

**ELECTRICITY INDUSTRY PARTICIPATION CODE
METERING EQUIPMENT PROVIDER AUDIT REPORT**

For

NOVA ENERGY LIMITED

Prepared by: Steve Woods – Veritek Limited

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EXECUTIVE SUMMARY

Nova Energy Limited (Nova) is a Metering Equipment Provider (MEP) and is required to undergo an audit by 08 May 2018, in accordance with clause 1(1)(b) of schedule 10.5.

The audit found a high level of compliance with the Code. There are only three ICPs with incorrect registry data and this matter will be resolved once these are recertified. 99 ICPs have expired certification and Nova is waiting on the Retailer in all cases to arrange access. Some inspections were not conducted within the allowable window and the relevant installations have been recertified. Controls have been strengthened in this area and there have not been any recent examples. Reporting to Retailers for faulty metering installations was late during 2017 but this matter is now resolved and all recent notifications have been on time.

Nova proposed to implement an AMI data collection system in November 2017. A material change audit was conducted and a report prepared. The system is not yet implemented and was therefore not examined during the audit.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends an audit frequency of 24 months. This recommendation seems reasonable given the low breach risk ratings and that some issues are now cleared.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Changes to registry records	4.10	3 of Schedule 11.4	Some records updated on the registry later than 10 business days	Strong	Low	1	Identified
Provision of Registry Information	6.2	7 (1), (2) and (3) of Schedule 11.4	Three ICPs with IN24.	Strong	Low	1	Cleared
Certification of metering installations	7.1	10.38 (a), clause 1 and clause 15 of Schedule 10.7	Certification expired for 99 ICPs.	Strong	Low	1	Identified
Inspections	8.2	Clause 46(1) of schedule 10.7	Some inspections not conducted within the allowable window. Recertification occurred immediately when this was discovered.	Strong	Low	1	Cleared
Faulty metering installations	9.1	10.43(4) and (5)	Five late reports for faulty metering installations.	Strong	Low	1	Identified

Future Risk Rating	5
Indicative Audit Frequency	24 months

Future risk rating	1-2	3-6	7-9	10-19	20-24	25+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

ISSUES

Subject	Section	Recommendation	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

I checked the Electricity Authority website, and I confirm there are no exemptions in place.

Audit commentary

I checked the Electricity Authority website, and I confirm there are no exemptions in place.

1.2. Structure of Organisation

Mike Geddes	MEP Manager
Vicky Farrell	Asset Administrator
Nina Goodwin	Asset Administration Assistant
Hine Komene	Asset Administration Assistant

1.3. Persons involved in this audit

Auditor: Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Nova personnel assisting in this audit were:

Name	Title
Mike Geddes	MEP Manager
Vicky Farrell	Asset Administrator

1.4. Use of Agents (Clause 10.3)

Code reference

Clause 10.3

Code related audit information

A participant who uses a contractor

- *remains responsible for the contractor's 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

Nova engages with ATHs to conduct certification activities and they are an ATH themselves, but there are no contractors used to perform MEP responsibilities.

Audit commentary

Nova engages with ATHs to conduct certification activities and they are an ATH themselves, but there are no contractors used to perform MEP responsibilities.

1.5. Hardware and Software

Nova MEP data is held in a metering database (CMMS), which is subject to backup arrangements in accordance with standard industry protocols.

1.6. Breaches or Breach Allegations

Nova confirmed there were no breach allegations related to the scope of this audit.

1.7. ICP Data

Metering Category	Number of ICPs
1	13,366
2	254
3	23
4	2
5	2
9	1

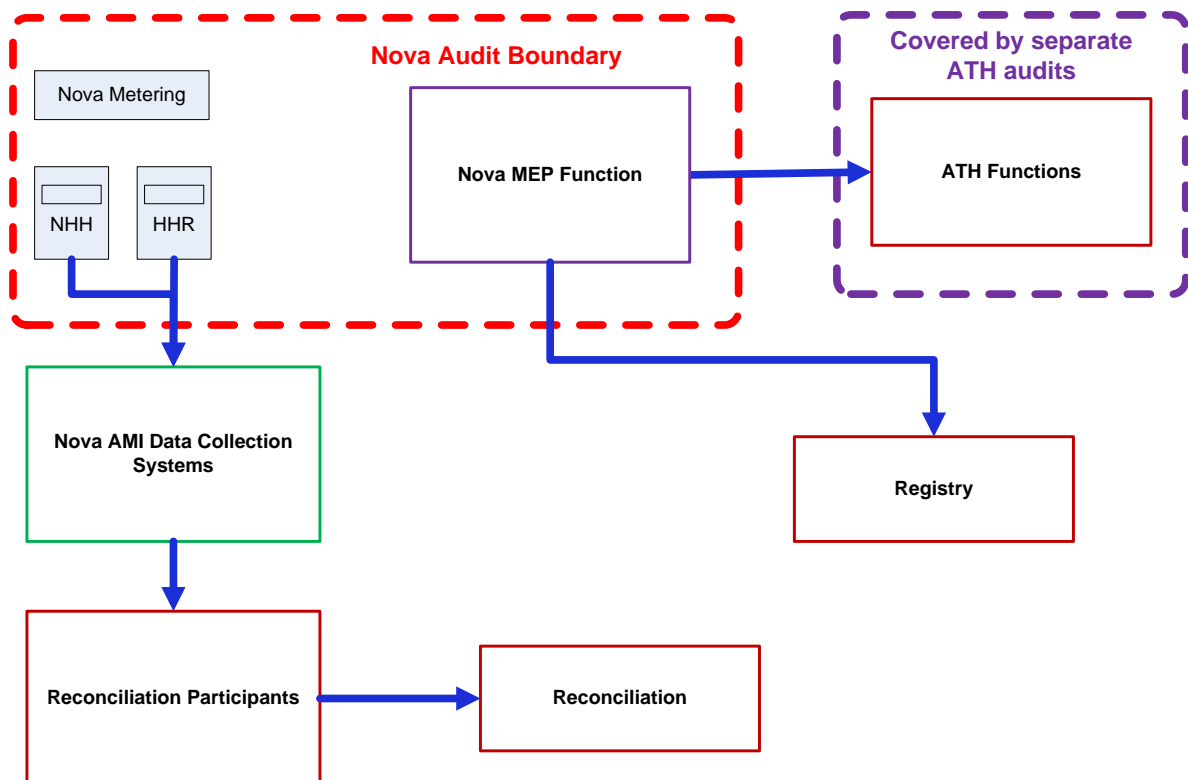
1.8. Authorisation Received

A letter of authorisation was not required or requested.

1.9. Scope of Audit

This audit was conducted in accordance with the Guideline for Metering Equipment Provider Audits V2.1, which was published by the Electricity Authority.

The boundaries of this audit are shown below for greater clarity. The data collection systems are shown in the diagram but the system is not yet live so I have excluded it from the audit scope.



1.10. Summary of previous audit

The previous audit was conducted in January 2017 by Steve Woods of Veritek Limited. The table below shows the status of the issues raised.

Table of Non Compliance

Subject	Section	Clause	Non-compliance	Status
Accuracy of registry records	6.2	7 (1), (2) and (3) of Schedule 11.4	Some registry records incomplete or incorrect.	Still existing for 3 ICPs
Changes to registry records	4.10	3 of schedule 11.4	Some records updated on the registry later than 10 business days.	Cleared
Certification of metering installations	7.1	10.38(a) of part 10 & clause 15 of schedule 10.7	416 ICPs with expired certification.	Still existing for 99 ICPs
Inspections	8.2	46 of schedule 10.7	Two ICPs with inspections overdue.	Repeated in this audit, now cleared

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Status
Accuracy of registry records	6.1	7 of schedule 11.4	Liaise with Retailer to determine if an import export meter needs to be installed for ICPs with DG recorded in the registry.	Cleared

2. OPERATIONAL INFRASTRUCTURE

2.1. MEP responsibility for services access interface (Clause 10.9(2))

Code reference

Clause 10.9(2)

Code related audit information

The MEP is responsible for providing and maintaining the services access interface.

Audit observation

I checked certification records for 25 metering installations, covering all relevant ATHs.

Audit commentary

I checked 25 certification records and found the services access interface was recorded by all ATHs.

Audit outcome

Compliant

2.2. Dispute Resolution (Clause 10.50(1) to (3))

Code reference

Clause 10.50(1) to (3)

Code related audit information

Participants must in good faith use its best endeavours to resolve any disputes related to Part 10 of the Code.

