ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

NAPIER CITY COUNCIL AND GENESIS ENERGY

Prepared by: Steve Woods

Date audit commenced: 15 April 2019

Date audit report completed: 15 May 2019

Audit report due date: 01-Jun-19

TABLE OF CONTENTS

EXECUTIVE SUMMARY

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

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

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information. The database is remotely hosted by RAMM Software Ltd and is managed by Power Solutions on behalf of NCC, who is Genesis' customer. The fieldwork and asset data capture is conducted by Pope Electrical. Reporting is provided to NCC, Unison and Genesis on a monthly basis.

This audit found four non-compliances and makes no recommendations.

The field audit found the database accuracy was high and processes appear sound for ensuring items of load are correctly identified and recorded.

There are two main issues, as follows:

1. The load for two ICPs is only on for half of the night (turned off at midnight), but submission occurs using the NSP profile, which is a full night profile, therefore the load is spread over the whole night when it should not be.
2. ICP identifiers are linked to pole information not light information in RAMM, therefore PSL makes an adjustment in the monthly report to correct the ICP. The total kWh is correct and appears to be allocated to the correct ICPs, but the ICPs in the database are incorrect. Manual manipulation of the database output can lead to errors and I strongly recommend the database is corrected and manual manipulation ceases as soon as possible.

Genesis are continuing to work with Unison to resolve the 133 private lights reported in the last audit. If any are confirmed to belong to council, they will have the correct ICP added to them.

The future risk rating of 12 indicates that the next audit be completed in 12 months.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	NSP profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight. Ballast information in RAMM not used for submission.	Moderate	Medium	4	Investigating
ICP identifier and items of load	2.2	11(2)(a) and (aa) of Schedule 15.3	ICP identifiers in the database not correct.	Weak	Low	3	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	One item of load not recorded in the database.	Strong	Low	1	Identified
Volume information accuracy	3.2	15.2 and 15.37B(c)	NSP profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.	Moderate	Medium	4	Investigating
Future Risk Rating						12	

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	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

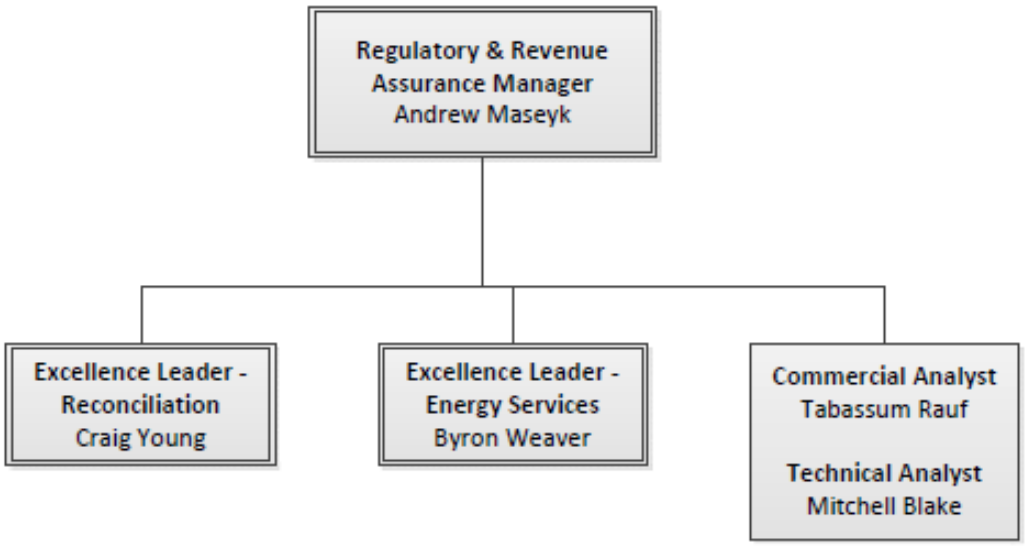
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit commentary

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

1.2. Structure of Organisation

Genesis provided the relevant organisational structure:



1.3. Persons involved in this audit

Auditor:

Name	Title
Steve Woods	Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Craig Young	Excellence Leader- Reconciliation	Genesis Energy
Grace Hawken	Technical Specialist - Reconciliations Team	Genesis Energy
Jon Stevens	Projects Engineer	Power Solutions

