ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

For

NZTA BOP EAST AND GENESIS ENERGY

Prepared by: Rebecca Elliot

Date audit commenced: 15 March 2018

Date audit report completed: 25 May 2018

Audit report due date: 1 June 2018

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EXECUTIVE SUMMARY

This audit of the Bay of Plenty East - NZTA (**NZTA**) DUML database and processes was conducted at the request of Genesis Energy Limited (**Genesis**) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

Genesis are using the registry information to reconcile this load as no wattage reports have been received. I have assessed NZTA's RAMM database data against the registry figures. A field audit against the RAMM database extract was undertaken to assess the accuracy of this. This found a combined estimated over submission of 157,665.15 kWh per annum.

I recommend that a full field audit is undertaken, and the database information is corrected.

This audit found six non-compliances and one recommendation is made. The future risk rating of 60 indicates that the next audit be completed in three months. The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	Database not used for submission. The registry UML figures are used to calculate submission. The combined variance between the registry and the RAMM database and field audit variances will be resulting in an estimated over submission of 157,665.15 kWh per annum.	None	High	12	Investigating
Description and capacity of load	2.4	11(2)(c) and (d) of Schedule 15.3	66 items of load had no lamp, make, model or wattage recorded.	Weak	Low	3	Investigating
All load recorded in database	2.5	11(2A) and (d) of Schedule 15.3	12 additional items of load found in the field.	None	High	12	Investigating
Tracking of load change	2.6	11(3) of Schedule 15.3	Monthly reports not provided to Genesis for submission. Load changes not tracked in the database.	Weak	High	9	Investigating
Database accuracy	3.1	15.2 and 15.37B(b)	Database not used for submission. The database accuracy against the field is assessed to be 90.2 % indicating an estimated over submission of 32,000 kWh per annum if this were used for submission.	None	High	12	Investigating

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Volume information accuracy	3.2	15.2 and 15.37B(c)	Database not used for submission. The registry UML figures are used to calculate submission. The combined variance between the registry and the RAMM database and field audit variances will be resulting in an estimated over submission of 157,665.15 kWh per annum.	None	High	12	Investigating
Future Risk Rating						60	

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

RECOMMENDATIONS

Subject	Section	Description	Recommendation
Database Accuracy	3.1	Undertake a full field audit and correct data in RAMM.	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

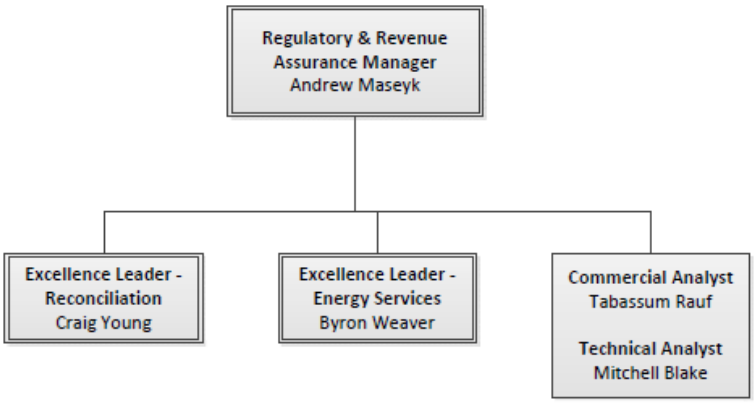
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Genesis provided the relevant organisational structure:



1.3. Persons involved in this audit

Auditor:

Rebecca Elliot

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Craig Young	Excellence Leader - Reconciliation	Genesis Energy
Grace Hawken	Technical Specialist - Reconciliations Team	Genesis Energy
Mike Russell	Senior Network Manager	Bay of Plenty East - NZTA

1.4. Hardware and Software

A database is not used to reconcile this load.

The field audit was undertaken against the RAMM database. This is a SQL database used for the management of DUML is remotely hosted by RAMM Software Ltd. The specific module used for DUML is called RAMM Contractor.

