

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

NULITE ILLUMINATED SIGNS LTD AND
MERCURY NZ LTD

Prepared by: Rebecca Elliot

Date audit commenced: 12 April 2019

Date audit report completed: 25 May 2018

Audit report due date: 01-Jun-19

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EXECUTIVE SUMMARY

This audit covers the Nulite Illuminated Signs Limited (Nulite) DUML database and processes and was conducted at the request of Mercury NZ Limited (Mercury) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

The ICPs associated with the Nulite load were previously included in the audit of Mercury's small Auckland customers, but as these are all separate customers managed in excel spreadsheets, this audit has been undertaken of the Nulite lights only.

The last audit found two Nulite ICPs were decommissioned in error. These have been returned to active but due to the timing of these corrections to the registry, the volumes for the end of May 2017 and the complete month of June 2017 were not submitted, resulting in under submission of 2,834.68 kWh. I confirmed volumes for the two ICPs have been submitted since July 2017.

As was reported in the last audit, there were significantly more lights found in the field for Nulite. These maybe connected to metered supplies, so I recommend that Mercury liaise with Nulite to confirm that all items of load are being reconciled. I also recommend that the tracking of load change process is reviewed with Nulite to ensure all changes are updated in the database.

This audit found six non-compliances and makes two recommendations. The future risk rating indicates that the next audit be completed in three months. I have considered this in conjunction with Mercury's responses and I recommend that the next audit be in six months.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	Under submission of 2,384.68 kWh across May and June 2017 due to the ICPs being recorded as decommissioned on the registry. Additional lights found in the field resulting in an estimated annual under submission of 33,518.8 kWh.	Weak	Medium	6	Identified
Description and capacity of load	2.4	11(2)(c) of Schedule 15.3	No lamp descriptions recorded only a total wattage is recorded.	Weak	Low	3	Identified
All load recorded in the database	2.5	11(2A) of Schedule 15.3	27 additional lights found in the field.	Weak	Medium	6	Identified
Audit trail	2.7	11.4 of Schedule 15.3	The audit trail does not include the details of the person making the change in the spreadsheet.	Weak	Low	3	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	The field audit found 27 additional lights resulting in a potential under submission of 33,518.8 kWh per annum.	Weak	Medium	6	Identified
Volume information accuracy	3.2	15.2 and 15.37B(c)	Additional lights found in the field resulting in an estimated annual under submission of 33,518.8 kWh.	Weak	Medium	6	Identified
Future Risk Rating						30	

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

RECOMMENDATIONS

Subject	Section	Recommendation
All load recorded in the database	2.5	Liaise with Nulite to undertake a full field audit and confirm that all items of load are being reconciled.
Tracking of load change	2.6	Liaise with Nulite to ensure that load changes are captured in a timely manner.

