

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
RECONCILIATION PARTICIPANT AUDIT REPORT**

For

**BODY CORPORATE POWER (BCPL)**

Prepared by: Ewa Glowacka

Date audit commenced: 9 April 2019

Date audit report completed: 29 May 2019

Audit report due date: 26-May-19

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## EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Body Corporate Power (BCPL) to support their application for certification, in accordance with clauses 4 of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.1 issued by the Electricity Authority.

At the time of the audit, Body Corporate Power was trading 76 ICPs. All ICPs were reconciled as NHH. Body Corporate Power uses JC Consulting's services to provide reconciliation services as described in the body in this document.

Body Corporate Power conducts switching using the registry web interface. JC Consulting provides the reconciliation services and manages meter readings provided by WELLS.

On 22/02/19 the Authority advised that the use of a participant audit report as an agent report may be an acceptable way of confirming compliance. The Authority stipulated that a letter would be required to confirm that the Orbus Business Services Ltd (ORBS) audit included all the relevant functions conducted by JC Consulting. Body Corporate Power received such a letter from Veritek therefore we used the Orbus Business Services Ltd reconciliation participant audit dated 6/7/2018 to confirm compliance of the processes in the areas relevant to Body Corporate Power. We conducted sampling using Body Corporate Power information to confirm that the processes were used and to verify outcomes. As part of this audit we reviewed the Wells audit report dated 21/06/18 and EDM I report dated 21/06/18.

The audit found 12 non-compliances and one issue. The level of compliance since the last audit has improved in the following areas:

- NHH meter readings
- Management of ICPs status in the registry

The main issue identified during this audit was

- Incorrect profile for solar installation

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 18 which results in an indicative audit frequency of 12 months. We agree with the result.

We thank Body Corporate Power staff for their full and complete cooperation in this audit.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Audit requirements	1.11	15.37A	Audit report complete late	Moderate	Low	2	Identified
Relevant information	2.1	11.2	Incorrect profile for some ICPs	Moderate	Low	2	Identified
Provision of information	2.2	15.35	Body Corporate Power failed to take all practicable steps to provide complete and accurate submission volumes for October 2018.	Strong	Low	1	Cleared
Changes to registry information	3.3	10 of Schedule 11.1	Backdated trader and status events in the registry	Moderate	Low	2	Identified
Management of "inactive" status	3.9	19 of Schedule 11.1	Incorrect status applied to one ICP	Strong	Low	1	Identified
Losing trader to provide final information – standard switch	4.3	5 of Schedule 11.1	The last read date for 1 ICP was incorrect	Strong	Low	1	Identified
Non-half hour switch event meter reading - standard switch	4.5	6(3)(b) of Schedule 11.3	The switch event read rejected for one ICP.	Strong	Low	1	Identified
Losing traded must provide final information – switch move	4.8	10(1) of Schedule 11.3	CS file for one ICP was sent late	Moderate	Low	2	Identified
Losing trader determines a different date – switch move	4.9	10(2) of Schedule 11.3	For one ICP a different date was assigned (in the past) than requested by the gaining trader	Moderate	Low	2	Identified
Gaining trader informs registry of switch request - gaining trader switch	4.12	14 of Schedule 11.3	Incorrect type of switch used for one ICP	Strong	Low	1	Identified
Withdrawal of switch requests	4.15	17 of Schedule 11.3	One NW file was sent late	Strong	Low	1	Identified

HHR aggregates information provision to the reconciliation manager	<b>Error! Reference source not found.</b>	15.8	HHRAGGR files do not contain electricity supplied information	Strong	Low	1	Not required. The Code change required a line up with RN file specification. Breach risk rating excluded from total
Reconciliation participant to prepare information	12.9	15.4	Mismatch of submissions profile between the registry and submitted files for four ICPs; switch event meter reading not used for one ICP	Moderate	Low	2	Identified
Future Risk Rating						18	

Future risk rating	0-1	1-3	4-15	16-40	41-55	56+
Indicative audit frequency	36 months	24 months	18 months	12months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Description	Recommendation
			Nil

## ISSUES

Subject	Section	Description	Issue
			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

Body Corporate Power does not have any exemptions granted to exempt them from compliance with all or any of the clauses.

#### Audit commentary

Body Corporate Power did not apply for any exemptions. We checked the Electricity Authority website and confirm that there are no exemptions in place.

### 1.2. Structure of Organisation

James Martin is the Managing Director of Body Corporate Power.

### 1.3. Persons involved in this audit

Name	Title	Company
James Martin	Managing Director	Body Corporate Power
John Candy	Consultant	JCC Consulting
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates

### 1.4. Use of Agents (Clause 15.34)

#### Code reference

*Clause 15.34*

#### Code related audit information

*A reconciliation participant who uses an agent*

- *remains responsible for the contractor's fulfilment of the participant's Code obligations*
- *cannot assert that it is not responsible or liable for the obligation due to something the agent has or has not done*

#### Audit observation

Body Corporate Power uses three agents to meet their obligations; WELLS, a meter reading company, EDM1 (reading one 3PH category 3 metering installation), and JC Consulting, to create and submit files to the reconciliation manager.

#### Audit commentary

As a part of this audit we reviewed the WELLS audit report dated 21/06/18. We do acknowledge that this audit is older than seven months. We contacted the auditor of Wells, coming up a new audit in May'19),



and she commented that there we no changes to WELLS’s process which could negatively impact their compliance.

### 1.5. Hardware and Software

No particular software is used. Switching and registry updates are done using the registry web interface. JC Consulting uses the RM TOOL (Access database).

### 1.6. Breaches or Breach Allegations

File reference: 1812BCPL1

On 13 February 2019, the Authority’s Compliance Committee (Committee) considered the alleged breach of clause 15.2(1) of the Electricity Industry Participation Code 2010 by Body Corporate Power Limited on 6 November 2018.

In this case the market administrator alleges Body Corporate Power failed to take all practicable steps to provide complete and accurate submission volumes for October 2018.

The Committee decided to take no further action on the breach under regulation 11(1)(b) of the Electricity Industry (Enforcement) Regulations 2010.

### 1.7. ICP Data

Metering Category	(7/4/2019)	(08/05/18)	(2017)
1	69	46	16
2	1	2	2
3	2	0	0
4	0	0	0
5	0	0	0
9	0	0	0

Status	Number of ICPs (07/04/19)	Number of ICPs (08/05/18)	Number of ICPs (2017)
Active (2,0)	71	7	18
Inactive – new connection in progress (1,12)	5	4	6
Inactive – electrically disconnected vacant property (1,4)	0	0	0
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	0
Inactive – electrically disconnected at pole fuse (1,8)	0	0	0

Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	0
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	0	1	0
Inactive – reconciled elsewhere (1,5)	0	38	0
Decommissioned (3)	3	2	3

### 1.8. Authorisation Received

Body Corporate Power provided a letter of authorisation to Ewa Glowacka of TEG & Associates permitting the collection of data from other parties for matters directly related to the audit.

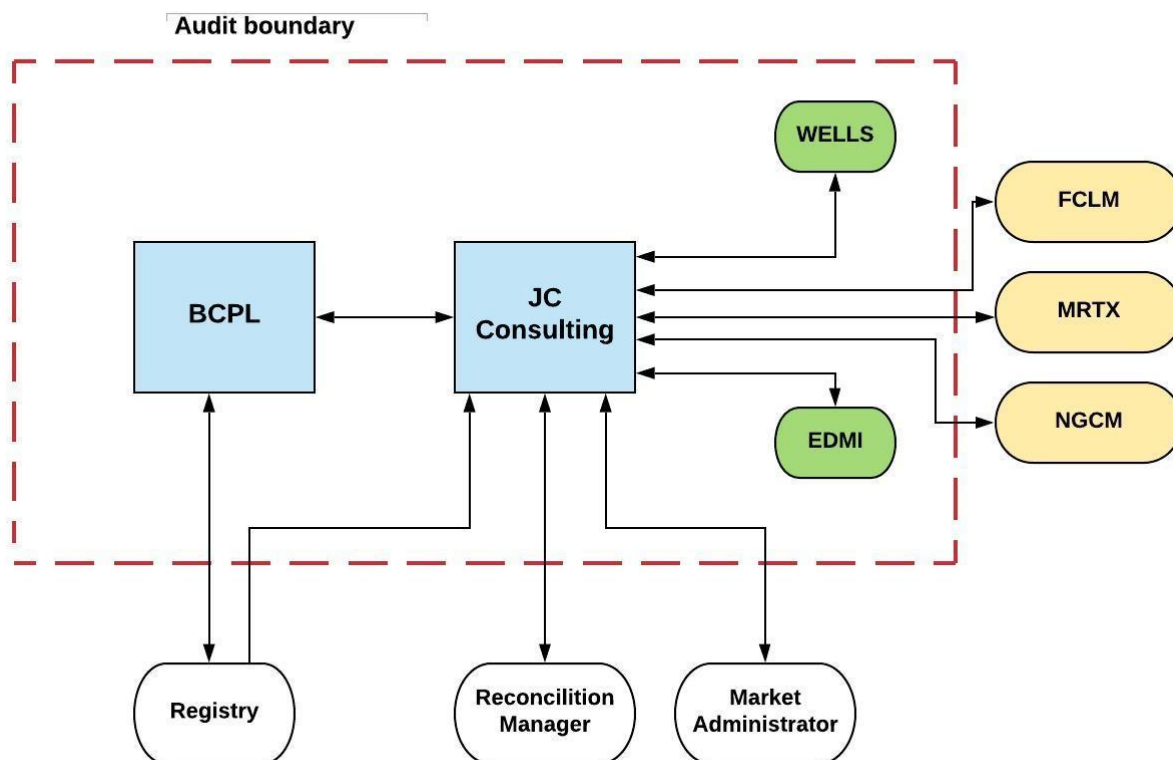
### 1.9. Scope of Audit

This reconciliation participant audit was performed at the request of Body Corporate Power to encompass the Authority’s request for annual audits as required by clause 2, of Schedule 15.1, of the Code to assure compliance with the Electricity Industry Participation Code 2010.

The audit was carried out on the 9th of April 2019, at 19 Arrenway Drive, Auckland.

The audit covers the following processes under clause 15.38 of Part 15, performed by Body Corporate Power:

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Relevant to audit	Agents Involved in Performance of Tasks
(a) - Maintaining registry information and performing customer and embedded generator switching	✓	
(b) – Gathering and storing raw meter data	✓	WELLS – NHH meter readings EDMI – HHR data
(c)(i) - Creation and management of HHR volume information	✗	
(c)(ii) - Creation and management of NHH volume information	✗	
(c)(ii) - Creation and management of HHR and NHH volume information	✓	JCC Consulting
(c)(iv) - Creation and management of dispatchable load information	✗	
(d)(i) – Calculation and delivery of ICP days under clause 15.6	✓	JCC Consulting
(d)(ii) - delivery of electricity supplied information under clause 15.7	✓	JCC Consulting
(d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	JCC Consulting
(e) – Provision of submission information for reconciliation	✓	JCC Consulting
(f) - Provision of metering information to the grid owner in accordance with subpart 4 of part 13	✗	



### 1.10. Summary of previous audit

The previous audit was conducted by Ewa Glowacka of TEG & Associates on 18th March 2018. The findings are noted in the table below:

Subject	Section	Clause	Non-Compliance	Comment
Relevant information	2.1	11.2	Incorrect date of assigned status for 38 ICPs located in Clifton Court	Still exists
Provision of information	2.2	15.35	Submission files late in July'18	Still exists
Changes to registry information	3.3.	10 of Schedule 11.1	Backdated trader and status events in the registry	Still exists
Management of "inactive" status	3.9	19 of Schedule 11.1	Incorrect status was assigned for 38 ICPs	Still exists
Losing trader response to switch request and event dates – standard switch	4.2.	3 of Schedule 11.1	3 out of 8 AN files were sent late to the registry	Cleared
Losing trader to provide final	4.3	5 of Schedule 11.1	2 out of 10 CS files were sent late to the registry	Still exists

information – standard switch				
Losing traded must provide final information – switch move	4.8	10(1) of Schedule 11.3	One CS file was sent late	Still exists
Losing trader to provide final information – switch move	4.10	11 of Schedule 11.3	Incorrect content of CS for 0000142054UNB5D and	Cleared
Derivation of meter readings	6.6	3(2) of Schedule 15.	Validation of meter readings for 0000142054UNB5D were done using customer reads	Cleared
HHR aggregates information provision to the reconciliation manager	.11.4.	15.8	HHRAGGR files do not contain electricity supplied information	Still exists
Creation of submission information	12.2	15.4	Submission files were late in July'17. BCPL lodged a self-breach	Cleared
Historical estimates reporting to RM	13.3	10 of Schedule 15.3	Target of 80% was not met for HEN0331. There was only one ICP traded on this NSP	Cleared

### 1.11. Audit requirements (Clause 15.37A)

#### Code reference

Clause 15.37A

#### Code related audit information

*Each reconciliation participant and each dispatchable load purchaser must arrange to be audited regularly in accordance with Part 16A in respect of the reconciliation participant's or dispatchable load purchaser's obligations under this Part.*

#### Audit observation

The Body Corporate Power reconciliation participant audit was due to be submitted to the authority by 26<sup>th</sup> March 2019 for certification to be approved by 26<sup>th</sup> May 2019. The site audit was conducted on 9<sup>th</sup> of April 2019 therefore the audit report will be lodged late. This is recorded as non-compliance.

