		
decommissioned. The sinstallation of a new me	olved ICP 0000031712DE94F is now second issue involving the etering point will be resolved once oncerns around access to read the solved	20/12/2018	Identified		
Preventative actions to	aken to ensure no further issues will occur	Completion date			
Commercial Manager f	ought to the attention of the or Wholesale so that the appropriate f the Network can be put in place	20/12/2018			

## 3. CREATION OF ICPS

#### 3.1. Distributors must create ICPs (Clause 11.4)

#### **Code reference**

Clause 11.4

#### Code related audit information

The distributor must create an ICP identifier in accordance with Clause 1 of Schedule 11.1 for each ICP on the distributor's network. This includes an ICP identifier for the point of connection at which an embedded network connects to the distributor's network.

#### **Audit observation**

Aurora's new connection process was examined and examination of the list file found no ICPs have been created during the audit period.

#### **Audit commentary**

Aurora's ICP creation process is compliant and no new connections have been made during the audit period.

## **Audit outcome**

Compliant

## 3.2. Participants may request distributors to create ICPs (Clause 11.5(3))

#### **Code reference**

Clause 11.5(3)

## **Code related audit information**

The distributor, within 3 business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.

#### **Audit observation**

Aurora's new connection process was examined and examination of the list file found no ICPs have been created during the audit period.

## **Audit commentary**

ICP requests are received directly from customers or their agents via the submission of an Aurora Connection Application (ACA). ICPs are created at "New" immediately, whether engineering work is required or not.

There were no new ICPs created in Waipori Village, however during Aurora's audit the records for 20 ICPs were examined and all were created on the same day.

### **Audit outcome**

Compliant

## 3.3. Provision of ICP Information to the registry manager (Clause 11.7)

#### **Code reference**

Clause 11.7

#### Code related audit information

The distributor must provide information about ICPs on its network in accordance with Schedule 11.1.

#### **Audit observation**

Aurora's new connection process was examined and examination of the list file found no ICPs have been created during the audit period.

#### **Audit commentary**

Aurora requires livening contractors to provide prior notification of their intention to energise an ICP. It is intended that ICP statuses be changed from "New" to "Ready" prior to physical livening occurring.

There were no new connections conducted during the audit period.

Aurora has a fully automated registry update process to ensure all information listed in this clause is provided to the registry. Aurora data is contained in GTV, which is validated against the registry on a regular basis, error logs are created if any fields are different, and these are then investigated.

#### **Audit outcome**

Compliant

#### 3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule 11.1)

#### **Code reference**

Clause 7(2) of Schedule 11.1

#### **Code related audit information**

The distributor must provide information specified in Clauses 7(1)(a) to 7(1)(o) of Schedule 11.1 as soon as practicable and prior to electricity being traded at the ICP.

#### **Audit observation**

The new connection process was examined. The event detail report for the period from 1/2/17 - 15/1/18 was examined.

#### **Audit commentary**

Aurora requires contractors to provide prior notification of their intention to connect and energise an ICP. It is intended that ICP statuses be changed from "New" to "Ready" prior to energisation occurring. Non-compliance was recorded in the Aurora report for the late updating of the registry of one ICP. This was due to human error.

There were no new connections conducted for DUNW during the audit period.

#### **Audit outcome**

Compliant

## 3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)

#### **Code reference**

Clause 7(2A) of Schedule 11.1

#### **Code related audit information**

The distributor must provide the information specified in subclause (1)(p) to the registry manager no later than 10 business days after the date on which the ICP is initially electrically connected.

#### **Audit observation**

The new connection process was examined. The event detail report for the period from 1/2/17 - 15/1/18 was examined.

#### **Audit commentary**

Non-compliance was recorded in the Aurora report for the late updating of the initial electrical connection date for ten ICPs. This was less than 1% of all new connections completed for the audit period and the controls were rated as strong.

There were no new connections conducted for DUNW during the audit period.

#### **Audit outcome**

Compliant

## 3.6. Connection of ICP that is not an NSP (Clause 11.17)

#### **Code reference**

Clause 11.17

#### Code related audit information

A distributor must, when connecting an ICP that is not an NSP, follow the connection process set out in Clause 10.31.

The distributor must not connect an ICP (except for an ICP across which unmetered load is shared) unless a trader is recorded in the registry as accepting responsibility for the ICP.

In respect of ICPs across which unmetered load is shared, the distributor must not connect an ICP unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load.

#### **Audit observation**

The new connection process was examined. The event detail report for the period from 1/2/17 - 15/1/18 was examined.

#### **Audit commentary**

Compliance is recorded in the Aurora audit report.