Disputes that are unable to be resolved may be referred to the Authority for determination.

Complaints that are not resolved by the parties or the Authority may be referred to the Rulings Panel by the Authority or participant.

Audit observation

I checked whether any disputes had been dealt with during the audit period.

Audit commentary

Nova has not been required to resolve any disputes in accordance with this clause.

Audit outcome

Compliant

2.3. MEP Identifier (Clause 7(1) of Schedule 10.6)

Code reference

Clause 7(1) of Schedule 10.6

Code related audit information

The MEP must ensure it has a unique participant identifier and must use this participant identifier (if required) to correctly identify its information.

Audit observation

I checked the registry data to ensure the correct MEP identifier was used.

Audit commentary

Nova uses the BOPE identifier in all cases.

Audit outcome

Compliant

2.4. Communication Equipment Compatibility (Clause 40 Schedule 10.7)

Code reference

Clause 40 Schedule 10.7

Code related audit information

The MEP must ensure that the use of its communication equipment complies with the compatibility and connection requirements of any communication network operator the MEP has equipment connected to.

Audit observation

I checked that the ATH has a process to check the relevant type test certificates to ensure compliance with this clause.

Audit commentary

Nova ensures all communication equipment is appropriately certified with the relevant telecommunications standards. This is recorded in type test certificates. Telecommunications providers no longer provide “approval” but the type test reports confirm no interference will occur.

Audit outcome

Compliant

2.5. Participants to Provide Accurate Information (Clause 11.2 and Clause 10.6)

Code reference

Clause 11.2 and Clause 10.6

Code related audit information

The MEP must take all practicable steps to ensure that information that the MEP is required to provide to any person under Parts 10 and 11 is complete and accurate, not misleading or deceptive and not likely to mislead or deceive.

If the MEP becomes aware that in providing information under Parts 10 and 11, the MEP has not complied with that obligation, the MEP must, as soon as practicable, provide such further information as is necessary to ensure that the MEP does comply.

Audit observation

The content of this audit report was reviewed to determine whether all practicable steps had been taken to provide accurate information.

Audit commentary

The content of this audit report indicates that Nova has taken all practicable steps to ensure that information is complete and accurate.

Audit outcome

Compliant

3. PROCESS FOR A CHANGE OF MEP

3.1. Payment of Costs to Losing MEP (Clause 10.22)

Code reference

Clause 10.22

Code related audit information

The MEP for a metering installation may change only if the responsible participant enters into an arrangement with another person to become the MEP for the metering installation, and if certain notification requirements are met (in relation to the registry and the reconciliation manager).

The gaining MEP must pay the losing MEP a proportion of the costs within 20 business days of assuming responsibility.

The costs are those directly and solely attributable to the certification and calibration tests of the metering installation or its components from the date of switch until the end of the current certification period.

Audit observation

I checked if Nova had sent or received any invoices.

Audit commentary

Nova has not sent or received any invoices in relation to this clause during the audit period.

Audit outcome

Not applicable

3.2. Registry Notification of Metering Records (Clause 2 of Schedule 11.4)

Code reference

Clause 2 of Schedule 11.4

Code related audit information

The gaining MEP must advise the registry of the registry metering records for the metering installation within 15 days of becoming the MEP for the metering installation.

Audit observation

There were no examples found in the event detail report because Nova has not become the MEP for any ICPs other than new connections.

Audit commentary

There were no examples found in the event detail report because Nova has not become the MEP for any ICPs other than new connections.

Audit outcome

Not applicable

3.3. Provision of Metering Records to Gaining MEP (Clause 5 of Schedule 10.6)

Code reference

Clause 5 of Schedule 10.6

Code related audit information

During an MEP switch, a gaining MEP may request access to the losing MEP's metering records.

On receipt of a request from the gaining MEP, the losing MEP has 10 business days to provide the gaining MEP with the metering records or the facilities to enable the gaining MEP to access the metering records.

The losing MEP must ensure that the metering records are only received by the gaining MEP or its contractor, the security of the metering records is maintained, and only the specific metering records required for the purposes of the gaining MEP exercising its rights and performing its obligations are provided.

Audit observation

I checked with Nova to confirm whether there had been any requests from other MEPs.

Audit commentary

This has not occurred and no examples are available to examine. Some records have been requested by a retailer but not by any MEPs. There is a Standard Operating Procedure for this event should it occur.

Audit outcome

Compliant

3.4. Termination of MEP Responsibility (Clause 10.23)

Code reference

Clause 10.23

Code related audit information

Even if the MEP ceases to be responsible for an installation, the MEP must either comply with its continuing obligations; or before its continuing obligations terminate, enter into an arrangement with a participant to assume those obligations.

The MEP is responsible if it:

- *is identified in the registry as the primary metering contact or*
- *is the participant who owns the meter for the POC or to the grid or*
- *has accepted responsibility under clause 1(1)(a)(ii) of schedule 11.4 or*
- *has contracted with a participant responsible for providing the metering installation.*

MEPs obligations come into effect on the date recorded in the registry as being the date on which the metering installation equipment is installed or, for an NSP the effective date set out in the NSP table on the Authority's website.

An MEPs obligations terminate only when;

- *the ICP changes under clause 10.22(1)(a);*
- *the NSP changes under clause 10.22(1)(b), in which case the MEPs obligations terminate from the date on which the gaining MEP assumes responsibility;*
- *the metering installation is no longer required for the purposes of Part 15; or*
- *the load associated with an ICP is converted to be used solely for unmetered load.*

Audit observation

I confirmed that Nova has ceased to be responsible for some metering installations by checking the event detail report.

Audit commentary

Nova has ceased to be responsible for some metering installations and they still continue with their responsibilities, mainly in relation to the storage of records, which are kept indefinitely. I checked ICP 1000002780BPD37, which was decommissioned in early 2017 and the records were still available. Standard Operating Procedure (SOP) 008 states records will be kept for 48 months.

Audit outcome

Compliant

4. INSTALLATION AND MODIFICATION OF METERING INSTALLATIONS

4.1. Design Reports for Metering Installations (Clause 2 of Schedule 10.7)

Code reference

Clause 2 of Schedule 10.7

Code related audit information

The MEP must obtain a design report for each proposed new metering installation or a modification to an existing metering installation, before it installs the new metering installation or before the modification commences.

Clause 2(2) and (3)—The design report must be prepared by a person with the appropriate level of skills, expertise, experience and qualifications and must include a schematic drawing, details of the configuration scheme that programmable metering components are to include, confirmation that the configuration scheme has been approved by an approved test laboratory, maximum interrogation cycle, any compensation factor arrangements, method of certification required, and name and signature of the person who prepared the report and the date it was signed.

Clause 2(4)—The MEP must provide the design report to the certifying ATH before the ATH installs or modifies the metering installation (or a metering component in the metering installation).

Audit observation

Nova has engaged Accucal as an ATH and Nova is an ATH themselves. I checked the Nova design reports and I confirmed that the design reports for three metering installations where Nova is the MEP and Accucal was the ATH, were the same as those checked during the Accucal audit, where compliance was confirmed. The Nova design reports are compliant.

Audit commentary

The design reports include all of the requirements noted above and they were prepared by a person with the appropriate level of skills, expertise, experience and qualifications.

Audit outcome

Compliant

4.2. Contracting with ATH (Clause 9 of Schedule 10.6)

Code reference

Clause 9 of Schedule 10.6

Code related audit information

The MEP must, when contracting with an ATH in relation to the certification of a metering installation, ensure that the ATH has the appropriate scope of approval for the required certification activities.

Audit observation

I confirmed that Nova has used Accucal and their own ATH (Nova Class B) during the audit period.

Audit commentary

I checked the Authority's website and confirm that all ATHs have appropriate scopes of approval.

Audit outcome

Compliant

4.3. Metering Installation Design & Accuracy (Clause 4(1) of Schedule 10.7)

Code reference

Clause 4(1) of Schedule 10.7

Code related audit information

The MEP must ensure:

- *that the sum of the measured error and uncertainty does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of the metering installation*
- *the design of the metering installation (including data storage device and interrogation system) will ensure the sum of the measured error and the smallest possible increment of the energy value of the raw meter data does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of installation*
- *the metering installation complies with the design report and the requirements of Part 10.*

Audit observation

I checked the processes used by Nova to ensure compliance with the design and with the error thresholds stipulated in Table 1. I also checked the certification records for 25 metering installations.

