ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

ROTORUA LAKES COUNCIL AND MERCURY NZ LTD

Prepared by: Rebecca Elliot

Date audit commenced: 9 November 2018

Date audit report completed: 23 November 2018

Audit report due date: 01-Dec-18

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EXECUTIVE SUMMARY

This audit of the Rotorua Lakes Council Unmetered Streetlights (**RLC**) DUML database and processes was conducted at the request of Mercury Energy 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 RLC DUML volume is reconciled as HHR following the approval by the Electricity Authority of Exemption 233. The burn hours are derived from a data logger.

Mercury have worked with RLC and have made good progress addressing the non-compliances found in the last audit. ICPs have been created by Unison for each NSP and load type, resulting in there being 13 ICPs for this DUML load. The new ICPs have a start date of 1/11/2018 so the volumes will be submitted against the correct NSPs from November 2018 onwards. A sample wattage report was provided in anticipation of this and I confirmed that the values matched to the database extract provided.

The gear wattages were being added in the wattage report outside of the database. These have now been added to the RAMM.

The DUML database accuracy tool indicates that there is some inaccurate information in the RLC database. This is due to the quality of the data being added in the field, specifically lamp wattage errors.

Overall the quality of the database and the issue of load being reconciled to the incorrect ICP has been addressed.

This audit found three non-compliances and makes no recommendations. The future risk rating of 18 indicates that the next audit be completed in six months, but I recommend that the next audit be in 12 months. The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The database accuracy is assessed to be 96.5% indicating an estimated over submission of 106,600 kWh per annum (excluding ballast). Incorrect profile recorded on the registry for ICP 0001264717UNC3A.	Moderate	High	6	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	The database accuracy is assessed to be 96.5% indicating an estimated over submission of 106,600 kWh per annum (excluding ballast). 3 items of load with conflicting lamp description, wattage and ballast combinations.	Moderate	High	6	Investigating
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database accuracy is assessed to be 96.5% indicating an estimated over submission of 106,600 kWh per annum (excluding ballast). Incorrect profile recorded on the registry for ICP 0001264717UNC3A.	Moderate	High	6	Identified
Future Risk Rating						18	

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	Description	Action

		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

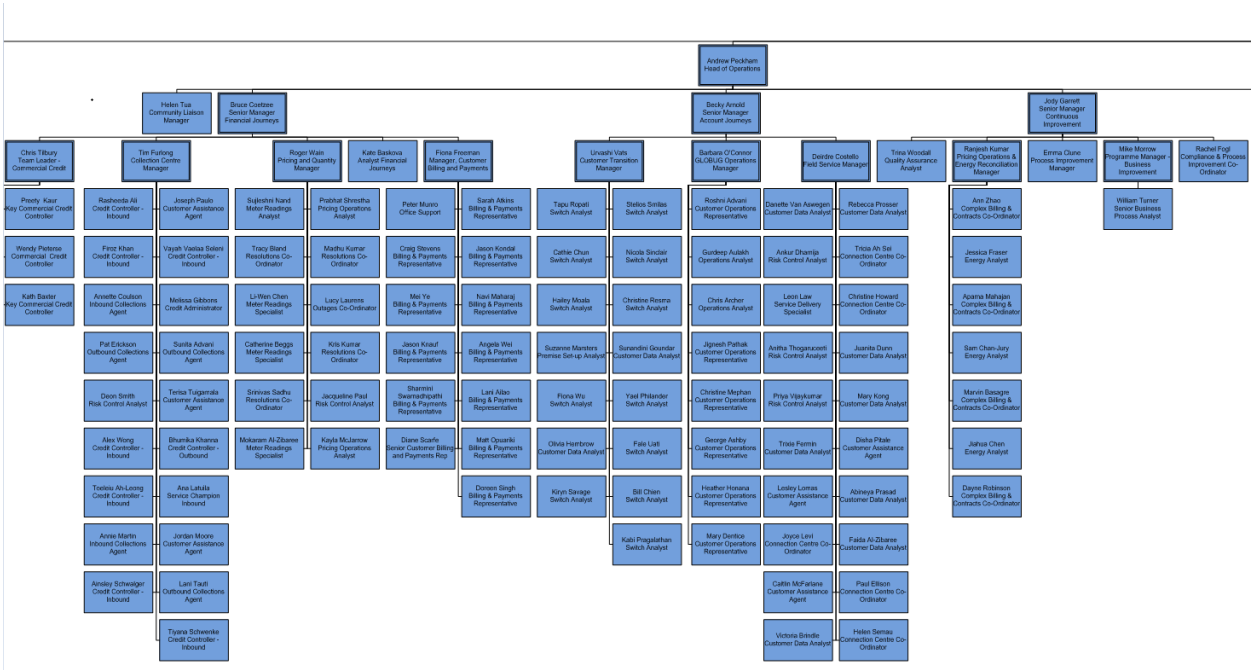
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit commentary

