

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT**

VERITEK

For

**WAIMAKIRIRI DISTRICT COUNCIL AND
GENESIS ENERGY**

Prepared by: Steve Woods

Date audit commenced: 24 April 2018

Date audit report completed: 30 April 2018

Audit report due date: 01-Jun-18

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EXECUTIVE SUMMARY

This audit of the Waimakiriri District Council (**WDC**) Unmetered Streetlights 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.

The audit found five non-compliances and makes two recommendations.

The field audit found 22 discrepancies in total. I found four additional lamps in the field than were recorded in the database, four lamps in the database not present in the field and 14 incorrect wattages.

The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum.

The future risk rating of 16 indicates that the next audit be completed in 12 months. The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum	Moderate	Medium	4	Investigating
Location of each item of load	2.3	11(2)(b) of Schedule 15.3	Some inadequate location information	Strong	Low	1	Investigating
All load recorded in database	2.5	11(2A) of Schedule 15.3	All load is not recorded in the database (4 lamps missing from field audit)	Moderate	Low	2	Investigating
Database accuracy	3.1	15.2 and 15.37B(b)	The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum	Moderate	Medium	4	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)	The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum	Moderate	Medium	4	Investigating
Future Risk Rating						16	

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

RECOMMENDATIONS

Subject	Section	Description	Action
ICP identifier	2.2	Check 65 streets where items of load are recorded against more than one ICP	Investigating
Database accuracy	3.1	Check all 24 125 watt MV lamps to confirm whether they have been replaced	Investigating

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

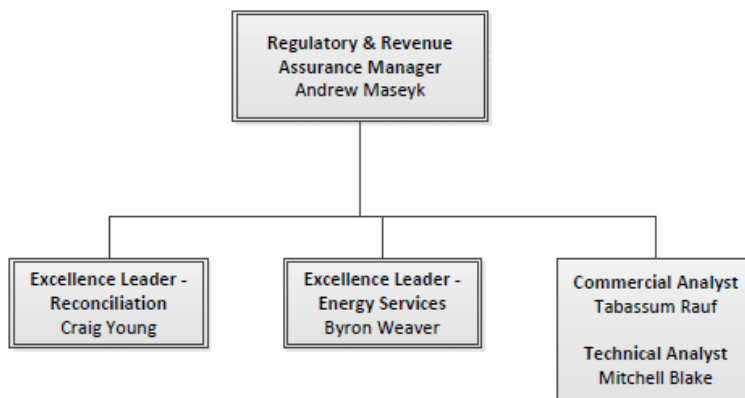
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit commentary

Genesis confirms that 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	Genesis Energy

	Team	
Sarah Barnes	Regulatory Manager	Mainpower
Neil O'Loughlin	Surveyor/ Pricing Co-ordinator	Mainpower
Joel Hung	Commercial Analyst	Mainpower

1.4. Hardware and Software

Section 1.8 shows that Mainpower maintains an Access databases for the management of the DUML information. Backup and restoration procedures are in accordance with normal industry protocols.

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)
0000366371MPF7B	Waimakariri District Council	STREET LIGHT SBK 0331	SST	2,370	257,093
0000565850KEA7B	Waimakariri District Council	DISTRIBUTED STREETLIGHTING OLD KAIAPOI BOROUGH	SST	578	67,749
0000366372MP3BB	Waimakariri District Council	STREET LIGHTING KAI0111	SST	2,214	223,226
0000282125MP3EF	Waimakariri District Council	STREETLIGHTS SBK0661SWN	SST	51	5,865
0000305303MPA1B	Waimakariri District Council	STREETLIGHTS SBK0661BHL	SST	23	3,835
0000328410MP099	Waimakariri District Council	STREETLIGHTS SBK0661BHL (Riverlea Estate)	SST	81	8,583

1.7. Authorisation Received

All information was provided directly by Genesis or Mainpower.