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

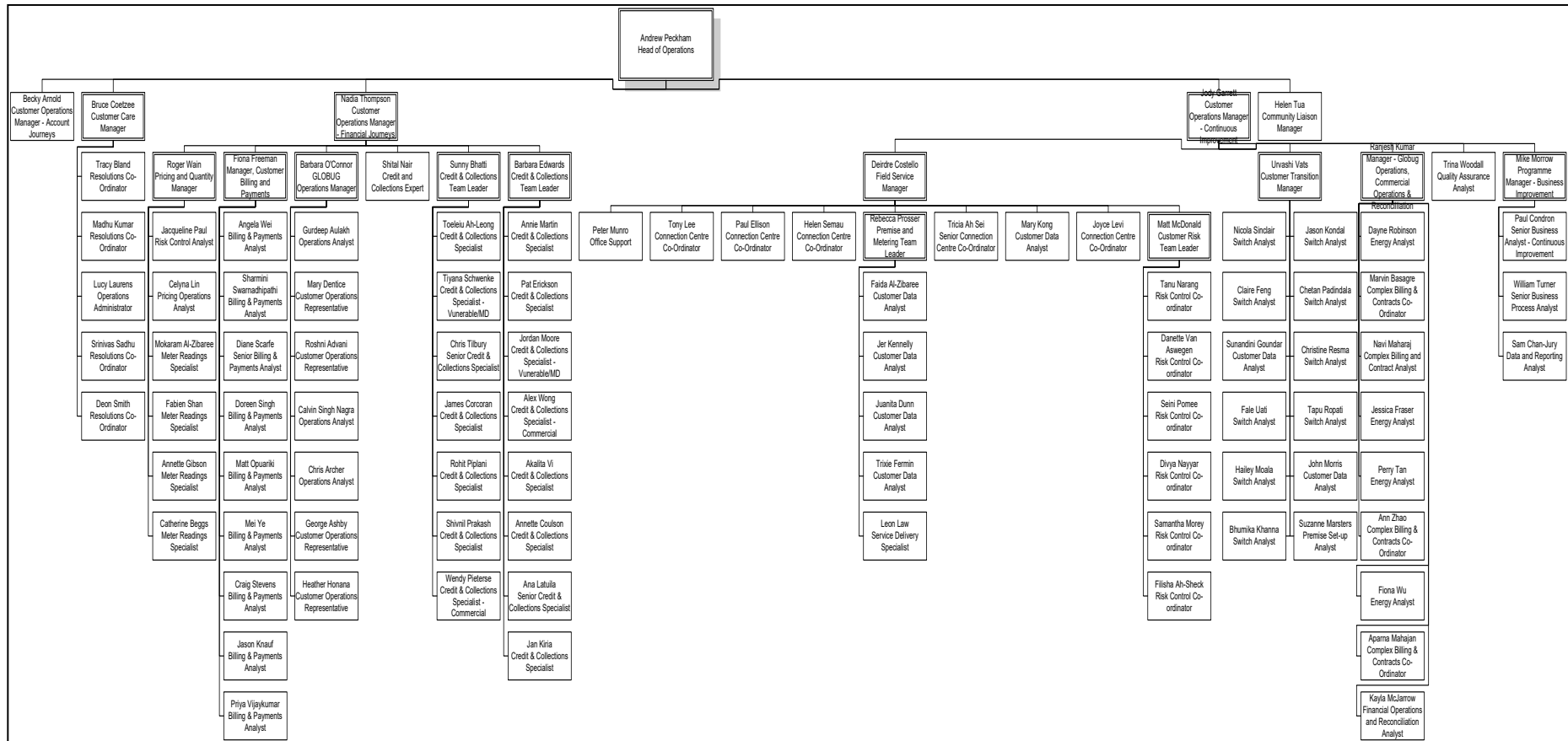
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

Mercury has no exemptions in place in relation to the ICP covered by this audit report.

1.2. Structure of Organisation

Mercury provided an organisational structure:



1.3. Persons involved in this audit

Auditor:

Rebecca Elliot

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Ranjesh Kumar	Pricing Operations and Energy Services Manager	Mercury NZ Ltd

1.4. Hardware and Software

The streetlight data for Nulite is held in an excel spreadsheet. This is backed up in accordance with standard industry procedures. Access to the spreadsheet is restricted by way of user log into the computer drive.

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Customer	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0136264797LC7C9	NULITE	East Tamaki	PAK0331	RPS	17	5,684
0586086117LC9FB		Great South Road -	WIR0331	RPS	13	4,276
0825228433LCE38		Great South Road -	TAK0331	RPS	6	1,992
0987953192LC3D8		Great South Road -	MNG0331	RPS	5	1,520
TOTAL					41	13,472

1.7. Authorisation Received

All information was provided directly by Mercury.