Exemption 233 has been granted to allow Mercury to submit HHR data for DUML to the Reconciliation Manager.

1.2. Structure of Organisation

Mercury provided their current 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
Andrew Robertson	Regulatory and Compliance Strategist	Mercury Energy
Aroha Clements	Data Technician	Rotorua Lakes Council
Darryl Robson	Operations Engineer	Rotorua Lakes Council
Edwin de Beun	Projects Engineer	Power Solutions
Sarah Dark	Business Development Manager- Large Commercial	Mercury Energy

1.4. Hardware and Software

Section 1.8 records that Roading Asset and Maintenance Management database, commonly known as RAMM continues to be used the management of DUML. This is remotely hosted by RAMM Software Ltd. The specific module used for DUML is called "SLIMM" which stands for "Streetlighting Inventory Maintenance Management".

Power Solutions confirmed that the database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000043653HR7F7	STREETLIGHTING	ROT0331	HHR	1,543	157,903
0000043654HRA3D	AMENITY LIGHTING	ROT0331	HHR	454	45,388
0000043655HR678	NZTA CBD	ROT0331	HHR	520	99,762
0000043656HRAB8	STREETLIGHTING	OWH0111	HHR	702	55,343
0000043658HR923	AMENITY P & R EASTSIDE	OWH0111	HHR	26	1,380
0000043659HR566	NZTA EASTSIDE	OWH0111	HHR	290	38,361
0000043660HRCCF	STREETLIGHTING	TRK0111	HHR	432	36,842
0000043661HR08A	AMENITY P & R NORTH	TRK0111	HHR	10	861

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000043662HRC4A	NZTA NORTH	TRK0111	HHR	54	7,382
0000043663HR00F	STREETLIGHTING	WRK0331	HHR	14	1,804
0001264717UNC3A	STREETLIGHTING	ROT0111	HHR	2,343	249,228
0001264718UN3E4	AMENITY P & R ROTORUA	ROT0111	HHR	410	36,587
0001264719UNFA1	NZTA ROTORUA	ROT0111	HHR	295	66,902
TOTAL				7,107	797,742

1.7. Authorisation Received

All information was provided directly by Mercury, RLC or Power Solutions.

