

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

For

**SOUTHLAND DISTRICT COUNCIL AND  
MERIDIAN ENERGY**

Prepared by: Rebecca Elliot

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Date audit report completed: 29 January 2019

Audit report due date: 1 March 2019

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## EXECUTIVE SUMMARY

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

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

Meridian moved to using the SDC data in June 2018. This audit found a high level of accuracy in this data and all but one of the previous non-compliances recorded in the last audit report have been cleared. Currently the data is being maintained in an excel spreadsheet but is being loaded to RAMM as soon as possible and no later than June 2019.

The future risk rating of five indicates that the next audit be completed in 18 months. Three minor non-compliances were identified, and one recommendation was raised. The matters raised are detailed below:

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Tracking of load change	2.6	11(3) of schedule 15.3	The SDC spreadsheet does not track changes.	Moderate	Low	2	Identified
Audit trail	2.7	11(4) of schedule 15.3	The SDC spreadsheet does not have an audit trail.	Moderate	Low	2	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	Small number of incorrect ballasts and light descriptions were found with a very minor impact on reconciliation.	Strong	Low	1	Identified
Future Risk Rating						5	

<b>Future risk rating</b>	0	1-4	5-8	9-15	16-18	19+
<b>Indicative audit frequency</b>	36 months	24 months	18 months	12 months	6 months	3 months

### RECOMMENDATIONS

Subject	Section	Description	Recommendation
Tracking of load changes	2.6	Clause 11(3) of Schedule 15.3	Investigate festive lighting and record in the database if being connected to the unmetered streetlight circuit.

### 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

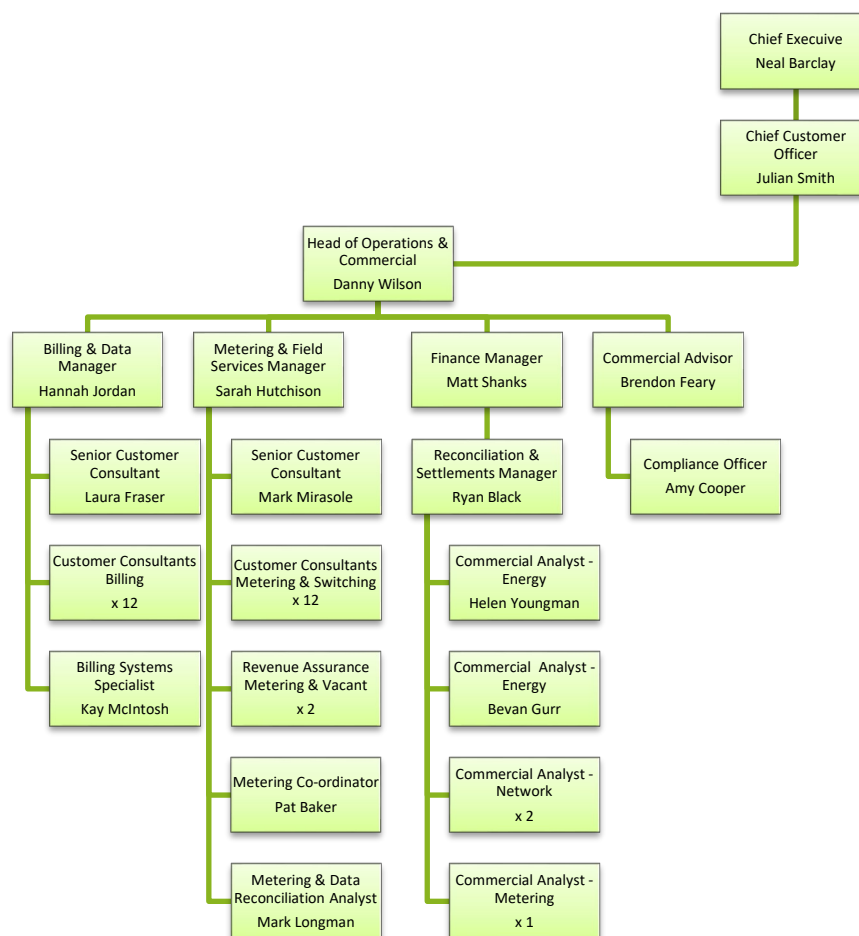
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

#### Audit commentary

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

### 1.2. Structure of Organisation

Meridian provided a copy of their 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
Michael Duggan	Roading Asset Analyst Engineer	Southland District Council
Amy Cooper	Compliance Officer	Meridian Energy
Helen Youngman	Energy Data Analyst	Meridian Energy

### 1.4. Hardware and Software

The SDC lights are currently held in an excel spreadsheet that is going to be loaded up to RAMM. This is expected to be completed by June 2019 at the latest.