There were no new connections conducted for DUNW during the audit period.

## **Audit outcome**

Compliant

## 3.7. Connection of ICP that is not an NSP (Clause 10.31)

#### **Code reference**

Clause 10.31

#### Code related audit information

A distributor must not connect an ICP that is not an NSP unless requested to do so by the trader trading at the ICP.

#### **Audit observation**

The new connection process was examined. The event detail report for the period from 1/2/17 - 15/1/18 was examined.

#### **Audit commentary**

Compliance is recorded in the Aurora audit report.

There were no new connections conducted for DUNW during the audit period.

#### **Audit outcome**

Compliant

## 3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A)

#### **Code reference**

Clause 10.31A

#### **Code related audit information**

A distributor may only temporarily electrically connect an ICP that is not an NSP if requested by an MEP for a purpose set out in clause 10.31A(2), and the MEP:

- has been authorised to make the request by the trader responsible for the ICP; and
- the MEP has an arrangement with that trader to provide metering services.

#### **Audit observation**

The new connection process was examined. The event detail report for the period from 1/2/17 - 15/1/18 was examined.

## **Audit commentary**

Compliance is recorded in the Aurora audit report.

There were no new connections conducted for DUNW during the audit period.

#### **Audit outcome**

Compliant

## 3.9. Connection of NSP that is not point of connection to grid (Clause 10.30)

#### **Code reference**

Clause 10.30

#### Code related audit information

A distributor must not connect an NSP on its network that is not a point of connection to the grid unless requested to do so by the reconciliation participant responsible for ensuring there is a metering installation for the point of connection.

The distributor must, within 5 business days of connecting the NSP that is not a point of connection to the grid, advise the reconciliation manager of the following in the prescribed form:

- the NSP that has been connected
- the date of the connection
- the participant identifier of the MEP for each metering installation for the NSP
- the certification expiry date of each metering installation for the NSP.

#### **Audit observation**

DUNW has not created any new NSPs during the audit period.

#### **Audit commentary**

DUNW has not created any new NSPs during the audit period.

#### **Audit outcome**

Not applicable

## 3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30(A))

#### **Code reference**

Clause 10.30(A)

#### **Code related audit information**

A distributor may only temporarily electrically connect an NSP that is not a point of connection to the grid if requested by an MEP for a purpose set out in clause 10.30A(3), and the MEP:

- has been authorised to make the request by the reconciliation participant responsible for the NSP; and
- the MEP has an arrangement with that reconciliation participant to provide metering services.

#### **Audit observation**

DUNW has not created any new NSPs during the audit period.

#### **Audit commentary**

DUNW has not created any new NSPs during the audit period.

#### **Audit outcome**

Not applicable

## 3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1)

#### **Code reference**

Clause 1(1) Schedule 11.1

#### **Code related audit information**

Each ICP created by the distributor in accordance with Clause 11.4 must have a unique identifier, called the "ICP identifier", determined in accordance with the following format:

## yyyyyyyyyxxccc where:

- yyyyyyyyy is a numerical sequence provided by the distributor
- xx is a code that ensures the ICP is unique (assigned by the Authority to the issuing distributor)
- ccc is a checksum generated according to the algorithm provided by the Authority.

#### **Audit observation**

The new connection process was examined. The event detail report for the period from 1/2/17 - 15/1/18 was examined.

#### **Audit commentary**

Compliance is recorded in the Aurora audit report.

There were no new connections conducted for DUNW during the audit period.

#### **Audit outcome**

Compliant

## 3.12. Loss category (Clause 6 Schedule 11.1)

#### **Code reference**

Clause 6 Schedule 11.1

#### **Code related audit information**

Each ICP must have a single loss category that is referenced to identify the associated loss factors.

#### **Audit observation**

The list file was examined to confirm all active ICPs have a single loss category code.

## **Audit commentary**

Each ICP only has a single loss category, which clearly identifies the relevant loss factor.

#### **Audit outcome**

Compliant

## 3.13. Management of "new" status (Clause 13 Schedule 11.1)

## **Code reference**

Clause 13 Schedule 11.1

#### Code related audit information

The ICP status of "New" must be managed by the distributor to indicate:

- the associated electrical installations are in the construction phase (Clause 13(a) of Schedule 11.1)
- the ICP is not ready for activation (Clause 13(b) of Schedule 11.1).

#### **Audit observation**

The management of ICPs in relation to the use of the "new" status was examined. The list file and event detail report for the period from 1/2/17 - 15/1/18 were examined.

#### **Audit commentary**

Compliance is recorded in the Aurora audit report.

