ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

NZTA WAIRARAPA AND CONTACT ENERGY LIMITED

Prepared by: Tara Gannon

Date audit commenced: 27 February 2020

Date audit report completed: 16 April 2020

Audit report due date: 1 June 2020

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EXECUTIVE SUMMARY

This audit of the **NZTA Wairarapa** 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. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information.

A Microsoft Access database is held by Dave Patten, on behalf of NZTA. Dave maintains this database in his capacity as a contractor to Power Services Wairarapa (PSW). PSW complete all fieldwork for the NZTA lights, with assistance from Fulton Hogan as required e.g. if repairs are needed following a major incident such as a pole being knocked down. When changes are made, PSW inform Dave Patten via email, who updates the Access database. Fulton Hogan is also advised, and they update RAMM for completeness. RAMM is not used for DUML processes for NZTA Wairarapa.

The NZTA Wairarapa DUML database contains two ICPs, which are currently supplied by different retailers. This audit report considers only 0020909000WR49A, which has been supplied by Contact since 12/11/19. A separate audit report has been created for Genesis Energy for 0666002555PC35F.

ICP	Property Name	NSP	Trader	Wattage	Light count
0020909000WR49A	TRANSIT NEW ZEALAND STREET LIGHTING	MST0331	CTCT 12/11/19 onwards GENE up to 11/11/19	4,987 W	33
0666002555PC35F	OFF POLE 818826 STATE HIGHWAY 2	GYT0331	GENE	6,768 W	41

A field audit was conducted of all 33 items of load connected to the MST0331 GXP. 100% accuracy was confirmed.

There is no regular reporting from the database to Contact. Contact reconciles the load for ICP 0020909000WR49A as standard unmetered load, using the RPS profile and the daily unmetered kWh recorded on the registry.

Four non-compliances were identified, and no recommendations were raised. The future risk rating of 15 indicates that the next audit be completed in 12 months. I recommend that the next audit is completed in a minimum of 12 months (01/06/2021 at the earliest), to allow time to investigate and confirm the correct ICPs for all NZTA lights within the region.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	Submissions are not calculated based on database information, and no database extracts are supplied to Contact. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331) which is supplied by Genesis Energy.	Weak	Medium	6	Identified
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify: 1) the user who made the data change, and 2) the date and time of the data change.	Strong	Low	1	Investigating
Database accuracy	3.1	15.2 and 15.37B(b)	32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331).	Moderate	Low	2	Identified
Volume information accuracy	3.2	15.2 and 15.37B(c)	Submissions are not calculated based on database information. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331).	Weak	Medium	6	Identified
Future Risk Rating						15	

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	Recommendation
		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

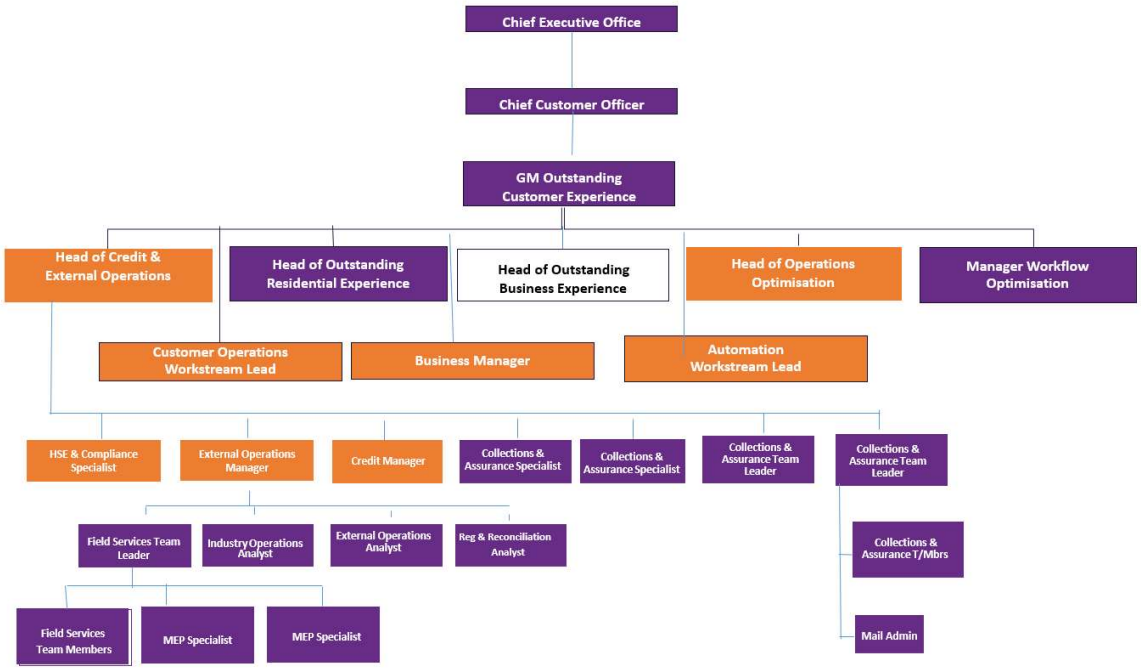
Current code exemptions were reviewed on the Electricity Authority website.