The database is backed-up in accordance with standard industry procedures. Access to the database is secure by way of password protection.

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
1000023034BP9E0	Streetlights Opotiki	WAI0111	UNM	141	18,855
1000023035BP5A5	TE KAHA	TKH0111	UNM	25	2,163
1000023036BP965	GALATEA	EDG0331	UNM	No data in database extract provided	unknown
1000023037BP520	Kawerau Streetlights	KAW0111	UNM	175	25,832
1000023049BP3E6	TRANSIT NEW ZEALAND (Edgecumbe)	EDG0331	UNM	118	15,438

The database extract has no load associated with ICP 1000023036BP965. NZTA advised that the load associated is believed to be a single isolated light at the end of SH 38. This needs to be confirmed and the registry updated with the light details and confirmed burn hours. If this is confirmed, then the ICP should be treated as standard unmetered load and excluded from the DUML audit process. This is discussed in **section 3.1**.

1.7. Authorisation Received

All information was provided directly by Genesis and NZTA East BOP.

1.8. Scope of Audit

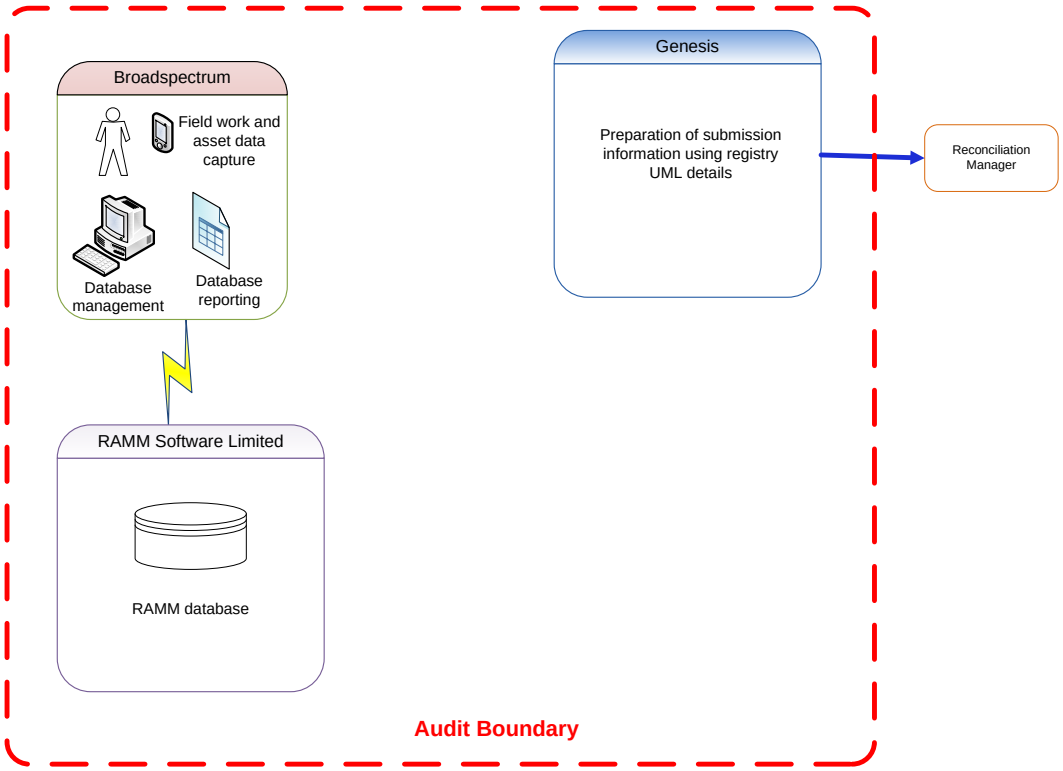
This audit of the Bay of Plenty East- NZTA (**NZTA**) DUML database and processes was conducted at the request of Genesis Energy Limited (**Genesis**) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

Genesis are using the registry information to reconcile this load as no wattage reports have been received. I have assessed the RAMM database data against the registry figures.