Access to the spreadsheet is restricted by way of user permissions. SDC confirmed that this directory is backed up as part of the BAU processes in place.

In anticipation of the data being uploaded to RAMM I confirmed that the database is backed up in accordance with industry standards and 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	Number of items of load	Database wattage (watts)
0000302001HEF6B	HERITAGE ESTATE	HER0111	81	6406
0008801031TP895	SDC LIGHTS - RURAL EDENDALE	EDN0331	17	690
0008801021TP238	SDC LIGHTS - URBAN EDENDALE	EDN0331	271	12785
0008801033TP810	SDC LIGHTS - RURAL GORE	GOR0331	77	6217
0008801023TP2BD	SDC LIGHTS - URBAN GORE	GOR0331	174	10561
0008801032TP455	SDC LIGHTS - RURAL INVERCARGILL	INV0331	122	7531
0008801034TP5DA	SDC LIGHTS - RURAL NORTH MAKAREWA	NMA0331	271	18252
0008801024TPF77	SDC LIGHTS - URBAN NORTH MAKAREWA	NMA0331	2231	110653
<b>Total</b>			<b>3244</b>	<b>170109</b>

ICP 0008801022TPEF8 was previously included as an ICP for this DUML database. Powernet confirmed to SDC in June 2018 that the load for this ICP is connected to NSP NMA0331 and the load is to be recorded against ICP 0008801024TPF77. This was updated by SDC prior to Meridian moving to using the SDC spreadsheet. Powernet do not want to decommission ICP 0008801024TPF77 in case the network is reconfigured in the future, therefore Meridian will move it to an inactive status.