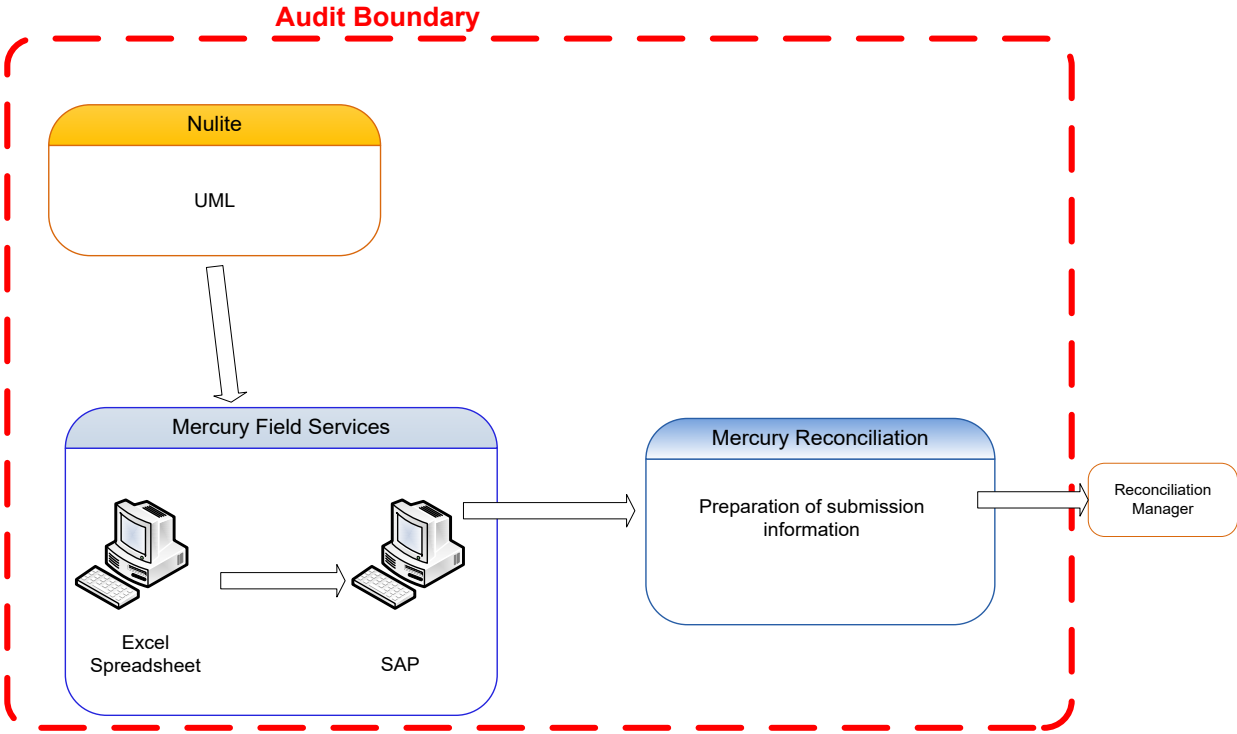
1.8. Scope of Audit

This audit covers the Nulite DUML database and processes and was conducted at the request of Mercury NZ Limited (Mercury) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately,

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

The ICPs associated with the Nulite load were previously included in the audit of Mercury’s small Auckland customers, but as these are all separate customers managed in excel spreadsheets, this audit has been undertaken of the Nulite lights only.

The spreadsheet is maintained by Mercury and the customer is expected to advise Mercury of any changes that occur.



The 100% field audit of all 41 items of load was carried out on May 16th, 2018.

1.9. Summary of previous audit

The previous audit was completed in May 2018 by Rebecca Elliot of Veritek Limited. This audit was combined with three other small Auckland DUML customers. Seven non-compliances were identified, and no recommendations were made. The current status of the non-compliances in relation to the Nulite lights are detailed below.

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	The field audit found variances. Two ICPs that appear to have load but are decommissioned in the registry resulting in an estimated under submission of 54,206.16 kWh per annum.	Still existing Still existing for period 24/5/17-30/6/17

Subject	Section	Clause	Non-compliance	Status
All load recorded in the database	2.5	11(2A) of Schedule 15.3	Additional items of load found in the field than recorded in the spreadsheet.	Still existing
Description and capacity of load	2.4	11(2)(c) of Schedule 15.3	Nulite spreadsheet has no lamp descriptions recorded.	Still existing
Database accuracy	3.1	15.2 and 15.37B(b)	The field audit found variances.	Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	The field audit found variances. Two ICPs that appear to have load but are decommissioned in the registry resulting in an estimated under submission of 49,723.38 kWh per annum.	Still existing Still existing for period 24/5/17-30/6/17

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUMML database audits are completed:

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

Audit observation

Mercury has requested Veritek to undertake this street lighting audit.

Audit commentary

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

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

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

Audit commentary

This clause requires that the distributed unmetered load database must satisfy the requirements of schedule 15.5 regarding the methodology for deriving submission information. Mercury reconciles this DUML load using the RPS profile. The daily kWh figure recorded in SAP, which is derived from the spreadsheet is used for submission. I checked the accuracy of the submission information by multiplying the daily kWh figure to the figure submitted in the AV080 for the month of April 2019. This confirmed the volume was calculated correctly from the registry figure.

The field audit found additional items of load in the field. This will be resulting in an estimated annual under submission of 33,515.8 kWh. This is discussed further in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: 11(1) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	Additional lights found in the field resulting in an estimated annual under submission of 33,518.8 kWh. Potential impact: High Actual impact: Medium Audit history: Twice previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be medium, based on the kWh differences detailed in section 3.1 .		
Actions taken to resolve the issue		Completion date	Remedial action status
Response: Non compliance accepted and remedial action on-going. Action: Mercury will update the information to ensure they are reported correctly. It is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> • The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations. • Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP. • We are taking feedback onboard with regard to tracking changes and who made the change on the databases. • Our intention is to have a consistent format across all databases where possible, to avoid error and confusion. 		On going	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The spreadsheet was checked to confirm the correct ICP was recorded correctly for the load.