Broadspectrum is engaged by NZTA and conducts the fieldwork and asset data capture.

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting. The diagram below shows the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 301 items of load on 30th April 2018.

1.9. Summary of previous audit

This is the first audit undertaken of this DUML load by Genesis Energy.

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Genesis have requested Veritek to undertake this streetlight audit.

Audit commentary

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

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

The process for calculation of consumption was examined.

Audit commentary

Genesis reconciles this DUML load using the UML profile. Genesis are using the registry information to reconcile all ICPs in this load as no wattage reports have been received including ICP 1000023036BP965 (Galatea). I compared the submission volumes with the load recorded in the database extract against the volumes submitted by Genesis and found:

ICP Number	Description	March submission	Estimated March submission	Estimated March difference
1000023034BP9E0	Streetlights Opotiki	12,542.60	6,955.61	- 5,586.99
1000023035BP5A5	TE KAHA	1,475.60	797.93	- 677.67
1000023037BP520	Kawerau Streetlights	4,795.70	9,363.42	4,567.72
1000023049BP3E6	TRANSIT NEW ZEALAND (Edgecumbe)	14,756.00	5,695.08	- 9,060.92

There is an estimated annual over submission for these ICPs of 126,665.15 kWh. This is calculated on the difference in the daily kWh figures. The field audit against the database quantities found a further estimated over submission of 31,000kWh. The combined over submission is estimated to be 157,665.15 kWh per annum. The variance if this load was calculated using a data logger is not able to be calculated. I recommend in **section 3.1**, that a full field audit be undertaken, and the data corrected in RAMM so that this be used for submission. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: unknown To: 30-Apr-18	Database not used for submission. The registry UML figures are used to calculate submission. The combined variance between the registry and the RAMM database and field audit variances will be resulting in an estimated over submission of 157,665.15 kWh per annum. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as none as none were evident. The audit risk rating is high as a database is not used for submission, and estimated kWh variances found between the registry figures used and the database extract, and the further variances found between the database and field audit were high.

Actions taken to resolve the issue	Completion date	Remedial action status
Due to the timing of the report, Genesis has yet to communicate the identified anomalies in the Audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	10/2018	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

An ICP is recorded for each item of load.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database contains either the nearest street address, pole numbers, metres from the end of the carriageway or Global Positioning System (GPS) coordinates for each item of load and users in the office and field can view these locations on a mapping system.

As detailed in **section 1.6**, the database extract has no load associated with ICP 1000023036BP965. NZTA advised that the load associated is believed to be a single isolated light at the end of SH 38. This needs to be confirmed and the registry updated with the light details and confirmed burn hours. If this is confirmed, then the ICP should be treated as standard unmetered load and excluded from the DUML audit process if it multiple points of connection across more than one circuit then the load will need to be added to the database.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage.

Audit commentary

Lamp make, model and lamp wattage are included in the database. It was found that 66 items of load had no light description and no wattage recorded. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: unknown To: 30-Apr-18	66 items of load had no lamp, make, model or wattage recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as none as none were evident. The impact is assessed to be low as there are only 66 items without the correct details.

Actions taken to resolve the issue	Completion date	Remedial action status
Due to the timing of the report, Genesis has yet to communicate the identified anomalies in the Audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	10/2018	

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of a statistical sample of 289 items of load on 30th April 2018.

Audit commentary

The field audit findings are detailed in the table below.