#### Audit outcome

Non-compliant

Non-compliance	Description
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<p>Audit Ref: 1.11 With: 15.37A  From: 26-Mar-19 To: 26-May-19</p>	<p>Audit report completed late  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The audit risk rating is recorded as low because the number of ICPs traded by is small therefore any impact to the market will be minor		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
Audit will be confirmed at least 3 months prior; Account was payment was confirmed on 28th March with Audit in April. We will now confirm Audit Payment in February and complete Audit in March. We were also on-boarding a new retailer, so this caused unnecessary delays	February 1st, 2020 for full payment	Identified	
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>		
	-		

## 2. OPERATIONAL INFRASTRUCTURE

### 2.1. Relevant information (Clause 10.6, 11.2, 15.2)

#### Code reference

Clause 10.6, 11.2, 15.2

#### Code related audit information

*A participant must take all practicable steps to ensure that information that the participant is required to provide is:*

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

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

#### Audit observation

Processes to provide information to the reconciliation manager were reviewed and assessed throughout this document. JC Consulting acts as the agent to Body Corporate Power to provide information in accordance with Part 15.

#### Audit commentary

To assess compliance with these clauses we examined the process of validating information in the registry. The LIS file dated 31/03/19 was examined to identify any inaccuracies. The Event Detail (EDA) file for the period 01/05/18 to 31/03/19 was examined to determine how quickly Body Corporate Power provides information to the registry and corrects information which was identified as inaccurate.

The LIS and Metering Installation Information (PR-255) files were analysed, the results are shown below:

Issue	Quantity	Comments
ICP Status = 002, MEP = blank, UNM Flag = N	0	No evidence of this occurring
ICP Status = 002, Generation Capacity is not blank,	8	
Highest Metering Category >2 with residential ANZSIC code assigned (000000)	1	0353203939LCB39
ANZSIC code = blank or T994, T994000, T99, T999, T999999, T995, T995000, T997, T997000, T998, T998000	0	No evidence of this occurring
ICP with B or G Inst Type, or non-null Fuel or Gen Capacity that do not have a corresponding Injection Register	0	No evidence of this occurring
Highest Metering Category greater than 2, Submission Type HHR = No	1	1002059115UNEE9, before "active" status assigned
Highest Metering Category = 9, UNM Flag=N	0	No evidence of this occurring

All active ICPs with Initial Energisation Date populated during a defined period	36	
All Active ICPs (ICP Status = 2) with Shared ICP List not blank	0	No evidence of this occurring
All ICPs at ICP Status 001,12	5	
Submission Type HHR = Y, Profile does not contain HH	0	No evidence of this occurring
Submission Type HHR and Submission Type NHH both = Y	1	1002059115UNEE9, before “active” status assigned
All active ICPs where Distributor has indicated UML (UML Load Details not NULL) but Retailer has none (UNM Flag = N)	0	No evidence of this occurring
All active ICPs with UNM Flag = Y	0	No evidence of this occurring
All active ICPs with load in excess of 6kWh (Daily Unmetered kWh greater than 16.4 daily)	0	No evidence of this occurring
All active ICPs with load between 3-6k kWh (Daily Unmetered kWh between 8.2-16.4 daily)	0	No evidence of this occurring
All active ICPs with Engineered profile (Daily Unmetered kWh = ENG)	3	No evidence of this occurring

In **section 12.9** we identified that some ICPs had incorrectly profile assigned. It was corrected before the audit was finalised.

JC Consulting runs weekly registry validation reporting to identify any changes that have occurred in the registry and to make sure that all the information required for submission is correct and accurate. This validation includes checks such as changes to unmetered loads, where embedded generation is recorded by the distributor, but Body Corporate Power is not aware that solar panels are electrically connected.

#### Audit outcome

Non-compliant



Non-compliance	Description		
Audit Ref: 2.1 With: 11.2  From: 01-Oct-18 To: 08-Nov-18	Incorrect profile for some ICPs  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. There was a minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating low		
Actions taken to resolve the issue		Completion date	Remedial action status
This was part of the on-boarding process with PowerEdge, three ICPs on the PowerCo Network were PV1 profile only as I had thought the submission was HHR. They were at the time NHH so should have been RPSPV1.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Registry Training will be booked for PowerEdge and we now have controls on changes to the registry		Next Registry Training Day and update of internal processes	

## 2.2. Provision of information (Clause 15.35)

### Code reference

Clause 15.35

### Code related audit information

*If an obligation exists to provide information in accordance with Part 15, a participant must deliver that information to the required person within the timeframe specified in the Code, or, in the absence of any such timeframe, within any timeframe notified by the Authority. Such information must be delivered in the format determined from time to time by the Authority.*

### Audit observation

We reviewed the process for file submission performed by JC Consulting and found them compliant.

Alleged breaches during the period covered by this audit were reviewed.

### Audit commentary

We found JC Consulting processes to be compliant. As per **section 1.6**, Market Administrator alleged breach against Body Corporate Power.

## Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35  From: 01-Oct-18 To: 08-Nov-18	Body Corporate Power failed to take all practicable steps to provide complete and accurate submission volumes for October 2018.  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>	Controls are recorded as strong. The issue was clarified with the Market Administrator.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an investigation because the EA noticed significant volume change in BCPL submission data. It was an investigation for which we were fully cleared. There was no Breach		N/A	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

### 2.3. Data transmission (Clause 20 Schedule 15.2)

#### Code reference

Clause 20 Schedule 15.2

#### Code related audit information

*Transmissions and transfers of data related to metering information between reconciliation participants or their agents, for the purposes of the Code, must be carried out electronically using systems that ensure the security and integrity of the data transmitted and received.*

#### Audit observation

JC Consulting downloads data from Metrix, FCLM, AMS, and Wells servers on behalf of Body Corporate Power. Data is downloaded daily.

#### Audit commentary

Once metering data is downloaded from the service providers servers it is uploaded to the RM TOOL.

JC Consulting copies metering data to a Dropbox shared with Body Corporate Power, the company uses this data for analysis and billing purposes.

The data transfer process was reviewed during the MEPs audit and Wells audit and found compliant.

We sampled six ICPs from MTRX, AMS and Wells and traced them from the original files to volume information created by JC Consulting, and uploaded to the reconciliation manager system.

#### **Audit outcome**

Compliant

### **2.4. Audit trails (Clause 21 Schedule 15.2)**

#### **Code reference**

*Clause 21 Schedule 15.2*

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

*Each reconciliation participant must ensure that a complete audit trail exists for all data gathering, validation, and processing functions of the reconciliation participant.*

*The audit trail must include details of information:*

- *provided to and received from the registry manager*
- *provided to and received from the reconciliation manager*
- *provided and received from other reconciliation participants and their agents.*

*The audit trail must cover all archived data in accordance with clause 18.*

*The logs of communications and processing activities must form part of the audit trail, including if automated processes are in operation.*

*Logs must be printed and filed as hard copy or maintained as data files in a secure form, along with other archived information.*

*The logs must include (at a minimum) the following:*

- *an activity identifier (clause 21(4)(a))*
- *the date and time of the activity (clause 21(4)(b))*
- *the operator identifier for the person who performed the activity (clause 21(4)(c)).*

#### **Audit observation**

We checked the audit trail for all data gathering, validation, and correction.

#### **Audit commentary**

JC Consulting retains an audit trail of downloaded data via FileZilla.

The audit trail of reconciliation files is recorded by the RM portal. The audit trail of data validation, estimation and creation of reconciliation files is recorded in the RM TOOL.

During this audit we confirmed that the audit trail for data gathering, validation and processing functions is archived. For any changes to data, logs are created showing the date and time of the activity, an activity identifier, and the operator identifier.

#### **Audit outcome**

Compliant

### **2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)**

#### **Code reference**

#### Clause 10.4

##### Code related audit information

*If a participant must obtain a consumer's consent, approval, or authorisation, the participant must ensure it:*

- *extends to the full term of the arrangement*
- *covers any participants who may need to rely on that consent.*

##### Audit observation

We reviewed the Terms and Conditions for Electricity Supply provided by Body Corporate Power.

##### Audit commentary

The Terms and Conditions covers contractors or agents, the Line Companies, the meter owner, and meter reader and any of their employees, contractors or agents. The agreement covers the full term of the arrangement. There are no long-term contracts for residential customers.

##### Audit outcome

Compliant

#### 2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))

##### Code reference

*Clause 10.7(2),(4),(5) and (6)*

##### Code related audit information

*The responsible reconciliation participant must, if requested, arrange access for the metering installation to the following parties:*

- *the Authority*
- *an ATH*
- *an auditor*
- *an MEP*
- *a gaining metering equipment provider.*

*The trader must use its best endeavours to provide access:*

- *in accordance with any agreements in place*
- *in a manner and timeframe which is appropriate in the circumstances.*

*If the trader has a consumer, the trader must obtain authorisation from the customer for access to the metering installation, otherwise it must arrange access to the metering installation.*

*The reconciliation participant must provide any necessary facilities, codes, keys or other means to enable the party to obtain access to the metering installation by the most practicable means.*

##### Audit observation

We reviewed the Terms and Conditions for Electricity Supply provided by Body Corporate Power.

##### Audit commentary

The section "Access to your premises", of the Terms and Conditions, covers access to a customer's property. Body Corporate Power will give at least 10 working days prior to entry.

##### Audit outcome

Compliant

## 2.7. Physical location of metering installations (Clause 10.35(1)&(2))

### Code reference

*Clause 10.35(1)&(2)*

### Code related audit information

*A reconciliation participant responsible for ensuring there is a category 1 metering installation or category 2 metering installation must ensure that the metering installation is located as physically close to a point of connection as practical in the circumstances.*

*A reconciliation participant responsible for ensuring there is a category 3 or higher metering installation must:*

- a) if practical in the circumstances, ensure that the metering installation is located at a point of connection; or*
- b) if it is not practical in the circumstances to locate the metering installation at the point of connection, calculate the quantity of electricity conveyed through the point of connection using a loss compensation process approved by the certifying ATH.*

### Audit observation

Body Corporate Power installations are category 1, 2, and 3 metering installations. None of the metering installations requires a compensation factor applied due to the location of the installation, as per MEP's advice.

### Audit commentary

We checked the RM TOOL functionality and confirmed that multipliers are applied to submission information.

### Audit outcome

Compliant

## 2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)

### Code reference

*Clause 11.15B*

### Code related audit information

*A trader must at all times ensure that the terms of each contract between a customer and a trader permit:*

- the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and*
- the terms of the assigned contract to be amended on such an assignment to—*
- the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or*
- such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and*
- the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and*

- *the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and*
- *the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).*

*The terms specified in subclause (1) must be expressed to be for the benefit of the Authority for the purposes of the Contracts (Privacy) Act 1982, and not be able to be amended without the consent of the Authority (clause 11.15B(2)).*

#### **Audit observation**

We reviewed the Terms and Conditions for Electricity Supply provided by Body Corporate Power.

#### **Audit commentary**

Section 21 of the Terms and Conditions says “If we commit an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.55 of the Code, we permit the Electricity Authority to assign the rights and obligations of BCPL to another Retailer”

#### **Audit outcome**

Compliant

### 2.9. Connection of an ICP (Clause 10.32)

#### **Code reference**

*Clause 10.32*

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

*A reconciliation participant must only request the connection of a point of connection if they:*

- *accept responsibility for their obligations in Parts 10, 11 and 15 for the point of connection; and*
- *have an arrangement with an MEP to provide 1 or more metering installations for the point of connection.*

#### **Audit observation**

The new connection process was examined.

#### **Audit commentary**

According to the process, Body Corporate Power applies to the relevant network for an ICP identifier on behalf of their customer. Once the ICP is in the registry, the ICP is claimed by changing the status from “ready” to “new connection in progress” (1,12) and an MEP is nominated. Once metering is installed and the installation electrically connected, the status of the ICP is changed to “active”.

Since the last audit Body Corporate Power gained one new connection 1002060916UNFA8.

#### **Audit outcome**

Compliant

### 2.10. Temporary Electrical Connection of an ICP (Clause 10.33)

#### **Code reference**

*Clause 10.33(1)*

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

*A reconciliation participant may temporarily electrically connect a point of connection, or authorise a MEP to temporarily electrically connect a point of connection, only if:*

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
- *the reconciliation participant is recorded in the registry as the trader responsible for the ICP*
- *if the ICP has metered load, 1 or more certified metering installations are in place*
- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

#### **Audit observation**

Body Corporate Power was not asked by any MEP to temporarily electrically connect a point of connection.

#### **Audit commentary**

Compliance confirmed by a verbal assurance by Body Corporate Power.

#### **Audit outcome**

Compliant

### **2.11. Electrical Connection of Point of Connection (Clause 10.33A)**

#### **Code reference**

*Clause 10.33A(1)*

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

*A reconciliation participant may electrically connect or authorise the electrical connection of a point of connection only if:*

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
- *the reconciliation participant is recorded in the registry as the trader responsible for the ICP*
- *if the ICP has metered load, 1 or more certified metering installations are in place*
- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

#### **Audit observation**

The process for new connections and the connection/disconnection of existing installations was examined.

The process for new connections is described in **section 2.9**.

The Event Detail (EDA) file for the period 01/05/18 to 31/03/19 was examined.

#### **Audit commentary**

We confirm that the new connection was electrically connected after BCPL was recorded in the registry as the proposed trader.

#### **Audit outcome**

Compliant

## 2.12. Arrangements for line function services (Clause 11.16)

### Code reference

Clause 11.16

### Code related audit information

*Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must ensure that it, or its customer, has made any necessary arrangements for the provision of line function services in relation to the relevant ICP*

*Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must have entered into an arrangement with an MEP for each metering installation at the ICP.*

### Audit observation

Body Corporate Power has an arrangement with all relevant networks. Agreements are always in place before any ICP is switched in.

### Audit commentary

Body Corporate Power demonstrated the existence of either a UoSA or other trading arrangement for all networks to which their ICPs are connected.

### Audit outcome

Compliant

## 2.13. Arrangements for metering equipment provision (Clause 10.36)

### Code reference

Clause 10.36

### Code related audit information

*A reconciliation participant must ensure it has an arrangement with the relevant MEP prior to accepting responsibility for an installation.*

### Audit observation

The Body Corporate Power business model is to always use FCLM as the MEP. For any new switches, Body Corporate Power accepts an existing MEP. If a NHH installation is changed to HHR, FCLM is always nominated as the MEP.

