

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

For

YES POWER

Prepared by: Ewa Glowacka – TEG & Associates

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Audit report due date: 10-Dec-19

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EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of YES Power (YESP) to support their application for certification, in accordance with clause 16A.24(b) of The Code.

At the time of audit YES Power was trading 192 ICPs, an increase of 166 ICPs. The company trades remotely read ICPs. Robotron*esales software is used for switching and reconciliation, and billing (not covered by this audit). Some switching is done using the registry web interface. Robotron*esales sends to the registry NT, AN, CS, and RR files. AC, NW, and AW files and trader, status, updates are created in the registry and the system is updated.

The Switch Breach report , EDA file and Audit Compliance Report for the period 1/12/18 to 15/10/19/19 were used to assist in the assessment of compliance.

YES Power provided copies of switching processes for both NHH and HHR switches even though at the time of audit only the standard and move-in processes were used. Compliance of NHH processes was based on a review of documentation and test data for NHH scenarios. The company have not started trading NHH ICPs.

YES Power, like many other small retailers, face the challenge of switching on the same read because quite often much bigger companies reject their switch reads. The company decided to be proactive and design a special algorithm which allows the accommodation a difference between AMI read and switch event read provided by a losing trader. It is done using a scaling algorithm, which “spreads” volumes across one or two days.

We identified 9 non-compliances. They have no impact on settlement outcomes because of the small number of ICPs affected. Overall, the level of compliance is good, the company is in the early stages of implementing a full automation of the registry interface. It should eliminate human error by using the registry web interface.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 16 which results in an indicative audit frequency of 12 months. We agree with the result.

We thank YES Power and Robotron staff for their full and complete cooperation in this audit.

AUDIT SUMMARY

NON-COMPLIANCES

| Subject | Section | Clause | Non Compliance | Controls | Audit Risk Rating | Breach Risk Rating | Remedial Action |
|--|---------|--------------------------|--|----------|-------------------|--------------------|-----------------|
| Changes to registry information | 3.3 | 10 of Schedule 11.1 | A small number of late registry updates | Moderate | Low | 2 | Identified |
| ANZSIC codes | 3.6 | 9(1)(k) of Schedule 11.1 | Incorrect ANZSIC code for one ICP | Strong | Low | 1 | Identified |
| Losing trader must provide final information - standard switch | 4.3 | 5 of Schedule 11.3 | Average daily consumption methodology is incorrect. Incorrect switch event read for one ICP | Moderate | Low | 2 | Identified |
| Retailers must use same reading - standard switch | 4.4 | 6(1) Schedule 11.3 | Not switching on the same reads for some ICPs | Moderate | Low | 2 | Identified |
| Losing trader must provide final information - switch move | 4.10 | 11 of Schedule 11.3 | Average daily consumption methodology is incorrect. Incorrect switch event read for one ICP, one CS file was late | Moderate | Low | 2 | Identified |
| Withdrawal of switch request | 4.15 | 17 of Schedule 11.3 | One AW file was late | Strong | Low | 1 | Identified |
| Correction of HHR metering information | 8.2 | 19(2) of Schedule 15.2 | HHR actual data provided by MEPS is overwritten to accommodate the volume difference after RR files are rejected by losing traders | Moderate | Low | 2 | Identified |

| | | | | | | | |
|--|------|---------------------|---|----------|-----|-----------|---|
| Electronic meter readings and estimated readings | 9.6 | 17 of Schedule 15.2 | No log files reviewed from FCLM, ARCS, and MTRX because they are not provided to them | Moderate | Low | 2 | Identified |
| HHR aggregates information provision to the reconciliation manager | 11.4 | 15.8 | HHRAGGR files do not contain electricity supplied information | Strong | Low | 1 | Not required. The Code change required a line up with RN file specification. Breach risk rating excluded from total |
| Accuracy of submission information | 12.7 | 15.2 | Some volumes could be inaccurate due to the scaling process algorithm | Moderate | Low | 2 | Identified |
| Future Risk Rating | | | | | | 16 | |
| Next audit date | | | | | | 12 months | |

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

RECOMMENDATIONS

| Subject | Section | Description | Recommendation |
|---------|---------|-------------|----------------|
| | | | Nil |

ISSUES

| Subject | Section | Description | Issue |
|---------|---------|-------------|-------|
| | | | Nil |

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code (Section 11)

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

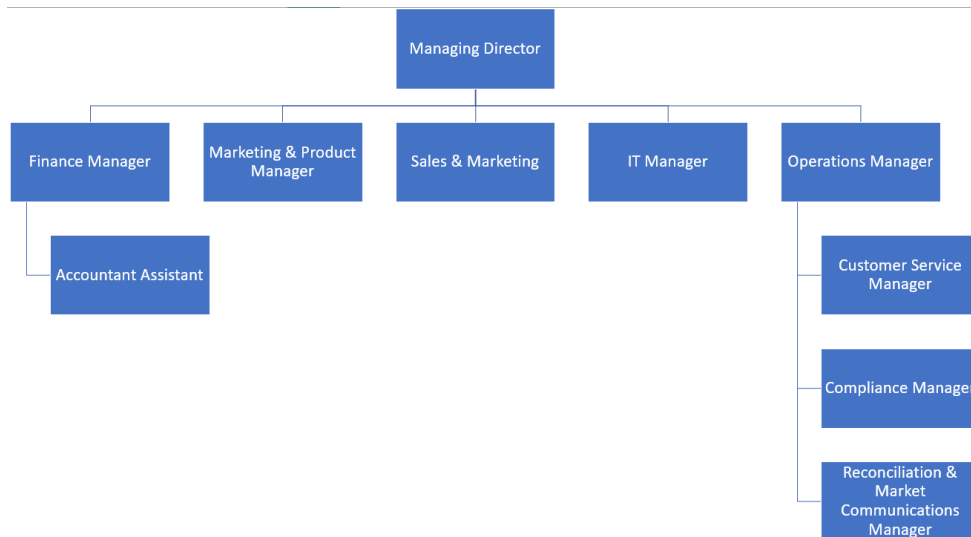
Audit observation

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

Audit commentary

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

1.2. Structure of Organisation



1.3. Persons involved in this audit

| Name | Title | Company |
|-------------------|--|------------------|
| David Grater | Managing Director | YES Power |
| Nicolas Halkhoree | Systems Analyst | YES Power |
| Arun Kumar | Marketing & Product Manager | YES Power |
| Christoph Sachse | Consultant | Robotron NZ Ltd |
| Alexander Born | Managing Director | Robotron NZ Ltd |
| Ewa Glowacka | Electricity Authority Approved Auditor | TEG & Associates |

1.4. Use of Agents (Clause 15.34)

Code reference

Clause 15.34

Code related audit information

A reconciliation participant who uses an agent

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

Audit observation

YES Power does not use any agents to fulfil their obligation covered in the scope of this audit.

Audit commentary

No agents are used by YES Power, all tasks covered in this audit are performed in-house.

1.5. Hardware and Software

YES Power uses robotron*esales software. The software is a cloud-based application, written and maintained by Robotron NZ. The company also uses another supporting software Zoho, which was not audited.

The Oracle database is stored in Sydney where it is regularly backed up. Additionally a copy of raw metering data is stored in NZ.

1.6. Breaches or Breach Allegations

There were no breaches or breach allegations lodged against YES Power in the period covered by this audit.