1.8. Scope of Audit

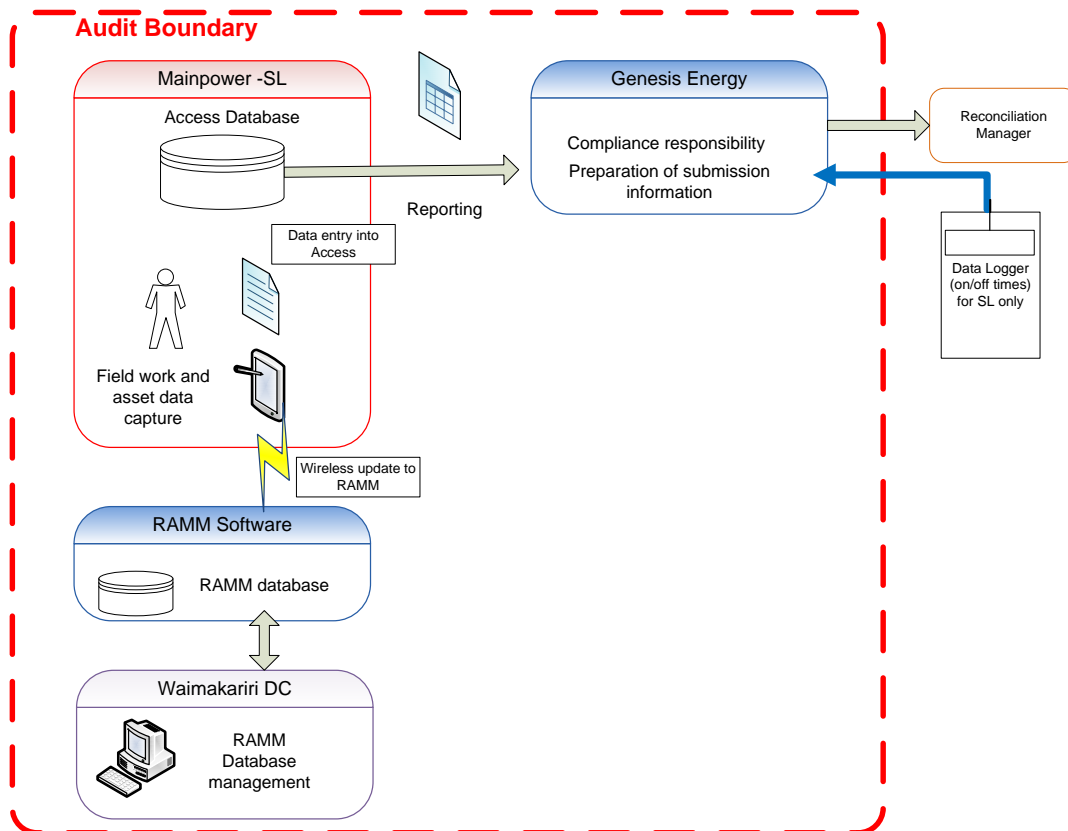
This audit of the WDC DUML database and processes was conducted at the request of Genesis, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied

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

WDC is located on the Mainpower network. Mainpower is engaged as the streetlighting maintenance contractor and they maintain a database, which is used by Genesis to calculate submission information. Mainpower provides reporting to Genesis on a monthly basis.

A RAMM database is held by WDC, who is Genesis's customer. This database is hosted by RAMM Software Limited and is populated by Mainpower, but it is not used by Genesis for the calculation of submission information.

The diagram below shows the flow of information and the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 332 items of load on 24th April 2018.

1.9. Summary of previous audit

Genesis provided a copy of the last audit report undertaken by Steve Woods of Veritek Limited in April 2017. The table below records the findings.

Table of Non-Compliance

Subject	Section	Clause	Non compliance	Status
ICP identifier	2.2	11(2)(a) of schedule 15.3	Some incorrect GXPs and therefore incorrect ICPs against some records	Further analysis recommended
Location information	2.3	11(2)(b) of schedule 15.3	Some location information incorrect in the database	Still existing
Capacity of items of load	2.4	11(2)(d) of schedule 15.3	Some wattages are incorrect	Still existing
Database accuracy	3.1	11(3) of schedule 15.3	Some incorrect recording of lamps	Still existing

Table of Recommendations

Subject	Section	Clause	Recommendation for Improvement	Status
Tracking of load changes	2.3	11(3) of schedule 15.3	Conduct a field audit of every new subdivision or upgraded area to ensure database accuracy.	Cleared

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Genesis has requested Veritek to undertake this streetlight audit.

Audit commentary

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

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

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

Audit commentary

Genesis reconciles this DUML load using the SST profile.