There were no ICPs at "new" during the audit period.

#### **Audit outcome**

Compliant

## 3.14. Monitoring of "new" & "ready" statuses (Clause 15 Schedule 11.1)

#### **Code reference**

Clause 15 Schedule 11.1

#### Code related audit information

If an ICP has had the status of "New" or has had the status of "Ready" for 24 months or more:

- the distributor must ask the trader who intends to trade at the ICP whether the ICP should continue to have that status (Clause 15(2)(a) of Schedule 11.1)
- the distributor must decommission the ICP if the trader advises that the ICP should not continue to have that status (Clause 15(2)(b) of Schedule 11.1).

#### **Audit observation**

I checked the list file for ICPs at New or Ready for longer than 24 months to confirm that traders had been notified.

#### **Audit commentary**

There were no ICPs found at the New or Ready statuses.

#### **Audit outcome**

Not applicable

## 3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1)

#### **Code reference**

Clause 7(6) Schedule 11.1

## **Code related audit information**

If the ICP connects the distributor's network to an embedded generating station that has a capacity of 10 MW or more (clause 7(1)(f) of Schedule 11.1):

- The loss category code must be unique; and
- The distributor must provide the following to the reconciliation manager:
  - o the unique loss category code assigned to the ICP
  - o the ICP identifier of the ICP
  - o the NSP identifier of the NSP to which the ICP is connected
  - o the plant name of the embedded generating station.

#### **Audit observation**

The list file was examined.

## **Audit commentary**

There are no embedded generators with a capacity greater than 10MW that require specific loss category codes. There has been no new embedded generation greater than 10MW created during the audit period.

## **Audit outcome**

Not applicable

## 4. MAINTENANCE OF REGISTRY INFORMATION

#### 4.1. Changes to registry information (Clause 8 Schedule 11.1)

#### **Code reference**

Clause 8 Schedule 11.1

#### Code related audit information

If information held by the registry that relates to an ICP for which the distributor is responsible changes, the distributor must give written notice to the registry manager of that change.

Notification must be given by the distributor within 3 business days after the change takes effect, unless the change is to the NSP identifier of the NSP to which the ICP is usually connected (other than a change that is the result of the commissioning or decommissioning of an NSP).

In those cases, notification must be given no later than 8 business days after the change takes effect.

If the change to the NSP identifier is for more than 14 days, the time within which notification must be effected in accordance with Clause 8(3) of Schedule 11.1 begins on the 15th day after the change.

#### **Audit observation**

The process to manage ICP changes were examined, with the event detail report for the period from 1/2/17-15/1/18.

#### **Audit commentary**

Evaluation of the event detail report found two address and three pricing events. All were updated within three business days with the exception of one address change for ICP 0000031687DE2E3. This has no market impact.

## **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1	One late address update to registry		
With: 8 Schedule 11.1	Potential impact: None		
	Actual impact: None		
	Audit history: Once		
From: 31-Oct-16	Controls: Strong		
To: 10-Feb-17	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong and the audit risk rating is low as only late one address event was found.		
Actions taken to resolve the issue		Completion date	Remedial action status
Agent reminded of the importance of updating the registry inside the allowed time frames			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
This was an exception and no change to BAU required			

## 4.2. Notice of NSP for each ICP (Clauses 7(1),(4) and (5) Schedule 11.1)

#### **Code reference**

Clauses 7(1), 7(4) and 7(5) Schedule 11.1

## **Code related audit information**

Under Clause 7(1)(b) of Schedule 11.1, the distributor must provide to the registry manager the NSP identifier of the NSP to which the ICP is usually connected.

If the distributor cannot identify the NSP that an ICP is connected to, the distributor must nominate the NSP that the distributor thinks is most likely to be connected to the ICP, taking into account the flow of electricity within its network, and the ICP is deemed to be connected to the nominated NSP.

#### **Audit observation**

The process to determine the correct NSP was examined. The registry list and event detail report were reviewed to determine compliance.

#### **Audit commentary**

The NSP for each ICP is notified to the registry as part of the new connections process. NSP identification occurs in the GIS. All ICPs have the correct NSP of WPV0061 recorded in the registry

## **Audit outcome**

Compliant

## 4.3. Customer queries about ICP (Clause 11.31)

#### **Code reference**

Clause 11.31

#### Code related audit information

The distributor must advise a customer (or any person authorised by the customer) or embedded generator of the customer or embedded generator's ICP identifier within 3 business days after receiving a request for that information.

#### **Audit observation**

The management of customer queries was examined.

#### **Audit commentary**

Aurora does receive direct requests for ICP identifiers and these are provided immediately.