Audit commentary

Nova has re-developed their uncertainty calculator in conjunction with MSL for use when conducting comparative certification. Compliance is confirmed.

With regard to the design of the installation (including data storage device and interrogation system), Nova ensures the sum of the measured error and the smallest possible increment of the energy value of the raw meter data does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of installation. There are no components installed where “coarse” rounding is in place for the data or where meters with a low pulse rate are connected to separate data storage devices.

Nova ensures the metering installation complies with the design report and the requirements of Part 10 by requiring ATH’s to confirm the installations matches the design, or by requiring updates to be provided if the installation does not match the design. The design report was recorded correctly for all 25 metering installations checked.

All Category 2 certification reports are checked to ensure fields, such as the design report, are correctly populated. Certification reports for all new connections are also checked regardless of metering category.

Audit outcome

Compliant

4.4. Subtractive Metering (Clause 4(2)(a) of Schedule 10.7)

Code reference

Clause 4(2)(a) of Schedule 10.7

Code related audit information

For metering installations for ICPs that are not also NSPs, the MEP must ensure that the metering installation does not use subtraction to determine submission information used for the purposes of Part 15.

Audit observation

I asked Nova to confirm whether subtraction was used for any metering installations where they were the MEP.

Audit commentary

Nova does not have any metering installations where subtractive metering is used.

Audit outcome

Not applicable

4.5. HHR Metering (Clause 4(2)(b) of Schedule 10.7)

Code reference

Clause 4(2)(b) of Schedule 10.7

Code related audit information

For metering installations for ICPs that are not also NSPs, the MEP must ensure that all category 3 or higher metering installations must be half-hour metering installations.

Audit observation

I checked Nova's list file to confirm compliance with this requirement.

Audit commentary

I checked Nova's list file and I confirm that all category 3 and above metering installations are HHR.

Audit outcome

Compliant

4.6. NSP Metering (Clause 4(3) of Schedule 10.7)

Code reference

Clause 4(3) of Schedule 10.7

Code related audit information

The MEP must ensure that the metering installation for each NSP that is not connected to the grid does not use subtraction to determine submission information used for the purposes of Part 15 and is a half-hour metering installation.

Audit observation

I checked if Nova is responsible for any NSP metering.

Audit commentary

Nova is responsible for metering at NSP ANI0331BOPDNP. Nova confirmed that subtraction is not used. The certification record confirmed it is HHR metered.

Audit outcome

Compliant

4.7. Responsibility for Metering Installations (Clause 10.26(10))

Code reference

Clause 10.26(10)

Code related audit information

The MEP must ensure that each point of connection to the grid for which there is a metering installation that it is responsible for has a half hour metering installation.

Audit observation

I checked if Nova is responsible for any GXP metering by reviewing the NSP Mapping Table.

Audit commentary

Nova is responsible for metering at two points of connection to the grid (KPA1101KAPEGD and MKE1101TODDGG), and they are both HHR metered.

Audit outcome

Compliant

4.8. Suitability of Metering Installations (Clause 4(4) of Schedule 10.7)

Code reference

Clause 4(4) of Schedule 10.7

Code related audit information

The MEP must, for each metering installation for which it is responsible, ensure that it is appropriate having regard to the physical and electrical characteristics of the POC.

Audit observation

I asked Nova to provide details of how they ensure the suitability of metering installations.

Audit commentary

The certification record contains a field in relation to this clause and the technician is required to confirm that installations are compliant and safe.

Audit outcome

Compliant

4.9. Installation & Modification of Metering Installations (Clauses 10.34(2), (2A) and (3))

Code reference

Clauses 10.34(2), (2A) and (3)

Code related audit information

If a metering installation is proposed to be installed or modified at a POC, other than a POC to the grid, the MEP must consult with and use its best endeavours, to agree with the distributor and the trader for that POC, before the design is finalised, on the metering installations:

- *required functionality*
- *terms of use*
- *required interface format*
- *integration of the ripple receiver and the meter*

- *functionality for controllable load.*

Each participant involved in the consultations must use its best endeavours to reach agreement and act reasonably and in good faith.

Audit observation

I checked whether appropriate consultation had occurred.

Audit commentary

A notification has been sent to all the Traders and Distributors. To date no responses have been received.

Audit outcome

Compliant

4.10. Changes to Registry Records (Clause 3 of Schedule 11.4)

Code reference

Clause 3 of Schedule 11.4

Code related audit information

The MEP must advise the registry of the registry metering records or any change to the registry metering records for a metering installation for which it is responsible, no later than 10 business days following:

- the electrical connection of an ICP that is not also an NSP*
- any subsequent change in any matter covered by the metering records.*

Audit observation

I checked the event detail report for the period 01/01/17 to 28/02/18 to evaluate the timeliness of registry updates.

Audit commentary

The table below shows that all new connections were updated on time but there was a small percentage of late registry updates. Most of the updates were a result Nova's periodic "self audit" process and specifically the identification of some ICPs recorded as "UN" but with a control device present. The "self audit" process is where Nova uses the same discrepancy database used by the auditors to identify potential issues.

Event	Year	Total ICPs	ICPs Notified Within 10 Days	ICPs Notified Greater Than 10 Days	Average Notification Days	Percentage Compliant
New connection	2016	20	12	8	Not calculated	60%
	2017	53	53	0	2.8	100%
	2018	40	40	0	1.9	100%
Update	2016	589	383	206	109.4	65%
	2017	5,174	498	4,676	469	11%

	2018	3,833	3,708	125	21	97%
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Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jan-17 To: 28-Feb-18	Some records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area because Nova has checks in place to identify and resolve discrepancies. The impact on participants, customers or settlement could be minor where a tariff change may be required; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Once discrepancy’s identified they have been corrected in the registry		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
To continue self-auditing every 6 months. Also internal discrepancy reports are completed every 10 days thus identifying data to be corrected before any breach occurs.		Complete	

4.11. Metering Infrastructure (Clause 10.39(1))

Code reference

Clause 10.39(1)

Code related audit information

The MEP must ensure that for each metering installation:

- an appropriately designed metering infrastructure is in place
- each metering component is compatible with, and will not interfere with any other component in the installation
- collectively, all metering components integrate to provide a functioning system

- *each metering installation is correctly and accurately integrated within the associated metering infrastructure.*

Audit observation

Nova recently implemented an AMI data collection system. The AMI metering and data collection system is considered “metering infrastructure”. The design report and type test report were checked to confirm compliance.

Audit commentary

The type test report, design report and this audit report confirm that the system will operate in a compliant manner.

Audit outcome

Compliant

4.12. Responsibility for Metering at ICP (Clause 11.18B(3))

Code reference

Clause 11.18B(3)

Code related audit information

If an ICP is to be decommissioned, the MEP who is responsible for each metering installation for the ICP must:

- *advise the trader no later than three business days prior to decommissioning that the trader must, as part of the decommissioning, carry out a final interrogation; or*
- *if the MEP is responsible for the interrogation of the metering installation, arrange for a final interrogation to take place.*

Audit observation

I checked whether Nova was the MEP at any decommissioned ICPs and whether notification had been provided to relevant traders.

Audit commentary

There were some ICPs decommissioned where Nova is the MEP during the audit period. Nova’s process is to obtain the meter reading on behalf of the trader when the metering is removed. I checked ten examples which showed that readings were obtained in seven instances. For the other three the buildings were demolished or destroyed and the meters were not recovered.

Audit outcome

Compliant

4.13. Measuring Transformer Burden and Compensation Requirements (Clause 31(4) and (5) of Schedule 10.7)

Code reference

Clause 31(4) and (5) of Schedule 10.7

Code related audit information

The MEP must, before approving the addition of, or change to, the burden or compensation factor of a measuring transformer in a metering installation, consult with the ATH who certified the metering installation.

If the MEP approves the addition of, or change to, the burden or compensation factor, it must ensure the metering installation is recertified by an ATH before the addition or change becomes effective.

Audit observation

I asked Nova whether they had approved any burden changes during the audit period.

Audit commentary

There have not been any examples of burden changes occurring during the audit period except at the time of recertification. Nova showed the certification reports for several metering installations where the burden had been increased to ensure it was above the lowest test point for the CTs. An example is shown below.