### Audit commentary

Body Corporate Power has an arrangement with all MEPs which provide metering services to them. The MEP is always nominated after acceptance of a new ICP or when a change of metering is requested.

### Audit outcome

Compliant



### 3. MAINTAINING REGISTRY INFORMATION

#### 3.1. Obtaining ICP identifiers (Clause 11.3)

##### Code reference

Clause 11.3

##### Code related audit information

*The following participants must, before assuming responsibility for certain points of connection on a local network or embedded network, obtain an ICP identifier for the point of connection:*

- a) a trader who has agreed to purchase electricity from an embedded generator or sell electricity to a consumer*
- b) an embedded generator who sells electricity directly to the clearing manager*
- c) a direct purchaser connected to a local network or an embedded network*
- d) an embedded network owner in relation to a point of connection on an embedded network that is settled by differencing*
- e) a network owner in relation to a shared unmetered load point of connection to the network owner's network*
- f) a network owner in relation to a point of connection between the network owner's network and an embedded network.*

*ICP identifiers must be obtained for points of connection at which any of the following occur:*

- a consumer purchases electricity from a trader 11.3(3)(a)*
- a trader purchases electricity from an embedded generator 11.3(3)(b)*
- a direct purchaser purchases electricity from the clearing manager 11.3(3)(c)*
- an embedded generator sells electricity directly to the clearing manager 11.3(3)(d)*
- a network is settled by differencing 11.3(3)(e)*
- there is a distributor status ICP on the parent network point of connection of an embedded network or at the point of connection of shared unmetered load. 11.3(3)(f)*

##### Audit observation

The process for new connections was reviewed as per **section 2.9**.

##### Audit commentary

Since the last audit Body Corporate Power gained one new connection.

##### Audit outcome

Compliant

#### 3.2. Providing registry information (Clause 11.7(2))

##### Code reference

Clause 11.7(2)

##### Code related audit information

*Each trader must provide information to the registry manager about each ICP at which it trades electricity in accordance with Schedule 11.1.*

##### Audit observation

The new connection process was examined. The LIS and EDA files were examined to check the correctness of information and if the registry was notified in the timeframe specified by the relevant clause.

## Audit commentary

The new connection process was described in **section 2.9**.

The company checks the information in the registry for each ICP, before the ICP is accepted, to be sure of their accuracy.

## Audit outcome

Compliant

### 3.3. Changes to registry information (Clause 10 Schedule 11.1)

#### Code reference

Clause 10 Schedule 11.1

#### Code related audit information

*If information provided by a trader to the registry manager about an ICP changes, the trader must provide written notice to the registry manager of the change no later than 5 business days after the change.*

#### Audit observation

To assess compliance, we reviewed the EDA file for the period 01/05/18 to 31/3/19.

#### Audit commentary

The table below shows the level of compliance for status changes, trader events such as profile, type of reconciliation.

Activity	Description	Total number of updates		No of updates later than 3BD		Date range of updates [BD]	
		2018	2019	2018	2019	2018	2019
Status (2,0)	active	3	41	2 (66.6%)	2 (4.8%)	31	Up 6
Status (1,12)	new connection in progress	37	78	0	75 (96%)		Up 33 to 251
Status (1,5)	Inactive – reconciled elsewhere	38	40	38 (100%)	40 (100%)	17	Up to 27
Trader		47	108	4 (8.5%)	9 (8.3%)	16 to 294	

#### Status “Active”

Number of late updates of this status decreased from 66.6% to 4.8%.

#### Status “New connection in progress” and “Reconcile elsewhere”

There is high number of backdated updates, almost 100%. It is a result of correcting data in the registry after the last audit. In the last audit we identified incorrect assignment of the status “Inactive-reconciled elsewhere” for ICPs at Clifton Court. All corrections were done by the end of May/beginning of June. It was done with the Authority assistance as a part of the last audit review.

## Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-May-18 To: 31-Mar-19	Backdated trader and status events in the registry  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate as they require some improvement. There was a minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating low		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL provided Mercury Energy and the EA a photo of the Temporary Builders Supply removed from the pillar. While at the same time Mercury had the ICP as Active in the registry. After considerable analysis of registry codes the only status that we could find that recognised an active status for an inactive ICP was reconciled elsewhere. We were later advised and agreed to use the status installation in progress. We carried out what was requested by us but think that Mercury was in Breach for having an Active ICP at the same premises when there was no way it could have been Active. BCPL correctly recorded and submitted all volume through the installation in progress to one ICP at Clifton Court		BCPL amended and self-breached to backdate all ICPs as requested by the EA.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

### 3.4. Trader responsibility for an ICP (Clause 11.18)

#### Code reference

*Clause 11.18*

#### Code related audit information

*A trader becomes responsible for an ICP when the trader is recorded in the registry as being responsible for the ICP.*

*A trader ceases to be responsible for an ICP if:*

- another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or
- the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).
- if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):
  - o arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and
  - o advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).

A trader who is responsible for an ICP (excluding UML) must ensure that an MEP is recorded in the registry for that ICP (clause 11.18(4)).

A trader must not trade at an ICP (excluding UML) unless an MEP is recorded in the registry for that ICP (clause 11.18(5)).

#### **Audit observation**

The LIS file dated 31/03/19 was analysed and we confirm that all ICPs have a MEP recorded in the registry.

#### **Audit commentary**

Body Corporate Power fully understand that as soon as they are recorded in the registry as accepting responsibility, the responsibility will cease only when an ICP switches out to another trader and its code is recorded in the registry.

Body Corporate Power is aware of their responsibility to notify the MEP where an ICP is decommissioned, and to obtain a final reading.

Since the last audit, the company has not marked any ICP as “ready for decommissioning”.

#### **Audit outcome**

Compliant

### **3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)**

#### **Code reference**

Clause 9 Schedule 11.1

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

Each trader must provide the following information to the registry manager for each ICP for which it is recorded in the registry as having responsibility:

- a) the participant identifier of the trader, as approved by the Authority (clause 9(1)(a))
- b) the profile code for each profile at that ICP, as approved by the Authority (clause 9(1)(b))
- c) the metering equipment provider for each category 1 metering or higher (clause 9(1)(c))
- d) the type of submission information the trader will provide to the RM for the ICP (clause 9(1)(ea))
- e) if a settlement type of UNM is assigned to that ICP, either:
  - the code ENG if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or
  - in all other cases, the daily average kWh of unmetered load at the ICP (clause 9(1)(f)(ii)).
  - the type and capacity of any unmetered load at each ICP (clause 9(1)(g))
  - the status of the ICP, as defined in clauses 12 to 20 (clause 9(1)(j))
  - except if the ICP exists for the purposes of reconciling an embedded network or the ICP has distributor status, the trader must provide the relevant business classification code applicable to the customer (clause 9(1)(k)).

*The trader must provide information specified in (a) to (j) above within 5 business days of trading (clause 9(2)).*

*The trader must provide information specified in 9(1)(k) no later than 20 business days of trading (clause 9(3))*

#### **Audit observation**

The LIS file dated 31/03/19 and Event Detail (EDA) file for the period 01/05/18 to 31/03/19 were examined.

#### **Audit commentary**

Body Corporate Power gained one new connection during the period covered by this audit. The analyses of the EDA files showed that Body Corporate Power provided all required information to the registry for that ICP.

#### **Audit outcome**

Compliant

### **3.6. ANZSIC codes (Clause 9 (1)(k) of Schedule 11.1)**

#### **Code reference**

*Clause 9 (1)(k) of Schedule 11.1*

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

*Traders are responsible to populate the relevant ANZSIC code for all ICPs for which they are responsible.*

#### **Audit observation**

The LIS file dated 31/03/19 was examined.

#### **Audit commentary**

The correctness of the ANZSIC code is checked when a switch is finalised. We reviewed the LIS file and confirm that all ICPs have the correct ANZSIC code recorded.

#### **Audit outcome**

Compliant

### **3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)**

#### **Code reference**

*Clause 9(1)(f) of Schedule 11.1*

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

*if a settlement type of UNM is assigned to that ICP, the trader must populate:*

*the code ENG - if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*

*the daily average kWh of unmetered load at the ICP - in all other cases (clause 9(1)(f)(ii)).*

#### **Audit observation**

The LIS file dated 31/03/19 was examined.

#### **Audit commentary**

At the time of this audit, Body Corporate Power was not trading any UML. As described in **section 2.1**, this is checked regularly as a validation process undertaken by JC Consulting.

#### **Audit outcome**

Compliant

### **3.8. Management of “active” status (Clause 17 Schedule 11.1)**

#### **Code reference**

*Clause 17 Schedule 11.1*

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

*The ICP status of “active” is managed by the relevant trader and indicates that:*

- *the associated electrical installations are electrically connected (clause 17(1)(a))*
- *the trader must provide information related to the ICP in accordance with Part 15, to the reconciliation manager for the purpose of compiling reconciliation information (clause 17(1)(b)).*

*Before an ICP is given the “active” status, the trader must ensure that:*

- *the ICP has only 1 customer, embedded generator, or direct purchaser (clause 17(2)(a))*
- *the electricity consumed is quantified by a metering installation or a method of calculation approved by the Authority (clause 17(2)(b)).*

#### **Audit observation**

We analysed the LIS and EDA files.

#### **Audit commentary**

All ICPs except a few, have the status “Ready”. Information for all ICPs was recorded in the registry and volumes were submitted by JC Consulting as the agent.

JC Consulting assists Body Corporate Power to apply the “active” status correctly.

#### **Audit outcome**

Compliant

### **3.9. Management of “inactive” status (Clause 19 Schedule 11.1)**

#### **Code reference**

*Clause 19 Schedule 11.1*

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

*The ICP status of “inactive” must be managed by the relevant trader and indicates that:*

- *electricity cannot flow at that ICP (clause 19(a)); or*
- *submission information related to the ICP is not required by the reconciliation manager for the purpose of compiling reconciliation information (clause 19(b)).*

#### **Audit observation**

We analysed the LIS and EDA files.

#### **Audit commentary**

The level of compliance has improved since the last audit. Body Corporate Power correctly applies the status “inactive” to traded ICPs. In **section 3.3** we described a clean-up of the status for ICPs relating to the connection in Clifton Court.

Analysis of the EDA file showed that ICP 1099574949CNF52 had its status incorrectly applied. It was backdated from “inactive-vacant” to “new connection in progress” by 251 business days.

JC Consulting assists Body Corporate Power to apply the “inactive” status correctly.

**Audit outcome**

Non-compliant

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 3.9 With: 19 of Schedule 11.1 From: 01-May-18 To: 31-Mar-19	Incorrect status applied to one ICP Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as strong. BCPL has a good understanding of different statuses in the registry. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating low		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This ICP was created by Counties Power and Assigned to BCPL. After our experience with Clifton Court we checked all ICPs that had in-active status. This ICP has no MEP and No Meter so it is not a vacant. The Status was changed and back dated correctly and recorded with a self-breach		Complete	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
BCPL is now aware of the EA’s preferred status for installations that are inactive.		Internal process updated	

**3.10. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)**

**Code reference**

Clause 15 Schedule 11.1

**Code related audit information**

*If an ICP has had the status of "New" or "Ready" for 24 calendar months or more, the distributor must ask the trader whether it should continue to have that status and must decommission the ICP if the trader advises the ICP should not continue to have that status.*

**Audit observation**

It is a distributor's code obligation to monitor any ICP which has had the status of "New" or "Ready" for 24 calendar months or more. It is expected that a trader be able to respond to such queries from distributors.

**Audit commentary**

Body Corporate Power has not received such a query from any distributor because the company does not trade new connections.

**Audit outcome**

Compliant



## 4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

### 4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)

#### Code reference

Clause 2 Schedule 11.3

#### Code related audit information

*The standard switch process applies where a trader and a customer or embedded generator enters into an arrangement in which the trader commences trading electricity with the customer or embedded generator at a non-half hour or unmetered ICP at which another trader supplies electricity, or the trader assumes responsibility for such an ICP.*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of a switch no later than 2 business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and 1 or more profile codes associated with that ICP.*

#### Audit observation

We examined the standard switch process documentation. We found it compliant.

#### Audit commentary

Body Corporate Power sent 41 NTTR to the registry. All NT files were sent with the event date being in the future.

Body Corporate Power is aware of the requirements of the Fair Trading Act 1986.

#### Audit outcome

Compliant

### 4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)

#### Code reference

Clauses 3 and 4 Schedule 11.3

#### Code related audit information

*Within 3 business days after receiving notice of a switch from the registry manager, the losing trader must establish a proposed event date. The event date must be no more than 10 business days after the date of receipt of such notification, and in any 12 month period, at least 50% of the event dates must be no more than 5 business days after the date of notification. The losing trader must then:*

- *provide acknowledgement of the switch request by (clause 3(a) of Schedule 11.3):*
- *providing the proposed event date to the registry manager and a valid switch response code (clause 3(a)(i) and (ii) of Schedule 11.3); or*
- *providing a request for withdrawal of the switch in accordance with clause 17 (clause 3(c) of Schedule 11.3).*

*When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice from the registry manager under clause 22(a) the losing trader had been responsible for less than 2 months.*

#### **Audit observation**

We analysed the EDA file to assess the switching timeline and correctness of information in the AN files. The Switch Breach report for the period covered by this audit was reviewed.

#### **Audit commentary**

The Switch Breach report has not recorded any breaches. Body Corporate Power sent 5 AN files, which were sent within 3 business days. 12 ICPs were gained by Genesis using the standard switch process, AN files were not sent for these ICPs.

Analysis of the EDA file showed that Body Corporate Power is compliant with clause 4(1)(b) of Schedule 11.3, more than 50% of switches had the event dates no more than 5 business days after the date of notification. In fact, for all switches Body Corporate Power accepted an event date proposed by a gaining trader.