1.8. Scope of Audit

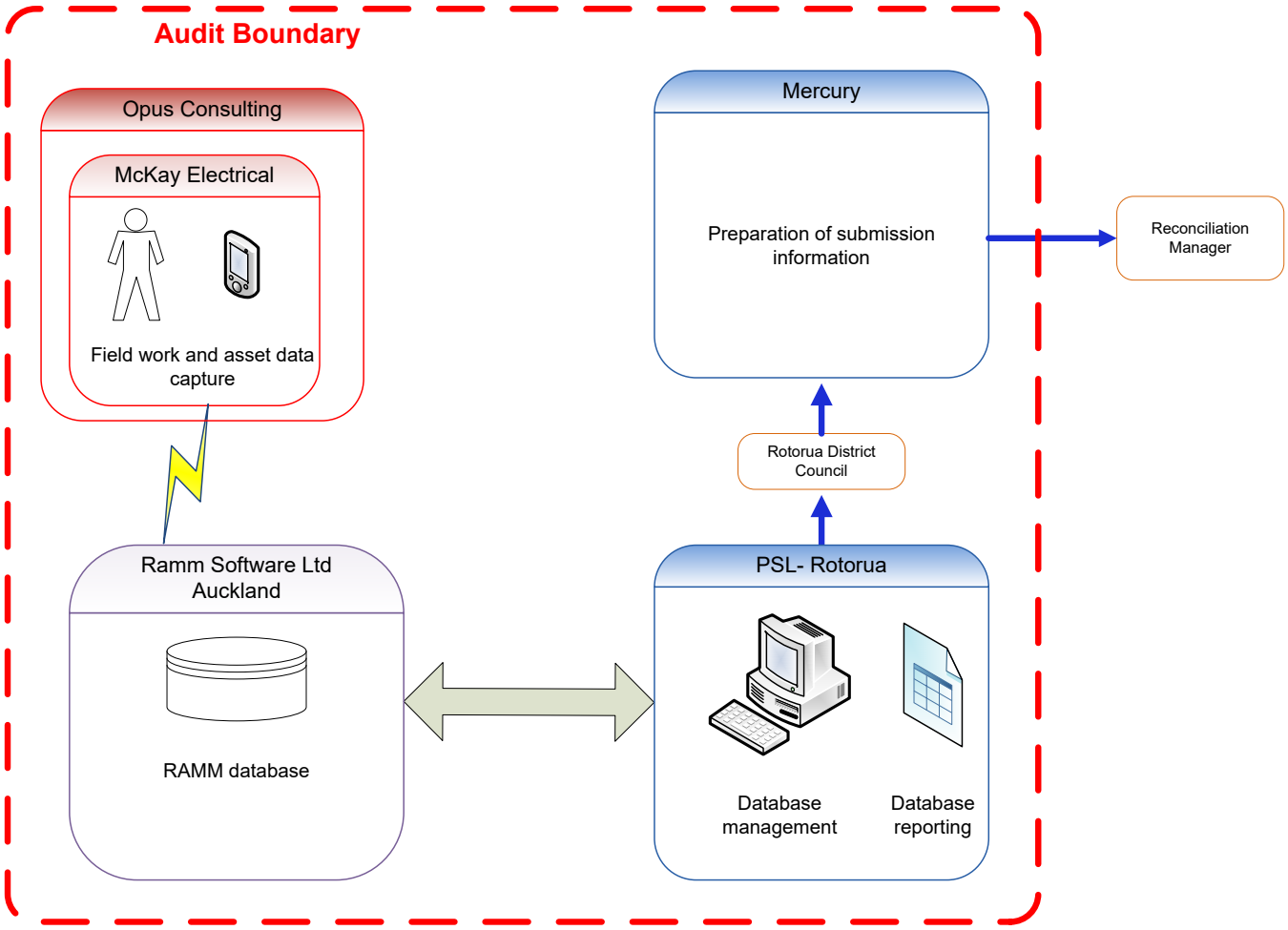
This audit of the Rotorua Lakes Council Unmetered Streetlights (**RLC**) DUML database and processes was conducted at the request of Mercury Energy Limited (**Mercury**), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

The RLC DUML volume is reconciled as HHR following the approval by the Electricity Authority of Exemption 233.

The database is remotely hosted by RAMM Software Ltd. The field contracts are managed by Opus Consulting. McKay Electrical carry out all the field work. This is captured using Pocket RAMM. Power Solutions manage the database reporting on behalf of the RLC and they provide reporting to Mercury on a monthly basis. The burn hours are derived from a data logger.

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



The field audit was undertaken of a statistical sample of 335 items of load on 13th November 2018.