1.7. ICP Data

| Metering Category | Number of ICPs (24/10/19) | Number of ICPs (06/12/18) | (date) | (date) |
|-------------------|---------------------------|---------------------------|--------|--------|
| 1 | 188 | 26 | | |
| 2 | 4 | 0 | | |
| 3 | 0 | 0 | | |
| 4 | 0 | 0 | | |
| 5 | 0 | 0 | | |
| 9 | 0 | 0 | | |

| Status | Number of ICPs (24/10/19) | Number of ICPs (06/12/18) | Number of ICPs (date) |
|--|---------------------------|---------------------------|-----------------------|
| Active (2,0) | 192 | 26 | |
| Inactive – new connection in progress (1,12) | 0 | 0 | |

| | | | |
|--|---|---|--|
| Inactive – electrically disconnected vacant property (1,4) | 0 | 0 | |
| Inactive – electrically disconnected remotely by AMI meter (1,7) | 0 | 0 | |
| Inactive – electrically disconnected at pole fuse (1,8) | 0 | 0 | |
| Inactive – electrically disconnected due to meter disconnected (1,9) | 0 | 0 | |
| Inactive – electrically disconnected at meter box fuse (1,10) | 0 | 0 | |
| Inactive – electrically disconnected at meter box switch (1,11) | 0 | 0 | |
| Inactive – electrically disconnected ready for decommissioning (1,6) | 0 | 0 | |
| Inactive – reconciled elsewhere (1,5) | 0 | 0 | |
| Decommissioned (3) | 1 | 0 | |

1.8. Authorisation Received

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

1.9. Scope of Audit

This reconciliation participant audit was performed at the request of YES Power (YESP). Clause 16A.24(b) to support the application for recertification. The audit was carried out at the YES Power office on the 31 October/1 November 2019 in Christchurch.

The table below shows the tasks under clause 15.38 of part 15 for which YES Power requires certification.

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

1.10. Summary of previous audit

The previous audit was conducted in October'18 by Ewa Glowacka of TEG & Associates. The following non-compliances were identified

| Subject | Section | Clause | Non-Compliance | Comments |
|--------------------------|---------|--------|--|----------|
| Provision of information | 2.2 | 15.35 | Volumes in file HHRAGGR and HHRVOLS did not match for Aug'18 submissions | Cleared |

| | | | | |
|--|------|---------------------|--|--------------|
| Change to registry information | 3.3 | 10 of Schedule 11.1 | Information for one ICP was changed later than 5 business days | Still exists |
| Losing trader response to switch request | 4.2 | 3 of Schedule 11.3 | AN file for one ICP was sent late by 2 business days | Still exists |
| Retailers must use same reading - standard switch | 4.4 | 6(1) Schedule 11.3 | 8 ICPs did not switch on the same read | Still exists |
| Gaining trader changes to switch meter reading - switch move | 4.11 | 12 Schedule 11.3 | One ICP did not switch on the same read | Cleared |
| HHR aggregates information provision to the reconciliation manager | 11.4 | 15.8 | HHRAGGR files do not contain electricity supplied information | Still exist |

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

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

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

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

Audit observation

The LIS file dated 24/10/19 was examined to identify any inaccuracies. The Event Detail (EDA) file and the Audit Compliance report for the audit period was examined.

Audit commentary

YES Power downloads the EDA file from the registry, daily, to update the robotron*esales database with any updates on ICPs traded by them.

The Audit Compliance report showed that all information in the registry was correct except an incorrect ANZSIC code for one ICP (**section 3.6**), which was overlooked and corrected during the audit.

Section 3.3 showed that YES Power acted quickly to correct information which was identified as inaccurate. It was the only correction like that and related to an incorrect status recorded in the registry by the previous trader.

Audit outcome

Compliant

2.2. Provision of information (Clause 15.35)

Code reference

Clause 15.35

Code related audit information

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

Audit observation

The processes for providing information were reviewed throughout the audit.

Audit commentary

Compliance was confirmed with regards to the format of information and the timeframe, in accordance with Part 15, in relevant sections of this report.

Audit outcome

Compliant

2.3. Data transmission (Clause 20 Schedule 15.2)

Code reference

Clause 20 Schedule 15.2

Code related audit information

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

Audit observation

On a daily basis YES Power receives HHR data from the MEPs via SFTP server.

Audit commentary

The process for data transmission between YES Power and MEPs is a fully automated process. Reconciliation files are submitted via the RM portal and file exchange with the registry is done using SFTP server. During the audit the company walked us through the daily process for data exchange.

Audit outcome

Compliant

2.4. Audit trails (Clause 21 Schedule 15.2)

Code reference

Clause 21 Schedule 15.2

Code related audit information

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

The audit trail must include details of information:

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

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

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

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

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

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

Audit observation

During this audit we checked the audit trail for all data gathering, validation, and correction.

Audit commentary

YES Power sends and receives data to and from the registry. It is an automated process. Each upload is recorded by robotron*esales. Some updates are done using the registry website which has its own audit trail.

Reconciliation files are uploaded via the RM portal, which records date, time and a participant's login details. Metering data provided by MEPs is automatically uploaded by the software. robotron*esales has a built-in functionality to record a complete audit trail for all data gathering and communication with the registry. As per this clause requirement, the logs of activities includes the date and time of the activity, the operator identifier, and an activity identifier.

YES Power communicates with other participants via email e.g. notification of sending RR file. All emails are archived.

Audit outcome

Compliant

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

Code reference

Clause 10.4

Code related audit information

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

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

Audit observation

YES Power provided their Terms and Conditions.

Audit commentary

We reviewed the Terms and Conditions. They cover contractors or agents, networks, the meter owner, and meter reader and any of their employees, contractors or agents for the duration of the contract.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

- *the Authority*
- *an ATH*

- an auditor
- an MEP
- a gaining metering equipment provider.

The trader must use its best endeavours to provide access:

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

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

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

Audit observation

YES Power provided their Terms and Conditions.

Audit commentary

We reviewed the Terms and Conditions. Section 27 (Access to your property) of the Terms and Conditions covers access to a customer's property. It covers their agents, a distributor, and any metering service provider. It says: "Where we, The Network Operator or our contractor, need to access your property to undertake construction, upgrade, repair or maintenance work, we will give you at least 10 working days' Notice (unless another time is agreed between us)".

Audit outcome

Compliant

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

Code reference

Clause 10.35(1)&(2)

Code related audit information

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

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

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

Audit observation

The review of the LIS file showed that YES Power's installations are category 1 and 2.

Audit commentary

YES Power confirmed they do not have any installations to which metering data loss compensation has to be applied.

Audit outcome

Compliant

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

Code reference

Clause 11.15B

Code related audit information

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

- *the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and*
- *the terms of the assigned contract to be amended on such an assignment to—*
- *the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or*
- *such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and*
- *the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and*
- *the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and*
- *the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).*

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

Audit observation

YES Power provided their Terms and Conditions.

Audit commentary

In the Terms and Conditions section 33 is said “Where YES Power commits an “event of default” as defined by the Electricity Industry Participation Code 2010, YES Power or the Electricity Authority may assign YES Power’s rights and obligations under this Agreement to an alternative Electricity retailer (Recipient Retailer)”.

Audit outcome

Compliant

2.9. Connection of an ICP (Clause 10.32)

Code reference

Clause 10.32

Code related audit information

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

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

Audit observation

The LIS file was reviewed. YES Power does not trade new connections.