#### **Audit outcome**

Compliant

### **4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)**

#### **Code reference**

*Clause 5 Schedule 11.3*

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

*If the losing trader provides information to the registry manager in accordance with clause 3(a) of Schedule 11.3 with the required information, no later than 5 business days after the event date, the losing trader must complete the switch by:*

- *providing event date to the registry manager (clause 5(a)); and*
- *provide to the gaining trader a switch event meter reading as at the event date, for each meter or data storage device that is recorded in the registry with accumulator of C and a settlement indicator of Y (clause 5(b)); and*
- *if a switch event meter reading is not a validated reading, provide the date of the last meter reading (clause 5(c)).*

#### **Audit observation**

We analysed the EDA file to assess the switching timeline and correctness of information in CS files. The Switch Breach report for the period covered by this audit was reviewed.

#### **Audit commentary**

Body Corporate Power is using the Switch Breach Report daily to monitor switch notifications. All CS file were sent within 5 business days after the event date.

We checked 10 CS files and all of them contained correct information but one. The CS file for one ICP had the "Last Read Date" on 5/11/18, but the transfer date was 01/10/18. It was probably human error.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.3 With: 15.8 From: 07-Nov-18 To: 09-Nov-18	The last read date for 1 ICP was incorrect Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. The process is well controlled. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL Transferred 10 ICPs to Genesis Energy on 1st October 2018. For these ICPs BCPL is a tier 2 retailer. BCPL maintains the customer relationship and invoices the customer. This ICP had an estimated read and we had an opportunity to physically read the meter on 5th November. Genesis was slow to change registry so BCPL updated the reading to actual			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Internal processes update that if a switch is in progress not to update registry but update gaining retailer			

#### 4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)

##### Code reference

Clause 6(1) and 6A Schedule 11.3

##### Code related audit information

*The losing trader and the gaining trader must both use the same switch event meter reading as determined by the following procedure:*

- *if the switch event meter reading provided by the losing trader differs by less than 200 kWh from a value established by the gaining trader, the gaining trader must use the losing trader's validated meter reading or permanent estimate (clause 6(a)); or*
- *the gaining trader may dispute the switch meter reading if the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more. (clause 6(b)).*

*If the gaining trader disputes a switch meter reading because the switch event meter reading provided by the losing trader differs by 200 kWh or more, the gaining trader must, within 4 calendar months of the registry manager giving the gaining trader written notice of having received information about the switch completion, provide to the losing trader a changed switch event meter reading supported by 2 validated meter readings.*

- *the losing trader can choose not to accept the reading, however, must advise the gaining trader no later than 5 business days after receiving the switch event meter reading from the gaining trader (clause 6A(a)); or*
- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 6A(b)).*

#### **Audit observation**

The process for managing read change requests (RR files ) is managed by JC Consulting. We reviewed the process and found it compliant.

#### **Audit commentary**

Body Corporate Power reconciles all their new switches as NHH. JC Consulting performs a comparison between a switch event read and a read from the MEP or Wells. If the difference is less than 200 kWh, the switch event read provided by a losing trader is used for reconciliation. If the difference is greater than 200 kWh, RR file is sent.

Body Corporate Power did not send any RR files but received 1 RR file, which was rejected.

#### **Audit outcome**

Compliant

### 4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)

#### **Code reference**

*Clause 6(2) and (3) Schedule 11.3*

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

*If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry: and*

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b));*
- *the gaining trader within 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading.*

#### **Audit observation**

The process for the management of read change was examined. The EDA file was examined to identify if any RRs were received by Body Corporate Power from the gaining trader who will trade electricity from a meter with a half hour submission type in the registry.

#### **Audit commentary**

We identified one ICP for which Electric Kiwi provided the switch event meter reading from an AMI certified meter within 5 business days. Body Corporate Power rejected the RR. The difference between readings was 1 kWh. The rejection of the RR file was caused by misinterpreting what flag was assigned to the read in the RR file.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.5 With:6(3)(b) of Schedule 11.3  From: 07-Nov-18 To: 09-Nov-18	The switch event read rejected for one ICP.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, requirements well understood. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue	Completion date	Remedial status	action
BCPL internal process picks up discrepancy in Actual Read file and estimated. In this incidence the Actual Read file to Midnight was 1 kWh variance to the submitted file and triggered a RR .	Updated internal Process	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
Accept RR small variances if from AMI meter reading	Updated internal Process		

#### 4.6. Disputes - standard switch (Clause 7 Schedule 11.3)

##### Code reference

Clause 7 Schedule 11.3

##### Code related audit information

*A losing trader or gaining trader may give written notice to the other that it disputes a switch event meter reading provided under clauses 1 to 6. Such a dispute must be resolved in accordance with clause 15.29 (with all necessary amendments).*

##### Audit observation

There were no disputes with a losing trader. If such a situation were to occur in the future it would be resolved in accordance with this clause.

##### Audit commentary

Body Corporate Power confirmed that no disputes occurred in the period covered by this audit which would require a resolution. Body Corporate Power stated that they will not decline to accept another traders' validated meter reading or permanent estimate if they are reasonable and appropriate in the applicable circumstances.

##### Audit outcome

Compliant

#### 4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)

##### Code reference

*Clause 9 Schedule 11.3*

##### Code related audit information

*The switch move process applies where a gaining trader has an arrangement with a customer or embedded generator to trade electricity at an ICP using non half-hour metering or an unmetered ICP, or to assume responsibility for such an ICP, and no other trader has an agreement to trade electricity at that ICP, this is referred to as a switch move and the following provisions apply:*

*If the “uninvited direct sale agreement” applies, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*In the event of a switch move, the gaining trader must advise the registry manager of a switch and the proposed event date no later than 2 business days after the arrangement comes into effect.*

*In its advice to the registry manager the gaining trader must include:*

- *a proposed event date (clause 9(2)(a)); and*
- *that the switch type is "MI" (clause 9(2)(b)); and*
- *one or more profile codes of a profile at the ICP. (clause 9(2)(c))*

##### Audit observation

The switch move process was examined. The EDA file for the period covered by this audit was reviewed.

##### Audit commentary

Body Corporate Power sent 5 NTMI. All files were sent within 2 days business days after the arrangement comes into effect.

The company is aware of the requirements of the Fair Trading Act 1986.

##### Audit outcome

Compliant

#### 4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)

##### Code reference

*Clause 10(1) Schedule 11.3*

##### Code related audit information

*10(1) Within 5 business days after receiving notice of a switch move request from the registry manager—*

- *10(1)(a) If the losing trader accepts the event date proposed by the gaining trader, the losing trader must complete the switch by providing to the registry manager:*
  - *confirmation of the switch event date; and*
  - *a valid switch response code; and*
  - *final information as required under clause 11; or*

- 10(1)(b) If the losing trader does not accept the event date proposed by the gaining trader, the losing trader must acknowledge the switch request to the registry manager and determine a different event date that—
  - o is not earlier than the gaining trader’s proposed event date, and
  - o is no later than 10 business days after the date the losing trader receives notice; or
- 10(1)(c) request that the switch be withdrawn in accordance with clause 17.

#### Audit observation

The EDA file for the period covered by this audit was reviewed.

#### Audit commentary

Analysis of the EDA file confirmed that Body Corporate Power lost two ICPs using the switch move process. The CS file for one ICP ( 0000142054UNB5D) was sent later than required. It was sent using the same timeline as is used for a standard switch.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 19-Apr-18 To: 01-May-19	CS file for one ICP was sent late. 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 they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Review Switching Code part 10 (1) of Schedule 11.3.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Seek registry training and update internal process documentation		30/06/2019	

#### 4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)

#### Code reference

Clause 10(2) Schedule 11.3

#### Code related audit information

If the losing trader determines a different date, then within 10 business days of receiving notice the losing trader must also complete the switch by providing to the registry manager as described in subclause (1)(a):

- the event date proposed by the losing trader; and
- a valid switch response code; and
- final information as required under clause 1.

**Audit observation**

The EDA file for the period covered by this audit was reviewed to assess compliance.

**Audit commentary**

The review of the EDA file showed that, for ICP 0384713678LC234, Body Corporate Power did not accept the event date of 4/2/19 requested by Mercury Energy. BCPL assigned a different date of 01/02/19, which is in the past. It constitutes non-compliance.

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.9 With: 10(2) of Schedule 11.3  From: 01-May-19 To: 05-May-19	For one ICP a different date was assigned (in the past) than requested by the gaining trader.  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 moderate as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Client requested change over date of 1st February. NT with 1st Feb sent to Mercury and acknowledged on 5th February			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Accept proposed change over date by Losing retailer to remain compliant.		01/05/19	

4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)

**Code reference**

Clause 11 Schedule 11.3



### Code related audit information

The losing trader must provide final information to the registry manager for the purposes of clause 10(1)(a)(ii), including—

- the event date (clause 11(a)); and
- a switch event meter reading as at the event date for each meter or data storage device that is recorded in the registry with an accumulator type of C and a settlement indicator of Y (clause 11(b)); and
- if the switch event meter reading is not a validated meter reading, the date of the last meter reading of the meter or storage device. (clause (11(c)).

### Audit observation

The move out switches were examined using the EDA file.

### Audit commentary

Two ICPs (0000142054UNB5D and 0384713678LC234) switched out to other traders. For both switches Body Corporate Power provided validated meter readings.

### Audit outcome

Compliant

## 4.11. Gaining trader changes to switch meter reading – switch move(Clause 12 Schedule 11.3)

### Code reference

Clause 12 Schedule 11.3

### Code related audit information

The gaining trader may use the switch event meter reading supplied by the losing trader or may, at its own cost, obtain its own switch event meter reading. If the gaining trader elects to use this new switch event meter reading, the gaining trader must advise the losing trader of the switch event meter reading and the actual event date to which it refers as follows:

- if the switch meter reading established by the gaining trader differs by less than 200 kWh from that provided by the losing trader, both traders must use the switch event meter reading provided by the gaining trader (clause 12(2)(a)); or
- if the switch event meter reading provided by the losing trader differs by 200 kWh or more from a value established by the gaining trader, the gaining trader may dispute the switch meter reading. In this case, the gaining trader, within 4 calendar months of the date the registry manager gives the gaining trader written notice of having received information about the switch completion, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by 2 validated meter readings and the losing trader must either (clause 12(2)(b) and clause 12(3)):
- advise the gaining trader if it does not accept the switch event meter reading and the losing trader and the gaining trader must resolve the dispute in accordance with the disputes procedure in clause 15.29 (with all necessary amendments) (clause 12(3)(a)); or
- if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 12(3)(b)).

12(2A) If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry,

- the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 12(2A)(b));

- *the gaining trader no later than 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading. (clause 12(2B)).*

#### **Audit observation**

The EDA file for the period covered by this audit was reviewed.

#### **Audit commentary**

Body Corporate Power did not send or received any RR file for this type of switch.

#### **Audit outcome**

Compliant

### **4.12. Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)**

#### **Code reference**

*Clause 14 Schedule 11.3*

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

*The gaining trader switch process applies when a trader has an arrangement with a customer or embedded generator to trade electricity at an ICP at which the losing trader trades electricity with the customer or embedded generator, and one of the following applies at the ICP:*

- *the gaining trader will trade electricity through a half hour metering installation that is a category 3 or higher metering installation; or*
- *the gaining trader will trade electricity through a non-AMI half hour metering installation and the losing trader trades electricity through a non-AMI non half hour metering installation; or*
- *the gaining trader will trade electricity through a non-AMI non half hour metering installation and the losing trader trades electricity through a non-AMI half hour metering installation*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of the switch and expected event date no later than 3 business days after the arrangement comes into effect.*

*14(2) The gaining trader must include in its advice to the registry manager:*

- a) a proposed event date; and*
- b) that the switch type is HH.*

*14(3) The proposed event date must be a date that is after the date on which the gaining trader advises the registry manager, unless clause 14(4) applies.*

*14(4) The proposed event date is a date before the date on which the gaining trader advised the registry manager, if:*

*14(4)(a) – the proposed event date is in the same month as the date on which the gaining trader advised the registry manager; or*

*14(4)(b) – the proposed event date is no more than 90 days before the date on which the gaining trader advises the registry manager and this date is agreed between the losing and gaining traders.*

#### **Audit observation**

The gaining trader switch process was reviewed. The EDA file was analysed.

#### Audit commentary

Body Corporate Power switched one ICP (1001256544UNCD6) using the gaining trader process. An incorrect process was used because the ICP is a category 1 metering installation.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.12 With: 14 of Schedule 11.3 From: 07-Oct-18 To: 11-Nov-18	Incorrect type of switch used for one ICP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was one of the ICPs transferring to Genesis at 40 Rosedale Rd. It was a BTS supply that should have changed to permanent. However, Genesis decommissioned the ICP. BCPL had to create a New ICP to continue with the upgrade. The New ICP is Category 3.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was a one-off error by Genesis. In the future BCPL will upgrade ICPs before engaging Genesis.			

#### 4.13. Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)

##### Code reference

Clause 15 Schedule 11.3

##### Code related audit information

Within 3 business days after the losing trader is informed about the switch by the registry manager, the losing trader must:

- 15(a) - provide to the registry manager a valid switch response code as approved by the Authority;
- or

15(b) - provide a request for withdrawal of the switch in accordance with clause 17.

#### **Audit observation**

The EDA file was analysed.

#### **Audit commentary**

One ICP switched out from Body Corporate Power using this type of switch. The AN file was sent within 3 business days.

#### **Audit outcome**

Compliant

### 4.14. Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)

#### **Code reference**

Clause 16 Schedule 11.3

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

*The gaining trader must complete the switch no later than 3 business days, after receiving the valid switch response code, by advising the registry manager of the event date.*

*If the ICP is being electrically disconnected, or if metering equipment is being removed, the gaining trader must either-*

*16(a)- give the losing trader or MEP for the ICP an opportunity to interrogate the metering installation immediately before the ICP is electrically disconnected or the metering equipment is removed; or*

*16(b)- carry out an interrogation and, no later than 5 business days after the metering installation is electrically disconnected or removed, advise the losing trader of the results and metering component numbers for each data channel in the metering installation.*

#### **Audit observation**

The EDA file was analysed.