CT Checks				
With Burdening resistors installed				
Calculated Burden at rated current of CT				
PHASE	SEC V	SEC A	VA	Pass/Fail
1	0.127760	1.574000	2 029	Pass
2	0.159990	1.936800	2 065	Pass
3	0.152270	1.938800	1 963	Pass

Audit outcome

Compliant

4.14. Changes to Software ROM or Firmware (Clause 39(1) and 39(2) of Schedule 10.7)

Code reference

Clause 39(1) and 39(2) of Schedule 10.7

Code related audit information

The MEP must, if it proposes to change the software, ROM or firmware of a data storage device installed in a metering installation, ensure that, before the change is carried out, an approved test laboratory:

- *tests and confirms that the integrity of the measurement and logging of the data storage device would be unaffected*
- *documents the methodology and conditions necessary to implement the change*
- *advises the ATH that certified the metering installation of any change that might affect the accuracy of the data storage device.*

The MEP must, when implementing a change to the software, ROM or firmware of a data storage device installed in a metering installation:

- *carry out the change in accordance with the methodology and conditions identified by the approved test laboratory under clause 39(1)(b)*
- *keep a list of the data storage devices that were changed*
- *update the metering records for each installation affected with the details of the change and the methodology used.*

Audit observation

I checked if there any examples of changes in accordance with these clauses.

Audit commentary

There were some firmware changes conducted during the audit period. The new firmware version was supplied by EDM I (an approved laboratory) along with instructions. The changes were made in the laboratory prior to the installation of the meters. Records show the relevant firmware version.

Audit outcome

Compliant

4.15. Temporary Energisation (Clause 10.28(6))

Code reference

Clause 10.28(6)

Code related audit information

An MEP must not request the temporary energisation of a new POC unless authorised to do so by the reconciliation participant responsible for that POC and has an arrangement with that reconciliation participant to provide metering services.

Audit observation

I checked examples of insufficient load certification to determine whether there were any examples of temporary energisation for the purposes of testing.

Audit commentary

I checked examples of insufficient load certification to determine whether there were any examples of temporary energisation for the purposes of testing. None were identified.

Audit outcome

Not applicable

5. METERING RECORDS

5.1. Accurate and Complete Records (Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4)

Code reference

Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4

Code related audit information

The MEP must, for each metering installation for which it is responsible, keep accurate and complete records of the attributes set out in Table 1 of Schedule 11.4. These include:

- a) the certification expiry date of each metering component in the metering installation*
- b) all equipment used in relation to the metering installation, including serial numbers and details of the equipment's manufacturer*
- c) the manufacturer's or (if different) most recent test certificate for each metering component in the metering installation*
- d) the metering installation category and any metering installations certified at a lower category*
- e) all certification reports and calibration reports showing dates tested, tests carried out, and test results for all metering components in the metering installation*
- f) the contractor who installed each metering component in the metering installation*
- g) the certification sticker, or equivalent details, for each metering component that is certified under Schedule 10.8 in the metering installation:*
- h) any variations or use of the 'alternate certification' process*
- i) seal identification information*
- j) any applicable compensation factors*
- k) the owner of each metering component within the metering installation*
- l) any applications installed within each metering component*
- m) the signed inspection report confirming that the metering installation complies with the requirements of Part 10.*

Audit observation

I checked certification records for 25 metering installations to evaluate compliance with this clause. I also checked the Category 1 inspection records for the 2017 year.

Audit commentary

All certification records were complete and accurate, and the inspection process did not identify any information related issues.

Audit outcome

Compliant

5.2. Inspection Reports (Clause 4(2) of Schedule 10.6)

Code reference

Clause 4(2) of Schedule 10.6

Code related audit information

The MEP must, within 10 business days of receiving a request from a participant for a signed inspection report prepared under clause 44 of Schedule 10.7, make a copy of the report available to the participant.

Audit observation

I asked Nova whether any requests had been made for copies of inspection reports.

Audit commentary

Nova has not been requested to supply any inspection reports, but these are available and can be supplied on request.

Audit outcome

Compliant

5.3. Retention of Metering Records (Clause 4(3) of Schedule 10.6)

Code reference

Clause 4(3) of Schedule 10.6

Code related audit information

The MEP must keep metering installation records for 48 months after any metering component is removed, or any metering installation is decommissioned.

Audit observation

I checked old metering records to confirm compliance.

Audit commentary

Nova keeps records indefinitely. I confirmed this by checking some records more than four years old.

Audit outcome

Compliant

5.4. Provision of Records to ATH (Clause 6 Schedule 10.6)

Code reference

Clause 6 Schedule 10.6

Code related audit information

If the MEP contracts with an ATH to recertify a metering installation and the ATH did not previously certify the metering installation, the MEP must provide the ATH with a copy of all relevant metering records not later than 10 business days after the contract comes into effect.

Audit observation

Nova will comply with this requirement as it arises. There are no current examples where this has occurred.

Audit commentary

Nova will comply with this requirement as it arises. There are no current examples where this has occurred.

Audit outcome

Not applicable

6. MAINTENANCE OF REGISTRY INFORMATION

6.1. MEP Response to Switch Notification (Clause 1(1) of Schedule 11.4)

Code reference

Clause 1(1) of Schedule 11.4

Code related audit information

Within 10 business days of being advised by the registry that it is the gaining MEP for the metering installation for the ICP, the MEP must enter into an arrangement with the trader and advise the registry it accepts responsibility for the ICP and of the proposed date on which it will assume responsibility.

Audit observation

I checked the event detail report for the period 01/01/17 to 28/02/18 to confirm whether all responses were within 10 business days.

Audit commentary

All responses were within 10 business days.

Audit outcome

Compliant

6.2. Provision of Registry Information (Clause 7 (1), (2) and (3) of Schedule 11.4)

Code reference

Clause 7 (1), (2) and (3) of Schedule 11.4

Code related audit information

The MEP must provide the information indicated as being 'required' in Table 1 of clause 7 of Schedule 11.4 to the registry, in the prescribed form for each metering installation for which the MEP is responsible.

From 1 April 2015, a MEP is required to ensure that all the registry metering records of its category 1 metering installations are complete, accurate, not misleading or deceptive, and not likely to mislead or deceive.

The information the MEP provides to the registry must derive from the metering equipment provider's records or the metering records contained within the current trader's system.

Audit observation

I checked the list file for 100% of records to identify discrepancies.

Audit commentary

Analysis of the list file and an event detail report for all Nova ICPs found a small number of issues. The table below shows the issues found, and has a comparison to the previous audit results.

Quantity 2016	Quantity 2017	Quantity 2018	Issue	Resolved?
1	1	0	Installations without CT information populated on the registry.	
2	1	0	Metering installation with blank records.	
2	0	0	ICPs with compensation factors above 3 but recorded as Category 1.	
1	0	0	Incorrect compensation factor of 109 recorded in the registry. Has been corrected to 100.	
1	0	0	"Invalid" certification date recorded on the registry.	
40	0	0	Category 1 installations with certification duration of more than 15 years.	
2	0	0	Category 2 installations certified for longer than the period allowed in Table 1.	
246	7	3	ICPs with IN24.	In progress - These are interim certified sites so will be updated once certification has been resolved
3	2	1	ICP 1000022999BP60D shows as "G" but only the local service is operational and metered. Nova's metering is compliant because it is load only.	
2	1	0	CN only with a residential ANZSIC code indicating domestic use. This is a pump and it's possible the ANZSIC code may be incorrect. The CN code is correct.	
0	1	0	Night without Day	
1,300	9	0	No control device information on the registry for certified control devices. None of these are being used on installations where the retailer is using a profile requiring certification.	
-	-	1	UN with a control device	Yes, resolved prior to the audit

Audit outcome

Non-compliant

Non-compliance	Description
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Jan-17</p> <p>To: 28-Feb-18</p>	<p>Three ICPs with IN24.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong in this area because there were only a small number of issues (4 ICPs) and these were all known to Nova.</p> <p>The three remaining discrepancies may have a minor impact on tariff and therefore billing accuracy. The audit risk rating is therefore low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
These three ICPs are uncertified and Nova MEP is trying to gain access to the installation to no avail. Correspondence to trader requesting such access has been shown to the auditor		Done	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to self-audit and manage Staff training to maintain a high level of expertise in this area		On-going	

6.3. Correction of Errors in Registry (Clause 6 of Schedule 11.4)

Code reference

Clause 6 of Schedule 11.4

Code related audit information

By 0900 hours on the 13th business day of each reconciliation period, the MEP must obtain from the registry:

- *a list of ICPs for the metering installations the MEP is responsible for*
- *the registry metering records for each ICP on that list.*

No later than five business days following collection of data from the registry, the MEP must compare the information obtained from the registry with the MEP's own records.