Audit commentary

YES Power will not be trading new connections in the near future. When YES Power decides to take on new connections they will document the process. The current company policy is to trade existing installations only.

Audit outcome

Compliant

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

Code reference

Clause 10.33(1)

Code related audit information

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

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

Audit observation

As described in **section 2.9** YES Power will not be dealing with new connections for some time.

Audit commentary

Compliance was not assessed because there were no new connections.

Audit outcome

Not applicable

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

Code reference

Clause 10.33A(1)

Code related audit information

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

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

Audit observation

YES Power will not be trading new connections for some time. The process of connecting and reconnection existing installations was reviewed.

Audit commentary

As described **section 3.9** during the audit period the status for 2 ICPs was changed. The process was followed. All of them have valid Metering Installation Certification.

Audit outcome

Compliant

2.12. Arrangements for line function services (Clause 11.16)

Code reference

Clause 11.16

Code related audit information

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

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

Audit observation

YES Power trades ICPs located on ORION, Vector, FCLM, and DUNE networks

Audit commentary

YES Power has an arrangement with all relevant networks. Agreements are always in place before any ICP is switched in. Arrangements with MEPs are in place.

Audit outcome

Compliant

2.13. Arrangements for metering equipment provision (Clause 10.36)

Code reference

Clause 10.36

Code related audit information

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

Audit observation

The company uses the MEP services of FCLM, ARC, AMS, and MTRX. They are the same MEP which were used in the previous audit period.

Audit commentary

The company demonstrated the existence of agreements with FCLM, ARC, AMS, and MTRX.

Audit outcome

Compliant

3. MAINTAINING REGISTRY INFORMATION

3.1. Obtaining ICP identifiers (Clause 11.3)

Code reference

Clause 11.3

Code related audit information

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

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

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

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

Audit observation

YES Power's policy is not to trade new connections. The LIS file and EDA files confirm this.

Audit commentary

YES Power does not plan to trade new connections in the near future.

Audit outcome

Compliant

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

Code reference

Clause 11.7(2)

Code related audit information

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

Audit observation

The business process for signing up a new customer is to evaluate each ICP .

Audit commentary

We analysed the LIS file dated 24/10/19 and confirm that the company provided all information to the registry for installations at which they trade energy.

Audit outcome

Compliant

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

Code reference

Clause 10 Schedule 11.1

Code related audit information

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

Audit observation

We reviewed the EDA file for the period 1/12/18 to 15/10/19/19 and the Audit Compliance report.

Audit commentary

The results are shown below:

| Status update | Year | Total number of updates | No of updates within 5BD | No of updates later than 5BD | Average notification days [BD] | Percentage compliant |
|---|-------------|-------------------------|--------------------------|------------------------------|--------------------------------|----------------------|
| Change to active (2,0) | 2018 | 1 | 1 | 0 | | 100% |
| | 2019 | 9 | 8 | 1 | 6.25 | 88.8% |
| Change to electrically disconnected vacant property -(1,4) | 2018 | 0 | | | | |
| | 2019 | 1 | 1 | 0 | 1 | 100% |
| Change to electrically disconnected ready for decommissioning (1,6) | 2018 | 0 | | | | |
| | 2019 | 1 | 0 | 1 | 10 | 0% |
| Change to electrically disconnected by AMI meter (1,7) | 2018 | 0 | | | | |
| | 2019 | 1 | 1 | 1 | 1 | 100% |
| Trader (NT updates and MEP nominations are excluded) | 2018 | 26 | | | | |
| | 2019 | 20 | 19 | 1 | 3.2 | 95% |
| MEP nomination | 2018 | 0 | | | | |
| | 2019 | 4 | 0 | 0 | 56.5 | 0% |

One update to “active” (0007117697RN51B) was backdated because the ICP status assigned by the previous retailer (1,4) was incorrect.

All MEP nominations were backdated. It was discussed during the audit. They currently use the date raising the job as the nomination date. In other cases, the actual date of when the meter was replaced as the nomination date. There four ICPs have their nomination done from the switch event date instead of when the meter job was raised or when was actually replaced.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Dec-18 To: 15-Nov-19 | A small number of late registry updates Potential impact: Low Actual impact: None Audit history: Once previously Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are rated as moderate because there are some improvements that can be made to them. The audit risk rating is low as the late updates had no impact on settlement because of the small number of ICPs affected. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Business rules and business processes were updated to avoid late registry entries | | 08/11/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

3.4. Trader responsibility for an ICP (Clause 11.18)

Code reference

Clause 11.18

Code related audit information

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

A trader ceases to be responsible for an ICP if:

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

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

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

Audit observation

We examined the LIS and EDA files for the period covered by this audit. The decommissioning processes were examined

Audit commentary

All ICPs have a MEP assigned in the registry.

When an ICP needs to be decommissioned, YES Power requests from a MEP, the removal of a meter and a final read. Only one ICP was decommissioned and we can confirm that final reads were used for reconciliation.

YES Power understands that as soon as they are recorded in the registry as accepting responsibility, the responsibility will cease only when an ICP switches out to another trader.

Audit outcome

Compliant

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

Code reference

Clause 9 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

We examined the EDA file, the LIS file, and the Audit Compliance report.

Audit commentary

We confirm that the information provided to the registry for ICPs traded by YES Power is correct. YES Power does not trade new connections.

Audit outcome

Compliant

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

Code reference

Clause 9 (1)(k) of Schedule 11.1

Code related audit information

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

Audit observation

We reviewed the LIS file and the Audit Compliance report. The ANZSIC code is checked during signed up process.

Audit commentary

We identified one ICP (0006681662RN9F5) with an incorrect code, which was missed. The residential code "O" was assigned instead "H451" (Cafes Restaurants and Takeaway Food Services).

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 04-Jun-19 To: 15-Nov-19 | Incorrect ANZSIC code for one ICP Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as strong , one ICP was overlooked. The audit risk rating is low because the impact on the settlement outcome is none | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| New customer process was updated to double check ANZSIC with customer to avoid wrong ANZSIC code at the registry | | 18/10/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

Code reference

Clause 9(1)(f) of Schedule 11.1

Code related audit information

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

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

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

Audit observation

The LIS file and the Audit Compliance report was analysed.

Audit commentary

YES Power does not trade UML ICPs.

Audit outcome

Compliant

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

Code reference

Clause 17 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The LIS file was reviewed.

Audit commentary

At the time of the audit all ICPs had the status “active”.

Robotron*esales assigns only one customer per ICP. All active installations are metered, and volumes are reconciled every month. YES Power has implemented a process to check the status of an ICP after the switch is finalised.

Audit outcome

Compliant

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

Code reference

Clause 19 Schedule 11.1

Code related audit information

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

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

Audit observation

The reconnection and disconnection process was reviewed. The LIS file was examined to identify all ICPs with the status "inactive".

Audit commentary

We noted that during the audit period the status for 2 ICPs was changed. The process was followed.

All of them have valid Metering Installation Certification.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

YES Power does not trade new installations.

Audit outcome

Compliant

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

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

Code reference

Clause 2 Schedule 11.3

Code related audit information

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

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

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

Audit observation

The process of signing up customers was reviewed, and we found it compliant.

Audit commentary

The company goes through a number of validation checks before sending a notification to the registry. YES Power sent 157 notifications (NTTR) for standard switches. The registry was notified within 2 business days of the arrangement coming into effect.