1.4. Hardware and Software

A 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)
0000939920HB224	Marine Parade Lighting	RDF0331	NST	21	2,108
0000939921HBE61	Carriageway Lighting	RDF0331	NST	162	25,790
0000939923HBEE4	Amenity Lighting	RDF0331	NST	82	5,419
0000939906HBEFE	Road Lighting	RDF0331	NST	7,362	665,931
0000939908HBD65	Amenity Lighting	RDF0331	NST	1,116	99,626
Total				8,770	818,990

As reported in the last audit report there are 133 lights where the ICP is reported as private. This is discussed in **section 2.2**.

1.7. Authorisation Received

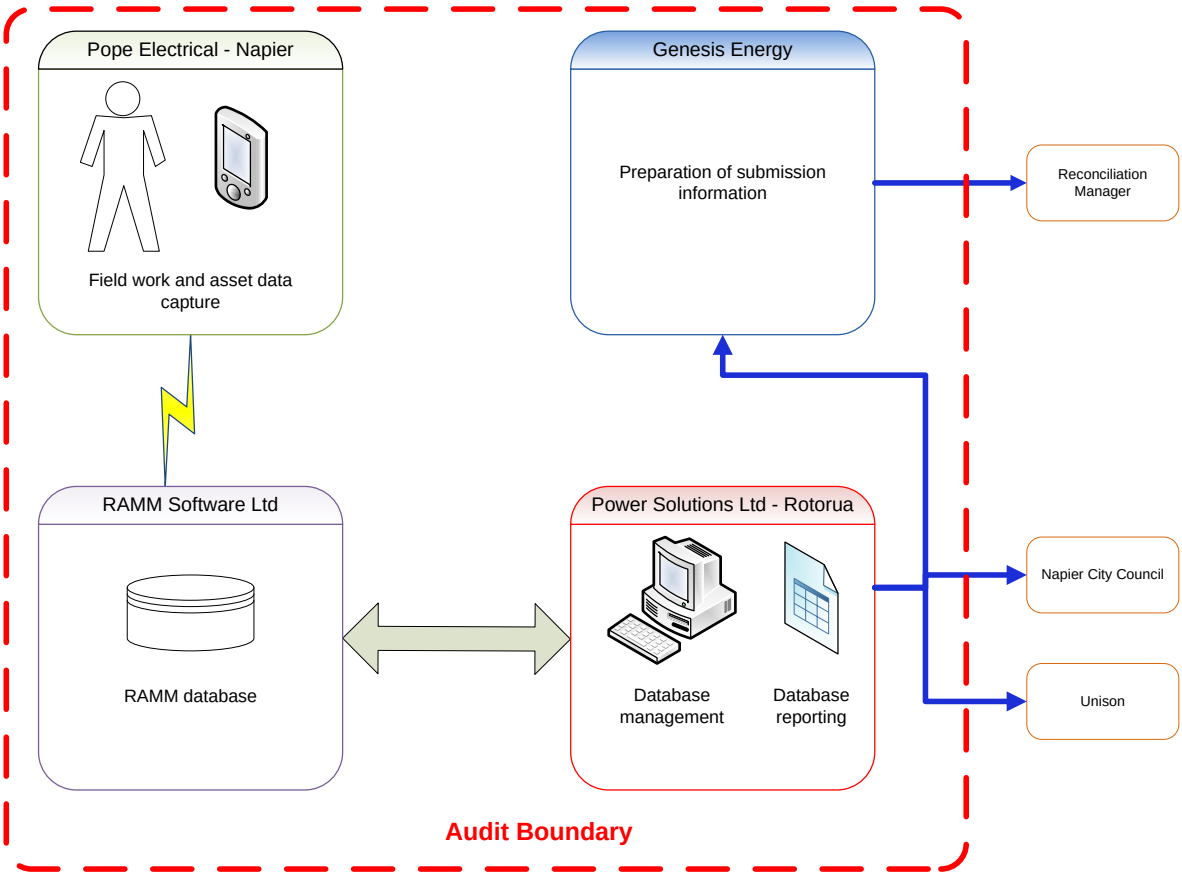
All information was provided directly by Genesis or Power Solutions.