1.9. Summary of previous audit

Mercury provided a copy of the last audit report undertaken by Rebecca Elliot of Veritek Limited in May 2018. The current status of that audit's findings 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 database accuracy is assessed to be 97.4% indicating an estimated over submission of 79,600 kWh per annum (excluding ballast). Incorrect profile recorded on the registry for ICP 0001264717UNC3A.	Still existing
ICP identifier and items of load	2.2	11(2)(a) and (aa) of Schedule 15.3	2,806 items of load with no ICP recorded.	Cleared

Subject	Section	Clause	Non compliance	Status
Description and capacity of load	2.4	11(2)(c) and (d) of Schedule 15.3	Ballast is not recorded in the database.	Cleared
Database accuracy	3.1	15.2 and 15.37B(b)	The database accuracy is assessed to be 97.4% indicating an estimated over submission of 79,600 kWh per annum (excluding ballast). The database is not complete as ballasts are not recorded in the RAMM database.	Still existing Cleared
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database accuracy is assessed to be 97.4% indicating an estimated over submission of 79,600 kWh per annum (excluding ballast). Incorrect profile recorded on the registry for ICP 0001264717UNC3A. Some of the load not recorded against the correct NSP.	Still existing Still existing Cleared

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Status
Tracking of load change	2.6	Review new streetlight electrical connection process with Unison.	Tracking of load change	Cleared
Volume information accuracy	3.2	Liaise with Unison to create ICP/s to correctly reconcile the DUML load against the correct GXP.	Volume information accuracy	Cleared

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Mercury have requested Veritek to undertake this streetlight audit.

Audit commentary

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

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

The process for calculation of consumption was examined 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 concerning the methodology for deriving submission information. Mercury reconciles the RLC load using the HHR profile. All ICPs are correctly recorded with the exception of ICP 0001264717UNC3A which has the "HHR" profile but with the NHH submission flag recorded on the registry. Mercury have attempted to correct this but the registry will not an update without a meter being recorded but there is no certified metering present at this ICP. This is recorded as a non-compliance below.

I checked the accuracy of the submission information by multiplying the total kW from the database by the total "on" time from the data logger file and the figures matched for October 2018.

ICPs have been created by Unison for each NSP and load type resulting in there being 13 ICPs for this DUML load. The new ICPs have a start date of 1/11/2018 so the volumes will be submitted against the correct NSPs from November 2018 onwards. A sample wattage report was provided in anticipation of this and I confirmed that the values matched to the database extract provided.

The DUML audit tool found that the database has some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance and discussed in **section 3.1** and **3.2**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Jun-17 To: 19-Nov-18	The database accuracy is assessed to be 96% indicating an estimated over submission of 136,300 kWh per annum. Incorrect profile recorded on the registry for ICP 0001264717UNC3A. Potential impact: High Actual impact: High Audit history: Three times previously Controls: Moderate Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time. The impact is assessed to be high, based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
As indicated by the auditor, the data will be more accurate in the next audit period.	November 2018	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

The database has been updated with the additional ICPs that have been created by Unison to ensure that the load is reconciled to the correct NSP. All items of load have an ICP recorded against them as required by this clause.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

The database contains two fields for wattage, firstly the manufacturers rated wattage and secondly the "ballast wattage". The ballast wattage is expected to be a calculated figure which accounts for any variation from the input wattage and includes losses associated with ballasts. All had a value populated. The accuracy of these is discussed in **section 3.1**.

Audit outcome

Compliant

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of a statistical sample of 335 items of load on 13th November 2018.

Audit commentary

The field audit findings are detailed in the table below:

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
NZTA					
HEMO RD (SH 30)	20	18	-2	6	2 x HPS not found in the field 6x LED in the field not HPS
PUKUATUA ST (SH 30A)	17	17			
SHIRLEY ST	1	1			
RLC Parks					
AQUATIC CENTRE ENTRANCE	1	1			
ARAWA ST	11	11			
KUIRAU A FOOTPATH	1	1			
KUIRAU D FOOTPATH	1	1			
LAKE EDGE (EAST)	14	14			
RLDC H-N					
HARATUA PL	2	2			
HAYNES CRES	4	4			
HIGH ST	10	10			
HOLDENS AVE	5	5			
HONA RD	10	10		1	1x LED found in the field not HPS
HUARERE ST	4	4			
ISLAND VIEW RD	9	9			
KAKA ST	2	2			