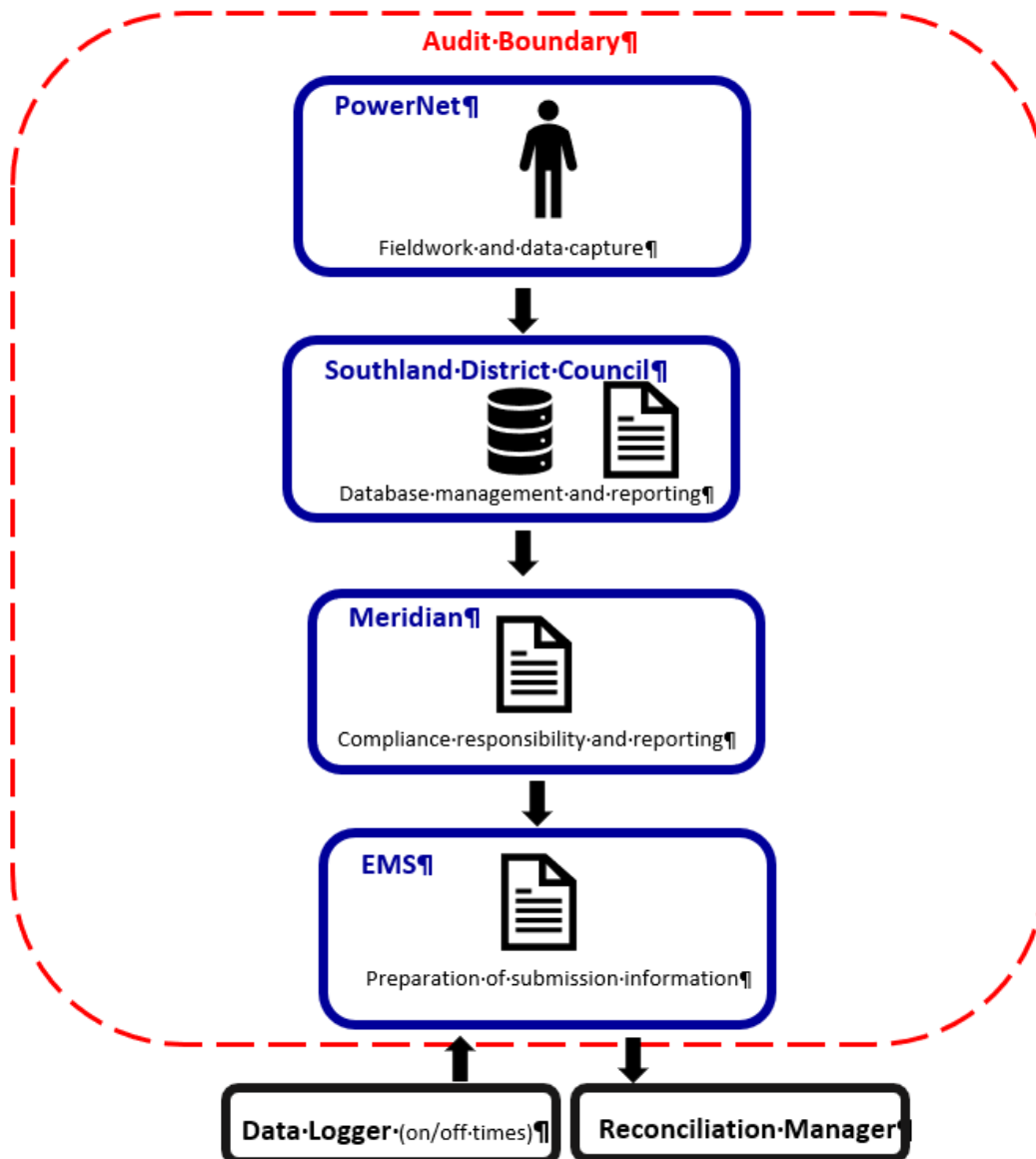
## 1.7. Authorisation Received

All information was provided directly by Meridian and SDC.

## 1.8. Scope of Audit

Meridian started using the SDC information for submission in June 2018. The lights are recorded in an excel spreadsheet which is being uploaded into RAMM as soon as possible and no later than June 2019. PowerNet is responsible for all field work. SDC include the NZTA lighting for the Southland district in their database.

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 Distributor databases are no longer being used for submission. The diagram below shows the audit boundary for clarity.



The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

The field audit was undertaken of 270 items of load on 22-23 January 2019.

### 1.9. Summary of previous audit

The previous audit was completed in March 2018 by Tara Gannon of Veritek Limited. Six non-compliances were identified, and one recommendation was made. The statuses of the non-compliances and recommendations are described below.



Subject	Section	Clause	Non-compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	<p>The databases contain some incorrect and missing information.</p> <ul style="list-style-type: none"> <li>The Aurora Energy Heritage Estate database accuracy is assessed to be 98.3% indicating an estimated over submission of 440 kWh per annum.</li> <li>The PowerNet database accuracy is assessed to be 93.7% indicating an estimated over submission of 7,500 kWh per annum.</li> <li>Some lamps situated in Heritage Estate outside the Aurora Energy embedded network are not recorded in PowerNet's database.</li> <li>Two lamps in the PowerNet database do not have wattage information recorded.</li> <li>Seven lamps in the PowerNet database had incorrect descriptions, but wattage was recorded correctly.</li> </ul> <p>Some lamps have incorrect ballast wattages recorded. The total difference for the Aurora Energy Heritage Estate database is 1.5 watts (6 kWh per annum over reported), and the total difference for the PowerNet database is 146.5 watts (625 kWh per annum under reported).</p>	Cleared
Location of each item of load	2.3	11(2)(b) of Schedule 15.3	<p>45 items of load do not have a street address recorded.</p> <p>Eleven items of load had incorrect or insufficient address information and could not be easily located.</p>	Cleared
Description and capacity of load	2.4	11(2)(b) of Schedule 15.3	<p>Two items of load do not have lamp wattage or total wattage recorded.</p>	Cleared
All load recorded in database	2.5	11(2A) of Schedule 15.3	<p>The field audit identified eight lamps missing from Aurora Energy's Heritage Estate database. Some new and extended streets with lights were also excluded from the database.</p>	Cleared

Subject	Section	Clause	Non-compliance	Status
Tracking of load change	2.6	11(3) of schedule 15.3	<p>The tracking of load changes is not being carried out in relation to changing of light type on existing items of load for the PowerNet database.</p> <p>Changes are not being tracked in Aurora Energy's Heritage Estate database.</p>	Still existing in relation to the SDC spreadsheet but will be resolved once the data is loaded to RAMM
Database accuracy	3.1	15.2 and 15.37B(b)	<p>The databases contain some incorrect and missing information.</p> <ul style="list-style-type: none"> <li>The Aurora Energy Heritage Estate database accuracy is assessed to be 98.3% indicating an estimated over submission of 440 kWh per annum.</li> <li>The PowerNet database accuracy is assessed to be 93.7% indicating an estimated over submission of 7,500 kWh per annum.</li> <li>Some lamps situated in Heritage Estate outside the Aurora Energy embedded network are not recorded in PowerNet's database.</li> <li>Two lamps in the PowerNet database do not have wattage information recorded.</li> <li>Seven lamps in the PowerNet database had incorrect descriptions, but wattage was recorded correctly.</li> </ul> <p>Some lamps have incorrect ballast wattages recorded. The total difference for the Aurora Energy Heritage Estate database is 1.5 watts (6 kWh per annum over reported), and the total difference for the PowerNet database is 146.5 watts (625 kWh per annum under reported).</p>	Cleared

