

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

For

**WELLINGTON ADVERTISING SIGNS AND
PRIME ENERGY LIMITED**

Prepared by: Steve Woods

Date audit commenced: 31 July 2019

Date audit report completed: 31 July 2019

Audit report due date: 1 June 2018

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EXECUTIVE SUMMARY

This audit of the Wellington Advertising Signs DUML database and processes was conducted at the request of Prime Energy Limited (Prime) 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.

A database exists in the form of a spreadsheet and it has an audit trail. A new sheet is saved if any changes are made.

Non-compliance is recorded for a late audit. Prime delayed the audit to ensure the data was 100% accurate.

The database wattage and count information were found to be 100% accurate. The future risk rating of two indicates a next audit period of 36 months.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
DUML audit	1.10	16A.26 and 17.295F	Audit conducted late for database	Moderate	Low	2	Cleared
Future Risk Rating						2	

Future risk rating	1-3	4-6	7-8	9-17	18-26	27+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Clause	Recommendation

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

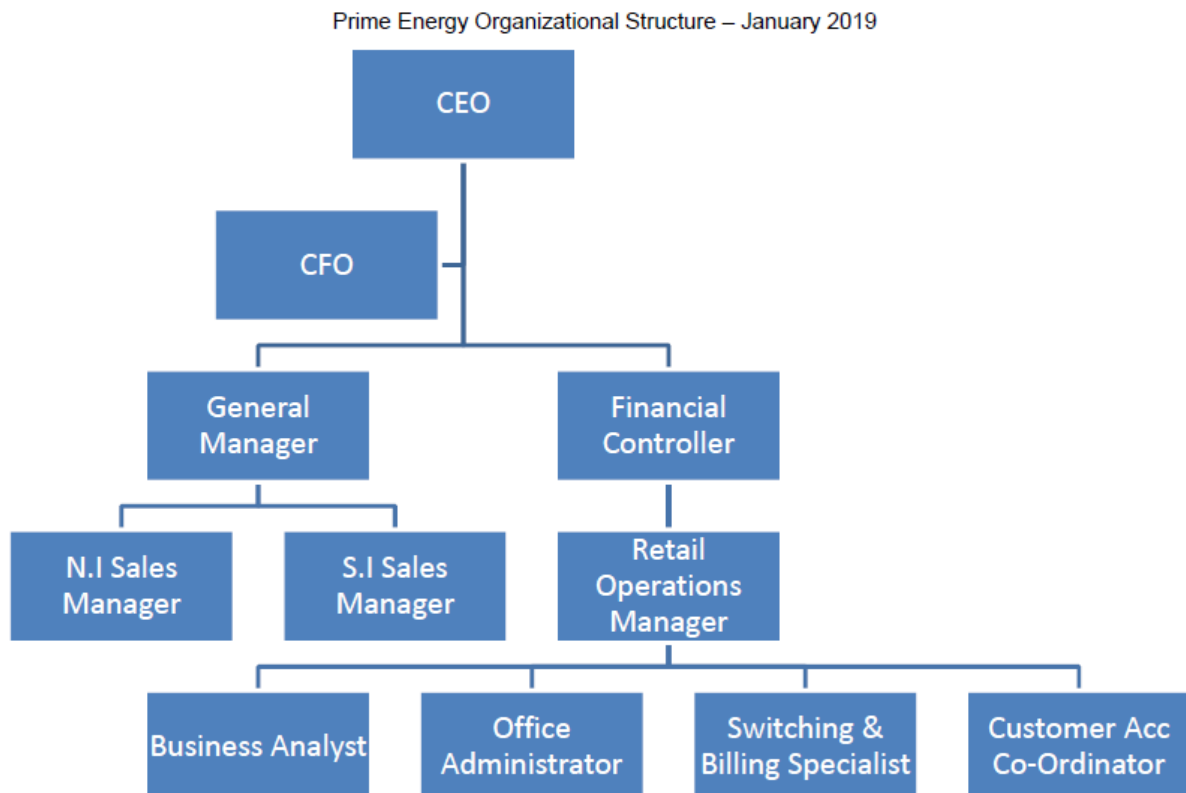
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

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

1.2. Structure of Organisation

Prime provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditor:

Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Shainaz Rafiq	Retail Operations Manager	Prime

1.4. Hardware and Software

Data is contained in a spreadsheet managed by Prime and APN (the customer for the DUML)

Backup is in accordance with standard industry protocols, with Amazon and in-house backups performed.