Within five business days of becoming aware of any discrepancy between the MEP's records and the information obtained from the registry, the MEP must correct the records that are in error and advise the registry of any necessary changes to the registry metering records.

Audit observation

I conducted a walkthrough of the validation processes to confirm compliance. I checked Nova's reporting which shows days elapsed between finding a discrepancy and updating the registry.

Audit commentary

Nova has a metering database (CMMS) which has daily reporting of discrepancies. These discrepancies are dealt with fortnightly. Nova demonstrated that all issues were resolved within five business days in the most recent report. Compliance is confirmed.

Audit outcome

Compliant

6.4. Cancellation of Certification (Clause 20 of Schedule 10.7)

Code reference

Clause 20 of Schedule 10.7

Code related audit information

The certification of a metering installation is automatically cancelled on the date on which one of the following events takes place:

- a) the metering installation is modified otherwise than under sub clause 19(3) or 19(6)*
- b) the metering installation is classed as outside the applicable accuracy tolerances set out in Table 1 of Schedule 10.1, defective or not fit for purpose under this Part or any audit*
- c) an ATH advises the metering equipment provider responsible for the metering installation of a reference standard or working standard used to certify the metering installation not being compliant with this Part at the time it was used to certify the metering installation, or the failure of a group of meters in the statistical sampling recertification process for the metering installation, or the failure of a certification test for the metering installation*
- d) the manufacturer of a metering component in the metering installation determines that the metering component does not comply with the standards to which the metering component was tested*
- e) an inspection of the metering installation, that is required under this Part, is not carried out in accordance with the relevant clauses of this Part*
- f) if the metering installation has been determined to be a lower category under clause 6 and the maximum current conveyed through the metering installation at any time exceeds the current rating of its metering installation category as set out in Table 1 of Schedule 10.1*
- g) the metering installation is certified under clause 14 and sufficient load is available for full certification testing and has not been retested under clause 14(4)*
- h) a control device in the metering installation certification is, and remains for a period of at least 10 business days, bridged out under clause 35(1)*
- i) the metering equipment provider responsible for the metering installation is advised by an ATH under clause 48(6)(b) that a seal has been removed or broken and the accuracy and continued integrity of the metering installation has been affected.*

A metering equipment provider must, within 10 business days of becoming aware that one of the events above has occurred in relation to a metering installation for which it is responsible, update the metering installation's certification expiry date in the registry.

Audit observation

I checked for examples of all of the points listed above, and checked whether certification had been cancelled, and whether the registry had been updated within 10 business days.

Audit commentary

During the audit period, some inspections were not conducted within the required window. Certification was cancelled immediately when this was discovered and re-certification occurred. No other examples of cancelled certification were found. This is discussed further in Section 8.2.

Audit outcome

Compliant

6.5. Registry Metering Records (Clause 11.8A)

Code reference

Clause 11.8A

Code related audit information

The MEP must provide the registry with the required metering information for each metering installation the MEP is responsible for, and update the registry metering records in accordance with Schedule 11.4.

Audit observation

This clause refers to schedule 11.4 which is discussed in **Section 6.2**, apart from the requirement to provide information in the “prescribed form”. I checked for examples of Nova not using the prescribed form.

Audit commentary

This clause refers to schedule 11.4 which is discussed in **Section 6.2**, apart from the requirement to provide information in the “prescribed form”. I checked for examples of Nova not using the prescribed form and did not find any exceptions.

Audit outcome

Compliant

7. CERTIFICATION OF METERING INSTALLATIONS

7.1. Certification and Maintenance (Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7)

Code reference

Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7

Code related audit information

The MEP must obtain and maintain certification for all installations and metering components for which it is responsible. The MEP must ensure it:

- *performs regular maintenance, battery replacement, repair/replacement of components of the metering installations*
- *updates the metering records at the time of the maintenance*
- *has a recertification programme that will ensure that all installations are recertified prior to expiry.*

Audit observation

I conducted the following checks to identify metering installations with expired, cancelled or late certification:

- the registry PR255 report was checked to identify ICPs with expired certification
- the new connections process was checked by using the event detail report, PR255 and the list file to identify ICPs where the certification was not conducted within five business days of energisation
- I checked ICPs where certification was cancelled to ensure the registry was updated accordingly.

Audit commentary

At the time of the audit there were 99 installations with expired certification. 36 of these were previously fully certified and 63 were previously interim certified. In all cases Nova provided correspondence with Retailers requesting them to provide access, customer details or to arrange remedial actions to resolve safety or other issues to enable recertification to occur. Whilst Nova is non-compliant for having expired certification, the Retailers are also non-compliant for not arranging access.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 01-Apr-15 To: 31-Dec-17	Certification expired for 99 ICPs. Potential impact: High Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>I have recorded the controls as strong because Nova has engaged in correspondence with Retailers for a long period of time to attempt to get access.</p> <p>The impact on settlement is recorded as low. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification, but the quantity is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
To continue following up with traders to gain access to these installations		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>To continue following up with traders to gain access to these installations</p> <p>Along with tis Nova MEP has a recertification SOP which includes identifying and notifying traders of impending recertifications.</p>		On-going	

7.2. Certification Tests (Clause 10.38(b) and clause 9 of Schedule 10.6)

Code reference

Clause 10.38(b) and clause 9 of Schedule 10.6

Code related audit information

For each metering component and metering installation an MEP is responsible for, the MEP must ensure that:

- *an ATH performs the appropriate certification and recertification tests*
- *the ATH has the appropriate scope of approval to certify and recertify the metering installation.*

Audit observation

I checked the certification records for 25 metering installations to confirm compliance. ATHs have shown that their processes include all tests and the reports confirm tests are completed.

Audit commentary

Most certification activities have been conducted by Nova with some being conducted by Accucal. The most recent audit reports for all ATHs confirm the appropriate testing is conducted.

Audit outcome

Compliant

7.3. Active and Reactive Capability (Clause 10.37(1) and 10.37(2)(a))

Code reference

Clause 10.37(1) and 10.37(2)(a)

Code related audit information

For any category 2 or higher half-hour metering installation that is certified after 29 August 2013, the MEP must ensure that the installation has active and reactive measuring and recording capability.

Consumption only installations that is a category 3 metering installation or above must measure and separately record:

- a) import active energy*
- b) import reactive energy*
- c) export reactive energy.*

Consumption only installations that are a category 2 metering installation must measure and separately record import active energy.

All other installations must measure and separately record:

- a) import active energy*
- b) export active energy*
- c) import reactive energy*
- d) export reactive energy.*

All grid connected POCs with metering installations which are certified after 29 August 2013 should measure and separately record:

- a) import active energy*
- b) export active energy*
- c) import reactive energy*
- d) export reactive energy.*

Audit observation

All relevant metering is compliant with this clause.

Audit commentary

All relevant metering is compliant with this clause.

Audit outcome

Compliant

7.4. Local Service Metering (Clause 10.37(2)(b))

Code reference

Clause 10.37(2)(b)

Code related audit information

The accuracy of each local service metering installation in grid substations must be within the tolerances set out in Table 1 of Schedule 10.1.

Audit observation

This clause relates to Transpower as an MEP.

Audit commentary

This clause relates to Transpower as an MEP.

Audit outcome

Not applicable

7.5. Measuring Transformer Burden (Clause 30(1) and 31(2) of Schedule 10.7)

Code reference

Clause 30(1) and 31(2) of Schedule 10.7

Code related audit information

The MEP must not permit a measuring transformer to be connected to equipment used for a purpose other than metering, unless it is not practical for the equipment to have a separate measuring transformer.

The MEP must ensure that a change to, or addition of, a measuring transformer burden or a compensation factor related to a measuring transformer is carried out only by:

- a) the ATH who most recently certified the metering installation*
- b) for a POC to the grid, by a suitably qualified person approved by both the MEP and the ATH who most recently certified the metering installation.*

Audit observation

I asked Nova if there were any examples of burden changes or the addition of non-metering equipment being connected to metering CTs.

Audit commentary

There are no examples of burden changes having occurred.

