

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

METLIFECARE GREENWOOD RETIREMENT
VILLAGE TAURANGA
AND CONTACT ENERGY

Prepared by: Steve Woods

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Date audit report completed: 16 April 2021

Audit report due date: 12-Jun-20

TABLE OF CONTENTS

Executive summary	3
Audit summary	4
Non-compliances	4
Recommendations	4
Issues 4	
1. Administrative	6
1.1. Exemptions from Obligations to Comply with Code	6
1.2. Structure of Organisation	6
1.3. Persons involved in this audit.....	7
1.4. Hardware and Software	7
1.5. Breaches or Breach Allegations.....	7
1.6. ICP Data	7
1.7. Authorisation Received	7
1.8. Scope of Audit	7
1.9. Summary of previous audit	8
1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F).....	9
2. DUML database requirements.....	11
2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)	11
2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)	12
2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)	12
2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)	12
2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)	13
2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)	14
2.7. Audit trail (Clause 11(4) of Schedule 15.3).....	14
3. Accuracy of DUML database	15
3.1. Database accuracy (Clause 15.2 and 15.37B(b))	15
3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))	16
Conclusion	18
Participant response	19

EXECUTIVE SUMMARY

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

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

Contact Energy has an excel spreadsheet to track the lamps at Greenwood.

The field audit was undertaken of all of the Greenwood distributed unmetered load, consisting of 136 items of load on 21st March 2021.

Contact reconciles this DUML load using the RPS profile and are using the registry information, which is updated to match the database kW multiplied by an estimated 11.5 hours per day. The methodology is correct, but the database is not accurate, as recorded in Sections 2.5 and 3.1.

The total under submission is 1,230 kWh per annum due to 12 additional lights identified by the field audit.

There were five non-compliances found and no recommendations were made. The future risk rating of 11 indicates that the next audit be completed in 12 months. I recommend Contact updates the database with the missing lights, and the next audit is conducted in 24 months.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Distributed unmetered load audits	1.10	16A.26 and 17.295F	DUML audit not completed within the required timeframe.	Weak	Low	3	Cleared
Deriving submission information	2.1	11.1 of schedule 15.3	DUML database is not up to date. 12 additional lights identified by the field audit resulting in under submission by 1,230 kWh per annum.	Moderate	Low	2	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	12 additional items of load found in the field not recorded in the database.	Moderate	Low	2	Identified
Database Accuracy	3.1	15.2 and 15.37B(b)	12 additional items of load found in the field that would result in an estimated under submission of 1,230 kWh per annum.	Moderate	Low	2	Identified
Volume information accuracy	3.2	15.2 & 15.37B(c)	DUML database is not up to date. 12 additional lights identified by the field audit resulting in under submission by 1,230 kWh per annum.	Moderate	Low	2	Identified
Future Risk Rating						11	

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

RECOMMENDATIONS

Subject	Section	Description	Remedial Action
		Nil	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