1.8. Scope of Audit

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

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

The database is remotely hosted by RAMM Software Ltd and is managed by Power Solutions on behalf of NCC, who is Genesis' customer. The fieldwork and asset data capture is conducted by Pope Electrical. Reporting is provided to NCC, Unison and Genesis on a monthly basis. 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.



The field audit was undertaken of a statistical sample of 384 items of load on 15 April 2019.

1.9. Summary of previous audit

Genesis provided a copy of the last audit report undertaken by Rebecca Elliot of Veritek Limited in October 2018. The findings are shown in the tables below.

Table of Non-Compliance

Subject	Section	Clause	Non-Compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	Under submission of approximately 102.48kWh annually due to incorrect submission calculation. Under submission of approximately 116,751kWh for ICP 0000939906HBEFE due to missing items of load in monthly report. 17 items of load with no ICP resulting in an estimated under submission of 803 kWh per annum. 40 items of load recorded with zero wattage, estimate of 16,571 kWh per annum.	Mostly cleared. Cannot identify the cause of the kW difference for Sept 2018.
ICP identifier and items of load	2.2	11(2)(a) and (aa) of Schedule 15.3	17 items of load do not have an ICP recorded resulting in an estimated 803kWh of under submission per annum.	Cleared
Description and capacity of load	2.4	11(2)(c) and (d) of Schedule 15.3	40 items of load recorded with zero wattage, estimate of 16,571 kWh per annum. 66 items of load with no gear wattage recorded in the database.	Cleared
Database accuracy	3.1	15.2 and 15.37B(b)	The ballasts in RAMM are not used for reconciliation and they are not recorded correctly in RAMM. 17 items of load with no ICP resulting in an estimated Under submission of 803 kWh per annum. 40 items of load recorded with zero wattage, estimate of 16,571 kWh per annum.	Ballasts in RAMM still not used
Volume information accuracy	3.2	15.2 and 15.37B(c)	Under submission of approximately 102.48kWh annually due to incorrect submission calculation. Under submission of approximately 116,751kWh for ICP 0000939906HBEFE due to missing items of load in monthly report. 17 items of load with no ICP resulting in an estimated Under submission of 803 kWh per annum. 40 items of load recorded with zero wattage, estimate of 16,571 kWh per annum.	Mostly cleared. Cannot identify the cause of the kW difference for Sept 2018.

Table of Recommendations

Subject	Section	Clause	Recommendation for Improvement	Status
			Nil	

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

Genesis 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

Genesis reconciles this DUML load using the NST profile. The total volume submitted to the Reconciliation Manager is based on a monthly database report derived from RAMM and the "burn time" which is sourced from data loggers installed on the Unison network. The methodology is compliant for the "full night" items of load but there are 244 items of load subject to "half night" switching. These lights are turned off at midnight, but the kWh is allocated over the entire night period. This does not achieve compliance with the rules of the profile.

The previous audit found that the monthly report for the month of September 2018 did not match the database contents. This appears to have been caused by the manipulation of data by PSL as part of preparation of a report for Genesis.

The report for March 2019 was examined and it was found that the report did not match the content of the database. ICP identifiers are linked to pole information not light information, therefore PSL makes an adjustment in the monthly report to correct the ICP. The total kWh is correct and appears to be allocated to the correct ICPs, but the ICPs in the database appear to be incorrect. This is recorded in **section 2.2** as non-compliance.

The ballast in RAMM is not used for submission. The correct wattages are added in the monthly report. The correct ballasts are applied, but this needs to be in the database. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Oct-18 To: 15-May-19	NSP profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight. Ballast information in RAMM not used for submission. Potential impact: High Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4

Audit risk rating	Rationale for audit risk rating
Medium	The controls are rated as moderate, because they are sufficient to ensure that settlement is correct most of the time. The impact is assessed to medium because approx. 70,000 kWh per annum is submitted in the incorrect time period due to use of the incorrect profile.