Audit outcome

Compliant

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

Code reference

Clauses 3 and 4 Schedule 11.3

Code related audit information

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

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

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

Audit observation

We reviewed the EDA file and the Switch Breach report for the period covered by this audit.

Audit commentary

The Switch Breach report did not record any late AN files. AN files are sent by the system.

For 92.31% of switches the event date was less than 5 business days.

Audit outcome

Compliant

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

Code reference

Clause 5 Schedule 11.3

Code related audit information

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

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

Audit observation

The standard switch process was examined to assess compliance. We reviewed the EDA file for the audit period and the Switch Breach report.

Audit commentary

YES Power sent 24 CS files as response to a gaining trader. Up to April this year the company was using the registry interface to pass information. At the time of the audit, this function is being performed by robotron*esales.

We reviewed all the information in 10 CS files. We found a few anomalies.

- Average daily consumption is expected to be calculated using the volume from two most recent validated meter reads divided by the number of days between them. This method gives false results if validated reads are received daily, but it is the current Code interpretation. Robotron*esales calculate as average consumption of last 7 days, which is non-compliant.
- CS file for ICP 0007137192RNE9B had a switch event read recorded at the end of the transfer date not the day before. This file was created manually in Feb'19. It is the only file for standard switch containing incorrect information.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|--|-----------------|------------------------|
| Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 01-Dec-18 To: 15-Nov-19 | Average daily consumption methodology is incorrect. Incorrect switch event read for one ICP Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are rated as moderate; this is the second audit which identifies a problem with the CS files. The audit risk rating is low because the number of switches affected was low. It has no impact on settlement | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Business rules and systems were adjusted to use correct calculation method and date. | | 31/12/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

Code reference

Clause 6(1) and 6A Schedule 11.3

Code related audit information

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

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

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

- *the losing trader can choose not to accept the reading, however, must advise the gaining trader no later than 5 business days after receiving the switch event meter reading from the gaining trader (clause 6A(a)); or*

- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 6A(b)).*

Audit observation

The EDA file and the Switch Breach Report for the audit period was analysed. We walked through the RR files process.

Audit commentary

YES Power sent 41 RR files and received 1 file, which they accepted.

According to the Switch Breach Report YES Power sent 3 RR files later than 4 calendar months of being notified by the registry about the switch completion. The files were sent late by about 1.5 months.

13 RR files were rejected by the losing traders. All rejected RR were actual reads from AMI meters, but they were sent later than 5 business days therefore losing traders did not have an obligation to accept them. The companies were mostly big companies and don't accept RR files.

To remedy the situation YES Power developed a "scaling" process, which mean the difference between a switch event read and their actual read received from the MEP is apportioned across one or two days. The parameters are that it can't be more than 10% and below 2 kWh. If outside of those parameters then no scaling is done.

We would like to acknowledge the company for taking a proactive action to make sure that compliance is met. However, there are two problems with their approach

- Below 2 kWh no scaling is done therefore they do not switch on the same read
- Actual data is overwritten therefore it is non-compliance with clause 19(2) of Schedule 15.2

These issues were discussed during the audit. YES Power will change the scaling algorithm to switch in, exactly, on a switch event read. Washup files will be provided.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|--|-----------------|------------------------|
| Audit Ref: 4.4 With: 6(1) of Schedule 11.3 From: 01-Dec-18 To: 15-Nov-19 | Not switching on the same reads for some ICPs Potential impact: None Actual impact: None Audit history: Once before Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are rated as moderate because the company does not account for 2 kWh difference. The audit risk rating is low because the number of switches affected was low. It has no impact on settlement | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The process was adjusted, readings will be rounded to a whole number and then scaling will be done without threshold. In future focus will be on RR file acceptance. | | | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

Code reference

Clause 6(2) and (3) Schedule 11.3

Code related audit information

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

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

Audit observation

The EDA file and the Switch Breach Report for the audit period was analysed.

Audit commentary

YESP Power received only one RR file from Electric Kiwi (AMI read) which was accepted.

Audit outcome

Compliant

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

Code reference

Clause 7 Schedule 11.3

Code related audit information

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 9 Schedule 11.3

Code related audit information

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

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

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

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

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

Audit observation

We reviewed the EDA file and the Switch Breach report covered by this audit.

Audit commentary

YES Power sent 53 notifications (NTMI) for switch move switches. The registry was notified within 2 business days of the arrangement coming into effect. For some switch notifications a switch event was in

the past, it was caused by the late notification by a customer. YES Power does not request a customer to specify a date of move in on their website.

Audit outcome

Compliant

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

Code reference

Clause 10(1) Schedule 11.3

Code related audit information

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

- *10(1)(a) If the losing trader accepts the event date proposed by the gaining trader, the losing trader must complete the switch by providing to the registry manager:
 - o *confirmation of the switch event date; and*
 - o *a valid switch response code; and*
 - o *final information as required under clause 11; or**
- *10(1)(b) If the losing trader does not accept the event date proposed by the gaining trader, the losing trader must acknowledge the switch request to the registry manager and determine a different event date that—
 - o *is not earlier than the gaining trader’s proposed event date, and*
 - o *is no later than 10 business days after the date the losing trader receives notice; or**
- *10(1)(c) request that the switch be withdrawn in accordance with clause 17.*

Audit observation

We reviewed the EDA file and the Switch Breach report for the period covered by this audit.

Audit commentary

The Switch Breach report did not record any late AN files. AN files are sent by the system.

Audit outcome

Compliant

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

Code reference

Clause 10(2) Schedule 11.3

Code related audit information

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

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

Audit observation

We reviewed the EDA file and the Switch Breach report for the period covered by this audit.

Audit commentary

The Switch Breach report did not record any late AN files. AN files are sent by the system. We checked 5 AN files, a valid switch response code was used.

Audit outcome

Compliant

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

Code reference

Clause 11 Schedule 11.3

Code related audit information

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

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

Audit observation

We reviewed the EDA file and the Switch Breach report for the period covered by this audit.

Audit commentary

One CS file was late.

We reviewed 5 CS files to evaluate all information. We identify one ICP 0007137192RNE9B for which a switch event read was recorded at the end of the transfer date, not the day before.

As per **section 4.3**, average daily consumption is calculated using the same methodology.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 4.10 With: 11 of Schedule 11.3 From: 01-Dec-18 To: 15-Nov-19 | Average daily consumption methodology is incorrect. Incorrect switch event read for one ICP, one CS file was late Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are rated as moderate because there are some improvements that can be made to them. The audit risk rating is low as the late updates had no impact on settlements because only one ICP affected | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Business rules and systems were adjusted to use correct calculation method and date. | | 31/12/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

Code reference

Clause 12 Schedule 11.3

Code related audit information

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

- *if the switch meter reading established by the gaining trader differs by less than 200 kWh from that provided by the losing trader, both traders must use the switch event meter reading provided by the gaining trader (clause 12(2)(a)); or*
- *if the switch event meter reading provided by the losing trader differs by 200 kWh or more from a value established by the gaining trader, the gaining trader may dispute the switch meter reading. In this case, the gaining trader, within 4 calendar months of the date the registry manager gives the gaining trader written notice of having received information about the switch completion, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by 2 validated meter readings and the losing trader must either (clause 12(2)(b) and clause 12(3)):*

- *advise the gaining trader if it does not accept the switch event meter reading and the losing trader and the gaining trader must resolve the dispute in accordance with the disputes procedure in clause 15.29 (with all necessary amendments) (clause 12(3)(a)); or*
- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 12(3)(b)).*

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

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 12(2A)(b));*
- *the gaining trader no later than 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading. (clause 12(2B)).*

Audit observation

The EDA file and the Switch Breach Report for the audit period was analysed. We walked through the RR files process.