#### **Audit commentary**

Body Corporate Power completed the switch of 1001256544UNCD6) in a compliant manner.

#### **Audit outcome**

Compliant

### 4.15. Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)

#### **Code reference**

Clauses 17 and 18 Schedule 11.3

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

*A losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 2 calendar months after the event date of the switch.*

*If a trader requests the withdrawal of a switch, the following provisions apply:*

- *for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):*

- *the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and*
- *the withdrawal advisory code published by the Authority. (clause 18(c)(ii))*
- *within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal. (clause 18(d))*
- *on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c). All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request. (clause 18(e))*
- *if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16. (clause 18(f))*

#### **Audit observation**

The process for withdrawal switch was analysed. The Switch Breach Report was reviewed.

#### **Audit commentary**

The Switch Breach Report did not record any non-compliance with this clause.

A review of the EDA file showed that BCPL sent 4 NW files. The reason code used in the files was correct. One of them (for ICP 1001256544UNCD6) was sent later than 2 calendar months after the event of the switch.

BCPL received 9 NW files, the company responded sending AW files within 5 business days.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.15 With: 17 of Schedule 11.3 From: 26-Jul-18 To: 30-Nov-18	One NW file was sent late. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
As Above, this ICP was a BTS that should have gone to permanent. The new CAT 3 meter was installed and live. Genesis instead decommissioned the ICP. BCPL had to create a new ICP. In the registry the new meter was assigned to the decommissioned ICP.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
BCPL created a new ICP and FCLM moved the meter to the new ICP. The issue of Genesis decommissioning the BTS was resolved.		Complete	

#### 4.16. Metering information (Clause 21 Schedule 11.3)

##### Code reference

Clause 21 Schedule 11.3

##### Code related audit information

For an interrogation or validated meter reading or permanent estimate carried out in accordance with Schedule 11.3:

*21(a)- the trader who carries out the interrogation, switch event meter reading must ensure that the interrogation is as accurate as possible, or that the switch event meter reading is fair and reasonable.*

*21(b) and (c) - the cost of every interrogation or switch event meter reading carried out in accordance with clauses 5(b) or 11(b) or (c) must be met by the losing trader. The costs in every other case must be met by the gaining trader.*

##### Audit observation

We examined the meter reading process in relation to the switching process. Body Corporate Power has lost a small number of ICPs in the period covered by this audit. In the event that an actual read won't be available JC Consulting will calculate an estimate.

#### **Audit commentary**

All meter readings used in the switching process will be validated meter readings or estimates.

#### **Audit outcome**

Compliant

### 4.17. Switch saving protection (Clause 11.15AA to 11.15AB)

#### **Code reference**

*Clause 11.15AA to 11.15AB*

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

*A trader that buys electricity from the clearing manager may elect to have a switch saving protection by giving notice to the Authority in writing.*

*If a protected trader enters into an arrangement with a customer of another trader (the losing trader), or a trader enters into an arrangement with a customer of a protected trader, to commence trading electricity with the customer, the losing trader must not, by any means, initiate contact with the customer to attempt to persuade the customer to terminate the arrangement during the period from the receipt of the NT to the event date of the switch including by:*

*11.15AB(4)(a)- making a counter offer to the customer; or*

*11.15AB(4)(b)- offering an enticement to the customer.*

#### **Audit observation**

Body Corporate Power is not part of the Switch saving protection program.

#### **Audit commentary**

It was discussed during the audit. The company does not approach customers to offer a better deal after receiving NT file. 4 NW files were sent, none of them used the reason code "CX".

#### **Audit outcome**

Compliant

## 5. MAINTENANCE OF UNMETERED LOAD

### 5.1. Maintaining shared unmetered load (Clause 11.14)

#### Code reference

Clause 11.14

#### Code related audit information

The trader must adhere to the process for maintaining shared unmetered load as outlined in clause 11.14:

*11.14(2) - The distributor must give written notice to the traders responsible for the ICPs across which the unmetered load is shared, of the ICP identifiers of the ICPs.*

*11.14(3) - A trader who receives such a notification from a distributor must give written notice to the distributor if it wishes to add or omit any ICP from the ICPs across which unmetered load is to be shared.*

*11.14(4) - A distributor who receives such a notification of changes from the trader under (3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared.*

*11.14(5) - If a distributor becomes aware of any change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change as soon as practicable after that change or decommissioning.*

*11.14(6) - Each trader who receives such a notification must, as soon as practicable after receiving the notification, adjust the unmetered load information for each ICP in the list for which it is responsible to ensure that the entire shared unmetered load is shared equally across each ICP.*

*11.14(7) - A trader must take responsibility for shared unmetered load assigned to an ICP for which the trader becomes responsible as a result of a switch in accordance with Part 11.*

*11.14(8) - A trader must not relinquish responsibility for shared unmetered load assigned to an ICP if there would then be no ICPs left across which that load could be shared.*

*11.14(9) - A trader can change the status of an ICP across which the unmetered load is shared to inactive status, as referred to in clause 19 of Schedule 11.1. In that case, the trader is not required to give written notice to the distributor of the change. The amount of electricity attributable to that ICP becomes UFE.*

#### Audit observation

The LIS file dated 31/3/19 was analysed.

#### Audit commentary

There are no shared unmetered load ICPs traded by Body Corporate Power. JC Consulting checks weekly, to see if any of the networks have not entered an historic SUML which will be reconciled if such a situation occurs.

#### Audit outcome

Compliant

### 5.2. Unmetered threshold (Clause 10.14 (2)(b))

#### Code reference

Clause 10.14 (2)(b)



### Code related audit information

*The reconciliation participant must ensure that unmetered load does not exceed 3,000 kWh per annum, or 6,000 kWh per annum if the load is predictable and of a type approved and published by the Authority.*

### Audit observation

The LIS file dated 31/3/19 was analysed.

### Audit commentary

Body Corporate Power does not trade unmetered load ICPs.

### Audit outcome

Compliant

## 5.3. Unmetered threshold exceeded (Clause 10.14 (5))

### Code reference

*Clause 10.14 (5)*

### Code related audit information

*If the unmetered load limit is exceeded the retailer must:*

- *within 20 business days, commence corrective measure to ensure it complies with Part 10*
- *within 20 business days of commencing the corrective measure, complete the corrective measures*
- *no later than 10 business days after it becomes aware of the limit having been exceeded, advise each participant who is or would be expected to be affected of:*
  - o *the date the limit was calculated or estimated to have been exceeded*
  - o *the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.*

### Audit observation

The LIS file dated 31/3/19 was analysed.

### Audit commentary

Body Corporate Power does not trade unmetered load ICPs. This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)

### Code reference

*Clause 11 Schedule 15.3, Clause 15.37B*

### Code related audit information

*An up-to-date database must be maintained for each type of distributed unmetered load for which the retailer is responsible. The information in the database must be maintained in a manner that the resulting submission information meets the accuracy requirements of clause 15.2.*

*A separate audit is required for distributed unmetered load data bases.*

*The database must satisfy the requirements of Schedule 15.5 with regard to the methodology for deriving submission information.*

**Audit observation**

The LIS file dated 31/3/19 was analysed.

**Audit commentary**

BCPL does not trade a distributed unmetered load and do not have such plans. This clause is not applicable. Compliance was not assessed.

**Audit outcome**

Not applicable

## 6. GATHERING RAW METER DATA

### 6.1. Electricity conveyed & notification by embedded generators(Clause 10.13, Clause 10.24 and 15.13)

#### Code reference

*Clause 10.13, Clause 10.24 and Clause 15.13*

#### Code related audit information

*A participant must use the quantity of electricity measured by a metering installation as the raw meter data for the quantity of electricity conveyed through the point of connection.*

*This does not apply if data is estimated or gifted in the case of embedded generation under clause 15.13.*

*A trader must, for each electrically connected ICP that is not also an NSP, and for which it is recorded in the registry as being responsible, ensure that:*

- *there is 1 or more metering installations*
- *all electricity conveyed is quantified in accordance with the Code*
- *it does not use subtraction to determine submission information for the purposes of Part 15.*

*An embedded generator must give notification to the reconciliation manager for an embedded generating station, if the intention is that the embedded generator will not be receiving payment from the clearing manager or any other person through the point of connection to which the notification relates.*

#### Audit observation

The process for embedded generation was reviewed during ORBS's audit and found compliant. The EDA and LIS files were reviewed for the period covered by this audit.

#### Audit commentary

All ICPs traded by Body Corporate Power are metered, no subtraction method is used to determine submission information.

Body Corporate Power uses the quantity of electricity measured by HHR and NHH metering installations, which is provided by MEPs and WELLS.

#### Audit outcome

Compliant

### 6.2. Responsibility for metering at GIP(Clause 10.26 (6), (7) and (8))

#### Code reference

*Clause 10.26 (6), (7) and (8)*

#### Code related audit information

*For each proposed metering installation or change to a metering installation that is a connection to the grid, the participant, must:*

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least 3 months for the grid owner to review and comment on the design*
- *respond within 3 business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

*The participant responsible for the metering installation must:*

- *advise the reconciliation manager of the certification expiry date not later than 10 business days after certification of the metering installation*
- *become the MEP or contract with a person to be the MEP*
- *advise the reconciliation manager of the MEP identifier no later than 20 days after entering into a contract or assuming responsibility to be the MEP.*

#### **Audit observation**

Body Corporate Power does not trade such installations.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **6.3. Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)**

#### **Code reference**

*Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3*

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

*The reconciliation participant must advise the metering equipment provider if a control device is used to control load or switch meter registers.*

*The reconciliation participant must ensure the control device is certified prior to using it for reconciliation purposes.*

#### **Audit observation**

The LIS file and reconciliation files were analysed.

#### **Audit commentary**

The file analysis showed that Body Corporate Power submits volumes to the reconciliation manager using RPS, PV1, and HHR profiles. No control devices are needed. The company has never approached a MEP asking for a control device to be certified.

#### **Audit outcome**

Compliant

### **6.4. Reporting of defective metering installations (Clause 10.43(2) and (3))**

#### **Code reference**

*Clause 10.43(2) and (3)*

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

*If a participant becomes aware of an event or circumstance that lead it to believe a metering installation could be inaccurate, defective, or not fit for purpose they must:*

- *advise the MEP*
- *include in the advice all relevant details.*

#### **Audit observation**

The process documentation to manage defective installations was examined.

### Audit commentary

Any defective installations are identified through the meter reading validation process conducted by JC Consulting or they notify MEPs or its agents. If such an issue arises, Body Corporate Power raises a SR asking for an investigation and replacement of a meter if necessary.

No defective meters have been identified during the period covered by this audit.

### Audit outcome

Compliant

## 6.5. Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)

### Code reference

Clause 2 Schedule 15.2

### Code related audit information

*Only a certified reconciliation participant may collect raw meter data, unless only the MEP can interrogate the meter, or the MEP has an arrangement which prevents the reconciliation participant from electronically interrogating the meter:*

*2(2) - The reconciliation participant must collect raw meter data used to determine volume information from the services interface or the metering installation or from the MEP.*

*2(3) - The reconciliation participant must ensure the interrogation cycle is such that it does not exceed the maximum interrogation cycle in the registry .*

*2(4) - The reconciliation participant must interrogate the meter at least once every maximum interrogation cycle.*

*2(5) - When electronically interrogating the meter the participant must:*

- a) ensure the system is to within +/- 5 seconds of NZST or NZDST*
- b) compare the meter time to the system time*
- c) determine the time error of the metering installation*
- d) if the error is less than the maximum permitted error, correct the meter's clock*
- e) if the time error is greater than the maximum permitted error then:
  - i) correct the metering installation's clock*
  - ii) compare the metering installation's time with the system time*
  - iii) correct any affected raw meter data.**
- f) download the event log.*

*2(6) – The interrogation systems must record:*

- the time*
- the date*
- the extent of any change made to the meter clock.*

### Audit observation

The data collection conducted by JC Consulting was examined during ORBS's audit and found compliant.

### Audit commentary

The data is collected by FCLM, AMS, and MTRX then downloaded by JC Consulting, who validates it. HHR data is used for reconciliation provided by EDMI.

Compliance with this clause in relation to clock synchronisation is validated during MEP and EDMI audits.

## Audit outcome

Compliant

### 6.6. Derivation of meter readings (Clause 3(1), 3(2) and 5 Schedule 15.2)

#### Code reference

*Clause 3(1), 3(2) and 5 Schedule 15.2*

#### Code related audit information

*All meter readings must in accordance with the participants certified processes and procedures and using its certified facilities be sourced directly from raw meter data and, if appropriate, be derived and calculated from financial records.*

*All validated meter readings must be derived from meter readings.*

*A meter reading provided by a consumer may be used as a validated meter reading only if another set of validated meter readings not provided by the consumer are used during the validation process.*

*During the manual interrogation of each NHH metering installation the reconciliation participant must:*

- a) obtain the meter register*
- b) ensure seals are present and intact*
- c) check for phase failure (if supported by the meter)*
- d) check for signs of tampering and damage*
- e) check for electrically unsafe situations.*

*If the relevant parts of the metering installation are visible and it is safe to do so.*

#### Audit observation

The data collection conducted by JC Consulting was examined during ORBS's audit and found compliant.

#### Audit commentary

Metering data is collected remotely by AMS, MRTX and FCLM. Reads are collected manually by Wells (5 ICPs). Body Corporate Power does not read meters themselves. There were no customer reads.