I checked the February 2018 extract provided by Mainpower against the submission totals supplied by Genesis and found that submission matched the database.

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

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time but there are still some errors. The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis energy has spoken with Joel Hung (MainPower) Joel is looking into the issues outlined in this audit.		10/2018	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis Energy are working with contracted parties to ensure accuracy and completeness.	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

All items of load have an ICP recorded against them.

There are 65 streets where the items of load are recorded against more than one ICP. I have asked Mainpower to confirm whether the ICP is recorded correctly.

Recommendation	Description	Audited party comment	Remedial action
Clause 11(2)(a) and (aa) of Schedule 15.3	Check 65 streets where items of load are recorded against more than one ICP	Genesis has requested these ICP's to be checked and nsp amended	Investigating

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 Mainpower database contains a field for the nearest street address and there are GPS coordinates. There are 12 records with lot numbers and no street address and also without GPS coordinates, which makes them difficult to locate.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	Some inadequate location information Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating:		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk most of the time and the number of issues is low. The impact is a lack of clarity when conducting the field audit. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis energy has spoken with Joel Hung (MainPower) Joel is looking into the issues outlined in this audit.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis Energy are working with contracted parties to ensure accuracy and completeness.		10/2018	

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 DUMML 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 and that each item of load had a value recorded in these fields.

Audit commentary

Mainpower's access database contains the manufacturers rated wattage and the ballast wattage.

Audit outcome

Compliant

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 332 items of load on 24th 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
Large Town					
ARLINGTON BOULEVARD	12	12			
ASHGROVE ST	8	8		3	3 125w MV actually 70 SON
ASHLEY PLACE	1	1	2-		
BLACKADDER ROAD	9	9			
BLAKE ST	13	12	-1	1	250 SOM actually 150 SON
CNR JOHN & WHITE ST	1	1			
COBDEN PL	2	2			
ELLEN PL	2	2			
EPSON DRIVE	3	3			
GERALD BEATTIE LANE	2	2			
GRAY CRES	6	6			
HUGH ST	4	4			
ISLAND RD	4	3	-1		
ISLAND ROAD	16	15	-1	2	1 LED recorded as SON and 1 SON recorded as LED
JENKINS ST	3	3		2	2 70 SON recorded

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
					as 110 SON
JORDAN STREET	5	5			
KAHU STREET	4	4			
KINLEY ST	9	9			
KINLEY STREET	2	2			
PIPI-WAI STREET	4	4			
POUNAMU PLACE	8	8			
RANGIORA WOODEND RD	20	20			
RANGIORA WOODEND ROA	2	2			
RANGIORA WOODEND ROAD	1	1			
RATA ST	3	3		2	2 errors on Rata
RATA STREET	6	6			
REGENT AVE	8	8			
SEAWARD STREET	3	3			
SIMS ROAD	1	1			
STONE RD	2	2			
TREFFERS AVE	3	3		1	Double Fluoro actually a 70 SON
TRIPOLI STREET	6	6			
VICKERY ST	8	8			
VICKERY STREET	1	0	-1		
WOOTEN PLACE	9	9			
ARLINGTON BOULEVARD	12	12			
New					
BACHELOR PLACE	3	3			

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
BLAIR PLACE	5	5			
CASSINO STREET	11	11			
DURRELLS LANE	1	1			
GEERING PLACE	2	2			
GOODWIN STREET	10	10			
KEATING STREET	3	3			
STORER STREET	8	8			
TOA STREET	2	2			
WAIOTAHU ROAD	4	4			
WINTERBOURN STREET	2	2			
Small Town					
BATTEN GR	5	5			
BATTEN GROVE	3	3			
BRADLEYS RD	2	2			
CARRS ROAD	13	13			
EARLEYS RD	1	1			
EARLYS RD	2	2			
FERRY RD	6	6			
KNIGHT ST	1	1		1	1 70 SON recorded as fluoro
MATAI PL	2	2			
MCHUGHS RD	3	3			
MCHUGHS ROAD	4	4			
NORTH EYRE RD	1	1			
NORTH EYRE ROAD	2	2			