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	NSP	Number of items of load	Database wattage (watts)
0000156503CK186	APN CPK0331	CPK0331	19	47,032
0001259564UN4AC	APN WIL0331	WIL0331	10	24,941
Total			29	71,973

1.7. Authorisation Received

All information was provided directly by Prime.

1.8. Scope of Audit

This audit of the Wellington Advertising Signs DUMML database and processes was conducted at the request of Prime Energy Limited (Prime) 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 DUMML audits version 1.1, which became effective on 1 June 2017.

A database exists in the form of a spreadsheet and it has an audit trail. A new sheet is saved if any changes are made.

1.9. Summary of previous audit

This is the first full audit of this database for Prime.

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

Prime have requested Veritek to undertake this DUMML audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database, but the audit was due by 01/06/18.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 01-Jun-18 To: 31-Jul-19	Audit conducted late for database Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate based on the controls in place now, which will ensure ongoing audits will be conducted. Prime wanted to ensure the data was 100% accurate before having an audit conducted. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The list was inherited by Wellington Electricity as a bucket list from GENE/VECT during the change over back in 2008 so we had to ensure the signs existed		June 2019	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Now that we have compiled the 1 st database & have all the photos/spec from the customer. It will be easier to monitor the changes in the future. We will also inform the network to update their record. We hadn't done this because we wanted to ensure the database was audited prior to us requesting the network to make any changes.]		Proposed or actual date	

2. DUMML 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:

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

Audit observation

The process for calculation of consumption was examined.

Audit commentary

Prime reconciles this DUMML load using the RPS profile. The kW figures are derived from the database and it is assumed the hours of operation each day are 11.877, which is a reasonable average compared to streetlight on/off times in the same area. Whilst the RPS profile is not the most suitable one for night only lighting, the Code allows it to be used.

The submission totals were checked for the most recent six-month period and they match the information in the database.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUMML database must contain:

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

Audit observation

The database was checked to confirm an ICP is recorded for each item of load.

Audit commentary

An ICP is recorded for each item of load in the database.

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 spreadsheet contains a street address and a photo of each item of load so it can be located. An extract is shown below.

	0009601	Thorndon Quay, Wellington Central	This free standing site is viewed by all traffic entering Wellington's CBD along Thorndon Quay. It is also less than 500 metres from the Capital Gateway Shopping Complex.	0001259564UN4AC
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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.

Audit commentary

The spreadsheet contains a description of the sign, details of the light fittings inside each sign, total wattage and kWh per day. The consumption of the signs was checked during the first half of 2019 to ensure the data was correct.

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

A field audit was undertaken by the customer's electrician and the results were provided with a photo of each sign confirming it was present.

Audit commentary

The field audit found 100% accuracy.

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

Prime has a robust process to record any changes if required. This has been proven with other similar databases. The current data is valid as at 30/06/19 and any changes result in a new sheet in the spreadsheet with the date of the change.

I did not identify any problems with the tracking of load changes.

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 spreadsheet contains a complete audit trail of all additions and changes. A new sheet is created when any changes are made. The spreadsheet contains two earlier versions as separate sheets.

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

A field audit was undertaken by the customer's electrician and the results were provided with a photo of each sign confirming it was present.

Audit commentary

The field audit found 100% accuracy.

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 all ICPs have the correct profile and submission flag
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Prime reconciles this DUML load using the RPS profile. The kW figures are derived from the database and it is assumed the hours of operation each day are 11.877, which is a reasonable average compared to streetlight on/off times in the same area. Whilst the RPS profile is not the most suitable one for night only lighting, the Code allows it to be used.

The submission totals were checked for the most recent six-month period and they match the information in the database.

The field audit found 100% accuracy.

Audit outcome

Compliant

CONCLUSION

A database exists in the form of a spreadsheet and it has an audit trail. A new sheet is saved if any changes are made.

The database wattage and count information was found to be 100% accurate. The future risk rating of zero indicates a next audit period of 36 months.

PARTICIPANT RESPONSE

We only have 2 DUMML database and have to say this was the most difficult one. Working with an historic bucket list wasn't easy but we are glad we got there in the end. We would like to thank the Electricity Authority for giving us the time extension.