## Audit outcome

Compliant

### 6.7. NHH meter reading application (Clause 6 Schedule 15.2)

#### Code reference

*Clause 6 Schedule 15.2*

#### Code related audit information

*For NHH switch event meter reads, for the gaining trader the reading applies from 0000 hours on the day of the relevant event date and for the losing trader at 2400 hours at the end of the day before the relevant event date.*

*In all other cases, All NHH readings apply from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation.*

#### Audit observation

The process for the application of meter reading was examined as part of ORBS's audit and found compliant.

### Audit commentary

We examined the outcomes of the process in **section 12.11** and found it compliant.

### Audit outcome

Compliant

## 6.8. Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)

### Code reference

*Clause 7(1) and (2) Schedule 15.2*

### Code related audit information

*Each reconciliation participant must ensure that a validated meter reading is obtained in respect of every meter register for every non half hour metered ICP for which the participant is responsible, at least once during the period of supply to the ICP by the reconciliation participant and used to create volume information.*

*This may be a validated meter reading at the time the ICP is switched to, or from, the reconciliation participant.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 7(1).*

### Audit observation

The EDA file was examined to identify ICPs which have switched out since the last audit.

The process for missing reads was examined during the ORBS's audit and found compliant.

### Audit commentary

The EDA file showed that 16 ICPs switched to other traders. The company provided evidence that all of them were read at least once during their responsibility. JC Consulting closely monitors meter readings. Meter Frequency Reports show how good the read attainment results are. Wells reads only 5 ICPs and the rest of them are read remotely.

### Audit outcome

Compliant

## 6.9. NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)

### Code reference

*Clause 8(1) and (2) Schedule 15.2*

### Code related audit information

*At least once every 12 months, each reconciliation participant must obtain a validated meter reading for every meter register for non-half hour metered ICPs, at which the reconciliation participant trades continuously for each 12 month period.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 8(1).*

### Audit observation

The process for missing reads was examined during the ORBS's audit and found compliant. We reviewed the Meter Frequency Reports (MFR) for 12 months. The reports were accurate and submitted to the Authority in time.

#### **Audit commentary**

JC Consulting provided the reports for the period May'18 to Feb'19. A review of Meter Frequency Reports confirmed that Body Corporate Power met the read attainment requirements for all months.

#### **Audit outcome**

Compliant

### 6.10. NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)

#### **Code reference**

*Clause 9(1) and (2) Schedule 15.2*

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

*In relation to each NSP, each reconciliation participant must ensure that for each NHH ICP at which the reconciliation participant trades continuously for each 4 months, for which consumption information is required to be reported into the reconciliation process. A validated meter reading is obtained at least once every 4 months for 90% of the non-half hour metered ICPs.*

*A report is to be sent to the Authority providing the percentage, in relation to each NSP, for which consumption information has been collected no later than 20 business days after the end of each month.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 9(1).*

#### **Audit observation**

The process for missing reads was examined during the ORBS's audit and found compliant. We reviewed the Meter Frequency Reports (MFR) for 4 months. The reports were accurate and submitted to the Authority in time.

#### **Audit commentary**

JC Consulting provided the reports for the period May'18 to Feb'19. A review of Meter Frequency Reports confirmed that Body Corporate Power met the read attainment requirements for all months.

#### **Audit outcome**

Compliant

### 6.11. NHH meter interrogation log (Clause 10 Schedule 15.2)

#### **Code reference**

*Clause 10 Schedule 15.2*

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

*The following information must be logged as the result of each interrogation of the NHH metering:*

*10(a) - the means to establish the identity of the individual meter reader*

*10(b) - the ICP identifier of the ICP, and the meter and register identification*

*10(c) - the method being used for the interrogation and the device ID of equipment being used for interrogation of the meter.*



*10(d) - the date and time of the meter interrogation.*

#### **Audit observation**

NHH metering data is collected by Wells, FCLM, AMS and Metrix.

#### **Audit commentary**

Compliance with this clause was assessed during the Wells and Metrix audits. We reviewed Wells audit dated 21/06/18.

#### **Audit outcome**

Compliant

### 6.12. HHR data collection (Clause 11(1) Schedule 15.2)

#### **Code reference**

*Clause 11(1) Schedule 15.2*

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

*Raw meter data from all electronically interrogated metering installations must be obtained via the services access interface.*

*This may be carried out by a portable device or remotely.*

#### **Audit observation**

HHR data is collected by FCLM and EDMI on behalf of Body Corporate Power and passed to JC Consulting.

#### **Audit commentary**

FCLM and EDMI are responsible for HHR collection. Compliance with this clause was examined during their MEP audits. We reviewed the EDMI audit report.

#### **Audit outcome**

Compliant

### 6.13. HHR interrogation data requirement (Clause 11(2) Schedule 15.2)

#### **Code reference**

*Clause 11(2) Schedule 15.2*

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

*The following information is collected during each interrogation:*

*11(2)(a) - the unique identifier of the data storage device*

*11(2)(b) - the time from the data storage device at the commencement of the download unless the time is within specification and the interrogation log automatically records the time of interrogation*

*11(2)(c) - the metering information, which represents the quantity of electricity conveyed at the point of connection, including the date and time stamp or index marker for each half hour period. This may be limited to the metering information accumulated since the last interrogation*

*11(2)(d) - the event log, which may be limited to the events information accumulated since the last interrogation*

*11(2)(e) - an interrogation log generated by the interrogation software to record details of all interrogations.*

*The interrogation log must be examined by the reconciliation participant responsible for collecting the data and appropriate action must be taken if problems are apparent or an automated software function flags exceptions.*

#### **Audit observation**

HHR data is collected by FCLM and EDMI on behalf of Body Corporate Power and passed to JC Consulting.

#### **Audit commentary**

FCLM and EDMI are responsible for HHR collection. Compliance with this clause was examined during their MEP audits. We reviewed the EDMI audit report.

#### **Audit outcome**

Compliant

### 6.14. HHR interrogation log requirements (Clause 11(3) Schedule 15.2)

#### **Code reference**

*Clause 11(3) Schedule 15.2*

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

*The interrogation log forms part of the interrogation audit trail and, as a minimum, must contain the following information:*

*11(3)(a)- the date of interrogation*

*11(3)(b)- the time of commencement of interrogation*

*11(3)(c)- the operator identification (if available)*

*11(3)(d)- the unique identifier of the meter or data storage device*

*11(3)(e)- the clock errors outside the range specified in Table 1 of clause 2*

*11(3)(f)- the method of interrogation*

*11(3)(g)- the identifier of the reading device used for interrogation (if applicable).*

#### **Audit observation**

HHR data is collected by FCLM and EDMI on behalf of Body Corporate Power and passed to JC Consulting.

#### **Audit commentary**

FCLM and EDMI are responsible for HHR collection. Compliance with this clause was examined during their MEP audits. We reviewed the EDMI audit report.

#### **Audit outcome**

Compliant

## 7. STORING RAW METER DATA

### 7.1. Trading period duration (Clause 13 Schedule 15.2)

#### Code reference

Clause 13 Schedule 15.2

#### Code related audit information

*The trading period duration, normally 30 minutes, must be within  $\pm 0.1\%$  ( $\pm 2$  seconds).*

#### Audit observation

At the time of audit Body Corporate Power was not trading HHR ICPS.

#### Audit commentary

When Body Corporate Power decides to trade HHR ICPS, data will be received from FCLM which is the preferred MEP. Volumes will be reconciled by JC Consulting.

#### Audit outcome

Compliant

### 7.2. Archiving and storage of raw meter data (Clause 18 Schedule 15.2)

#### Code reference

Clause 18 Schedule 15.2

#### Code related audit information

*A reconciliation participant who is responsible for interrogating a metering installation must archive all raw meter data and any changes to the raw meter data for at least 48 months, in accordance with clause 8(6) of Schedule 10.6.*

*Procedures must be in place to ensure that raw meter data cannot be accessed by unauthorised personnel.*

*Meter readings cannot be modified without an audit trail being created.*

#### Audit observation

The process for archiving and storing raw meter data was reviewed during ORBS's audit and found compliant.

#### Audit commentary

A review of audit trails in **section 2.4** confirmed that reads cannot be modified without creating an audit trail.

HHR data is received from FCLM and EDMI, who archives raw meter data. Body Corporate Power keeps a copy of all HHR data.

#### Audit outcome

Compliant

### 7.3. Non metering information collected / archived (Clause 21(5) Schedule 15.2)

#### Code reference

Clause 21(5) Schedule 15.2

#### Code related audit information

*All relevant non-metering information, such as external control equipment operation logs, used in the determination of profile data must be collected, and archived in accordance with clause 18.*

**Audit observation**

Body Corporate Power only uses RPS, PV1 and HHR profile for reconciliation submissions. No external control equipment is used.

**Audit commentary**

Compliance was not assessed because this clause is not applicable to the Body Corporate Power operation.

**Audit outcome**

Not applicable

## 8. CREATING AND MANAGING (INCLUDING VALIDATING, ESTIMATING, STORING, CORRECTING AND ARCHIVING) VOLUME INFORMATION

### 8.1. Correction of NHH meter readings (Clause 19(1) Schedule 15.2)

#### Code reference

Clause 19(1) Schedule 15.2

#### Code related audit information

*If a reconciliation participant detects errors while validating non-half hour meter readings, the reconciliation participant must:*

*19(1)(a) - confirm the original meter reading by carrying out another meter reading*

*19(1)(b) - replace the original meter reading the second meter reading (even if the second meter reading is at a different date)*

*19(1A) if a reconciliation participant detects errors while validating non half hour meter readings, but the reconciliation participant cannot confirm the original meter reading or replace it with a meter reading from another interrogation, the reconciliation participant must:*

- *substitute the original meter reading with an estimated reading that is marked as an estimate; and*
- *subsequently replace the estimated reading in accordance with clause 4(2)*

#### Audit observation

The correction of NHH readings, if necessary, is completed by JC Consulting. The process was reviewed during ORBS's audit and found compliant.

#### Audit commentary

No NHH corrections were made during the period covered by this audit.

#### Audit outcome

Compliant

### 8.2. Correction of HHR metering information (Clause 19(2) Schedule 15.2)

#### Code reference

Clause 19(2) Schedule 15.2

#### Code related audit information

*If a reconciliation participant detects errors while validating half hour meter readings, the reconciliation participant must correct the meter readings as follows:*

*19(2)(a) - if the relevant metering installation has a check meter or data storage device, substitute the original meter reading with data from the check meter or data storage device; or*

*19(2)(b) - if the relevant metering installation does not have a check meter or data storage device, substitute the original meter reading with data from another period provided:*

- (i) *The total of all substituted intervals matches the total consumption recorded on a meter, if available; and*
- (ii) *The reconciliation participant considers the pattern of consumption to be materially similar to the period in error*

#### Audit observation

The correction of HHR readings, if necessary, is completed by JC Consulting. The process was reviewed during ORBS's audit and found compliant.

#### **Audit commentary**

No HHR corrections were made during the period covered by this audit. JC Consulting conducts very thorough HHR data validation to detect possible data inaccuracies.

#### **Audit outcome**

Compliant

### **8.3. Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)**

#### **Code reference**

*Clause 19(3) Schedule 15.2*

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

*A reconciliation participant may use error compensation and loss compensation as part of the process of determining accurate data. Whichever methodology is used, the reconciliation participant must document the compensation process and comply with audit trail requirements set out in the Code.*

#### **Audit observation**

Error and loss compensation was discussed during the audit.

#### **Audit commentary**

Body Corporate Power only supplies ICPs with metering categories 1 to 3 and does not deal with any installations with error or loss compensation.

#### **Audit outcome**

Compliant

### **8.4. Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)**

#### **Code reference**

*Clause 19(4) and (5) Schedule 15.2*

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

*In correcting a meter reading in accordance with clause 19, the raw meter data must not be overwritten. If the raw meter data and the meter readings are the same, an automatic secure backup of the affected data must be made and archived by the processing or data correction application.*

*If data is corrected or altered, a journal must be generated and archived with the raw meter data file. The journal must contain the following:*

*19(5)(a)- the date of the correction or alteration*

*19(5)(b)- the time of the correction or alteration*

*19(5)(c)- the operator identifier for the person within the reconciliation participant who made the correction or alteration*

*19(5)(d)- the half-hour metering data or the non-half hour metering data corrected or altered, and the total difference in volume of such corrected or altered data*

*19(5)(e)- the technique used to arrive at the corrected data*

*19(5)(f)- the reason for the correction or alteration.*

**Audit observation**

The process for the correction of NHH and HHR reads was examined during the ORBS's audit and found compliant.

**Audit commentary**

No corrections have occurred since the last audit. Audit trails are discussed in section 2.4. JC Consulting receives only a copy of raw meter data. Retention of raw meter data is the responsibility of MRTX, FCLM, AMS and Wells. It was covered in the MEP audits and found compliant.

We reviewed Wells's audit report, compliance was confirmed.

**Audit outcome**

Compliant

## 9. ESTIMATING AND VALIDATING VOLUME INFORMATION

### 9.1. Identification of readings (Clause 3(3) Schedule 15.2)

#### Code reference

*Clause 3(3) Schedule 15.2*

#### Code related audit information

*All estimated readings and permanent estimates must be clearly identified as an estimate at source and in any exchange of metering data or volume information between participants.*

#### Audit observation

The estimation processes and classifications were examined during the ORBS's audit and found compliant.

#### Audit commentary

We reviewed a sample of five readings in the RM TOOL and confirmed they were correctly labelled. We traced them from the source file to the JC Consulting system. Each register read or interval read has a flag assigned.

#### Audit outcome

Compliant

### 9.2. Derivation of volume information (Clause 3(4) Schedule 15.2)

#### Code reference

*Clause 3(4) Schedule 15.2*

#### Code related audit information

*Volume information must be directly derived, in accordance with Schedule 15.2, from:*

*3(4)(a) - validated meter readings*

*3(4)(b) - estimated readings*

*3(4)(c) - permanent estimates.*

#### Audit observation

JC Consulting provided a submission summary for Sept'18 to Jan'19.