#### **Audit outcome**

Compliant

## 4.4. ICP location address (Clause 2 Schedule 11.1)

#### **Code reference**

Clause 2 Schedule 11.1

#### **Code related audit information**

Each ICP identifier must have a location address that allows the ICP to be readily located.

#### **Audit observation**

The list file was analysed.

## **Audit commentary**

A check of DUNW's list file found that all ICPs have unique addresses with sufficient information to allow the ICPs to be readily located.

## **Audit outcome**

Compliant

## 4.5. Electrically disconnecting an ICP (Clause 3 Schedule 11.1)

#### **Code reference**

Clause 3 Schedule 11.1

## **Code related audit information**

Each ICP created after 7 October 2002 must be able to be electrically disconnected without electrically disconnecting another ICP, except for ICPs that are the point of connection between a network and an embedded network, or ICPs that represent the consumption calculated by the difference between the total consumption for the embedded network and all other ICPs on the embedded network.

## **Audit observation**

The management of this process was examined.

#### **Audit commentary**

For new connections, this clause is well understood, and the policy is to allow shared service mains but individual fusing is required. A section in the "network connection inspection form" requires that fusing information be notified. No new connections have occurred during the audit period.

#### **Audit outcome**

Compliant

## 4.6. Distributors to Provide ICP Information to the Registry manager (Clause 7(1) Schedule 11.1)

#### **Code reference**

Clause 7(1) Schedule 11.1

#### Code related audit information

For each ICP on the distributor's network, the distributor must provide the following information to the registry manager:

- the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)
- the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)
- the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)
- the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)
- the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)
- if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):
  - a) the unique loss category code assigned to the ICP
  - b) the ICP identifier of the ICP
  - c) the NSP identifier of the NSP to which the ICP is connected
  - d) the plant name of the embedded generating station
- the price category code assigned to the ICP, which may be a placeholder price category code only
  if the distributor is unable to assign the actual price category code because the capacity or
  volume information required to assign the actual price category code cannot be determined
  before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)
- if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):
  - a) a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity
  - b) a blank chargeable capacity if the capacity value can be determined from metering information
  - c) the actual chargeable capacity of the ICP in any other case
- the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1)

- the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)
- the status of the ICP (Clause 7(1)(k) of Schedule 11.1)
- designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)
- if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)
- if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)
- if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):
  - a) the nameplate capacity of the generator; and
  - b) the fuel type
- the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1)

#### **Audit observation**

The list file was examined to check for the population of all required information and its alignment with the trader where appropriate e.g. distributed generation, unmetered load if known and shared unmetered load.

#### **Audit commentary**

Examination of the list file confirmed that ICP information had been populated correctly. There is no distributed generation present and the one ICP for the streetlights has the load recorded in the required format. This load is managed via a DUML database and therefore this is not required to be populated by the Distributor. I recommend that the Distributor load detail be updated to reflect that this a DUML ICP.

Recommendation	Description	Audited party comment	Remedial action
Regarding: 7(1)(m) of schedule 11.1	Remove streetlight load details and update to indicate DUML	Will work with Aurora to implement this change by the 01/04/2018	Identified

#### **Audit outcome**

Compliant

4.7. Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)

#### **Code reference**

Clause 7(3) Schedule 11.1

## **Code related audit information**

The distributor must provide the following information to the registry manager no later than 10 business days after the trading of electricity at the ICP commences:

- the actual price category code assigned to the ICP (Clause 7(3)(a) of Schedule 11.1)
- the actual chargeable capacity of the ICP determined by the price category code assigned to the ICP (if any) (Clause 7(3)(b) of Schedule 11.1)
- the actual distributor installation details of the ICP determined by the price category code assigned to the ICP (if any) (Clause 7(3)(c) of Schedule 11.1).

#### **Audit observation**

Examination of the registry list file found no ICPs have been electrically connected during the audit period.

#### **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 4.8. GPS coordinates (Clause 7(8) and (9) Schedule 11.1)

## **Code reference**

Clause 7(8) and (9) Schedule 11.1

#### Code related audit information

If a distributor populates the GPS coordinates (optional), it must meet the NZTM2000 standard in a format specified by the Authority.

#### **Audit observation**

VDNZ do not populate GPS co-ordinates on the registry, therefore compliance was not assessed.