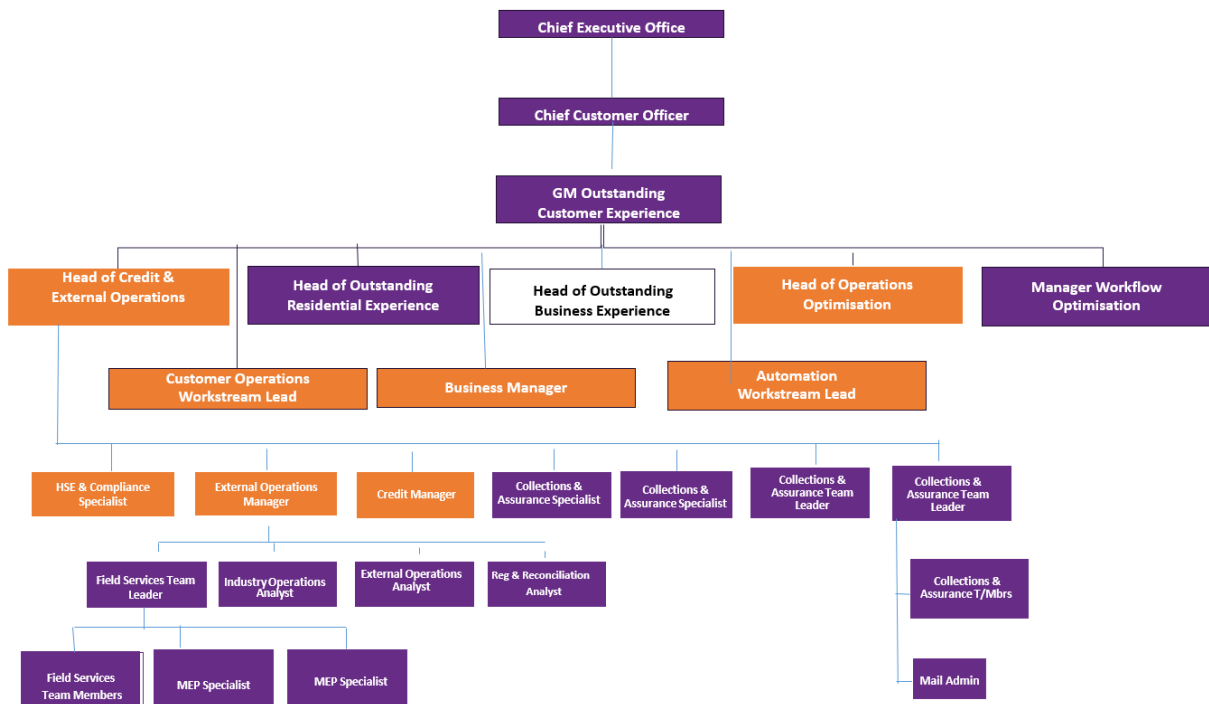
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit commentary

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

1.2. Structure of Organisation

Contact provided a copy of their organisational structure:



1.3. Persons involved in this audit

Auditor:

Name	Title
Steve Woods	Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Luke Cartmell-Gollan	Commercial Operations Manager	Contact Energy

1.4. Hardware and Software

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

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	Profile	Database number of items of load	Database wattage (watts)
0000544421TU1DA	GREENWOOD PARK LANE ST LIGHTS	RPS	136	3,264
Total			136	3,264

1.7. Authorisation Received

All information was provided directly by Contact.

1.8. Scope of Audit

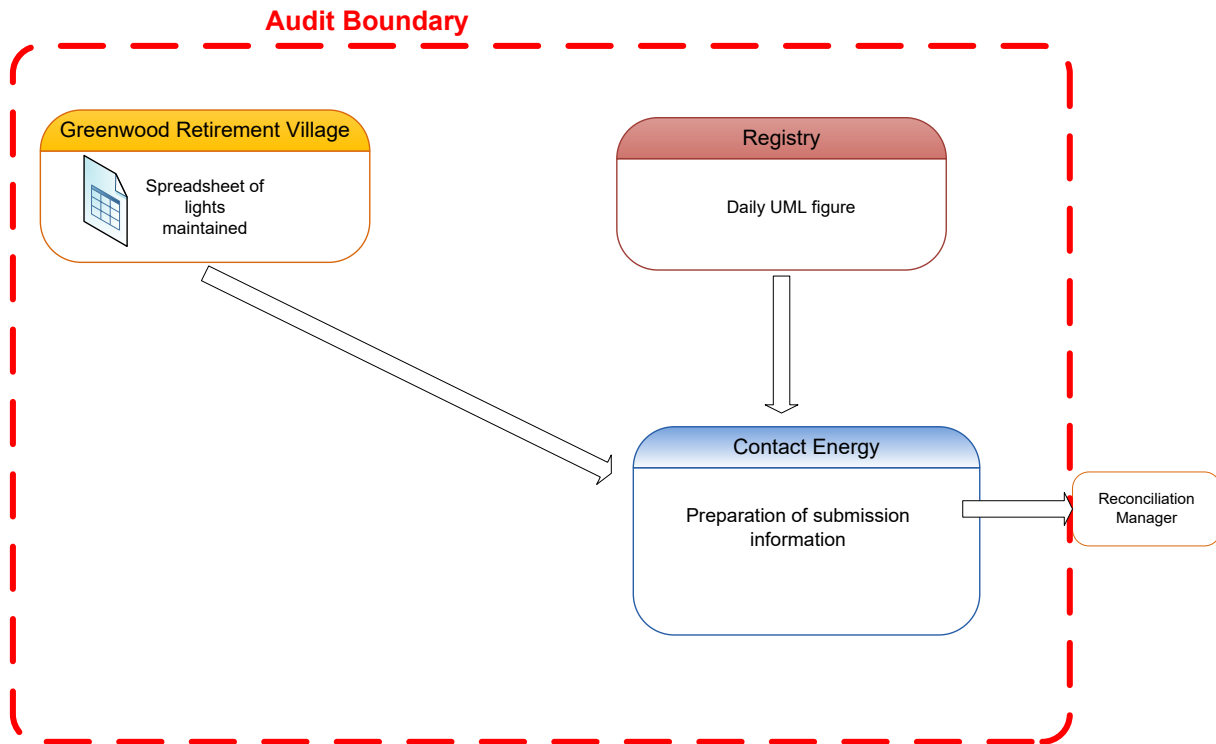
This audit of the Metlifecare Greenwood Retirement Village DUMML database and processes was conducted at the request of Contact, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