#### Audit commentary

The data provided by JC Consulting was reviewed in **section 11** and **12** to confirm that volumes were based on readings as required.

#### Audit outcome

Compliant

### 9.3. Meter data used to derive volume information (Clause 3(5) Schedule 15.2)

#### Code reference

*Clause 3(5) Schedule 15.2*

#### Code related audit information



*All meter data that is used to derive volume information must not be rounded or truncated from the stored data from the metering installation.*

#### **Audit observation**

Meter data is collected by MEPs, EDMI, and Wells.

#### **Audit commentary**

We compared a sample of five ICPs and compared data received from FCLM and EDMI with data stored in the RM TOOL. We confirmed that data was neither rounded nor truncated.

Compliance with this clause was part of the Wells, EDMI and MEPs audits.

#### **Audit outcome**

Compliant

### 9.4. Half hour estimates (Clause 15 Schedule 15.2)

#### **Code reference**

*Clause 15 Schedule 15.2*

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

*If a reconciliation participant is unable to interrogate an electronically interrogated metering installation before the deadline for providing submission information, the submission to the reconciliation manager must be the reconciliation participant's best estimate of the quantity of electricity that was purchased or sold in each trading period during any applicable consumption period for that metering installation.*

*The reconciliation participant must use reasonable endeavours to ensure that estimated submission information is within the percentage specified by the Authority.*

#### **Audit observation**

HHR estimation is conducted by JC Consulting if necessary. The process was examined as part of ORBS's audit and found compliant.

#### **Audit commentary**

JC Consulting stated that no HHR data required estimation. Body Corporate Power was not trading any HHR ICPs but did last year.

There is a requirement to use "reasonable endeavours" to ensure that data is accurate to within 10%. The ORBS's audit confirmed that the process documentation is sufficient to achieve compliance.

JC Consulting confirmed that no HHR data was estimated for Body Corporate Power ICPs.

#### **Audit outcome**

Compliant

### 9.5. NHH metering information data validation (Clause 16 Schedule 15.2)

#### **Code reference**

*Clause 16 Schedule 15.2*

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

*Each validity check of non-half hour meter readings and estimated readings must include the following:*

16(2)(a) - confirmation that the meter reading or estimated reading relates to the correct ICP, meter, and register

16(2)(b) - checks for invalid dates and times

16(2)(c) - confirmation that the meter reading or estimated reading lies within an acceptable range compared with the expected pattern, previous pattern, or trend

16(2)(d) - confirmation that there is no obvious corruption of the data, including unexpected 0 values.

#### **Audit observation**

NHH metering information data validation is conducted by JC Consulting. The process was reviewed during ORBS's audit and found compliant.

#### **Audit commentary**

JC Consulting adopted a validation process for NHH reads which consists of checking for high, low reads, consumption detected >10% of rollover amount, consumption on de energised sites, missing reads, negative consumption. There is also a process to monitor "possible" bridged meters. Unexpected consumption on deenergised sites is monitored.

#### **Audit outcome**

Compliant

### 9.6. Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)

#### **Code reference**

Clause 17 Schedule 15.2

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

*Each validity check of electronically interrogated meter readings and estimate readings must be at a frequency that will allow a further interrogation of the data storage device before the data is overwritten within the data storage device and before this data can be used for any purpose under the Code.*

*Each validity check of a meter reading obtained by electronic interrogation or an estimated reading must include:*

*17(4)(a) - checks for missing data*

*17(4)(b) - checks for invalid dates and times*

*17(4)(c) - checks of unexpected 0 values*

*17(4)(d) - comparison with expected or previous flow patterns*

*17(4)(e) - comparisons of meter readings with data on any data storage device registers that are available*

*17(4)(f) - a review of meter and data storage device event list. Any event that could have affected the integrity of metering data must be investigated.*

#### **Audit observation**

JC Consulting receives remotely read metering data from FCLM, MTRX., NGCM, and EDMI. The process for the validation of HHR metering information was reviewed during ORBS's audit and found compliant.

#### **Audit commentary**

When data is uploaded into the RM TOOL a validity check of meter readings is conducted and an exception report is created. MEPs and EDMI are advised if there is an issue. According to the service agreement with FCLM, the company have an obligation to advise of meter events. The data is received by JC Consulting. No events were reported which could affect the integrity of metering data.

**Audit outcome**

Compliant

## 10. PROVISION OF METERING INFORMATION TO THE GRID OWNER IN ACCORDANCE WITH SUBPART 4 OF PART 13 (CLAUSE 15.38(1)(F))

### 10.1. Generators to provide HHR metering information (Clause 13.136)

#### Code reference

Clause 13.136

#### Code related audit information

*The generator (and/or embedded generator) must provide to the grid owner connected to the local network in which the embedded generator is located, half hour metering information in accordance with clause 13.138 in relation to generating plant that is subject to a dispatch instruction:*

- *that injects electricity directly into a local network; or*
- *if the meter configuration is such that the electricity flows into a local network without first passing through a grid injection point or grid exit point metering installation.*

#### Audit observation

Body Corporate Power is not required to provide information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 10.2. Unoffered & intermittent generation provision of metering information (Clause 13.137)

#### Code reference

Clause 13.137

#### Code related audit information

*Each generator must provide the relevant grid owner half-hour metering information for:*

- *any unoffered generation from a generating station with a point of connection to the grid 13.137(1)(a)*
- *any electricity supplied from an intermittent generating station with a point of connection to the grid. 13.137(1)(b)*

*The generator must provide the relevant grid owner with the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of that generator's volume information. (clause 13.137(2))*

*If such half-hour metering information is not available, the generator must provide the pricing manager and the relevant grid owner a reasonable estimate of such data. (clause 13.137(3))*

#### Audit observation

Body Corporate Power is not required to provide information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 10.3. Loss adjustment of HHR metering information (Clause 13.138)

#### Code reference

Clause 13.138

#### Code related audit information

*The generator must provide the information required by clauses 13.136 and 13.137,*

*13.138(1)(a)- adjusted for losses (if any) relative to the grid injection point or, for embedded generators the grid exit point, at which it offered the electricity*

*13.138(1)(b)- in the manner and form that the pricing manager stipulates*

*13.138(1)(c)- by 0500 hours on a trading day for each trading period of the previous trading day.*

*The generator must provide the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of the generator's volume information.*

#### Audit observation

Body Corporate Power is not required to provide information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 10.4. Notification of the provision of HHR metering information (Clause 13.140)

#### Code reference

Clause 13.140

#### Code related audit information

*If the generator provides half-hourly metering information to a grid owner under clauses 13.136 to 13.138, or 13.138A, it must also, by 0500 hours of that day, advise the relevant grid owner.*

#### Audit observation

Body Corporate Power is not required to provide information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

## 11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

### 11.1. Buying and selling notifications (Clause 15.3)

#### Code reference

Clause 15.3

#### Code related audit information

*Unless an embedded generator has given a notification in respect of the point of connection under clause 15.3, a trader must give notice to the reconciliation manager if it is to commence or cease trading electricity at a point of connection using a profile with a profile code other than HHR, RPS, UML, EG1, or PV1 at least five business days before commencing or ceasing trader.*

*The notification must comply with any procedures or requirements specified by the reconciliation manager.*

#### Audit observation

The LIS file dated 31/03/19 was used to identify which profiles are used.

#### Audit commentary

Body Corporate Power uses RPS, and PV1. Trading notifications were not required.

#### Audit outcome

Compliant

### 11.2. Calculation of ICP days (Clause 15.6)

#### Code reference

Clause 15.6

#### Code related audit information

*Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of:*

*15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

*The ICP days information must be calculated using the data contained in the retailer or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.*

#### Audit observation

The ICP days reporting is completed by JC Consulting as Body Corporate Power's agent. The process for the calculation of ICP days was examined during the ORBS's audit and found compliant.

We reviewed the GR-100 for the period May'18 to Jan'19.

#### Audit commentary

We reviewed the ICP days file (AV-110) submitted to the reconciliation manager and GR-100 provided by the reconciliation manager. We confirm that the difference between ICP days calculated by the registry and JC Consulting was "0". The exemption was Sept'18 and Dec'18, the difference was very small. The consecutive revision corrected discrepancies.

## Audit outcome

Compliant

### 11.3. Electricity supplied information provision to the reconciliation manager (Clause 15.7)

#### Code reference

Clause 15.7

#### Code related audit information

*A retailer must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each NSP, aggregated by invoice month, for which it has provided submission information to the reconciliation manager, including revised submission information for that period as non-loss adjusted values in respect of:*

*15.7(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

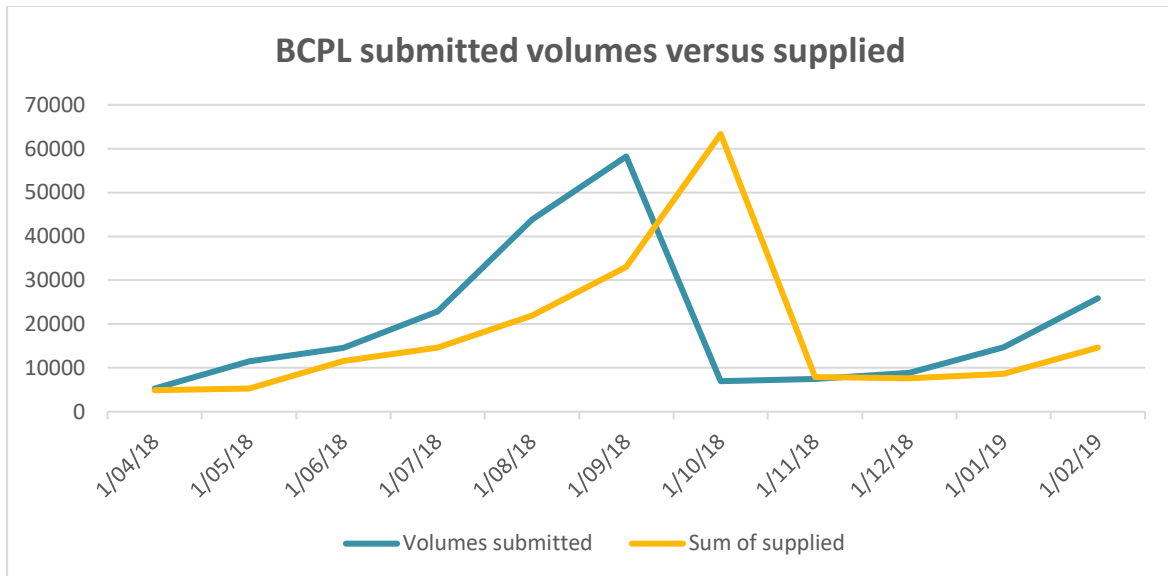
#### Audit observation

JC Consulting submits AV-120 every month. We confirm it was submitted for all revisions in the period covered by this audit.

#### Audit commentary

The table below shows a comparison between volumes submitted and supplied (billed).

Month	Sum of Submitted Volume [kWh]	Sum of Supplied Volumes [kWh]
1/04/18	5289.68	4905
1/05/18	11480.77	5282
1/06/18	14573.67	11551
1/07/18	22870.49	14604
1/08/18	43824.7	21964
1/09/18	58228.25	33055
1/10/18	6980.71	63363
1/11/18	7452.16	7936
1/12/18	8880.86	7646
1/01/19	14676.77	8670
1/02/19	25901.2	14651



In last year's audit, Body Property Power was found to be non-compliant. All issues were rectified.

#### Audit outcome

Compliant

### 11.4. HHR aggregates information provision to the reconciliation manager (Clause 15.8)

#### Code reference

Clause 15.8

#### Code related audit information

*A retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each half hourly metered ICP for which it has provided submission information to the reconciliation manager, including:*

*15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

#### Audit observation

JC Consulting provided a set of submission files (AV140) for May'18 to Dec'18.

GR-090 (missing ICPs) was reviewed for May'18 to Dec'18. .

We compared the volumes in HHRVOLS and HHRAGGR for a selected month.

The process for the calculation and aggregation of HHR data was examined during the ORBS's audit and found to be correct.

#### Audit commentary

We compared volumes in HHRVOLS and HHRAGGR for the months Oct'18 to Dec'18. There were very small differences between the volumes and aggregates.

The HHRAGGR files are prepared at ICP level based on submission information. Clause 15.8 states that the HHRAGGR should contain electricity supplied information rather than submission information. The



Reconciliation Manager Functional Specification in section 3, described HHRAGGR as HHR submission information that is aggregated per ICP for the whole month.

There is a misalignment between the Code requirements and RM file specification. It is a problem well known to the Authority and is awaiting a resolution.

**Audit outcome**

Non-compliant

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 11.4 With: 15.8 From: 01-May-18 To: 31-Mar-19	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Body Corporate Power submits submissions volumes as per the reconciliation manager specification.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
			Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	

## 12. SUBMISSION COMPUTATION

### 12.1. Daylight saving adjustment (Clause 15.36)

#### Code reference

Clause 15.36

#### Code related audit information

*The reconciliation participant must provide submission information to the reconciliation manager that is adjusted for NZDT using 1 of the techniques set out in clause 15.36(3) specified by the Authority.*

#### Audit observation

Body Corporate Power receives HHR data from EDMI and FCLM. The process was reviewed as part of ORBS's audit report and found compliant

#### Audit commentary

EDMI's compliance with this clause is covered by their audit, which was reviewed. The data provided is daylight saving adjusted using the "trading period run on" technique.

FCLMs compliance with this clause is covered by their MEP audit.