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will investigate whether the potential for a "Profile" to be developed is possible. Due to the non-standard nature, Genesis believes if a UML profile is applied, it too will allocate the volume across incorrect time periods making it non-compliant and disadvantaging the energy supplier. Genesis will be requesting the additional ballast information to be added into the RAMM database.	01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis will be reviewing this unusual scenario of half night lighting on carriage ways, for this region. Genesis will need to understand clearly how these lights are managed and whether there is sufficient evidence to substantiate a submission for a new profile.	01/09/2019	

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

As reported the last audit, there are 133 items of load where the ICP is recorded as Private and these are not reconciled as part of the council load. These are being investigated in conjunction with Unison and if found to belong to the council the correct ICP will be added.

All records have an ICP, but as recorded in **section 2.1**, the ICP is against the pole not the light and PSL adjusts the kWh per ICP to cater for this. The ICPs in the database are therefore not correct. This is recorded as a non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 01-Oct-18 To: 13-May-19	ICP identifiers in the database not correct. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as weak because the design of the database does not ensure ICP identifiers are correct. The audit risk rating is low because the total kWh is correct and there is only one relevant GXP.

Actions taken to resolve the issue	Completion date	Remedial action status
The private lighting has been investigated and where the council has deemed the private light to be a council asset they have correct the information. Where the lighting has been deemed private. This is a distributor issue and will need to be addressed by the distributor. Incorrect ICP will need to be analysed to support the request to the council to make the change to attach the ICP to the lamp rather than the pole.	01/09/2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis requested the private lighting be investigated, in which it has been done. The assets have been identified and the council's contractor is I the process of change. Future private lighting will be the responsibility of the distributor to maintain.	01/09/2019	

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, displacement value and pole numbers and Global Positioning System (GPS) coordinates for majority of items of load and users in the office and field can view these locations on a mapping system.

There is one item of that that does not have either displacement or pole number, but it does have GPS co-ordinates in addition to the road name.

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 records for wattage, firstly the lamp wattage and secondly the gear wattage, which represents ballast losses. Analysis of the database found no blank records and no discrepancies.

As discussed in **section 2.1**, the ballast in RAMM is not used for submission even though it is present and is correct in the database. The correct wattages are added in the monthly report. This is recorded as non-compliance in **section 2.1**.

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 384 items of load.

Audit commentary

The field audit discrepancies are detailed in the table below:

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
LEE RD EAST TO OXFORD ST ACCESSWAY	2	2	-	2	22W LED in database, 35W MH in the field
LANARK CRESCENT	4	4	-	1	35W MH in database, 70W HPS in the field
ALFRED STREET	6	6	-	2	Total wattage is correct, but one LED is recorded as MH and one MH is recorded as LED
ESSEX STREET	10	10	-	7	35W MH in database, LED in the field
EWAN PLACE	5	5	-	1	80W MV in the database, 35W MH in the field.
KAURI STREET	5	5	-	1	35W MH in database, LED in the field
LANCASTER STREET	17	17	-	8	6 35W MH in database, LED in the field. 1 LED in the database, 35W MH in the field. 1 150W HPS in the database, LED in the field.
MARINE PARADE PARKING PRECINCT	12	11	-1	-	Pole ID 3289 not found
PUKEKURA PLACE	11	12	+1	-	Additional 80W MV identified
SHEEHAN STREET	9	8	-1	-	Pole ID 10908 not found

This clause relates to lights in the field not recorded in the database. There was one additional item of load found in the field.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Oct-18 To: 13-May-19	One item of load not recorded in the database. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor because only one light was identified; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
The audit process has identified the missing asset. Genesis have requested this to be added.	01/07/2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
The council's contractor has been made aware of the missing item and will be correcting the dataset.	01/07/2019	

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 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.

The processes were reviewed for new lamp connections and the tracking of load changes due to faults and maintenance. All fault and maintenance work is controlled by PSL and conducted by Pope Electrical through "RAMM Contractor". Once each job is completed the database is updated via field PDA's. Paperwork is also provided to note materials used, and this is compared with the data in the database for each job. The monthly outage patrols also involve a check of database accuracy. For new subdivisions, NCC engages Pope to record the lighting details in the database.

NCC has had no Christmas lights for the past three years and there are no plans in the future to do this.