Contact Energy have created a database to track the lamps at Greenwood. The information recorded on the registry is being used for submission until the field audit undertaken for this audit confirmed the database to be correct.

Any changes made to the field are updated in the spreadsheet maintained by the Village Manager and these updates are expected to be provided to Contact.

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



The field audit was undertaken of the entire Greenwood Village spreadsheet, consisting of 136 items of load on 21st March 2021.

1.9. Summary of previous audit

The previous audit was conducted in December 2018 by Rebecca Elliot of Veritek Limited. The table below shows that the non-compliances are still existing.

Subject	Section	Clause	Non-Compliance	Status
Distributed unmetered load audits	1.10	16A.26 and 17.295F	DUML audit not completed within the required timeframe.	Still existing
Deriving submission information	2.1	11.1 of schedule 15.3	DUML database is not up to date.	Still existing
All load recorded in database	2.5	11(2A) of Schedule 15.3	31 additional items of load found in the field not recorded in the database.	Still existing

Subject	Section	Clause	Non-Compliance	Status
Database Accuracy	3.1	15.2 and 15.37B(b)	31 additional items of load found in the field that would result in an estimated under submission of 3,178 kWh per annum if this were used for submission.	Still existing
Volume information accuracy	3.2	15.2 & 15.37B(c)	DUML database not used to calculate submission.	Still existing

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Contact have requested Veritek to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database, but it was not completed by June 12th 2020 as specified by the Electricity Authority.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 12-Jun-20 To: 21-Mar-21	DUML audit not completed within the required timeframe. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating
Low	The controls are rated as weak. The delay was due to late provision of the database to be audited. The impact is assessed to be low based on the under submission recorded in Section 2.1.

Actions taken to resolve the issue	Completion date	Remedial action status
Client engaged to support the DUML audit process and sufficient data provided to Veritek to facilitate the audit.	31/3/2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>This particular ICP is switching away, so no preventative action can be taken regarding this particular database and ICP.</p> <p>Schedule and timelines agreed between Simply Energy and Veritek for all future Audits required. This follows the transition of DUML ICPs to the CTCS code managed by Simply Energy.</p>	31/3/2021	

2. DUMML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

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

Audit commentary

Contact reconciles this DUMML load using the RPS profile and are using the registry information, which is updated to match the database kW multiplied by an estimated 11.5 hours per day. The methodology is correct, but the database is not accurate, as recorded in Sections 2.5 and 3.1.

The total under submission is 1,230 kWh per annum due to 12 additional lights identified by the field audit.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.1 of schedule 15.3 From: 01-Dec-18 To: 21-Mar-21	DUMML database is not up to date. 12 additional lights identified by the field audit resulting in under submission by 1,230 kWh per annum. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor at 1,230 kWh per annum under submission; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Client has been advised of the additional lights that need to be added to their excel database. (NB: This ICP is switching effective 1/4/2021)		31/3/21	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
N/a Switch in progress at the time of receiving audit.		