Audit outcome

Not applicable

7.6. Certification as a Lower Category (Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7)

Code reference

Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7

Code related audit information

A category 2 or higher metering installation may be certified by an ATH at a lower category than would be indicated solely on the primary rating of the current if the MEP, based on historical metering data, reasonably believes that:

- the maximum current will at all times during the intended certification period be lower than the current setting of the protection device for the category for which the metering installation is certified, or is required to be certified by the Code; or*
- the metering installation will use less than 0.5 GWh in any 12 month period.*

If a metering installation is categorised under clause 6(1)(b), the ATH may, if it considers appropriate, and, at the MEP's request, determine the metering installation's category according to the metering installation's expected maximum current.

If a meter is certified in this manner:

- *the MEP must, each month, obtain a report from the participant interrogating the metering installation, which details the maximum current from raw meter data from the metering installation by either calculation from the kVA by trading period, if available, or from a maximum current indicator if fitted in the metering installation conveyed through the point of connection for the prior month; and*
- *if the MEP does not receive a report, or the report demonstrates that the maximum current conveyed through the POC was higher than permitted for the metering installation category it is certified for, then the certification for the metering installation is automatically cancelled.*

Audit observation

I checked all ICPs for examples where the CT ratio was above the threshold to confirm that protection was appropriate or that monitoring was in place.

Audit commentary

Nova has certified one metering installation as Category 3 with 2000/5 CTs. Nova demonstrated that the protection for this installation is rated at 1,200 amps. One Category 2 installation has 600/5 CTs and the protection is rated at 500 amps.

Audit outcome

Compliant

7.7. Insufficient Load for Certification Tests (Clauses 14(3) and (4) of Schedule 10.7)

Code reference

Clauses 14(3) and (4) of Schedule 10.7

Code related audit information

If there is insufficient electricity conveyed through a POC to allow the ATH to complete a prevailing load test for a metering installation that is being certified as a half hour meter and the ATH certifies the metering installation the MEP must:

- *obtain and monitor raw meter data from the metering installation at least once each calendar month to determine if load during the month is sufficient for a prevailing load test to be completed:*
- *if there is sufficient load, arrange for an ATH to complete the tests (within 20 business days).*

Audit observation

I checked if there were any examples of Insufficient load certifications

Audit commentary

Nova does not allow certification in accordance with this clause. Load banks are required to be used to increase the load to conduct testing.

Audit outcome

Not applicable

7.8. Insufficient Load for Certification – Cancellation of Certification (Clause 14(6) of Schedule 10.7)

Code reference

Clause 14(6) of Schedule 10.7

Code related audit information

If the tests conducted under clause 14(4) of Schedule 10.7 demonstrate that the metering installation is not within the relevant maximum permitted error:

- *the metering installation certification is automatically revoked:*
- *the certifying ATH must advise the MEP of the cancellation within 1 business day:*
- *the MEP must follow the procedure for handling faulty metering installations (clause 10.43 - 10.48).*

Audit observation

Nova does not allow certification in accordance with this clause. Load banks are required to be used to increase the load to conduct testing.

Audit commentary

Nova does not allow certification in accordance with this clause. Load banks are required to be used to increase the load to conduct testing.

Audit outcome

Not applicable

7.9. Alternative Certification Requirements (Clauses 32(2), (3) and (4) of Schedule 10.7)

Code reference

Clauses 32(2), (3) and (4) of Schedule 10.7

Code related audit information

If an ATH cannot comply with the requirements to certify a metering installation due to measuring transformer access issues, and therefore certifies the metering installation in accordance with clause 32(1) of Schedule 10.7, the MEP must:

- *advise the market administrator, by no later than 10 business days after the date of certification of the metering installation, of the details in clause 32(2)(a) of Schedule 10.7*
- *respond, within 5 business days, to any requests from the market administrator for additional information*
- *ensure that all of the details are recorded in the metering installation certification report*
- *take all steps to ensure that the metering installation is certified before the certification expiry date.*

If the market administrator determines the ATH could have obtained access the metering installation is deemed to be defective and the MEP must follow the process of handling faults metering installations in clauses 10.43 to 10.48.

Audit observation

I checked the registry records to confirm whether alternative certification had been applied.

Audit commentary

Alternative certification has not been applied to any metering installations.

Audit outcome

Not applicable

7.10. Timekeeping Requirements (Clause 23 of Schedule 10.7)

Code reference

Clause 23 of Schedule 10.7

Code related audit information

If a time keeping device that is not remotely monitored and corrected controls the switching of a meter register in a metering installation, the MEP must ensure that the time keeping device:

- a) has a time keeping error of not greater than an average of 2 seconds per day over a period of 12 months*
- b) is monitored and corrected at least once every 12 months.*

Audit observation

I asked Nova whether there were any metering installations with timeclocks.

Audit commentary

Nova confirmed there are no metering installations with timeclocks.

Audit outcome

Not applicable

7.11. Control Device Bridged Out (Clause 35 of Schedule 10.7)

Code reference

Clause 35 of Schedule 10.7

Code related audit information

The participant must, within 10 business days of bridging out a control device or becoming aware of a control device being bridged out, notify the following parties:

- the relevant reconciliation participant*
- the relevant metering equipment provider.*

If the control device is used for reconciliation, the metering installation is considered defective in accordance with 10.43.

Audit observation

I checked the process for the management of bridged control devices and I checked whether any notifications were required to other parties.

Audit commentary

I checked three ICPs with bridged control devices. There is a process in place for this activity and they were all resolved immediately by a metering contractor. Notification was provided in a compliant manner.

Audit outcome

Compliant

7.12. Control Device Reliability Requirements (Clause 34(5) of Schedule 10.7)

Code reference

Clause 34(5) of Schedule 10.7

Code related audit information

If the MEP is advised by an ATH that the likelihood of a control device not receiving signals would affect the accuracy or completeness of the information for the purposes of Part 15, the MEP must, within three business days inform the following parties of the ATH's determination (including all relevant details):

- a) the reconciliation participant for the POC for the metering installation*
- b) the control signal provider.*

Audit observation

I checked the steps Nova had taken to identify regions with signal propagation issues.

Audit commentary

Nova has not received notification from ATHs in accordance with this clause. Nova did receive notification from Horizon to install 317Hz control devices on their network because of potential propagation issues with the old 750Hz plant. All control devices used on the Horizon network are now 317Hz.

Audit outcome

Compliant

7.13. Statistical Sampling (Clauses 16(1) and (5) of Schedule 10.7)

Code reference

Clauses 16(1) and (5) of Schedule 10.7

Code related audit information

The MEP may arrange for an ATH to recertify a group of category 1 metering installations for which the MEP is responsible using a statistical sampling process.

The MEP must update the registry in accordance with Part 11 on the advice of an ATH as to whether the group meets the recertification requirements.

Audit observation

I checked whether statistical sampling had occurred during the audit period.

Audit commentary

Nova has not conducted any statistical sampling during the audit period.

Audit outcome

Not applicable

7.14. Compensation Factors (Clause 24(3) of Schedule 10.7)

Code reference

Clause 24(3) of Schedule 10.7

Code related audit information

If a compensation factor must be applied to a metering installation that is an NSP, the MEP must advise the reconciliation participant responsible for the metering installation of the compensation factor within 10 days of certification of the installation.

In all other cases the MEP must advise the registry of the compensation factor.

Audit observation

I checked the records for 15 CT metered metering installations to confirm that compensation factors were correctly recorded on the registry.

Audit commentary

Compensation factors have been updated accurately on the registry. I confirmed this by checking the records for 15 ICPs.

Audit outcome

Compliant

7.15. Metering Installations Incorporating a Meter (Clause 26(1) of Schedule 10.7)

Code reference

Clause 26(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each meter in a metering installation it is responsible for is certified.

Audit observation

I checked the certification records for 25 metering installations to confirm compliance.

Audit commentary

Meters were certified for all 25 installations.

Audit outcome

Compliant

7.16. Metering Installations Incorporating a Measuring Transformer (Clause 28(1) of Schedule 10.7)

Code reference

Clause 28(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each measuring transformer in a metering installation it is responsible for is certified.

Audit observation

I checked the certification records for 15 metering installations to confirm compliance.

Audit commentary

Measuring transformers were certified for all 15 installations.

Audit outcome

Compliant

7.17. Metering Installations Incorporating a Data Storage Device (Clause 36(1) of Schedule 10.7)

Code reference

Clause 36(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each data storage device in a metering installation it is responsible for is certified.

Audit observation

I checked the certification records for 11 metering installations to confirm compliance.

Audit commentary

The 11 certification records that I checked confirmed that data storage devices are being correctly certified.