Subject	Section	Clause	Recommendations	Status
ICP identifier	2.2	11(1) of Schedule 15.3	Confirm the correct ICP identifier for light number T6663 3/5 Gunn St, Te Anau.	Cleared - now recorded against the correct ICP
Tracking of Load Change	2.3	11(3) of schedule 15.3	Review management of street light information between Southland DC and Delta.	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 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**

Meridian 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

Meridian reconciles this DUML load using the DST profile. The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian's reconciliation participant audit, and its accuracy and compliance was confirmed.

I compared the SDC spreadsheet provided during December 2018 to the capacity information Meridian supplied to EMS in December 2018 and found it matched exactly.

The database was confirmed to fall within the database accuracy threshold. There are a small number of lights with incorrect ballast resulting in a very minor amount of over submission. This is recorded as non-compliance in **section 3.1** but as the impact is estimated to be 64 kWh per annum, I have recorded compliance for this section.

#### Audit outcome

Compliant

### 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 SDC spreadsheet was checked to confirm an ICP is recorded for each item of load.

#### Audit commentary

An ICP is recorded for each item of load. The one item recorded in the previous audit in the PowerNet database that was recorded against the incorrect ICP is correctly recorded in the SDC spreadsheet.

#### 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 SDC spreadsheet was examined to confirm the location is recorded for all items of load.

#### Audit commentary

Street addresses and GPS coordinates are recorded for all items of load.

#### 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 SDC spreadsheet was checked to confirm that they contained a field for lamp type and wattage capacity and included any ballast or gear wattage.

#### Audit commentary

A lamp type, lamp wattage, gear wattage and total wattage is included for each item of load in the SDC spreadsheet.

The accuracy of these is discussed in **section 3.1**.

#### 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 270 items of load on 22-23 January 2019. The total population was divided into seven geographical strata.

### Audit commentary

The field audit found a high level of accuracy. The four errors are detailed in the table below:

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
Beaufort Street	4	4	-	1	70W HPS recorded in the database- 28W LED found in the field
Caswell Street	10	10	-	1	22W LED recorded in the database- 70W HPS found in the field
Turbine Drive	6	6	-	1	22W LED recorded in the database- 70W HPS found at the end of the road by Hydro station
<b>Total lights</b>	<b>270</b>	<b>269</b>	-	<b>3</b>	

The field audit found a high level of accuracy. This is discussed in **section 3.1**. No additional lights were found in the field.

### Audit outcome

Compliant

## 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 DUMML 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 SDC spreadsheet.

### 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 of a copy of the report to Meridian when changes occur is sufficient to achieve compliance.

The current excel spreadsheet does not track changes and this is recorded as non-compliance below. As detailed in **section 1.4**, this data is being uploaded to RAMM as soon as possible and no later than June 2019. RAMM does track changes so once this is complete this non-compliance will be cleared.

The processes were reviewed for new lamp connections and the tracking of load changes due to faults and maintenance.

Fault, maintenance and LED upgrade work is completed by PowerNet as a contractor. PowerNet advise SDC when work is complete, and SDC use this information to maintain their own spreadsheet which is being uploaded to RAMM.

SDC advised that there have been no new connections for at least four years. If a new connection is required a request will be issued to PowerNet.

The LED upgrade is largely finished with only decorative lighting i.e. bespoke lamp heads where a standard LED lamp head cannot be installed, and some rural flag lighting is still to be changed out. This does not include the NZTA lighting but SDC maintain these lights in the database for submission purposes. SDC does not intend to use a central management system or dimming.

The outage patrol process is still being determined with the new LED lights as the failure rate for LED lights is low. The LED light provider will replace any failed lights for the first 12 months. Any failures are expected to be notified to the SDC via calls from the public.

Christmas lights are not thought to be installed on the unmetered circuits, but I recommend that this is investigated to confirm.