#### **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 4.9. Management of "ready" status (Clause 14 Schedule 11.1)

#### **Code reference**

Clause 14 Schedule 11.1

#### **Code related audit information**

The ICP status of "Ready" must be managed by the distributor and indicates that:

- the associated electrical installations are ready for connecting to the electricity supply (Clause 14(1)(a) of Schedule 11.1); or
- the ICP is ready for activation by a trader (Clause 14(1)(b) of Schedule 11.1)

Before an ICP is given the "Ready" status in accordance with Clause 14(1) of Schedule 11.1, the distributor must:

- identify the trader that has taken responsibility for the ICP (Clause 14(2)(a) of Schedule 11.1)
- ensure the ICP has a single price category (Clause 14(2)(b) of Schedule 11.1).

#### **Audit observation**

The management of ICPs in relation to the use of the "ready" status was examined. The list file and event detail report for the period from 1/2/17 - 15/1/18 were examined.

#### **Audit commentary**

Compliance is recorded in the Aurora audit report.

There were no ICPs at "ready" during the audit period.

#### **Audit outcome**

Compliant

## 4.10. Management of "distributor" status (Clause 16 Schedule 11.1)

#### **Code reference**

Clause 16 Schedule 11.1

#### **Code related audit information**

The ICP status of "distributor" must be managed by the distributor and indicates that the ICP record represents a shared unmetered load installation or the point of connection between an embedded network and its parent network.

## **Audit observation**

It is unlikely that DUNW will deal with any ICPs with a "Distributor" status because there is no shared unmetered load on this network, and there are no embedded networks connected to DUNW.

#### **Audit commentary**

Not applicable

## **Audit outcome**

Not applicable

## 4.11. Management of "decommissioned" status (Clause 20 Schedule 11.1)

#### **Code reference**

Clause 20 Schedule 11.1

#### Code related audit information

The ICP status of "decommissioned" must be managed by the distributor and indicates that the ICP is permanently removed from future switching and reconciliation processes (Clause 20(1) of Schedule 11.1).

Decommissioning only occurs when:

- electrical installations associated with the ICP are physically removed (Clause 20(2)(a) of Schedule 11.1); or
- there is a change in the allocation of electrical loads between ICPs with the effect of making the ICP obsolete (Clause 20(2)(b) of Schedule 11.1); or
- in the case of a distributor-only ICP for an embedded network, the embedded network no longer exists (Clause 20(2)(c) of Schedule 11.1).

#### **Audit observation**

The list file was examined in relation to the use of the decommissioned status.

#### **Audit commentary**

As reported in the last three audits there is one ICP with a status of "ready for decommissioning". ICP 0000031712DE94F was changed to this status in 2005. As this has not been resolved for the last three reports the lack of management of ICPs at this status is recorded as non-compliance below.

#### **Audit outcome**

Non-compliant

Non-compliance	Description			
Audit Ref: 4.11	One ICP at the "ready for decommissioning" status not managed			
With: 20 Schedule	Potential impact: None			
11.1	Actual impact: None			
	Audit history: None			
From: entire audit period	Controls: Weak			
	Breach risk rating: 3			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as weak as this ICP has been identified in the last three audits and has yet to be resolved.			
	As this relates to one ICP the audit risk rating is low.			
Actions taken to resolve the issue		Completion date	Remedial action status	
This issue has now been resolved		20/02/2018	Cleared	
Preventative actions taken to ensure no further issues will occur		Completion date		
All issue will now be bought to the attention of the Commercial Manager for Wholesale so that the appropriate level of management of the Network can be put in place		20/02/2018		

## 4.12. Maintenance of price category codes (Clause 23 Schedule 11.1)

## **Code reference**

Clause 23 Schedule 11.1

## **Code related audit information**

The distributor must keep up to date the table in the registry of the price category codes that may be assigned to ICPs on each distributor's network by entering in the table any new price category codes.

Each entry must specify the date on which each price category code takes effect, which must not be earlier than 2 months after the date the code is entered in the table.

A price category code takes effect on the specified date.

#### **Audit observation**

The price category code table on the registry was examined.

#### **Audit commentary**

DUNW has not created any new price category codes during the audit period; compliance was not assessed.

#### **Audit outcome**

Not applicable

## 5. CREATION AND MAINTENANCE OF LOSS FACTORS

#### 5.1. Updating table of loss category codes (Clause 21 Schedule 11.1)

## **Code reference**

Clause 21 Schedule 11.1

#### **Code related audit information**

The distributor must keep the registry up to date with the loss category codes that may be assigned to ICPs on the distributor's network.

The distributor must specify the date on which each loss category code takes effect.

A loss category code takes effect on the specified date.

#### **Audit observation**

The loss category code table on the registry was examined.

#### **Audit commentary**

MACQ has not created any new price category codes during the audit period; compliance was not assessed.