Audit commentary

YES Power sent 3 RR files and no RR files were received for Switch Move. One file was rejected (0006528970RNA2E) by Contact Energy, the company commented that Contact in most cases rejects RR files. We investigated what reading YES Power used for reconciliation. It was a slightly more complex situation than normal because originally CTCT was the losing retailer but there was some discussion that it was actually MERIs ICP, so everything was rolled back. Meridian accepted YES Powers' RR file therefore compliance is confirmed.

YES Power used the scaling process to switch on the same read but as per comments in **section 4.4**, actual data was overwritten.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.3

Code related audit information

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

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

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

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

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

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

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

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

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

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

Audit observation

The switching process for a Gaining Trader Switch was reviewed. The EDA file was examined for the audit period.

Audit commentary

YES Power did not gain any ICPs using this type of switch. Compliance confirmed based on a review of the process.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.3

Code related audit information

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

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

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

Audit observation

The switching process for a Gaining Trader Switch was reviewed. The EDA file was examined for the audit period.

Audit commentary

YES Power did not gain any ICPs using this type of switch. Compliance confirmed based on a review of the process.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

The switching process for a Gaining Trader Switch was reviewed. The EDA file was examined for the audit period.

Audit commentary

YES Power did not gain any ICPs using this type of switch. Compliance confirmed based on a review of the process.

Audit outcome

Compliant

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

Code reference

Clauses 17 and 18 Schedule 11.3

Code related audit information

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

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

- *for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):*
 - o *the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and*
 - o *the withdrawal advisory code published by the Authority. (clause 18(c)(ii))*
- *within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal. (clause 18(d))*
- *on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c).*

All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request. (clause 18(e))

- if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16. (clause 18(f))

Audit observation

The EDA file and Switch Breach report for the audit period was examined.

Audit commentary

The Switch Breach report did not record any late NW files.

YES Power sent 5 NW files and all of them were accepted. They received 12 NW files. The company did not respond within 5 business days for 0006053190RN813.

We reviewed all NW files; the correct reason codes were used.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|--|-----------------|------------------------|
| Audit Ref: 4.15 With: 17 of Schedule 11.3 From: 03-May-19 To: 06-May-19 | One AW file was late Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as strong. The audit risk rating is low because there is no impact on the settlement outcome | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Business rules and business processes were updated. Daily tasks make sure not to miss any manual processed files | | 31/05/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

4.16. Metering information (Clause 21 Schedule 11.3)

Code reference

Clause 21 Schedule 11.3

Code related audit information

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

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

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

Audit observation

The meter reading process in relation to the switching process was examined. All reads are received from MEPS.

Audit commentary

The company understands that it would be their responsibility to obtain any additional read and pay for it.

Audit outcome

Compliant

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

Code reference

Clause 11.15AA to 11.15AB

Code related audit information

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

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

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

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

Audit observation

YES Power is not part of the Switch saving protection. The customer retention process was reviewed.

Audit commentary

It was discussed during the audit. According to the process, a Customer Service member checks each NT received from the registry to see if it is received from a trader who is a member of the Switch Saving Protection. If they are, the customer won't be approached by YES Power to discuss a better option.

Audit outcome

Compliant

5. MAINTENANCE OF UNMETERED LOAD

5.1. Maintaining shared unmetered load (Clause 11.14)

Code reference

Clause 11.14

Code related audit information

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

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

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

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

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

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

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

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

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

Audit observation

We reviewed the LIS file dated 24/10/19 and the Audit Compliance report for the period covered by this audit.

Audit commentary

YESP has a policy of not taking on unmetered load ICPs. If there is UML found later, Customer Services will discuss with the customer the option of having metering put in place or to switch to another retailer. If this is not possible, YESP creates consumption based on the daily kWh information from the registry.

Audit outcome

Compliant

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

Code reference

Clause 10.14 (2)(b)

Code related audit information

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

Audit observation

We reviewed the LIS file dated 24/10/19 and the Audit Compliance report for the period covered by this audit.

Audit commentary

YES Power does not trade unmetered load ICPs.

Audit outcome

Compliant

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

Code reference

Clause 10.14 (5)

Code related audit information

If the unmetered load limit is exceeded the retailer must:

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

Audit observation

It was discussed with YES Power during the audit.

Audit commentary

The company is aware of their obligation and it will abide by the Code obligation.

Audit outcome

Compliant

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

Code reference

Clause 11 Schedule 15.3, Clause 15.37B

Code related audit information

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

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

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

Audit observation

The LIS file was reviewed. YES Power does not trade any distributed unmetered load and do not have plans to do so in the future.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

6. GATHERING RAW METER DATA

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

Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

Code related audit information

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

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

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

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

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

Audit observation

All installations traded by YES Power are metered. No subtraction method is used to determine submission information provided to the reconciliation manager.

Audit commentary

YES Power has 11 ICPs with solar panels installed. Import volumes are submitted to the RM. The profile used for submissions is HHR. Compliance confirmed by a review of the HHRAGGR file.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

The participant responsible for the metering installation must:

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

Audit observation

YES Power is not responsible for any GIPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

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

Audit observation

Reconciliation files analysis showed that YES Power submits volumes to the reconciliation manager using the HHR profile.

Audit commentary

No control devices are needed therefore they have never approached a MEP asking for a control device to be certified.

Audit outcome

Compliant

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

Code reference

Clause 10.43(2) and (3)

Code related audit information

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

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

Audit observation

All meter data is provided daily by MEPs (NGCM, FCLM, MTRX, and NGCM).

Audit commentary

Daily reports are created and reviewed to identify missing or “0” data. This could be caused by a bridged or faulty meter. Data can be displayed graphically which allows detection quite easily.

The company commented that no faulty meters were identified in the audit period.

Audit outcome

Compliant

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

Code reference

Clause 2 Schedule 15.2

Code related audit information

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

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

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

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

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

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

2(6) – The interrogation systems must record:

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

Audit observation

All data is gathered by MEPs on behalf of YES Power. It is automatically uploaded to their system.

Audit commentary

The clock synchronisation process is reviewed as a part of the MEPs audit. No non-compliances were identified.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

All validated meter readings must be derived from meter readings.

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

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

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

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

Audit observation

The data collection process was examined, meter data is provided by MEPS only.

Audit commentary

Yes Power does not collect data themselves and also does not accept customer reads. The only ICPs traded by YES Power are HHR.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 15.2

Code related audit information

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

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

Audit observation

YES Power has not started trading NHH ICPs.

Audit commentary

Compliance confirmed based on scenarios described in **section 12.11**.

Audit outcome

Compliant

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

Code reference

Clause 7(1) and (2) Schedule 15.2

Code related audit information

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

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

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

Audit observation

YES Power has not started trading NHH ICPs.

Audit commentary

The process for the monitoring of NHH reads is drafted. Compliance confirmed based on a process review.

Audit outcome

Compliant

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

Code reference

Clause 8(1) and (2) Schedule 15.2

Code related audit information

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

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

Audit observation

YES Power has not started trading NHH ICPs.