Audit commentary

There are no exemptions relevant to the scope of this audit. The DUML load is settled as NHH with the RPS profile.

1.2. Structure of Organisation

Contact Energy provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditor:

Tara Gannon

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Dave Patten	Project Manager	Sole Trader
Bernie Lett	Director	Power Services Wairarapa
Allie Jones	External Operations	Contact Energy

1.4. Hardware and Software

The Microsoft Access database used for the management of DUML is hosted by Dave Patten. Dave is a sole trader and confirmed that the database back-up is to a separate machine. Access to the database is restricted to Dave Patten.

Systems used by the trader to calculate submissions are assessed as part of their reconciliation participant audits.

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

The NZTA Wairarapa DUML database contains two ICPs, which are currently supplied by different retailers. This audit report considers only 0020909000WR49A, which has been supplied by Contact since 12/11/19. A separate audit report has been created for 0666002555PC35F.

ICP Number	Description	Trader	NSP	Profile	Number of items of load	Database wattage (watts)
0020909000WR49A	TRANSIT NEW ZEALAND STREET LIGHTING	CTCT	MST0331	RPS	33	4,987
0666002555PC35F	OFF POLE 818826 STATE HIGHWAY 2	GENE	GYT0331	UNM	41	6,768
Total					74	11,755

1.7. Authorisation Received

All information was provided directly by Contact, Dave Patten or PSW.

1.8. Scope of Audit

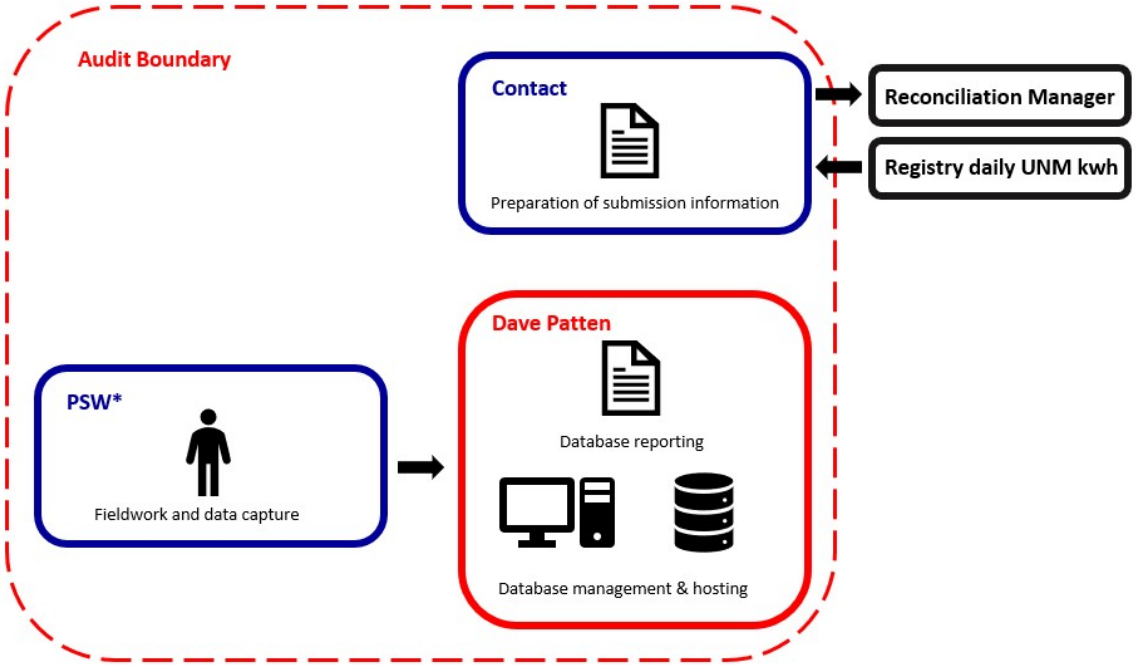
This audit of the NZTA Wairarapa DUML database and processes was conducted at the request of Contact in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied. The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A Microsoft Access database is held by Dave Patten, on behalf of NZTA. Dave maintains this database in his capacity as a contractor to Power Services Wairarapa (PSW). PSW complete all fieldwork for the NZTA lights, with assistance from Fulton Hogan as required e.g. if repairs are needed following a major incident such as a pole being knocked down. When changes are made, PSW inform Dave Patten via email, who updates the Access database. Fulton Hogan is also advised, and they update RAMM for completeness. RAMM is not used for DUML processes for NZTA Wairarapa.