Audit outcome

Compliant

7.18. Notification of ATH Approval (Clause 7 (3) Schedule 10.3)

Code reference

Clause 7 (3) Schedule 10.3

Code related audit information

If the MEP is notified by the Authority that an ATH's approval has expired, been cancelled or been revised, the MEP must treat all metering installations certified by the ATH during the period where the ATH was not approved to perform the activities as being defective and follow the procedures set out in 10.43 to 10.48.

Audit observation

I checked the ATH register to confirm compliance.

Audit commentary

All relevant ATHs have appropriate approval.

Audit outcome

Compliant

7.19. Interim Certification (Clause 18 of Schedule 10.7)

Code reference

Clause 18 of Schedule 10.7

Code related audit information

The MEP must ensure that each interim certified metering installation on 28 August 2013 is certified by no later than 1 April 2015.

Audit observation

I checked the registry records (PR255) to identify any ICPs with interim certification recorded.

Audit commentary

There are 63 previously interim certified installations with expired certification. This is recorded as non-compliance in **Section 7.1**.

Audit outcome

Not applicable

8. INSPECTION OF METERING INSTALLATIONS

8.1. Category 1 Inspections (Clause 45 of Schedule 10.7)

Code reference

Clause 45 of Schedule 10.7

Code related audit information

The MEP must ensure that category 1 metering installations (other than interim certified metering installations):

- *have been inspected by an ATH within 120 months from the date of the metering installation's most recent certification or*
- *for each 12 month period, commencing 1 January and ending 31 December, a sample of the category 1 metering installations selected under clause 45(2) of Schedule 10.7 has been inspected by an ATH.*

Before a sample inspection process can be carried out, the MEP must submit a documented process for selecting the sample to the Electricity Authority, at least two months prior to first date on which the inspections are to be carried out, for approval (and promptly provide any other information the Authority may request).

The MEP must not inspect a sample unless the Authority has approved the documented process.

The MEP must, for each inspection conducted under clause 45(1)(b), keep records detailing:

- *any defects identified that have affected the accuracy or integrity of the raw meter data recorded by the metering installation*
- *any discrepancies identified under clause 44(5)(b)*
- *relevant characteristics, sufficient to enable reporting of correlations or relationships between inaccuracy and characteristics*
- *the procedure used, and the lists generated, to select the sample under clause 45(2).*

The MEP must, if it believes a metering installation that has been inspected is or could be inaccurate, defective or not fit for purpose:

- *comply with clause 10.43*
- *arrange for an ATH to recertify the metering installation if the metering is found to be inaccurate under Table 1 of Schedule 10.1, or defective or not fit for purpose.*

The MEP must by 1 April in each year, provide the Authority with a report that states whether the MEP has, for the previous 1 January to 31 December period, arranged for an ATH to inspect each category 1 metering installation for which it is responsible under clause 45(1)(a) or 45(1)(b).

This report must include the matters specified in clauses 45(8)(a) and (b).

If the MEP is advised by the Authority that the tests do not meet the requirements under clause 45(9) of Schedule 10.7, the MEP must select the additional sample under that clause, carry out the required inspections, and report to the Authority, within 40 business days of being advised by the Authority.

Audit observation

I checked whether Nova had conducted sample inspections for Category 1 metering installations.

Audit commentary

I checked the inspection process and the associated reporting, which confirms compliance with the Code.

Audit outcome

Compliant

8.2. Category 2 to 5 Inspections (Clause 46(1) of Schedule 10.7)

Code reference

Clause 46(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each category 2 or higher metering installation is inspected by an ATH at least once within the applicable period. The applicable period begins from the date of the metering installation's most recent certification and extends to:

- 120 months for Category 2
- 60 months for Category 3
- 30 months for Category 4
- 18 months for Category 5.

Audit observation

I checked the registry information to confirm which ICPs were due for inspection and I then checked the inspection reports for all relevant ICPs.

Audit commentary

The inspection schedule is currently up to date. Nova reported that some installations had been re-certified because the inspections were not conducted within the window. The controls have since been strengthened to ensure all inspections are conducted on time.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 8.2 With: Clause 46(1) of schedule 10.7 From: 01-Jan-17 To: 12-Dec-17	Some inspections not conducted within the allowable window. Recertification occurred immediately when this was discovered. Potential impact: Low Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	The controls are recorded as strong because reporting is now in place to provide advanced warning of upcoming inspections. There was no impact because the installations have been recertified. Therefore the audit risk rating is recorded as low.
Actions taken to resolve the issue	
Completion date	Remedial action status

Installation was recertified	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
New maintenance dashboards have been built and inspections are arranged many months in advance now.	Complete	

8.3. Inspection Reports (Clause 44(5) of Schedule 10.7)

Code reference

Clause 44(5) of Schedule 10.7

Code related audit information

The MEP must, within 20 business days of receiving an inspection report from an ATH:

- *undertake a comparison of the information received with its own records*
- *investigate and correct any discrepancies*
- *update the metering records in the registry.*

Audit observation

I checked the inspection process and the results to confirm compliance.

Audit commentary

The inspection report information was checked against Nova's records within the required timeframe.

Audit outcome

Compliant

8.4. Broken or removed seals (Clause 48(4) and (5) of Schedule 10.7)

Code reference

Clause 48(4) and (5) of Schedule 10.7

Code related audit information

If the MEP is advised of a broken or removed seal it must use reasonable endeavours to determine

- a) *who removed or broke the seal*
- b) *the reason for the removal or breakage*

and arrange for an ATH to carry out an inspection of the removal or breakage and determine any work required to remedy the removal or breakage.

The MEP must make the above arrangements within

- a) *three business days, if the metering installation is category 3 or higher*
- b) *10 business days if the metering installation is category 2*
- c) *20 business days if the metering installation is category 1.*

Audit observation

I checked examples of notification of missing seals, which were all as a result of inspection processes or notification by field technicians.

Audit commentary

Nova has a documented process in place for the management of seals and any subsequent investigation and reporting. There were 28 examples found during the inspection process and in all cases, the seals were replaced immediately once it was determined there was no damage or tampering.

Audit outcome

Compliant

9. PROCESS FOR HANDLING FAULTY METERING INSTALLATIONS

9.1. Investigation of Faulty Metering Installations (Clause 10.43(4) and (5))

Code reference

Clause 10.43(4) and (5)

Code related audit information

If the MEP is advised or becomes aware that a metering installation may be inaccurate, defective, or not fit for purpose, it must investigate and report on the situation to all affected participants as soon as reasonably practicable after becoming aware of the information, but no later than;

- a) 20 business days for Category 1,
- b) 10 business days for Category 2 and
- c) 5 business days for Category 3 or higher.

Audit observation

I checked Nova's spreadsheet of faulty metering installations to determine compliance. I checked the timeframe from the service request date to the statement of situation date for 10 examples.

Audit commentary

Five examples from 2017 had reports prepared later than the allowable number of days. Five examples from 2018 were completed within the allowable number of days. There were some delays during 2017, the causes of which have been resolved. Examples checked from 2018 confirmed that there have been no further delays.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 01-Jan-17 To: 31-Dec-17	Five late reports for faulty metering installations. 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 they have recently been improved and current turnaround times are compliant. There is an impact on settlement and participants because the retailer requires the relevant reports in order to re-bill and adjust settlement information. The impact is minor due to the low number of examples; therefore the audit risk rating is low.
Actions taken to resolve the issue	
Completion date	
Remedial action status	

Internal staff training has been upgraded and the importance of timelines in both the ATH and the MEP has been raised and highlighted that the internal SOPs dictate the minimum timelines	Complete	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Nova MEP is managing this process via an active spreadsheet so that the return of reports is monitored and followed up if not provided within the MEP timeframe.	Complete	

9.2. Testing of Faulty Metering Installations (Clause 10.44)

Code reference

Clause 10.44

Code related audit information

If a report prepared under clause 10.43(4)(c) demonstrates that a metering installation is inaccurate, defective, or not fit for purpose, the MEP must arrange for an ATH to test the metering installation and provide a 'statement of situation'.

If the MEP is advised by a participant under clause 10.44(2)(a) that the participant disagrees with the report that demonstrates that the metering installation is accurate, not defective and fit for purpose, the MEP must arrange for an ATH to:

- a) test the metering installation*
- b) provide the MEP with a statement of situation within five business days of:*
- c) becoming aware that the metering installation may be inaccurate, defective or not fit for purpose; or*
- d) reaching an agreement with the participant.*

The MEP is responsible for ensuring the ATH carries out testing as soon as practicable and provides a statement of situation.