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
KARAKA ST	2	2			
KORIMAKO ST	4	4			
LAKE ROTOKAWAU RD	3	3			
MANAHI AVE	4	4			
MAPLE GR	3	3			
MCCAHON DR	7	7			
MCKEE AVE	7	7		1	1x LED found in the field not HPS
MEADE ST	3	3			
MIDDLETON RD	3	3		3	3x LED found in the field not HPS
MILDRED PL	1	1			
RLDC A-G					
AMOKURA ST	3	3			
AMUN PL	2	2			
AURORA ST	1	1			
BARRON CRES	5	5			
BARTLE RD	2	2			
BATA PL	1	1			
BROOKDALE DR	5	5			
CHAPMAN PL	5	5			
CHERRYWOOD PL	2	2			
CIVIC CENTRE (HAUPAPA ST)	2	2			
CLINKARD PL	1	1			
COMPTON ST	3	3			
DELPHI PL	1	1			
DIANA PL	1	1			
DICKENS ST	8	8			
DUNCAN ST	6	6			

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
EASON ST	6	6			
EMERALD ST	4	4			
FRISKEN PL	3	3			
GEAR ST	1	1			
GORDON RD	15	15			
RLDC O-Z					
PARK RD	7	7			
PARSONS RD	1	1			
PEGASUS DR	10	10		1	1x HPS found in the field not LED
PRYCE RD	2	2			
RANIERA PL	4	4			
RIVERHOLM DR	5	5			
ROGER ST	6	6			
SCOTT ST	4	4			
SHIRLEY ST	9	9			
STONEBRIDGE PARK DR	4	4			
TAMATEA ST	10	10			
TAWAVALE ST	12	12			
THEBES ST	4	4			
TRIGG AVE	5	5			
TUROA ST	3	3			
WARWICK DR	11	11			
WATERFORD ST EXTENSION	2	2			
WILLMOTT PL	2	2			
Grand Total	**327**	**325**	**2**	**12**	

I found two less lamps in the field than were recorded in the database and 12 wattage variances. These differences and the database accuracy are recorded as non-compliance in **section 3.1**. I did not identify any load missing from the database.

Audit outcome

Compliant

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

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

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

There have been no new subdivisions added during the audit period. In this event, RLC vests new subdivisions before new lights are electrically connected and add these lights to the database. RLC liaise with Unison to get the lights electrically connected and therefore the livening date is known. RAMM databases usually have the facility to add lights but indicate them as not connected so that they only get added to the monthly wattage report once they are electrically connected. RLC are working with Power Solutions to put this in place for the RLC database.

Outage patrols occur on a rolling basis and part of this process is to check the accuracy of the database. This is effectively a "rolling" database audit.

The processes were reviewed for ensuring that changes in the field are notified through to Power Solutions. All field data is entered directly into a PDA that then automatically populates the database. Opus Consulting carry out a 10% spot audit to confirm claims for work done are correctly carried out and all the relevant information is captured. The database accuracy detailed in **section 3.1** indicates that field changes are not always being captured accurately.

RLC do not connect any festive lighting into the unmetered streetlight circuits.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

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

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

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

Plan Item	Comments
Area of interest	Rotorua Lakes region
Strata	The database contains items of load in Rotorua Lakes area. The area has three distinct sub groups. This is reflective of light owner. There were no new developments identified. The processes for the management of RLC items of load are the same, but I decided to place the items of load into five strata, as follows: 1. Council owned road names A-G 2. Council owned road names H-N 3. Council owned road names O-Z 4. Parks and amenities 5. NZTA
Area units	I created a pivot table of the roads in each area and I used a random number generator in a spreadsheet to select a total of 65 sub-units.
Total items of load	335 items of load were checked.