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
Rural by Road Number					
321	58	57	-1	12	1x 150W HSP not found in the field 12 x LED in the field but recorded as HPS in the database
341	3	3		1	1x LED found in the field recorded as HPS in the database
347	19	18	-1		1x 29W LED not found in the field
1899	18	18		10	10 x LED in the field but recorded as HPS in the database
1915	5	5		4	4 x LED in the field but recorded as HPS in the database
2508	38	38		3	3 x LED in the field but recorded as HPS in the database
2509	2	1	-1		1x 29W LED not found in the field
Urban by road number					
322	32	32		13	13 x LED in the field but recorded as HPS in the database
340	51	63	12	12	12 x additional LED found in the database 12x LED in the field but recorded as HPS in the database
342	4	4			
1898	27	27		19	19 x LED in the field but recorded as HPS in the database
1906	9	9		6	6 x LED in the field but recorded as HPS in the database
1910	22	22		17	17 x LED in the field but recorded as HPS in the database
Total	301	289	15	97	

I found 12 more lamps in the field than were recorded in the database. This is recorded as non-compliance. There has been a partial rollout of LEDs and this is evident in the field audit, but these are not being updated in the RAMM database. The database accuracy is discussed in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) and (d) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	12 additional items of load found in the field. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as none as none were evident. The impact is assessed to be high, as I am unable to determine the actual impact as the database is not used for submission therefore I have been conservative and assessed it as high.

Actions taken to resolve the issue	Completion date	Remedial action status
Due to the timing of the report, Genesis has yet to communicate the identified anomalies in the Audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	10/2018	

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

Any changes that are made during any given month take effect from the beginning of that month. The information is available which would allow for the total load in kW to be retrospectively derived for any day. On 20 September 2012, the Authority sent a memo to retailers and auditors advising that tracking of load changes at a daily level was not required if the database contained an audit trail. I have interpreted this to mean that the provision monthly report is sufficient to achieve compliance. Genesis do not receive these and are using the registry figure for reconciliation. This is recorded as non-compliance below.

Pocket RAMM is expected to be used by the contractors to track changes but the field audit findings indicate that this process is not being used or monitored. Pocket RAMM doesn't have all the relevant light types loaded which will be adding to the lack of data accuracy. I recommend in **section 3.1**, a 100% audit be undertaken to correct the data in RAMM and that this be used for submission.

Outage patrols are carried out depending on the state highway rating. Major roads are patrolled every month whilst minor roads or remote locations are patrolled every two months.

NZTA are working on a business case to rollout LED lights across this network. As is evident in the field audit, pockets of the network have been upgraded but these changes have not flowed through to the database.

The new connection process was discussed. New streetlight circuits get connected by the network, but these do not get added to the RAMM database until the lights are vested to NZTA. This can be some months later and therefore the intervening period is not being reconciled. This is recorded as non-compliance below.

No festive lighting is connected on this NZTA DUML load.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	Monthly reports not provided to Genesis for submission. Load changes not tracked in the database. Potential impact: High Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 9
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak, as the field audit found a large volume of incorrect wattages. The impact is assessed to be high due to the kWh volumes.

Actions taken to resolve the issue	Completion date	Remedial action status
Due to the timing of the report, Genesis has yet to communicate the identified anomalies in the Audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	10/2018	

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

RAMM contains a complete audit trail of all additions and changes to the database information.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

The RAMM database is not used to derive submission. The unmetered load recorded in the registry is used to calculate submission. This is recorded as non-compliance below. A RAMM database does exist for this load and I assessed the accuracy by using the DUML Statistical Sampling Guideline. The table below shows the survey plan.

Plan Item	Comments
Area of interest	NZTA East BOP area
Strata	The database contains the NZTA items of load in for five ICPs in the Eastern Bay of Plenty region area. The processes for the management of all NZTA items of load are the same, but I decided to place the items of load into two strata: 1. Urban 2. Rural
Area units	I created a pivot table of the roads and I used a random number generator in a spreadsheet to select a total of 14 sub-units.
Total items of load	301 items of load were checked.