There is no regular reporting from the database to Contact. Contact reconciles the load for ICP 0020909000WR49A as standard unmetered load, using the RPS profile and the daily unmetered kWh recorded on the registry.

The NZTA Wairarapa DUML database contains two ICPs, which are currently supplied by different retailers. This audit report considers only 0020909000WR49A, which has been supplied by Contact since 12/11/19. A separate audit report has been created for Genesis Energy for 0666002555PC35F.

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



*with assistance from Fulton Hogan as required

A field audit was conducted of all 33 items of load connected to the MST0331 GXP on 27 February 2020.

1.9. Summary of previous audit

The previous audit of this database was undertaken by Tara Gannon of Veritek Limited in March 2018, and covered both the Genesis and Contact ICPs. The summary table below shows the statuses of the non-compliances raised in the previous audit. Further comment is made in the relevant sections of this report.

Subject	Section	Clause	Non-compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	1) Submissions for ICP 0666002555PC35F are not based on an unmetered load database. 2) In February 2018, the submission to the reconciliation manager was based on incorrect information. 3) November and December 2017 submissions for ICP 0020909000WR49A were based upon incorrect data.	Refer to the Genesis audit for this database: 1) Still existing. 2) Cleared. 3) A correction has been processed and revised submission data will be washed up.
Volume information accuracy	3.2	15.2 and 15.37B(c)	1) Submissions for ICP 0666002555PC35F are not based on an unmetered load database. 2) In February 2018, the submission to the reconciliation manager was based on incorrect information. 3) November and December 2017 submissions for ICP 0020909000WR49A were based upon incorrect data.	Refer to the Genesis audit for this database: 1) Still existing. 2) Cleared. 3) A correction has been processed and revised submission data will be washed up.

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 within the required timeframe.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

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

Audit commentary

Contact reconciles the load for ICP 0020909000WR49A as standard unmetered load, using the RPS profile and the daily unmetered kWh recorded on the registry.

I compared the registry information used for submission and database values, and I found that use of the registry values resulted in potential over submission of 20,354.3 kWh p.a. for 0020909000WR49A as shown in the table below.

Source	Daily unmetered kWh	kW	Estimated annual kWh[1]
Database	-	4.987	21,299.5
Registry/submission	114.12	-	41,653.8
Difference			**-20,354.3**

Some inaccurate ICP numbers were identified in the database, but there is no impact on submission because the database is not used. 32 of the 41 items of load with Powerco GXP = TP Greytown had ICP 0020909000WR49A recorded, but were expected to be recorded with ICP 0666002555PC35F which is supplied by Genesis Energy. I confirmed that the Powerco GXPs for these items were correct and the ICP numbers were incorrect, and this is recorded as non-compliance below.

No database extracts are provided to Contact.

Audit outcome

Non-compliant

[1] Based on estimated annual on hours of 4,271 for the database.

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 27-Feb-20 To: 27-Feb-20	Submissions are not calculated based on database information, and no database extracts are supplied to Contact. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331) which is supplied by Genesis Energy. Potential impact: High Actual impact: Unknown Audit history: Twice Controls: Weak Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate. The risk is medium based on the 20,354.3 kWh per annum difference between the database and registry information used for submission. The incorrect ICP numbers currently have no impact because the database information is not used for submission.