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

Audit commentary

A statistical sample of 335 items of load found that the field data was 96% of the database data for the sample checked. This is not within the required database accuracy of 2.5%+/-. The statistical sampling tool reported with 95% confidence the precision of the sample was 7.5% and the true load in the field will be between 92.2% to 99.7% of the load recorded in the database. The sample is not sufficiently precise to be able to determine the database accuracy but indicates that the database is likely to be over submitting largely due to incorrect wattages being recorded in the database.

The tool indicated that there is potentially 136,300 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool) of over submission. The statistical sampling tool reported with 95% confidence that there is a potential estimated submission variance range of between 265,500 kWh and 9,100 over submission. This is recorded as non-compliance.

The ballast values have been added to the RAMM database. These were checked and found all but three were correct. These items of load have conflicting lamp types and therefore the lamp wattage is recorded as 70W HPS, but the ballasts applied relate to 100W HPS in two instances and 80W MV in one instance. These have been passed to RLC to resolve. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Jun-17 To: 19-Nov-18	The database accuracy is assessed to be 96% indicating an estimated over submission of 136,300 kWh per annum. 3 items of load with conflicting lamp description, wattage and ballast combinations. Potential impact: High Actual impact: High Audit history: Once Controls: Moderate Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time. The impact is assessed to be high, based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
Mercury continues to work with the Council selected contractor to resolve this issue.	November 2019	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

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

Audit commentary

This clause requires that the distributed unmetered load database must satisfy the requirements of schedule 15.5 concerning the methodology for deriving submission information. Mercury reconciles the RLC load using the HHR profile. All ICPs are correctly recorded with the exception of ICP 0001264717UNC3A which has the "HHR" profile but with the NHH submission flag recorded on the registry. Mercury have attempted to correct this but the registry will not an update without a meter being recorded but there is no certified metering present at this ICP. This is recorded as a non-compliance below.

I checked the accuracy of the submission information by multiplying the total kW from the database by the total "on" time from the data logger file and the figures matched for October 2018.

ICPs have been created by Unison for each NSP and load type resulting in there being 13 ICPs for this DUML load. The new ICPs have a start date of 1/11/2018 so the volumes will be submitted against the correct NSPs from November 2018 onwards. A sample wattage report was provided in anticipation of this and I confirmed that the values matched to the database extract provided.

The DUML audit tool found that the database has some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance and discussed in **section 3.1** and **3.2**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Jun-17 To: 19-Nov-18	The database accuracy is assessed to be 96% indicating an estimated over submission of 136,300 kWh per annum. Incorrect profile recorded on the registry for ICP 0001264717UNC3A. Potential impact: High Actual impact: High Audit history: Three times previously Controls: Moderate Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as moderate, because the database management and submission calculation controls will mitigate risk most of the time. The impact is assessed to be high, based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
As indicated in the findings, the data will be more accurate from November.	March 2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

CONCLUSION

Mercury have worked with RLC and have made good progress addressing the non-compliances found in the last audit. ICPs have been created by Unison for each NSP and load type, resulting in there being 13 ICPs for this DUML load. The new ICPs have a start date of 1/11/2018 so the volumes will be submitted against the correct NSPs from November 2018 onwards. A sample wattage report was provided in anticipation of this and I confirmed that the values matched to the database extract provided.

The gear wattages were being added in the wattage report outside of the database. These have now been added to the RAMM.

The DUML database accuracy tool indicates that there is some inaccurate information in the RLC database. This is due to the quality of the data being added in the field, specifically lamp wattage errors.

Overall the quality of the database and the issue of load being reconciled to the incorrect ICP has been addressed.

This audit found three non-compliances and makes no recommendations. The future risk rating of 18 indicates that the next audit be completed in six months, but I recommend that the next audit be in 12 months.

PARTICIPANT RESPONSE

Mercury are currently working hard to resolve the registry issue with the incorrectly labelled ICP and will look to complete it within the 12 month period. Working with third parties who are responsible for the assets has significant challenges which seem to be more apparent in the DUML space.