#### Audit outcome

Compliant

### 12.2. Creation of submission information (Clause 15.4)

#### Code reference

Clause 15.4

#### Code related audit information

*By 1600 hours on the 4th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all NSPs for which the reconciliation participant is recorded in the registry as having traded electricity during the consumption period immediately before that reconciliation period (in accordance with Schedule 15.3).*

*By 1600 hours on the 13th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all points of connection for which the reconciliation participant is recorded in the registry as having traded electricity during any consumption period being reconciled in accordance with clauses 15.27 and 15.28, and in respect of which it has obtained revised submission information (in accordance with Schedule 15.3).*

#### Audit observation

JC Consulting calculates and provides reconciliation files on behalf of Body Corporate Power. At the time of audit reconciliation data is provided for both HHR and NHH ICPs.

#### Audit commentary

We checked the timing of file submissions and confirm that for May'18 to Feb'19 data was submitted late in Oct'18 and Jan'19, which constitutes non-compliance.

Accuracy of submissions between HHRVOLS and HHRAGGR were checked in **section 11.4**.

#### Audit outcome

Compliant

### 12.3. Allocation of submission information (Clause 15.5)

#### Code reference

Clause 15.5

#### Code related audit information

*In preparing and submitting submission information, the reconciliation participant must allocate volume information for each ICP to the NSP indicated by the data held in the registry for the relevant consumption period at the time the reconciliation participant assembles the submission information. Volume information must be derived in accordance with Schedule 15.2.*

*However, if, in relation to a point of connection at which the reconciliation participant trades electricity, a notification given by an embedded generator under clause 15.13 for an embedded generating station is in force, the reconciliation participant is not required to comply with the above in relation to electricity generated by the embedded generating station.*

#### Audit observation

The process for the allocation of submission information was examined during the ORBS's audit and found compliant.

#### Audit commentary

JC Consulting thoroughly validates and checks volume data before submission files are sent to the reconciliation manager. Copies of reconciliation submissions are provided to Body Corporate Power.

We compared consecutive submissions for Oct'18 and Dec'18 and found them to contain the same NSPs. The JC Consulting database inserts zeros lines where an NSP has been included in a previous revision but it is not present in the current revision. It could be caused by withdrawn switches.

#### Audit outcome

Compliant

### 12.4. Grid owner volumes information (Clause 15.9)

#### Code reference

Clause 15.9

#### Code related audit information

*The participant (if a grid owner) must deliver to the reconciliation manager for each point of connection for all of its GXPs, the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.9(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.9(b))*

#### Audit observation

The LIS file was reviewed. Body Corporate Power is not a grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

## 12.5. Provision of NSP submission information (Clause 15.10)

### Code reference

Clause 15.10

### Code related audit information

*The participant (if a local or embedded network owner) must provide to the reconciliation manager for each NSP for which the participant has given a notification under clause 25(1) Schedule 11.1 (which relates to the creation, decommissioning, and transfer of NSPs) the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.10(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.10(b))*

### Audit observation

The LIS file was reviewed. Body Corporate Power is not an embedded network owner.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 12.6. Grid connected generation (Clause 15.11)

### Code reference

Clause 15.11

### Code related audit information

*The participant (if a grid connected generator) must deliver to the reconciliation manager for each of its points of connection, the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.11(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.11(b))*

### Audit observation

The LIS file was reviewed. Body Corporate Power is not a grid owner.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 12.7. Accuracy of submission information (Clause 15.12)

### Code reference

Clause 15.12

### Code related audit information

*If the reconciliation participant has submitted information and then subsequently obtained more accurate information, the participant must provide the most accurate information available to the reconciliation manager or participant, as the case may be, at the next available opportunity for submission (in accordance with clauses 15.20A, 15.27, and 15.28).*

#### **Audit observation**

All relevant revisions were submitted on day 13 by JC Consulting. Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

#### **Audit commentary**

JC Consulting provided evidence that any updates to metering information are submitted to the RM. On day 4 JC Consulting used Body Corporate Power's own profile to calculate NHH submissions, they are replaced as soon as GR-030 is available.

#### **Audit outcome**

Compliant

### 12.8. Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)

#### **Code reference**

*Clause 4 Schedule 15.2*

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

*Only volume information created using validated meter readings, or if such values are unavailable, permanent estimates, has permanence within the reconciliation processes (unless subsequently found to be in error).*

*The relevant reconciliation participant must, at the earliest opportunity, and no later than the month 14 revision cycle, replace volume information created using estimated readings with volume information created using validated meter readings.*

*If, despite having used reasonable endeavours for at least 12 months, a reconciliation participant has been unable to obtain a validated meter reading, the reconciliation participant must replace volume information created using an estimated reading with volume information created using a permanent estimate in place of a validated meter reading.*

#### **Audit observation**

JC Consulting submits reconciliation files on behalf of Body Corporate Power.

We reviewed GR-170NHH for the period Aug'17 to Jan'18.

#### **Audit commentary**

The analysis showed that Body Corporate Power replace volume information by the month 14 revision cycle. Volume information was created using estimated readings and validated meter readings. In fact, by the month revision 7 all estimated readings were replaced by historical estimates/actual.

#### **Audit outcome**

Compliant

### 12.9. Reconciliation participants to prepare information (Clause 2 Schedule 15.3)

#### **Code reference**

*Clause 2 Schedule 15.3*

## Code related audit information

*If a reconciliation participant prepares submission information for each NSP for the relevant consumption periods in accordance with the Code, such submission information for each ICP must comprise the following:*

- *half hour volume information for the total metered quantity of electricity for each ICP notified in accordance with clause 11.7(2) for which there is a category 3 or higher metering installation (clause 2(1)(a)) for each ICP about which information is provided under clause 11.7(2) for which there is a category 1 or category 2 metering installation (clause 2(1)(b)):*
  - a) *any half hour volume information for the ICP; or*
  - b) *any non-half hour volumes information calculated under clauses 4 to 6 (as applicable).*
  - c) *unmetered load quantities for each ICP that has unmetered load associated with it derived from the quantity recorded in the registry against the relevant ICP and the number of days in the period, the distributed unmetered load database, or other sources of relevant information. (clause 2(1)(c))*
- *to create non half hour submission information a reconciliation participant must only use information that is dependent on a control device if (clause 2(2)):*
  - a) *the certification of the control device is recorded in the registry; or*
  - b) *the metering installation in which the control device is location has interim certification.*
- *to create submission information for a point of connection the reconciliation participant must apply to the raw meter data (clause 2(3)):*
  - a) *for each ICP, the compensation factor that is recorded in the registry (clause 2(3)(a))*
  - b) *for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(3)(b))*

## Audit observation

The process for aggregation and content of reconciliation files was reviewed during the ORBS's audit and found compliant.

## Audit commentary

No ICPs with unmetered load are supplied. Body Corporate Power only used RPS, PV1, and HHR profiles; no certified control devices were used to create volumes. We crosschecked the registry file and reconciliation files for three months and confirm that volumes were submitted for all ICPs.

We also identified ICP 0000522635NRBBD, 0001083210PC756, 1000022207BP97F and which has PV1 profile assigned in the registry. ICP 0140833080LC939 has a profile RPS in the registry but volumes for this ICPs were submitted using RPS and PV1 profile.

As per **section 4.5** Body Corporate Power did not use the switch event meter reading for one ICP.

## Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 12.9 With: 2 of Schedule 15.3  From: 01-May-18 To: 31-Mar-19	Mismatch of submissions profile between the registry and submitted files for four ICPs; switch event meter reading not used for one ICP.  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 they require some improvement. Management of profiles in the registry for installations with solar panels must be better managed between BCPL and JC Consulting. Audit risk rating is low because there is no impact on settlement outcomes because of the small number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL has updated internal processes and will seek Registry training for PowerEdge which BCPL is onboarding. In this instance the Switch Event Meter Reading was 1 kWh variance. In the future AMI Event reads will be as provided.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This example illustrated that our controls were too tight regarding variance in AMI reads as provided by an MEPS between gaining and losing retailers.		Complete	

## 12.10. Historical estimates and forward estimates (Clause 3 Schedule 15.3)

### Code reference

Clause 3 Schedule 15.3

### Code related audit information

*For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the following techniques to create historical estimates and forward estimates. (clause 3(1))*

*Each estimate that is a forward estimate or a historical estimate must clearly be identified as such. (clause 3(2))*

*If validated meter readings are not available for the purpose of clauses 4 and 5, permanent estimates may be used in place of validated meter readings. (clause 3(3))*

### Audit observation

We reviewed AV-080 for Oct'18 to Feb'19.

### Audit commentary

We confirm that historical and forward estimates were included and identified correctly.

### Audit outcome

Compliant

## 12.11. Historical estimate process (Clause 4 and 5 Schedule 15.3)

### Code reference

Clause 4 and 5 Schedule 15.3

### Code related audit information

*The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historic estimates of volume information for each ICP when the relevant seasonal adjustment shape is available.*

*If a seasonal adjustment shape is not available, the methodology for preparing an historical estimate of volume information for each ICP must be the same as in clause 4, except that the relevant quantities kWh<sub>Px</sub> must be prorated as determined by the reconciliation participant using its own methodology or on a flat shape basis using the relevant number of days that are within the consumption period and within the period covered by kWh<sub>Px</sub>.*

### Audit observation

Historical estimates are calculated by JC Consulting. The process was audited during the ORBS's audit and found compliant.

### Audit commentary

We asked JC Consulting to provide three examples of calculations relevant to Body Corporate Power. The scenarios provided covered the following scenarios:

- Switching In
- Switching Out
- Meter change

We checked calculations and confirm their correctness.

### Audit outcome

Compliant

## 12.12. Forward estimate process (Clause 6 Schedule 15.3)

### Code reference

Clause 6 Schedule 15.3

### Code related audit information

*Forward estimates may be used only in respect of any period for which an historical estimate cannot be calculated.*

*The methodology used for calculating a forward estimate may be determined by the reconciliation participant, only if it ensures that the accuracy is within the percentage of error specified by the Authority.*

### Audit observation



Forward estimates are calculated by JC Consulting if required. The process was audited during the ORBS's audit and found compliant.

#### **Audit commentary**

Body Corporate Power's forward estimates are based on a daily average consumption specified in the CS file or daily average consumption from the previous read to read. Using GR170NHH we checked variances between submission day 4 and day 13, the variances were negligible.

By revision 3, as per note in **section 12.8** and **13.3**, forward estimates are mostly replaced by historical estimates.

#### **Audit outcome**

Compliant

### 12.13. Compulsory meter reading after profile change (Clause 7 Schedule 15.3)

#### **Code reference**

*Clause 7 Schedule 15.3*

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

*If the reconciliation participant changes the profile associated with a meter, it must, when determining the volume information for that meter and its respective ICP, use a validated meter reading or permanent estimate on the day on which the profile change is to take effect.*

*The reconciliation participant must use the volume information from that validated meter reading or permanent estimate in calculating the relevant historical estimates of each profile for that meter.*

#### **Audit observation**

The LIS file showed that Body Corporate Power uses RPS and PV1 profiles for submissions as recorded in the registry.

#### **Audit commentary**

It was discussed during the audit and the company fully understands the requirement. There are a few situations where a submission profile is changed, such as installation of solar. In some cases a submission profile is changed from RPS to HHR when JC Consulting is provided good quality HHR data.

#### **Audit outcome**

Compliant

## 13. SUBMISSION FORMAT AND TIMING

### 13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3)

#### Code reference

*Clause 8 Schedule 15.3*

#### Code related audit information

*For each category 3 of higher metering installation, a reconciliation participant must provide half hour submission information to the reconciliation manager.*

*For each category 1 or category 2 metering installation, a reconciliation participant must provide to the reconciliation manager:*

- *Half hour submission information; or*
- *Non half hour submission information; or*
- *A combination of half hour submission information and non-half hour submission information*

*However, a reconciliation participant may instead use a profile if:*

- *The reconciliation participant is using a profile approved in accordance with clause Schedule 15.5; and*
- *The approved profile allows the reconciliation participant to provide half hour submission information from a non-half hour metering installation; and*
- *The reconciliation participant provides submission information that complies with the requirements set out in the approved profile.*

*Half hour submission information provided to the reconciliation manager must be aggregated to the following levels:*

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *trading period*

*The non-half hour submission information that a reconciliation participant submits must be aggregated to the following levels:*

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *consumption period or day*

#### Audit observation

Body Corporate Power provided submission files for May'18 to Feb'19. .

#### Audit commentary

We reviewed files and confirm that the format of submission files is compliant. We reviewed HHRVOLS and HHRAGGR in **section 11.4**. NHHVOLS were discussed in **section 12.9**.

#### Audit outcome

Compliant

### 13.2. Reporting resolution (Clause 9 Schedule 15.3)

#### Code reference

*Clause 9 Schedule 15.3*

#### Code related audit information

*When reporting submission information, the number of decimal places must be rounded to not more than 2 decimal places.*

*If the unrounded digit to the right of the second decimal place is greater than or equal to 5, the second digit is rounded up, and*

*If the digit to the right of the second decimal place is less than 5, the second digit is unchanged.*

#### Audit observation

We reviewed submission files for Sept'18 to Dec'18

#### Audit commentary

Submission information for NHH and HHR is rounded to two decimal places. It was discussed with the company as to how submission information was calculated, and JC Consulting confirm that submission volumes are rounded, using a method prescribed by this clause, at the end of calculations.

#### Audit outcome

Compliant

### 13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)

#### Code reference

*Clause 10 Schedule 15.3*

#### Code related audit information

*By 1600 hours on the 13th business day of each reconciliation period the reconciliation participant must report to the reconciliation manager the proportion of historical estimates per NSP contained within its non-half hour submission information.*

*The proportion of submission information per NSP that is comprised of historical estimates must (unless exceptional circumstances exist) be:*

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*
- *100% for revised data provided at the month 14 revision. (clause 10(3)(c))*

#### Audit observation

We reviewed GR-170NHH provided by the reconciliation manager covering submissions for Feb'18 to Dec'18

#### Audit commentary

The analysis of GR-170NHH showed that Body Corporate Power met the historical estimates attainment requirements for all revisions.

#### Audit outcome

Compliant

## CONCLUSION

## PARTICIPANT RESPONSE