Audit commentary

The process for the monitoring of NHH reads is drafted. Robotron*esales has a functionality to create a Meter Frequency report. Compliance confirmed based on a process review.

Audit outcome

Compliant

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

Code reference

Clause 9(1) and (2) Schedule 15.2

Code related audit information

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

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

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

Audit observation

YES Power has not started trading NHH ICPs.

Audit commentary

The process for the monitoring of NHH reads is drafted. Robotron*esales has a functionality to create a Meter Frequency report. Compliance confirmed based on a process review.

Audit outcome

Compliant

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

Code reference

Clause 10 Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

YES Power has not started trading NHH ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 11(1) Schedule 15.2

Code related audit information

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

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

Audit observation

HHR data is collected by MEPs.

Audit commentary

Compliance with this clause has been demonstrated by MEPs as part of their audits.

Audit outcome

Compliant

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

Code reference

Clause 11(2) Schedule 15.2

Code related audit information

The following information is collected during each interrogation:

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

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

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

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

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

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

Audit observation

HHR data is collected by MEPs.

Audit commentary

Compliance with this clause has been demonstrated by MEPs as part of their audits.

AMS provides log files which are reviewed. No other MEPs provide log files, it is identified as non-compliance in **section 9.3**.

Audit outcome

Compliant

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

Code reference

Clause 11(3) Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

HHR data is collected by MEPs.

Audit commentary

Compliance with this clause has been demonstrated by MEPs as part of their audits.

Audit outcome

Compliant

7. STORING RAW METER DATA

7.1. Trading period duration (Clause 13 Schedule 15.2)

Code reference

Clause 13 Schedule 15.2

Code related audit information

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

Audit observation

YES Power receives HHR data from NGCM, FCLM, MTRX and ARCS. We reviewed a sample of files from NGCM and confirm that the trading period was 30 minutes.

Audit commentary

Compliance with this clause has been demonstrated by MEPs and is discussed in their audit.

Audit outcome

Compliant

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

Code reference

Clause 18 Schedule 15.2

Code related audit information

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

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

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

Audit observation

Meters are interrogated by MEPs who archive raw meter data.

Audit commentary

MEPs are responsible for meeting compliance with this clause. It is reviewed during their audits.

A copy of raw meter data will be kept by YES Power indefinitely. Access to the copy of raw meter data is locked.

Audit outcome

Compliant

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

Code reference

Clause 21(5) Schedule 15.2

Code related audit information

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

Audit observation

It was discussed during the audit. YES Power does not use non-metering information to determine profile data.

Audit commentary

No non-metering information is collected by YES Power.

Audit outcome

Compliant

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

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

Code reference

Clause 19(1) Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

YES Power haven't started trading NHH ICPs yet. We reviewed documentation in relation to NHH processes.

Audit commentary

According to the NHH process, the same as for HHR, if such a situation occurs that errors are detected, an additional meter read will be requested from a MEP.

Audit outcome

Compliant

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

Code reference

Clause 19(2) Schedule 15.2

Code related audit information

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

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

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

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

Audit observation

As described in **section 4.4**, in some cases the correction of switch event reads provided in RR files by YES Power are rejected by losing traders.

Audit commentary

To remedy the situation, YES Power developed a “scaling” process, which mean the difference between a switch event read and the actual read received from the MEP is apportioned across one or two days. It allows YES Power to switch on the same read but it creates non-compliance with this clause.

The company developed a very sophisticated algorithm to achieve this. The current process is first to negotiate with a losing trader by sending emails and RR files, if RR files re refused twice, the scaling algorithm is applied. The problem with the current Code is that losing traders have no obligation to accept a RR file containing an AML read if it is sent after 5BD. They don’t even have to give a reason for it.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 8.2 With: 19(2) of Schedule 15.2 From: 01-Dec-18 To: 15-Nov-19 | HHR actual data provided by MEPS is overwritten to accommodate a volume difference after RR files are rejected by losing traders Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as moderate because it results in non-compliance but in fact they are strong, well managed. The audit risk rating is low because there is no impact on the settlement outcome | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| More focusing on RR files to get the same read with the losing retailer. | | 01/11/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

Code reference

Clause 19(3) Schedule 15.2

Code related audit information

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

Audit observation

YES Power traders mainly category 1 metering installations and a small number of category 2.

Audit commentary

This was discussed during the audit. There are no error and loss compensations applied to these installations. robotron*esales has a built-in functionality to apply compensation factors if necessary.

Audit outcome

Compliant

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

Code reference

Clause 19(4) and (5) Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

YES Power receives a copy of raw data which is never overwritten. If data is corrected, a journal is created. Audit trails are discussed in **section 2.4**.

Audit commentary

The company stated that, there were no instances of HHR data which required correction/alteration.

Audit outcome

Compliant

9. ESTIMATING AND VALIDATING VOLUME INFORMATION

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

Code reference

Clause 3(3) Schedule 15.2

Code related audit information

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

Audit observation

Data received from MEPS is actual. Any estimated data received from MTRX is imported into their system but replaced by YES Power own estimation if actual data is not provided by the time of calculation of submission volumes.

Audit commentary

Compliance is confirmed based on viewing meter readings in the robotron *esales database. It was also reviewed as a part of scenarios described in **section 12.11**.

Audit outcome

Compliant

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

Code reference

Clause 3(4) Schedule 15.2

Code related audit information

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

3(4)(a) - validated meter readings

3(4)(b) - estimated readings

3(4)(c) - permanent estimates.

Audit observation

Volume information provided to the reconciliation manager is calculated based on validated meter readings or estimates. All data stored in robotron *esales and used for reconciliation purposes is validated.

Audit commentary

A review of submission volumes confirmed that it is based on readings as specified by this clause. The correctness of the calculation for volumes using meter readings was assessed when evaluating HHRAGGR.

Audit outcome

Compliant

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

Code reference

Clause 3(5) Schedule 15.2

Code related audit information

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

Audit observation

Metering data received from MEPs is not rounded or truncated after being imported to the system.

Audit commentary

We sampled meter reads for 2 ICPs from each of the MEP files and confirm that meter reads in robotron *esales matched original files. Meter data was not truncated or rounded.

Audit outcome

Compliant

9.4. Half hour estimates (Clause 15 Schedule 15.2)

Code reference

Clause 15 Schedule 15.2

Code related audit information

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

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

Audit observation

During the audit we discussed the methodologies used by YES Power for estimating HHR data when necessary.

Audit commentary

The methodology of data estimation has not changed since the last audit.

- Interpolation for small gaps.

Where the number of trading periods missing is below a threshold, currently 4, then the values will be created by an interpolation method. A straight line will be assumed between the neighbouring values. If meter reads are available, scaling will be performed to scale the inserted values according to the missing amounts.

- Copy from previous patterns (checking for holidays).

For gaps larger than the few periods estimated using interpolation, a pattern matching process will be applied. This will be like for like, so where a section of readings is missing for say Monday to Wednesday a similar pattern will be searched for over previous weeks. . If meter reads are available, scaling will be performed to scale the inserted values in order to match the missing amounts.

- Average consumption value.

Alternatively, if the above two methods cannot apply, such as when it is a newly switched ICP, robotron *sales will create consumption based on the average daily kWh information received with the CS file using a generic profile (type of customer).

- General consumption profile.