Audit commentary

The spreadsheet records the correct ICP relative to the load.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The spreadsheet contains the road intersection for each sign.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The spreadsheet was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

Audit commentary

The Nulite spreadsheet contains only the wattage and no lamp descriptions. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	No lamp descriptions recorded only a total wattage is recorded. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be low as the volume of lights associated with this database are small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Response: Non compliance accepted and remedial action on-going. Action: Mercury will liaise with Nulite to ensure information is updated correctly.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury will liaise with Nulite to ensure information is updated correctly and in timely manner.		On going	

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

A field audit was undertaken of all 45 items of load.

Audit commentary

The findings from the field audit are detailed below:

Street/Area	Database Count	Field Count	Field count differences	Wattage differences	Comments
0136264797LC7C9 Pakuranga	17	36	19		19 additional signs found in the field than recorded in the database.
0987953192LC3D8 Otahuhu	5	7	2		Two additional signs found at the intersection of Harris and Smales Road, and intersection of Crooks and Harris Roads.
0825228433LCE38- Takanini	6	7	1		Additional sign at corner of Roscommon Road and Browns Road.
0586086117LC9FB Wiri	13	18	5		Five additional items found in the field.
TOTAL	41	68	27	-	

27 extra lights were found in the field. Many of these are the same items reported in the last audit report. The additional lights found in the field are recorded as non-compliance below.

I also found five horizontal Nulite signs on Great North Road in New Lynn. These maybe metered, so I recommend that Mercury liaise with Nulite to undertake a full audit of the Nulite load to confirm all items of load are being reconciled.

Description	Recommendation	Audited party comment	Remedial action
All load recorded in the database	Liaise with Nulite to undertake a full field audit and confirm that all items of load are being reconciled.	Mercury will take appropriate actions as per the recommendation.	Identified

The accuracy of the database is detailed in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	27 additional lights found in the field. Potential impact: High Actual impact: Medium Audit history: Twice previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be medium, based on the kWh differences detailed in section 3.1 .		
Actions taken to resolve the issue		Completion date	Remedial action status
Response: Non compliance accepted and remedial action on-going. Action: Mercury will liaise with Nulite to ensure information is updated correctly.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> • The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations. • Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP. • We are taking feedback onboard with regard to tracking changes and who made the change on the databases. • Our intention is to have a consistent format across all databases where possible, to avoid error and confusion. 		On going	

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

Any changes that are made during any given month take effect from the beginning of that month. The information is available which would allow for the total load in kW to be retrospectively derived for any day. On 20th September 2012, the Authority sent a memo to Retailers and auditors advising that tracking of load changes at a daily level was not required as long as the database contained an audit trail. I have interpreted this to mean that the production of a monthly “snapshot” report is sufficient to achieve compliance.

The database tracks additions and removals as required by this clause.

An annual audit is expected to be carried out by the property owner to confirm that the database is correct. The customer is expected to advise if any changes occur so that the database can be updated accordingly, and notes of the light type, wattage and ballast and the date of change are recorded. The additional lights found in the field indicate that this process is not working. I recommend that Mercury review the tracking of load change process to ensure all such changes are captured.

Description	Recommendation	Audited party comment	Remedial action
Tracking of load change	Liaise with the Nulite to ensure that load changes are captured in a timely manner.	Mercury will action the recommendation	Identified

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The spreadsheet was checked for audit trails.

Audit commentary

Examination of the spreadsheet found that the changes made are detailed and dated but no record of the person who has made the change was recorded.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.7 With: 11.4 of Schedule 15.3 From: 01-Jun-18 To: 30-Apr-19	The audit trail does not include the details of the person making the change in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as changes made in the database do not require the persons details making the change to be recorded as it is an excel spreadsheet. The impact is assessed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Response: Non compliance accepted and remedial action on-going. Action: Mercury will liaise with Nulite to ensure information is updated correctly to include person making the change.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> • The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations. • Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP. • We are taking feedback onboard with regard to tracking changes and who made the change on the databases. Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.		On going	

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

A full field audit of all 41 items of load was undertaken to confirm the accuracy of the spreadsheet.

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

Audit commentary

The field audit findings are detailed in **section 2.5**. The 27 additional lights found in the field indicate that the database is reporting 57% less volume than is present in the field. This is outside of the allowable +/- 5% threshold and will be resulting an estimated annual under submission is 33,515.8 kWh (this is calculated by multiplying the daily kWh figure by 365 days). This is recorded as non-compliance.