Recommendation	Description	Audited party comment	Remedial action
Regarding: Clause 11(3) of Schedule 15.3	Investigate festive lighting and record in the database if being connected to the unmetered streetlight circuit.	We will work with SDC and the network company to confirm how the Christmas lights are connected.	Investigating

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 2.6 With: Clause 11(3) of schedule 15.3 From: 01-Jun-18 To: 31-Jan-19	The SDC spreadsheet does not track changes. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate as the spreadsheet is being uploaded to RAMM which will then comply with this clause's requirements. The impact is assessed to be low as the data within the spreadsheet has a high level of accuracy and is expected to be loaded to RAMM where there is a full audit trail.		
Actions taken to resolve the issue		Completion date	Remedial action status
As reported, the upload of information to RAMM will resolve this issue		30 June 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			

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

### Code reference

*Clause 11(4) of Schedule 15.3*

### Code related audit information

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

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

### Audit observation

The SDC spreadsheet was checked for an audit trail.

### Audit commentary

The current spreadsheet does not track changes but as detailed in **section 1.4**, this data is being uploaded to RAMM in as soon as possible but no later than June 2019 and the RAMM database has a full audit trail as required by this clause.



**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 2.7 With: Clause 11(4) of schedule 15.3  From: 01-Jun-18 To: 31-Jan-19	The SDC spreadsheet does not have an audit trail.  Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate as the spreadsheet is being uploaded to RAMM which will then comply with this clause's requirements.  The impact is assessed to be low as the data within the spreadsheet has a high level of accuracy and is expected to be loaded to RAMM where there is a full audit trail.		
Actions taken to resolve the issue		Completion date	Remedial action status
As reported, the upload of information to RAMM will resolve this issue		30 June 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			

### 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	Southland District Council area
Strata	<p>The database contains items of load for the Southland District Council.</p> <p>The processes for the management of SDC of load are the same, but I decided to place the items of load into seven geographical strata of a similar size as follows:</p> <ol style="list-style-type: none"> <li>1. Five Rivers/Waikaia</li> <li>2. Riverton</li> <li>3. Te Anau</li> <li>4. Toestoes/Waihopi</li> <li>5. Wallace</li> <li>6. Winton</li> <li>7. Te Tipua/Tuatapere</li> </ol>
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 61 sub-units.
Total items of load	270 items of load recorded in the database were selected.

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

##### Audit commentary

A statistical sample of 270 items of load found that the field data was 100.8% of the database data for the sample checked. This is within the required database accuracy of 2.5%+/- . The statistical sampling tool reported with 95% confidence the precision of the sample was 5.4% and the true load in the field will be between 98.3% to 103.7% of the load recorded in the database. This indicates that the database is accurate.

The tool indicated that there is potentially 5,600 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool) of under submission. The statistical sampling tool reported with 95% confidence that there is a potential estimated submission variance range of between 12,400 kWh of over submission and 27,200 kWh per annum of over submission.

Wattages for all items of load were checked against the published standardised wattage table produced by the Electricity Authority supplemented with the Veritek wattage table for those wattages not included in the standardised wattage table. The following discrepancies were identified:

Light Type	Count	Database total wattage	Expected total wattage	Total Difference (watts)
18W Fluorescent	38	21	19.5	15

The estimated annual impact is 64 kWh per annum of over submission.

Descriptions for three 22W LED lights (pole numbers 129312, 48863 and 007650) were recorded with a HPS light type. The wattage is correct so there is no impact on submission. These have been passed to SDC to correct and non-compliance is recorded below.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)  From: 01-Jun-18 To: 31-Jan-19	Small number of incorrect ballasts and light descriptions were found with a very minor impact on reconciliation.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as strong, as they ensure errors are minimised.  The impact is assessed to be low based on the wattage differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
The discrepancies have been passed on to SDC to correct and we will follow up with them to ensure this is completed.		28/02/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

### 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 data submitted to EMS to prepare reconciliation submissions.

#### Audit commentary

Meridian reconciles this DUML load using the DST profile. The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian's reconciliation participant and EMS' agent audit, and its accuracy and compliance was confirmed.

I compared the SDC spreadsheet provided during December 2018 to the capacity information Meridian supplied to EMS in December 2018 and found it matched exactly.

The database was confirmed to fall within the database accuracy threshold. There are a small number of lights with incorrect ballast resulting in a very minor amount of over submission. This is recorded as non-compliance in **section 3.1** but as the impact is estimated to be 64 kWh per annum, I have recorded compliance for this section.

#### Audit outcome

Compliant

## CONCLUSION

Meridian moved to using the SDC data in June 2018. This audit found a high level of accuracy in this data. Currently the data is being maintained in an excel spreadsheet but is being loaded to RAMM as soon as possible and no later than June 2019.

The future risk rating of five indicates that the next audit be completed in 18 months. Three non-compliances were identified, and one recommendation was raised.

## PARTICIPANT RESPONSE

Meridian have reviewed this report and their comments are contained within the report.