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

Audit commentary

The database extract has no load associated with ICP 1000023036BP965. NZTA advised that the load associated is believed to be a single isolated light at the end of SH 38. This needs to be confirmed and the registry updated with the light details and confirmed burn hours. If this is confirmed, then the ICP should be treated as standard unmetered load and excluded from the DUML audit process.

The database was found to contain inaccuracies and missing data. The field data was 90.2% of the database data for the sample checked. The total wattage recorded in the database for the sample was 31,308 watts. The estimated total wattage found in the field for the sample checked was 29,947 watts, a difference of 1,361 watts. This will result in estimated over submission of 31,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool) if the database was used for submission.

I recommend a full field audit is undertaken to ensure that all items of load are recorded in the database with the correct ICP and all the details required to enable submission to be calculated correctly from the database.

Description	Recommendation	Audited party comment	Remedial action
Database accuracy	Undertake a full field audit and correct data in RAMM.	Genesis will advise that a full field audit has been advised. Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	Investigating

Wattages for the items of load with load recorded in the database were checked. This found a number of incorrect ballasts including 54 items of load where the wattage is recorded in both the wattage and ballast. The incorrect ballasts equate to annual over submission of 63,168.09 kWh if the current database was used for reconciliation. The correct ballasts need to be in the database and this is included in the recommendation above.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 30-Apr-18	Database not used for submission. The database accuracy against the field is assessed to be 90.2 % indicating an estimated over submission of 32,000 kWh per annum if this were used for submission. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as none as none were evident. The audit risk rating is high as a database is not used for submission, and estimated kWh variances found between the registry figures used and the database extract and the further variances found between the database and field audit were high.

Actions taken to resolve the issue	Completion date	Remedial action status
Due to the timing of the report, Genesis has yet to communicate the identified anomalies in the Audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	10/2018	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

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

Audit commentary

Genesis reconciles this DUML load using the UML profile. Genesis are using the registry information to reconcile all ICPs in this load as no wattage reports have been received including ICP 1000023036BP965 (Galatea). I compared the submission volumes with the load recorded in the database extract against the volumes submitted by Genesis and found:

ICP Number	Description	March submission	Estimated March submission	Estimated March difference
1000023034BP9E0	Streetlights Opotiki	12,542.60	6,955.61	- 5,586.99
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There is an estimated annual over submission for these ICPs of 126,665.15 kWh. This is calculated on the difference in the daily kWh figures. The field audit against the database quantities found a further estimated over submission of 31,000kWh. The combined over submission is estimated to be 157.665.15 kWh. The variance if this load was calculated using a data logger is not able to be calculated. I recommend in **section 3.1**, that a full field audit be undertaken, and the data corrected in RAMM so that this be used for submission. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: unknown To: 30-Apr-18	Database not used for submission. The registry UML figures are used to calculate submission. The combined variance between the registry and the RAMM database and field audit variances will be resulting in an estimated over submission of 157,665.15 kWh per annum. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak as they are unlikely to mitigate risk and remove errors. The impact is assessed to be medium, based on the kWh differences.

Actions taken to resolve the issue	Completion date	Remedial action status
Due to the timing of the report, Genesis has yet to communicate the identified anomalies in the Audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis, will be communicating the issues with the contracted party with the intent of gaining access/monthly database reporting to help reduce data errors.	10/2018	

CONCLUSION

Genesis are using the registry information to reconcile this load as no wattage reports have been received. I have assessed the RAMM database data against the registry figures. A field audit against the RAMM database extract was undertaken to assess the accuracy of this. This found a combined estimated over submission of 157,665.15 kWh per annum.

I recommend that a full field audit is undertaken, and the database information is corrected.

This audit found six non-compliances and one recommendation is made. The future risk rating of 60 indicates that the next audit be completed in three months and I agree with this recommendation.

PARTICIPANT RESPONSE

Genesis will be requesting the required data from NZTA BoP moving away from the registry populated values. Upon establishing this relationship, Genesis will work through any anomalies as required.