#### **Audit outcome**

Not applicable

## 5.2. Updating loss factors (Clause 22 Schedule 11.1)

#### **Code reference**

Clause 22 Schedule 11.1

#### **Code related audit information**

Each loss category code must have a maximum of 2 loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.

If the distributor wishes to replace an existing loss factor on the table in the registry, the distributor must enter the replaced loss factor on the table in the registry.

#### **Audit observation**

The loss category code table on the registry was examined.

#### **Audit commentary**

DUNW has updated the one loss category code. This change has been notified within the required timeframe.

### **Audit outcome**

Compliant

## 6. CREATION AND MAINTENANCE OF NSPS (INCLUDING DECOMMISSIONING OF NSPS AND TRANSFER OF ICPS)

## 6.1. Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1)

#### **Code reference**

Clause 11.8 and Clause 25 Schedule 11.1

#### **Code related audit information**

If the distributor is creating or decommissioning an NSP that is an interconnection point between 2 local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.

If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between 2 embedded networks, the embedded network owner must give written notice to the reconciliation manager of the creation or decommissioning.

If the distributor is creating or decommissioning an NSP that is a point of connection between an embedded network and another network, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.

If the distributor wishes to change the record in the registry of an ICP that is not recorded as being usually connected to an NSP in the distributor's network, so that the ICP is recorded as being usually connected to an NSP in the distributor's network (a "transfer"), the distributor must:

- give written notice to the reconciliation manager
- give written notice to the Authority
- give written notice to each affected reconciliation participant
- comply with Schedule 11.2.

#### **Audit observation**

The NSP table on the registry was examined. No NSPs were created or decommissioned during the audit period; compliance was not assessed.

#### **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 6.2. Provision of NSP information (Clause 26(1) and (2) Schedule 11.1)

#### **Code reference**

Clause 26(1) and (2) Schedule 11.1

#### Code related audit information

If the distributor wishes to create an NSP or transfer an ICP as described above, the distributor must request that the reconciliation manager create a unique NSP identifier for the relevant NSP.

The request must be made at least 10 business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between 2 local networks. In all other cases, the request must be made at least 1 month before the NSP is electrically connected or the ICP is transferred.

#### **Audit observation**

The NSP table on the registry was examined. No NSPs were created or decommissioned during the audit period; compliance was not assessed.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

#### 6.3. Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1)

#### **Code reference**

Clause 24(1) and Clause 26(3) Schedule 11.1

#### **Code related audit information**

If a participant has notified the creation of an NSP on the distributor's network, the distributor must give written notice to the reconciliation manager of the following:

- if the NSP is to be located in a new balancing area, all relevant details necessary for the new balancing area to be created and notification that the NSP to be created is to be assigned to the new balancing area
- in all other cases, notification of the balancing area in which the NSP is located.

#### **Audit observation**

The NSP table on the registry was examined. No NSPs were created or decommissioned during the audit period; compliance was not assessed.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

#### 6.4. Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1)

## **Code reference**

Clause 26(4) Schedule 11.1

#### **Code related audit information**

If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must give notice to the reconciliation manager at least 1 month before the creation or transfer of:

- the network on which the NSP will be located after the creation or transfer (Clause 26(4)(a))
- the ICP identifier for the ICP that connects the network and the embedded network (Clause 26(4)(b))
- the date on which the creation or transfer will take effect (Clause 26(4)(c)).

#### **Audit observation**

The NSP table on the registry was examined. The event detail report for the audit period was examined.

#### **Audit commentary**

No NSPs were changed during the audit period; compliance was not assessed. No ICPs had a change of NSP during the audit period; compliance was not assessed.

#### **Audit outcome**

Not applicable

## 6.5. Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1)

#### **Code reference**

Clause 24(2) and (3) Schedule 11.1

#### Code related audit information

The distributor must give written notice to the reconciliation manager of any change to balancing areas associated with an NSP supplying the distributor's network. The notification must specify the date and trading period from which the change takes effect, and be given no later than 3 business days after the change takes effect.

#### **Audit observation**

The NSP table on the registry was examined. No balancing areas were changed during the audit period; compliance was not assessed.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

#### 6.6. Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1)

## **Code reference**

Clause 27 Schedule 11.1

#### **Code related audit information**

If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least 1 month before the transfer.

#### **Audit observation**

The NSP table on the registry was examined. No ICPs became NSPs during the audit period; compliance was not assessed.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 6.7. Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2)

#### **Code reference**

Clause 1 to 4 Schedule 11.2

#### Code related audit information

If the distributor wishes to transfer an ICP, the distributor must give written notice to the Authority in the prescribed form, no later than 3 business days before the transfer takes effect.