As a last resort, when there is no other information available, a general consumption profile representing an average customer pattern will be used.

We asked YES Power how often data is estimated. Their comment was:

In R0 about 7% of ICP show estimates which goes below 3% in R3/7. Therefore most of the estimates get washed up. In general, the months fluctuate a bit. In most cases a few hours up to a day are affected. After R3 we currently don't have any estimates larger 2 days. Regarding the reasons, for larger communication issues YESP follows up directly with MEPs.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

YES Power has not started trading NHH ICPs.

Audit commentary

YES Power already imports register reads from MEPs. Thorough validation of data is performed during upload such as high consumption, low, zero values, load curve.

Audit outcome

Compliant

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

Code reference

Clause 17 Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

Meters are electronically interrogated by MEPs. Data is uploaded automatically on a daily basis.

Audit commentary

The validation parameters have not changed since the last audit.

Robotron*esales is set up with the following validation types:

1. Missing values: All import objects are constantly checked for missing values for the duration of a valid contract. "Missing value"-status is set and can be checked by the user.
2. Unexpected zero values: The daily consumption is checked for the lower threshold of zero. Potential Bridged meters are thereby identified.
3. High values: Threshold for individual values is currently set to 100kWh and for daily sum to 1000kWh.
4. Compare to previous patterns: Deviation between daily sum and previous days sum must be lower than 500%
5. Receive unexpected data: If data for dates older than one month are received, they will not be automatically imported. The user is notified and has to accept it manually

Additionally all meter data could be view graphically, which is an efficient way of checking flow patterns for each customer.

Log files are not reviewed because only AMS provides log files. Other MEPs don't.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 9.6 With: 17 of Schedule 15.2 From: 16-Oct-18 To: 16-Oct-19 | No log files reviewed from FCLM, ARCS, and MTRX because they are not provided to them Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as moderate because YES Power did not make sure that log files were provided to them. The audit risk rating is low because there is no impact on the settlement outcomes | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Update server structure to pick up MEP log files | | 29/02/2020 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

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

Code reference

Clause 13.136

Code related audit information

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

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

Audit observation

YES Power is not a generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

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

Code reference

Clause 13.137

Code related audit information

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

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

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

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

Audit observation

YES Power is not a generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

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

Code reference

Clause 13.138

Code related audit information

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

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

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

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

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

Audit observation

YES Power is not a generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

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

Code reference

Clause 13.140

Code related audit information

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

Audit observation

YES Power is not a generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

11.1. Buying and selling notifications (Clause 15.3)

Code reference

Clause 15.3

Code related audit information

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

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

Audit observation

The LIS file dated 24/10/19 was reviewed to confirm profiles used.

Audit commentary

YES Power only uses the HHR profile.

Audit outcome

Compliant

11.2. Calculation of ICP days (Clause 15.6)

Code reference

Clause 15.6

Code related audit information

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

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

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

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

Audit observation

We examined the calculation of ICP days. YES Power provided GR-100 and ICPDAYS files for Dec'18 to Sept'19.

Audit commentary

There were no late submissions of AV-110 files.

The review of GR-100 showed that there are hardly any differences between ICP days calculated by YES Power and the registry. Those minor differences are caused by late switches.

Audit outcome

Compliant

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

Code reference

Clause 15.7

Code related audit information

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

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

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

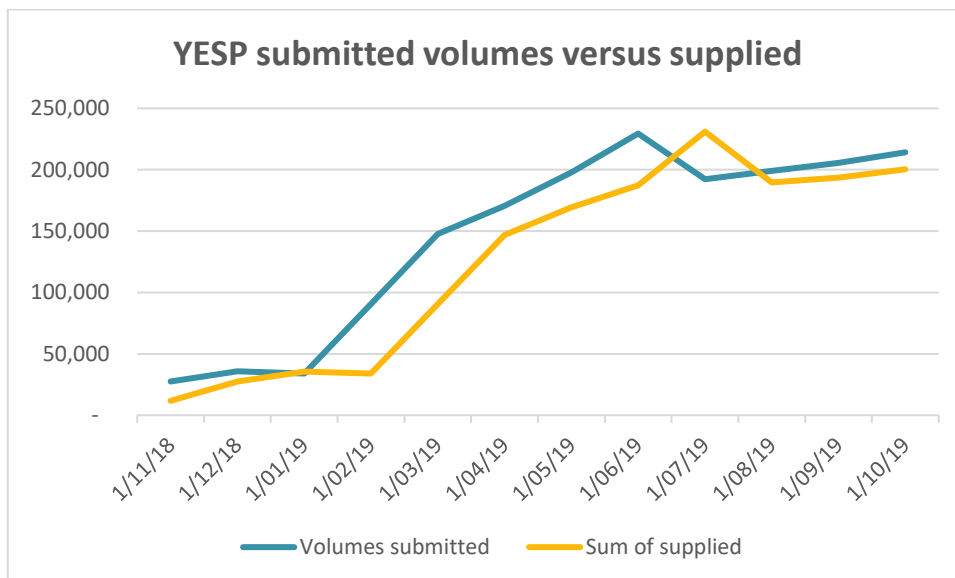
Audit observation

Every month YES Power submits BILLED file (AV-120) for the current month and scheduled revisions.

Audit commentary

There were no late submissions of AV-120 files.

The graph below shows volumes submitted and supplied for the audit period. Both files are offset by one month.



Audit outcome

Compliant

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

Code reference

Clause 15.8

Code related audit information

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

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

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

Audit observation

YES Power provided a set of submission files (AV140) for the month May'19 to Oct'19. We compared the volumes in HHRVOLS and HHRAGGR for selected months.

Audit commentary

We confirm, volumes in HHRVOLS and HHRAGGR matched well.

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

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| Audit Ref: 11.4 With: 15.8 From: 16-Oct-18 To: 15-Oct-19 | HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | YES Power submits submissions volumes as per the reconciliation manager specification. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| | | | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

12. SUBMISSION COMPUTATION

12.1. Daylight saving adjustment (Clause 15.36)

Code reference

Clause 15.36

Code related audit information

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

Audit observation

HHR data is collected by ARCS, FCLM, MTRX and NGCM. All data provided is daylight saving adjusted.

Audit commentary

Compliance with this clause has been demonstrated by ARCS and AMS as part of their MEP audit.

Audit outcome

Compliant

12.2. Creation of submission information (Clause 15.4)

Code reference

Clause 15.4

Code related audit information

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

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

Audit observation

YES Power provided reconciliation data for 6 months. We confirmed that volumes are submitted on day 4 and day 13 (all relevant revisions). NHHRVOLS, ICPDAYS, BILLED, HHRVOLS, and HHRAGGR files are submitted.

robotron*esales is used to create submission files.

Audit commentary

No breaches were recorded for the late provision of submission volumes.

Robotron*esales imports the EDA file from the registry every day which allows them to have the two data sets in sync.

Audit outcome

Compliant

12.3. Allocation of submission information (Clause 15.5)

Code reference

Clause 15.5

Code related audit information

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

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

Audit observation

We examined both HHRVOLS and HHRAGGR for May'19 and Oct'19.

Audit commentary

The company receives daily updates from the registry and any discrepancies are resolved. This approach allows the company to have volumes allocated for each ICP to the NSP indicated by the data held in the registry for the period when YES Power is responsible for the ICPs.