The check of database wattage alignment with the standardised wattage table was unable to be confirmed as the database contain no lamp descriptions and only a total wattage. This is recorded as non-compliance in **section 2.4**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: 15.2 and 15.37B(b) From: 01-Jun-17 To: 30-Apr-19	The field audit found 27 additional lights resulting in a potential under submission of 33,518.8 kWh per annum. Potential impact: High Actual impact: Medium Audit history: Twice previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Response: Non compliance accepted and remedial action on-going. Action: Mercury will update the information to ensure they are reported correctly. It is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> • The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations. • Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP. • We are taking feedback onboard with regard to tracking changes and who made the change on the databases. • Our intention is to have a consistent format across all databases where possible, to avoid error and confusion. 		On going	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

- checking the registry to confirm that the ICP has the correct profile and submission flag; and
- checking the expected kWh against the submitted figure to confirm accuracy.

Audit commentary

Mercury reconciles this DUML load using the RPS profile. The daily kWh figure recorded in SAP (which is derived from the spreadsheet) is used for submission. The registry was checked and confirmed that the ICP has the correct profile and submission flag.

I checked the accuracy of the submission information by multiplying the daily kWh figure to the figure submitted in the AV080 for the month of April 2019. This confirmed the volume was calculated correctly from the registry figure.

The two ICPs (0586086117LC9FB & 0825228433LCE38) that identified as decommissioned in error in the last audit have been returned to active with no inactive period on the registry on 4/9/18. This has resulted in no volumes being submitted for ICP 0586086117LC9FB from 23/5/17-30/6/17 and ICP 0825228433LCE38 from 24/5/17-30/6/17. This has occurred because the R14 revisions were submitted whilst these ICPs were incorrectly recorded as decommissioned. This has resulted in under submission of 2,384.68 kWh and is recorded as non-compliance below. The volumes for July 2017 were checked and confirmed that consumption has been submitted.

The field audit found additional items of load in the field. This will be resulting in an estimated annual under submission of 33,515.8 kWh. This is discussed further in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: 15.2 and 15.37B(c) From: 01-Jun-17 To: 30-Apr-19	Under submission of 2,384.68 kWh across May and June 2017 due to the ICPs being recorded as decommissioned on the registry. Additional lights found in the field resulting in an estimated annual under submission of 33,518.8 kWh. Potential impact: High Actual impact: Medium Audit history: Twice previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be medium, based on the kWh differences detailed in section 3.1.		
Actions taken to resolve the issue		Completion date	Remedial action status
Response: Non compliance accepted and remedial action on-going. Action: Mercury will update the information to ensure they are reported correctly. It is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> • The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations. • Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP. • We are taking feedback onboard with regard to tracking changes and who made the change on the databases. • Our intention is to have a consistent format across all databases where possible, to avoid error and confusion. 		On going	

CONCLUSION

The ICPs associated with the Nulite load were previously included in the audit of Mercury's small Auckland customers, but as these are all separate customers managed in excel spreadsheets, this audit has been undertaken of the Nulite lights only.

The last audit found two Nulite ICPs were decommissioned in error. These have been returned to active but due to the timing of these corrections to the registry, the volumes for the end of May 2017 and the complete month of June 2017 were not submitted, resulting in under submission of 2,834.68 kWh. I confirmed volumes for the two ICPs have been submitted since July 2017.

As was reported in the last audit, there were significantly more lights found in the field for Nulite. These maybe connected to metered supplies, so I recommend that Mercury liaise with Nulite to confirm that all items of load are being reconciled. I also recommend that the tracking of load change process is reviewed with Nulite to ensure all changes are updated in the database.

This audit found six non-compliances and makes two recommendations. The future risk rating indicates that the next audit be completed in three months. I have considered this in conjunction with Mercury's responses and I recommend that the next audit be in six months.

PARTICIPANT RESPONSE

Mercury has changed its process as stated in the preventative action above. Furthermore, Mercury will have an extra focus on DUML to meet the code obligation. Mercury will update the information to ensure they are reported correctly however it is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts. Mercury is reviewing the process.

We request EA to clear the previous non-compliance as it has minimal impact on the industry and monitor Mercury's DUML responsibilities going forward based on the preventative actions put in place.

We also request EA to review its breach risk rating to be more reflective rather than the domino effects, example: 2.1 and 3.2 non-compliance above, which are same however risk rating adds up to 12 points.