Actions taken to resolve the issue	Completion date	Remedial action status
Contact will engage with PSW in order to facilitate a monthly report from the database to ensure our settlement information is based on the DUML database information. As part of this engagement we will also arrange for the 32 items of load with incorrect ICP / GXP references to be corrected.	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

An ICP and GXP is recorded for each item of load in the database. The accuracy of ICP identifiers is discussed in **sections 2.1, 3.1** and **3.2**.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database contains a street address and location for each item of load. I was able to locate all items of load during the field audit.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The database was checked to confirm that:

- it contained a field for light type and wattage capacity,
- wattage capacities include any ballast or gear wattage, and
- each item of load has a light type, light wattage, and gear wattage recorded.

Audit commentary

A lamp description and size (including make and model) and lamp and gear wattages are recorded in the database for all items of load.

All items of load recorded in the database were surveyed in the field, and the database was found to be 100% accurate. No inaccurate wattage information was identified during the database review.

Audit outcome

Compliant

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

A field audit was conducted of all 33 items of load connected to the MST0331 GXP on 27 February 2020.

Audit commentary

The field audit did not find any differences between the information recorded in the database, and the lights present in the field.

Audit outcome

Compliant

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database functionality achieves compliance with the code. The database records a "last changed date" which indicates the date that the work was carried out, and it is possible to retrospectively determine the lights that were installed on a given date using this information.

The change management process is detailed in **section 3.1**.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

The Access database does not contain an audit trail, but before and after values are maintained within the database, and also retained in the monthly database extracts.

The detail sheets of the database extracts have an audit trail, which includes the new values and last lamp change date. The summary sheet contains notes briefly describing changes since the last database extract.

Non-compliance is recorded because:

1) the user is not specified (however only Dave Patten maintains the database), and
2) the date and time of the data change is not specified, only the date of the physical lamp change.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 27-Feb-20 To: 27-Feb-20	The available audit trails do not specify: 1) the user who made the data change, and 2) the date and time of the data change. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as strong, because the user who made the change and the approximate date and time of the change can be determined from other information which is available. The impact is assessed to be low based on the nature and type of non-compliance, and because only one user is maintaining the database.

Actions taken to resolve the issue	Completion date	Remedial action status
Contact will investigate with PSW regarding whether the current DUML Database is able to be enhanced to include a suitable audit trail.	March 2021	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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

Contact reconciles the load for ICP 0020909000WR49A as standard unmetered load, using the RPS profile and the daily unmetered kWh recorded on the registry.

A database extract was provided in February 2020 and I assessed the accuracy of this by using the DUML Statistical Sampling Guideline. The table below shows the survey plan.

Plan Item	Comments
Area of interest	NZTA Wairarapa streetlights connected to the MST0331 GXP (ICP 0020909000WR49A)
Strata	The database contains 33 items of load connected to the MST0331 GXP (ICP 0020909000WR49A). All 33 items of load were checked.
Area units	Not applicable, all 33 items of load were checked.
Total items of load	All 33 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority against the database or in the case of LED lights against the LED light specification.

The change management process and timeliness of database updates was evaluated.

Audit commentary

Field audit findings

All lights recorded in the database were surveyed in the field, and the database was found to be 100% accurate.

Light description and capacity accuracy

As discussed in **section 2.4**, a lamp description and size (including make and model) and lamp and gear wattages are recorded in the database for all items of load. No inaccurate wattage information was identified during the database review.

ICP number accuracy

The NZTA Wairarapa DUML database contains two ICPs

- 0666002555PC35F (GYT0331), which is supplied by Genesis; and
- 0020909000WR49A (MST0331), which is supplied by Contact Energy.

The database records the Powerco GXP description, ICP, and location for each item of load. I checked the consistency between these fields for each item of load. I found that 32 of the 41 items of load with Powerco GXP = TP Greytown had ICP 0020909000WR49A recorded. I confirmed that the Powerco GXPs

for these items were correct and the ICP numbers were incorrect, and this is recorded as non-compliance below.

Change management process findings

PSW complete all fieldwork for the NZTA lights, with assistance from Fulton Hogan as required e.g. if repairs are needed following a major incident such as a pole being knocked down. When changes are made, PSW inform Dave Patten via email, who updates the database. There are very few new connections or changes.