Audit outcome

Compliant

12.4. Grid owner volumes information (Clause 15.9)

Code reference

Clause 15.9

Code related audit information

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

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

Audit observation

YES Power is not a grid owner.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

12.5. Provision of NSP submission information (Clause 15.10)

Code reference

1057359 v7

Clause 15.10

Code related audit information

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

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

Audit observation

YES Power is not an embedded network owner.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

12.6. Grid connected generation (Clause 15.11)

Code reference

Clause 15.11

Code related audit information

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

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

Audit observation

Yes Power is not a grid connected generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

12.7. Accuracy of submission information (Clause 15.12)

Code reference

Clause 15.12

Code related audit information

If the reconciliation participant has submitted information and then subsequently obtained more accurate information, the participant must provide the most accurate information available to the

reconciliation manager or participant, as the case may be, at the next available opportunity for submission (in accordance with clauses 15.20A, 15.27, and 15.28).

Audit observation

We reviewed the schedule of reconciliation submissions used by YES Power. Every month, on day 13th, revision files are submitted for the relevant month. The company also provided the GR-170HHR file from the reconciliation manager.

Audit commentary

We confirm that YES Power submits revision files to the reconciliation manager. We reviewed the initial and revision reconciliation files for May'19 to Oct'19 and analysed the GR-170HHR.

In **section 4.4** we described how the scaling process works. If the difference is below 2 kWh no scaling is performed, therefore they do not switch on the same read, which means it is possible this could result in small inaccuracies.

Audit outcome

Non-compliant

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 12.7 With: 15.12 From: 01-Dec-18 To: 15-Nov-19 | Some volumes could be inaccurate due to the scaling process algorithm Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as moderate because of non-compliance in section 8.2. The audit risk rating is low because there is no impact on the settlement outcome | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The process was adjusted, readings will be rounded to a whole number and then scaling will be done without threshold. In future focus will be on RR file acceptance. | | | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

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

Code reference

Clause 4 Schedule 15.2

Code related audit information

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

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

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

Audit observation

YES Power has not traded NHH ICPs yet.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 2 Schedule 15.3

Code related audit information

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

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

Audit observation

We reviewed submission files for HHR ICPs created by YES Power for the audit period.

Audit commentary

YES Power submits HHRAGGR, HHRVOLS, ICPDAYS, and BILLED. All volumes are submitted using the HHR profile. The company does not trade UML, SUML or NHH ICPs.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 15.3

Code related audit information

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

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

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

Audit observation

At the time of this audit YES Power had not traded NHH ICPs yet.

Audit commentary

The system has the functionality to create AV-080 files which were tested in the test system.

Audit outcome

Compliant

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

Code reference

Clause 4 and 5 Schedule 15.3

Code related audit information

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

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

Audit observation

YES Power has not traded any NHH ICPs yet.

Audit commentary

For the assessment of compliance with this clause we provided YES Power with a set of scenarios to validate the accuracy of the calculation of historical and forward estimation for NHH ICPs. The scenarios were tested in the test system using test data. The results are shown below:

| Ref | Test | Comments | Result of Audit |
|-----|---|--|--------------------|
| 1 | Switch in during the month with estimated switch read, actual read gained in the next month, full profile data available. | Confirm that HE is calculated for the relevant part of the month, even though the switch in read is an estimate, and calculation begins on correct day | Compliant |
| 2 | Switch in during the month with actual switch read, actual read gained in the next month, full profile data available. | Confirm that HE is calculated for the relevant part of the month, and calculation begins on correct day | Compliant |
| 3 | Status change to active during the month, read gained in the next month, full profile data available | Confirm that HE is calculated for the relevant part of the month | Scenario not found |
| 4 | Switch out on estimate during the month | Confirm that HE is calculated even though the reading is an estimate Confirm that HE calculation ends on the correct day. | Compliant |
| 5 | Switch out on actual during the month | Confirm that HE is calculated for the relevant part of the month, and calculation ends on correct day | Compliant |
| 6 | Complete month without a read in the month | Read in the previous month and the month after, confirm correct HE for the month | Compliant |
| 7 | Complete month with a read during the month | Confirm the two calculations for the month are correct | Compliant |
| 8 | GXP change during the month | Confirm submission against one GXP for part month then the other GXP for part month, with correct HE/FE balance on each | Compliant |
| 9 | Switch in 2 months ago, first actual read gained in current month, profile data not available for current month | Confirm estimation is shown as forward, not historical | Scenario not found |

| | | | |
|----|--|--|--------------------|
| 10 | Meter change during month | Confirm estimation is calculated for both meters, and summed correctly | Compliant |
| 11 | Half-hour meter installed during month | NHH meters is replaced by HHR meter. Confirm that volumes of a day when meters were swapped were fully reconciled. | Compliant |
| 12 | Two reads in the same month | Confirm usage between two reads is 'Historic' even if no profile data is available | Compliant |
| 13 | ICP days for all HE scenarios above | Confirm ICP days calculations are correct | Compliant |
| 14 | GXP change backdated | Confirm usage is shown against correct GXP for the time of usage | Compliant |
| 15 | Unmetered load submission | Check that this works the same as a normal meter and is considered HE | Scenario not found |
| 16 | CS read modified by RR | Confirm that consumption is updated to match RR read replacing CS | Compliant |

Audit outcome

Compliant

12.12. Forward estimate process (Clause 6 Schedule 15.3)

Code reference

Clause 6 Schedule 15.3

Code related audit information

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

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

Audit observation

YES Power has not started trading NHH ICPs yet.

Audit commentary

During the testing of scenarios in **section 12.11**, YES Power described methods of forward estimates to be implemented if necessary.

Audit outcome

Compliant

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

Code reference

Clause 7 Schedule 15.3

Code related audit information

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

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

Audit observation

Yes Power was using the HHR profile for submissions only.

Audit commentary

The company fully understands their obligations in a situation when the profile associated with a meter is changed. The RPS and PV1 profiles will be used when the company gains NHH ICPs.

Audit outcome

Compliant

13. SUBMISSION FORMAT AND TIMING

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

Code reference

Clause 8 Schedule 15.3

Code related audit information

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

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

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

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

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

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

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

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

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

Audit observation

YES Power creates HHR submissions using robotron*esales. It is the same software which will be used when YES Power starts trading NHH ICPs.

We reviewed HHR files for May'19 to Oct'19.

Audit commentary

We reviewed files and confirm that the format of submission files is compliant. We reviewed HHRVOLS and HHRAGGR in **section 11.4**. ICP days we reviewed in **section 11.2**.

Audit outcome

Compliant

13.2. Reporting resolution (Clause 9 Schedule 15.3)

Code reference

Clause 9 Schedule 15.3

Code related audit information

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

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

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

Audit observation

robotron*esales rounds submission information to two decimal places. It is done after all data aggregation per NSP and loss factor code is complete.

Audit commentary

Compliance confirmed after a review of submission files (HHRAGGR, HHRVOLS, and BILLED) confirmed that submission data is rounded to two decimal places.

Audit outcome

Compliant

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

Code reference

Clause 10 Schedule 15.3

Code related audit information

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

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

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

Audit observation

At the time of the audit, YES Power was only trading HHR ICPs.

Audit commentary

The company has a full understanding of the requirements specified by this clause. The NHH processes are documented and were reviewed during the audit. We found them compliant.

Audit outcome

Compliant

CONCLUSION

PARTICIPANT RESPONSE