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

Code reference

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

Code related audit information

The DUMML database must contain:

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

Audit observation

The database was checked to confirm the correct ICP was recorded.

Audit commentary

The database has only one ICP associated with it and this is recorded in the spreadsheet.

outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database has a field for street name, location description, and GPS coordinates, all of which are populated for all items.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUMML database must contain:

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

Audit observation

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

Audit commentary

The database contains a Lamp description, lamp wattage and lamp ballast fields. These fields are populated for every item in the spreadsheet.

The accuracy of wattage and ballasts in the database is discussed in **section 3.1**.

Audit outcome

Compliant

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of the entire database of 136 items of load on 21st March 2021.

Audit commentary

The field audit findings found 12 more lights than is recorded in the Contact database. These items of load have been provided to Contact to review and update their database. The database accuracy is discussed in **section 3.1**. This is recorded as non-compliance below.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Dec-18 To: 21-Mar-21	12 additional items of load found in the field not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor at 1,230 kWh per annum under submission; therefore the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
Client has been advised of the additional lights that need to be added to their excel database. (NB: This ICP is switching effective 1/4/2021)	31/3/21	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/a Switch in progress at the time of receiving audit.		

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The maintenance of the Greenwood Village lights is managed privately. The Village Manager provides updates in relation to these lights and Contact maintains separate versions of the spreadsheet to show the changes.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The spreadsheet was checked for audit trails.

Audit commentary

The spreadsheet has a complete audit trail.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

A 100% field audit was undertaken of the spreadsheet.

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

Audit commentary

The 100% field audit found 12 more items in the field than is recorded in the spreadsheet resulting in a database accuracy of 108.11% (8.11% more lights found in the field than recorded in the database). This results in under submission of 1,230 kWh per annum.

Wattages for all items of load were checked against the published standardised wattage table produced by the Electricity Authority and found to be correct.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Dec-18 To: 21-Mar-21	12 additional items of load found in the field that would result in an estimated under submission of 1,230 kWh per annum. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor at 1,230 kWh per annum under submission; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status

Client has been advised of the additional lights that need to be added to their excel database. (NB: This ICP is switching effective 1/4/2021)	31/3/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/a Switch in progress at the time of receiving audit.		

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

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

Audit commentary

Contact reconciles this DUML load using the RPS profile and are using the registry information, which is updated to match the database kW multiplied by an estimated 11.5 hours per day. The methodology is correct, but the database is not accurate, as recorded in Sections 2.5 and 3.1.

The total under submission is 1,230 kWh per annum due to 12 additional lights identified by the field audit.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 & 15.37B(c) From: 01-Dec-18 To: 21-Mar-21	DUML database is not up to date. 12 additional lights identified by the field audit resulting in under submission by 1,230 kWh per annum. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor at 1,230 kWh per annum under submission; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Client has been advised of the additional lights that need to be added to their excel database. (NB: This ICP is switching effective 1/4/2021)		31/3/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
N/a Switch in progress at the time of receiving audit.			

CONCLUSION

Contact Energy has an excel spreadsheet to track the lamps at Greenwood.

The field audit was undertaken of all of the Greenwood distributed unmetered load, consisting of 136 items of load on 21st March 2021.

Contact reconciles this DUML load using the RPS profile and are using the registry information, which is updated to match the database kW multiplied by an estimated 11.5 hours per day. The methodology is correct, but the database is not accurate, as recorded in Sections 2.5 and 3.1.

The total under submission is 1,230 kWh per annum due to 12 additional lights identified by the field audit.

There were five non-compliances found and no recommendations were made.

PARTICIPANT RESPONSE

Contact acknowledges its responsibility in the audit being completed late.

Unfortunately the audit results were received after this ICP was in the progress of switching away from Contact, which makes it very difficult to provide any commentary regarding taking preventative action for future submissions.