Night patrols are completed monthly by Dave Patten, who reports any maintenance issues arising to PSW. The normal email process is followed to advise Dave of any changes made.

There are no immediate plans for widespread upgrades to occur. Where repair or maintenance activity requires a lamp to be replaced and PSW is unable to source a light of the same type, an LED is used.

The database records a "last changed date" which indicates the date that the work was carried out, and it is possible to retrospectively determine the lights that were installed on a given date using this information.

Festive and private lights

There are no private or festive lights for NZTA Wairarapa.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 27-Feb-20 To: 27-Feb-20	32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331). Potential impact: High Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as moderate. The ICP number missed being updated when the GXP was updated, creating a discrepancy. The impact is assessed to be low because the correct GXPs are recorded. There is no impact on submission because the database information is not used for submission.

Actions taken to resolve the issue	Completion date	Remedial action status
Contact will engage with PSW in order to facilitate a monthly report from the database to ensure our settlement information is based on the DUML database information. As part of this engagement we will also arrange for the 32 items of load with incorrect ICP / GXP references to be corrected.	Dec 2020	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

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

Audit commentary

Contact reconciles the load for ICP 0020909000WR49A as standard unmetered load, using the RPS profile and the daily unmetered kWh recorded on the registry. The correct profiles and submission types are recorded on the registry.

I compared the registry information used for submission and database values, and I found that use of the registry values resulted in potential over submission of 20,354.3 kWh p.a. for 0020909000WR49A as shown in the table below.

Source	Daily unmetered kWh	kW	Estimated annual kWh[2]
Database	-	4.987	21,299.5
Registry/submission	114.12	-	41,653.8
Difference			**-20,354.3**

Some inaccurate ICP numbers were identified in the database, but there is no impact on submission because the database is not used. 32 of the 41 items of load with Powerco GXP = TP Greytown had ICP 0020909000WR49A recorded, but were expected to be recorded with ICP 0666002555PC35F which is supplied by Genesis Energy. I confirmed that the Powerco GXPs for these items were correct and the ICP numbers were incorrect, and this is recorded as non-compliance below.

No database extracts are provided to Contact.

[2] Based on estimated annual on hours of 4,271 for the database.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 27-Feb-20 To: 27-Feb-20	Submissions are not calculated based on database information, and no database extracts are supplied to Contact. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331) which is supplied by Genesis Energy. Potential impact: High Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate. The risk is medium based on the 20,354.3 kWh per annum difference between the database and registry information used for submission. The incorrect ICP numbers currently have no impact because the database information is not used for submission.

Actions taken to resolve the issue	Completion date	Remedial action status
Contact will engage with PSW in order to facilitate a monthly report from the database to ensure our settlement information is based on the DUML database information. As part of this engagement we will also arrange for the 32 items of load with incorrect ICP / GXP references to be corrected	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

CONCLUSION

A Microsoft Access database is held by Dave Patten, on behalf of NZTA. Dave maintains this database in his capacity as a contractor to Power Services Wairarapa (PSW). PSW complete all fieldwork for the NZTA lights, with assistance from Fulton Hogan as required e.g. if repairs are needed following a major incident such as a pole being knocked down. When changes are made, PSW inform Dave Patten via email, who updates the Access database. Fulton Hogan is also advised, and they update RAMM for completeness. RAMM is not used for DUML processes for NZTA Wairarapa.

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0666002555PC35F	OFF POLE 818826 STATE HIGHWAY 2	GYT0331	GENE	6,768 W	41

A field audit was conducted of all 33 items of load connected to the MST0331 GXP. 100% accuracy was confirmed.

There is no regular reporting from the database to Contact. Contact reconciles the load for ICP 0020909000WR49A as standard unmetered load, using the RPS profile and the daily unmetered kWh recorded on the registry.

Four non-compliances were identified, and no recommendations were raised. The future risk rating of 15 indicates that the next audit be completed in 12 months. I recommend that the next audit is completed in a minimum of 12 months (01/06/2021 at the earliest), to allow time to investigate and confirm the correct ICPs for all NZTA lights within the region.

PARTICIPANT RESPONSE

Contact have reviewed this report and their comments are contained within its body.