#### **Audit observation**

DUNW has not acquired any new networks; compliance was not assessed.

#### **Audit commentary**

Not applicable.

#### **Audit outcome**

Not applicable

6.8. Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3))

#### **Code reference**

Clause 10.25(1) and 10.25(3)

#### **Code related audit information**

A network owner must, for each NSP that is not a point of connection to the grid for which it is responsible, ensure that:

- there is 1 or more metering installations (Clause 10.25(1)(a)); and
- the electricity is conveyed and quantified in accordance with the Code (Clause 10.25(1)(b))

For each NSP covered in 10.25(1) the network owner must, no later than 20 business days after a metering installation at the NSP is recertified advise the reconciliation manager of:

- the reconciliation participant for the NSP
- the participant identifier of the metering equipment provider for the metering installation
- the certification expiry date of the metering installation

#### **Audit observation**

The NSP supply point table was examined.

#### **Audit commentary**

The NSP supply point table was reviewed:

Distributor	NSP POC	Description	Responsible Party	MEP	Certification Expiry
DUNW	WPV0061	WAIPORI VILLAGE	TRUS	TRUM	6/11/2016

The table has not been updated since the last audit. An update form had been submitted to the Reconciliation Manager in June 2017 but the meter certification records provided for the last audit are still current and record an expiry date of 26/2/2026. The NSP table has TRUS as the responsible participant code, but this should be DUNW. The lack of updates to the NSP supply point table and incorrect information is recorded as non-compliance.

## **Audit outcome**

## Non-compliant

Non-compliance	Description			
Audit Ref: 6.8 With: 10.25(1) and	Network supply point table not updated with current meter certification expiry date.			
10.25(3)	Incorrect responsible party recorded on the NSP supply point table.			
	Potential impact: None			
From: 01-Feb-17	Actual impact: None			
To: 31-Jan-18	Audit history: Once			
	Controls: Weak			
	Breach risk rating: 3			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as weak as the Network supply point table has yet to be corrected and updated.			
	This has no direct impact on reconcil low.	impact on reconciliation therefore the audit risk rating is		
Actions taken to resolve the issue		Completion date	Remedial action status	
Will work with Location Management team, who are responsible for Registry updating at Trustpower, to ensure the table is updated by the 01/04/2018		01/04/2018	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
All issue will now be bought to the attention of the Commercial Manager for Wholesale so that the appropriate level of management of the Network can be put in place		20/02/2018		

6.9. Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2))

#### **Code reference**

Clause 10.25(2)

## **Code related audit information**

If the network owner proposes the creation of a new NSP which is not a point of connection to the grid it must:

- assume responsibility for being the metering equipment provider (Clause 10.25(2)(a)(i)); or
- contract with a metering equipment provider to be the MEP (Clause 10.25(2)(a)(ii)); and
- no later than 20 business days after identifying the MEP advise the reconciliation manager in the prescribed form of:
  - a) the reconciliation participant for the NSP (Clause 10.25(2)(b)(i)); and
  - b) the MEP for the NSP (Clause 10.25(2)(b)(ii)); and
  - c) no later than 20 business days after the data of certification of each metering installation, advise the reconciliation participant for the NSP of the certification expiry date (Clause 10.25(2)(c)).

#### **Audit observation**

The NSP table on the registry was examined. No NSPs were created during the audit period; compliance was not assessed.

#### **Audit commentary**

Not applicable.

## **Audit outcome**

Not applicable

## 6.10. Obligations concerning change in network owner (Clause 29 Schedule 11.1)

## **Code reference**

Clause 29 Schedule 11.1

## **Code related audit information**

If a network owner acquires all or part of a network, the network owner must give written notice to:

- the previous network owner (Clause 29(1)(a) of Schedule 11.1)
- the reconciliation manager (Clause 29(1)(b) of Schedule 11.1)
- the Authority (Clause 29(1)(c) of Schedule 11.1)
- every reconciliation participant who trades at an ICP connected to the acquired network or part of the network acquired (Clause 29(1)(d) of Schedule 11.1).

At least 1 month notification is required before the acquisition (Clause 29(2) of Schedule 11.1).

The notification must specify the ICPs to be amended to reflect the acquisition and the effective date of the acquisition (Clause 29(3) of Schedule 11.1).

## **Audit observation**

DUNW has not acquired any networks; compliance was not assessed.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 6.11. Change of MEP for embedded network gate meter (Clause 10.22(1)(b))

#### **Code reference**

Clause 10.22(1)(b)

#### **Code related audit information**

If the MEP for an ICP which is also an NSP changes the participant responsible for the provision of the metering installation under Clause 10.25, the participant must advise the reconciliation manager and the gaining MEP.