Audit observation

I checked Nova's spreadsheet of faulty metering installations to determine compliance. I checked the timeframe from the service request date to the statement of situation date for 10 examples.

Audit commentary

In all cases, appropriate testing and reporting was conducted immediately. There were no disputes regarding results. As recorded in **Section 9.1**, some statements of situation were provided late, but compliance is achieved with this clause.

Audit outcome

Compliant

9.3. Statement of Situation (Clause10.46(2))

Code reference

Clause10.46(2)

Code related audit information

Within three business days of receiving the statement from the ATH, the MEP must provide copies of the statement to:

- *the relevant affected participants*
- *the market administrator (for all category 3 and above metering installations and any category 1 and category 2 metering installations) on request.*

Audit observation

I checked Nova's spreadsheet of faulty metering installations to determine compliance. I checked the timeframe from the service request date to the statement of situation date for 10 examples.

Audit commentary

Statements of situation were provided as soon as they were received from the ATH.

Audit outcome

Compliant

10. ACCESS TO AND PROVISION OF RAW METER DATA AND METERING INSTALLATIONS

Nova proposed to implement an AMI data collection system in November 2017. A material change audit was conducted and a report prepared. The system is not yet implemented and was therefore not examined during the audit.

10.1. Access to Raw Meter Data (Clause 1 of Schedule 10.6)

Code reference

Clause 1 of Schedule 10.6

Code related audit information

The MEP must give authorised parties access to raw meter data within 10 business days of receiving the authorised party making a request.

The MEP must only give access to raw meter data to a trader or person, if that trader or person has entered into a contract to collect, obtain, and use the raw meter data with the end customer.

The MEP must provide the following when giving a party access to information:

- a) the raw meter data; or*
- b) the means (codes, keys etc.) to enable the party to access the raw meter data.*

The MEP must, when providing raw meter data or access to an authorised person use appropriate procedures to ensure that:

- the raw meter data is received only by that authorised person or a contractor to the person*
- the security of the raw meter data and the metering installation is maintained*
- access to the raw meter data is limited to only the specific raw meter data under clause 1(7)(c) of Schedule 10.6.*

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.2. Restrictions on Use of Raw Meter Data (Clause 2 of Schedule 10.6)

Code reference

Clause 2 of Schedule 10.6

Code related audit information

The MEP must not give an authorised person access to raw meter data if to do so would breach clause 2(1) of Schedule 10.6.

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.3. Access to Metering Installations (Clause 3(1), (3) and (4) of Schedule 10.6)

Code reference

Clause 3(1), (3) and (4) of Schedule 10.6

Code related audit information

The MEP must within 10 business days of receiving a request from one of the following parties, arrange physical access to each component in a metering installation:

- *a relevant reconciliation participant with whom it has an arrangement (other than a trader)*
- *the Authority*
- *an ATH*
- *an auditor*
- *a gaining MEP.*

This access must include all necessary means to enable the party to access the metering components

When providing access the MEP must ensure that the security of the metering installation is maintained and physical access is limited to only the access required for the purposes of the Code, regulations in connection with the party's administration, audit and testing functions.

Audit observation

Access will be provided as required. No requests have been made.

Audit commentary

Access will be provided as required. No requests have been made.

Audit outcome

Not applicable

10.4. Urgent Access to Metering Installations (Clause 3(5) of Schedule 10.6)

Code reference

Clause 3(5) of Schedule 10.6

Code related audit information

If the party requires urgent physical access to a metering installation, the MEP must use its best endeavours to arrange physical access.

Audit observation

Access will be provided as required. No requests have been made.

Audit commentary

Access will be provided as required. No requests have been made.

Audit outcome

Not applicable

10.5. Electronic Interrogation of Metering Installations (Clause 8 of Schedule 10.6)

Code reference

Clause 8 of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from an MEP's back office, the MEP must

- *ensure that the interrogation cycle does not exceed the maximum interrogation cycle shown in the registry*
- *interrogate the metering installation at least once within each maximum interrogation cycle.*

When raw meter data can only be obtained from an MEP's back office, the MEP must ensure that the internal clock is accurate, to within ± 5 seconds of:

- *New Zealand standard time; or*
- *New Zealand daylight time.*

When raw meter data can only be obtained from an MEP's back office, the MEP must record in the interrogation and processing system logs, the time, the date, and the extent of any change in the internal clock setting in the metering installation.

When raw meter data can only be obtained from an MEP's back office, the MEP must ensure that a data storage device in a metering installation does not exceed the maximum time error set out in Table 1 of clause 8(5) of Schedule 10.6.

The MEP must compare the time on the internal clock of the data storage device with the time on the interrogation and processing system clock, calculate and correct (if required by this provision) any time error, and advise the affected reconciliation participant.

When raw meter data can only be obtained from an MEP's back office, the MEP must, when interrogating a metering installation, download the event log, check the event log for evidence of malfunctioning or tampering, and if this is detected, carry out the appropriate requirements of Part 10.

The MEP must ensure that all raw meter data that can only be obtained from the MEPs back office, that is downloaded as part of an interrogation, and that is used for submitting information for the purpose of Part 15 is archived:

- *for no less than 48 months after the interrogation date*
- *in a form that cannot be modified without creating an audit trail*
- *in a form that is secure and prevents access by any unauthorised person*

in a form that is accessible to authorised personnel.

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.6. Security of Metering Data (Clause 10.15(2))

Code reference

Clause 10.15(2)

Code related audit information

The MEP must take reasonable security measures to prevent loss or unauthorised access, use, modification or disclosure of the metering data.

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.7. Time Errors for Metering Installations (Clause 8(4) of Schedule 10.6)

Code reference

Clause 8(4) of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from the MEPs back office, the MEP must ensure that the data storage device it interrogates does not exceed the maximum time error set out in Table 1 of clause 8(5) of Schedule 10.6.

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.8. Event Logs (Clause 8(7) of Schedule 10.6)

Code reference

Clause 8(7) of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from the MEP's back office, the MEP must, when interrogating a metering installation:

- a) *ensure an interrogation log is generated*
- b) *review the event log and:*
 - i. *take appropriate action*
 - ii. *pass the relevant entries to the reconciliation participant.*
- c) *ensure the log forms part of an audit trail which includes:*
 - i. *the date and*

- ii. *time of the interrogation*
- iii. *operator (where available)*
- iv. *unique ID of the data storage device*
- v. *any clock errors outside specified limits*
- vi. *method of interrogation*
- vii. *identifier of the reading device used (if applicable).*

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.9. Comparison of HHR Data with Register Data (Clause 8(9) of Schedule 10.6)

Code reference

Clause 8(9) of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from the MEP's back office, the MEP must ensure that each electronic interrogation that retrieves half-hour metering information compares the information against the increment of the metering installations accumulating meter registers.

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

10.10. Correction of Raw Meter Data (Clause 10.48(2),(3))

Code reference

Clause 10.48(2),(3)

Code related audit information

If the MEP is notified of a question or request for clarification in accordance with clause 10.48(1), the MEP must, within 10 business days:

- *respond in detail to the questions or requests for clarification*
- *advise the reconciliation participant responsible for providing submission information for the POC of the correction factors to apply and period the factors should apply to.*

Audit observation

Nova does not yet have a fully operational AMI data collection system.

Audit commentary

Nova does not yet have a fully operational AMI data collection system.

Audit outcome

Not applicable

CONCLUSION

The audit found a high level of compliance with the Code. There are only three ICPs with incorrect registry data and this matter will be resolved once these are recertified. 99 ICPs have expired certification and Nova is waiting on the Retailer in all cases to arrange access. Some inspections were not conducted within the allowable window and the relevant installations have been recertified. Controls have been strengthened in this area and there have not been any recent examples. Reporting to Retailers for faulty metering installations was late during 2017 but this matter is now resolved and all recent notifications have been on time.

Nova proposed to implement an AMI data collection system in November 2017. A material change audit was conducted and a report prepared. The system is not yet implemented and was therefore not examined during the audit.

PARTICIPANT RESPONSE

Nova MEP will continue to develop MEP SOPs that outline all MEP obligations required of it by the code. These documents itemize compliance and administrative processes to ensure that Nova will meet and exceed its obligations.

Also Nova MEP will continue to refine its procedures and dedicate a high level of training towards its staff.

Nova MEP has set itself a goal of having 100% compliance with regards to certified ICPs and as at April 2018 this figure is 99.3%.