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	Napier city region
Strata	The database contains items of load in Napier City Council area. The processes for the management of NCC items of load are the same, but I decided to place the items of load into six strata, as follows: 1. Amenity lighting 2. Carpark, aged care, private and ROW 3. Urban A-H 4. Urban I-P 5. Urban Q-Z.
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 81 sub-units.
Total items of load	384 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 384 items of load found that the field data was 97.2% of the database data for the sample checked. The statistical sampling tool reported with 95% confidence that the precision of the sample was 6.2% and the true load in the field will be between 93.7% to 99.9% of the load recorded in the database. This is within the required database accuracy of +/- 5%, therefore the database is accurate.

There will be potentially 97,300 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 the estimated impact will be between 218,600 kWh per annum over submission and 4,000 kWh per annum over submission.

Audit outcome

Compliant

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 database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Genesis reconciles this DUML load using the NST profile. The total volume submitted to the Reconciliation Manager is based on a monthly database report derived from RAMM and the "burn time" which is sourced from data loggers installed on the Unison network. The methodology is compliant for the "full night" items of load but there are 244 items of load subject to "half night" switching. These lights are turned off at midnight, but the kWh is allocated over the entire night period. This does not achieve compliance with the rules of the profile.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Oct-18 To: 15-May-19	NSP profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight. Potential impact: High Actual impact: High Audit history: Once Controls: Moderate Breach risk rating: 4
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as moderate, because they are sufficient to ensure settlement is accurate most of the time. The impact is assessed to medium because approx. 70,000 kWh per annum is submitted in the incorrect time period due to use of the incorrect profile.

Actions taken to resolve the issue	Completion date	Remedial action status

Genesis will investigate whether the potential for a “Profile” to be developed is possible. Due to the non-standard nature, Genesis believes if a UML profile is applied, it too will allocate the volume across incorrect time periods making it non-compliant and disadvantaging the energy supplier. Genesis will be requesting the additional ballast information to be added into the RAMM database.	01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Genesis will be reviewing this unusual scenario of half night lighting on carriage ways, for this region. Genesis will need to understand clearly how these lights are managed and whether there is sufficient evidence to substantiate a submission for a new profile.	01/09/2019	

CONCLUSION

This audit found four non-compliances and makes no recommendations.

The field audit found the database accuracy was high and processes appear sound for ensuring items of load are correctly identified and recorded.

There are two main issues, as follows:

1. The load for two ICPs is only on for half of the night (turned off at midnight), but submission occurs using the NSP profile, which is a full night profile, therefore the load is spread over the whole night when it should not be.
2. ICP identifiers are linked to pole information not light information in RAMM, therefore PSL makes an adjustment in the monthly report to correct the ICP. The total kWh is correct and appears to be allocated to the correct ICPs, but the ICPs in the database are incorrect. Manual manipulation of the database output can lead to errors and I strongly recommend the database is corrected and manual manipulation ceases as soon as possible.

Genesis are continuing to work with Unison to resolve the 133 private lights reported in the last audit. If any are confirmed to belong to council, they will have the correct ICP added to them.

The future risk rating of 12 indicates that the next audit be completed in 12 months.

PARTICIPANT RESPONSE

Genesis has been working with NCC on their dataset. The request has been made to add the one missing asset. The private lights were raised with NCC 6 months ago and have been investigated and site visits were completed by PSL to ascertain responsibility. The results were provided to Genesis who advised that any assets that the council have responsibility for will require a database amendment. Any asset that is deemed to be "private" will be the responsibility of the distributor to find a solution for and assign any SUML and responsibility to those connections and the current energy providers.

Genesis understands the allocation non-compliance raised by the auditor and wish to rectify the current profiling issue. However, if Genesis changes its process to use registry based recorded on/off times that correctly identifies the burn hours of "Half Nights" and assigns the "UML" profile for settlement. Albeit compliant, it too technically is non-compliant based on the auditors point that it spreads the load across the wrong time periods. It will also mean that the energy provider will be disadvantaged due to paying for energy during the day when this is reported as night load. Genesis are reviewing whether it's physically possible to apply for a new profile to allocate the load accurately.