#### **Audit observation**

The event detail report for the period from 01/02/2017 - 15/01/2018 was examined to determine whether there have been any MEP changes during the audit period.

#### **Audit commentary**

There have been no MEP changes during the audit period.

#### **Audit outcome**

Not applicable

## 6.12. Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2)

## **Code reference**

Clauses 5 and 8 Schedule 11.2

## **Code related audit information**

The distributor must give the Authority confirmation that it has received written consent to the proposed transfer from:

- the distributor whose network is associated with the NSP to which the ICP is recorded as being connected immediately before the notification (unless the notification relates to the creation of an embedded network) (Clause 5(a) of Schedule 11.2)
- every trader trading at an ICP being supplied from the NSP to which the notification relates (Clause 5(b) of Schedule 11.2).

The notification must include any information requested by the Authority (Clause 8 of Schedule 11.2).

#### **Audit observation**

DUNW has not acquired any networks; compliance was not assessed.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 6.13. Transfer of ICPs for embedded network (Clause 6 Schedule 11.2)

## **Code reference**

Clause 6 Schedule 11.2

## **Code related audit information**

If the notification relates to an embedded network, it must relate to every ICP on the embedded network.

## **Audit observation**

DUNW has not acquired any networks; compliance was not assessed.

## **Audit commentary**

Not applicable

## **Audit outcome**

Not applicable

## 7. MAINTENANCE OF SHARED UNMETERED LOAD

## 7.1. Notification of shared unmetered load ICP list (Clause 11.14(2) and (4))

#### **Code reference**

Clause 11.14(2) and (4)

#### **Code related audit information**

The distributor must give written notice to the registry manager and each trader responsible for the ICPs across which the unmetered load is shared of the ICP identifiers of those ICPs.

A distributor who receives notification from a trader relating to a change under Clause 11.14(3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared of the addition or omission of the ICP.

#### **Audit observation**

Examination of the registry list confirmed there is no shared unmetered load.

#### **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 7.2. Changes to shared unmetered load (Clause 11.14(5))

## **Code reference**

Clause 11.14(5)

## **Code related audit information**

If the distributor becomes aware of a change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change or decommissioning as soon as practicable after the change or decommissioning.

### **Audit observation**

Examination of the registry list confirmed there is no shared unmetered load.

## **Audit commentary**

Not applicable

#### **Audit outcome**

Not applicable

## 8. CALCULATION OF LOSS FACTORS

## 8.1. Creation of loss factors (Clause 11.2)

#### **Code reference**

Clause 11.2

#### Code related audit information

A participant must take all practicable steps to ensure that information that the participant is required to provide to any person under Part 11 is:

- a) complete and accurate
- b) not misleading or deceptive
- c) not likely to mislead or deceive.

#### **Audit observation**

The calculation of loss factors was reviewed.

#### **Audit commentary**

Delta calculate the WPVLV loss factor by subtracting the total consumption of all ICPs (based on the EIEP1 files from retailers) from the consumption recorded by the "gate" meter at the WPV0061 NSP. The loss factor to was updated on 31/1/18 to 1.6529 (effective 1/4/18) from 1.692. As detailed in the previous audit, there is an unmetered weir that will be accounting for a significant portion of the losses on this network. Trustpower are working to meter this site and confirmed they are unable to install an AMI meter on this site as there is no signal. Finding a safe meter site that meets all the health and safety requirements for a meter reader to be able to read the meter is proving difficult. Trustpower are working to find a solution to this. Delta will recalculate the loss factor once the metering has been installed.

#### **Audit outcome**

Compliant

## CONCLUSION

This audit found five non-compliances and makes one recommendation. The main issue to be resolved is the metering of the unmetered weir. This is proving problematic as DUNW have been unable to install AMI metering at the site due to there being no signal in the area and they haven't been able to identify a site for the meter that meets the health and safety requirements so that a meter reader can safely access. Trustpower are working to resolve this.

The next audit frequency table indicates that the next audit be due in 12 months. I have considered this result in conjunction with DUNW's responses and I agree with the recommendation.

## PARTICIPANT RESPONSE

Waipori is a small network associated with the Waipori generation scheme. It exists as a result of the historic separation of Power boards into Gentailers and Distributors. It is managed by Aurora on behalf of Trustpower. It is important to Trustpower that it is managed by a third party that is a proven performer as a Distribution business, Aurora has proven to be a capable and competent agent for Trustpower. Trustpower has instigated a stronger approach to its management of the Network and will ensure all issues of noncompliance, highlighted by the Audit, are dealt with expediently.