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
OROARKES RD	1	1			
O'ROARKES RD	1	1			
PARK TCE	16	16			
SWANNANOA ROAD	1	1			
TUAHIWI RD	9	9			
Tuahiwi road	3	3		2	125MV actually 70 SON
TUAWIHI RD	1	1			
WAIKUKU BEACH RD	2	2			
WAIKUKU BEACH ROAD	2	2			
WOODEND BEACH RD	5	5			
WOODEND BEACH ROAD	2	2			
Grand Total	331	331	8	14	

I found four additional lamps in the field than were recorded in the database, four lamps in the database not present in the field and 14 incorrect wattages. These differences are recorded as non-compliance in **section 3.1**. The items missing from the database are recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	All load is not recorded in the database (4 lamps missing from field audit) Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating
Low	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time. The impact is assessed to be low, based on the number of differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis energy has spoken with Joel Hung (MainPower) Joel is looking into the issues outlined in this audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis Energy are working with contracted parties to ensure accuracy and completeness.	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 September 20th 2012, the Authority sent a memo to Retailers and auditors advising that tracking of load changes at a daily level was not required as long as the database contained an audit trail. I have interpreted this to mean that the production of a monthly “snapshot” report is sufficient to achieve compliance.

Monthly “outage patrols” are conducted by Mainpower and the process is used to identify any incorrect wattage and location issues that may exist.

For new subdivisions, the technician provides a form per light and these are signed at the time of data entry to confirm database population. There is also a check against the design. Information is entered into the database immediately on receipt, without having to wait for other departments to process their information. The new subdivision part of the field audit confirmed 100% accuracy for the sample selected.

There are some festive lights connected each year and this is reported separately to Genesis for inclusion in submission information.

Audit outcome

Compliant

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

This audit report confirms that the requirement to conduct an audit has been met for this particular database.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

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

Plan Item	Comments
Area of interest	Waimakariri District Council
Strata	The database contains items of load in the Waimakariri District Council area. The processes for the management of items of load are the same, but I decided to place the items of load into three strata, as follows: <ol style="list-style-type: none"> 1. Large town 2. Small town 3. New NZTA lighting is a separate audit report and not included in this one.
Area units	I created a pivot table of the roads in each area and I used a random number generator in a spreadsheet to select a total of 69 subunits.
Total items of load	332 items of load were checked.

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

Audit commentary

The DUML database auditing tool provided a result indicating the field data was 95.9% of the database data. This will result in an estimated over submission by 106,900 kWh per annum.

The field audit found 14 incorrect wattages, four lamps in the field not in the database and four lamps in the database not in the field. Five of the errors related to lamps being incorrectly recorded as 125watt MV. There are a total of 24 lamps in the database recorded as 125watt MV; I recommend these are all checked to confirm whether they have been replaced with other lower wattage lamps.

Recommendation	Description	Audited party comment	Remedial action
Clause 15.2 and 15.37B(b)	Check all 24 125 watt MV lamps to confirm whether they have been replaced	Genesis has requested this to be investigated.	Investigating

I checked the wattages and ballasts being applied and found these were added correctly to the monthly report provided to Genesis for submission calculation.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Apr-17 To: 30-Apr-18	The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time, but there are still some errors. The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis energy has spoken with Joel Hung (MainPower) Joel is looking into the issues outlined in this audit.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis Energy are working with contracted parties to ensure accuracy and completeness.		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 the ICP has the correct profile and submission flag
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Genesis reconciles this DUML load using the SST profile.

I checked the February 2018 extract provided by Mainpower against the submission totals supplied by Genesis and found that submission matched the database.

The methodology for deriving submission information is compliant but there is some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance in this section and sections 2.1 and 3.1.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Apr-17 To: 30-Apr-18	The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum Potential impact: Medium Actual impact: Medium Audit history: Twice Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time but there are still some errors. The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status

Genesis energy has spoken with Joel Hung (MainPower) Joel is looking into the issues outlined in this audit.	10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis Energy are working with contracted parties to ensure accuracy and completeness.	10/2018	

CONCLUSION

The audit found five non-compliances and makes two recommendations.

The field audit found 22 discrepancies in total. I found four additional lamps in the field than were recorded in the database, four lamps in the database not present in the field and 14 incorrect wattages.

The database accuracy is assessed to be 95.9% indicating an estimated over submission of 106,900 kWh per annum.

PARTICIPANT RESPONSE

Genesis has been in communication with Main power and they are motivated to improve their database.