ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

For

NZTA WAIMAKARIRI AND CONTACT ENERGY (CTCS)

Prepared by: Rebecca Elliot

Date audit commenced: 9 April 2021

Date audit report completed: 24 May 2021

Audit report due date: 1 June 2021

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EXECUTIVE SUMMARY

This audit of the NZTA Mainpower DUML database and processes was conducted at the request of Contact Energy (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.

This DUML database switched from Contact Energy's CTCT participant code to the CTCS code on 1 October 2020. This is managed by Contact Energy's subsidiary Simply Energy. Contact Energy carried out a material change audit in relation to the ICPs that were switched to the CTCS code. This did not include the management of unmetered load. Therefore, a material change should have been undertaken prior to this. This is recorded as non-compliance in Contact Energy's Reconciliation Participant audit. This audit examines submission since it switched to the CTCS participant code.

Simply Energy manages unmetered loads by creating dummy meters. If there is no dummy meter their DA software estimates the volume at 55kWh/day. This is resulting in an estimated under submission of 274,918.08 kWh since these ICPs were switched to the CTCS participant code in October 2020. Simply Energy is investigating a solution to ensure accurate submissions.

Mainpower are no longer the field contractor and are not maintaining this database going forward, therefore any changes going forward are not being tracked until a new database source is determined.

This audit found five non-compliances, and no recommendations were raised. The future risk rating of 34 indicates that the next audit be completed in three months. I have considered this in conjunction with Contact Energy's responses. The report due date was 1st June 2021, it is very overdue and has extended beyond the recommended period, I recommend that the next audit is completed in three months.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	Estimated 274,918.08 kWh of under submission since switching to the CTCS profile from October 2020 up to February 2021.	None	High	12	Identified
Location of items of load	2.3	11(2)(b) of Schedule 15.3	Location information insufficient to locate at least 51 items of load.	Weak	Low	3	Investigating
Description and capacity of load	2.4	11(2)(c) and (d) of Schedule 15.3	41 lights with no wattage recorded resulting in under submission of 28,047 kWh. [based on burn 4271 burn hours]	Moderate	Low	2	Identified
Database accuracy	3.1	15.2 and 15.37B(	41 lights with no wattage recorded resulting in under submission of 28,047 kWh. [based on burn 4271 burn hours] Ten lamps have ballast added where this is not required, resulting in a very minor estimated under submission of 40W or 171 kWh p.a. based on 4,271 burn hours. 51 items of load with insufficient information to locate these. Load changes no longer tracked in the Mainpower database.	None	Low	5	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Volume information accuracy	3.2	15.2 and 15.37B(c)	Estimated 274,918.08 kWh of under submission since switching to the CTCS profile from October 2020 up to February 2021.	None	High	12	Identified
					Future Risk Rating	**34**	

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	Recommendation
		Nil	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

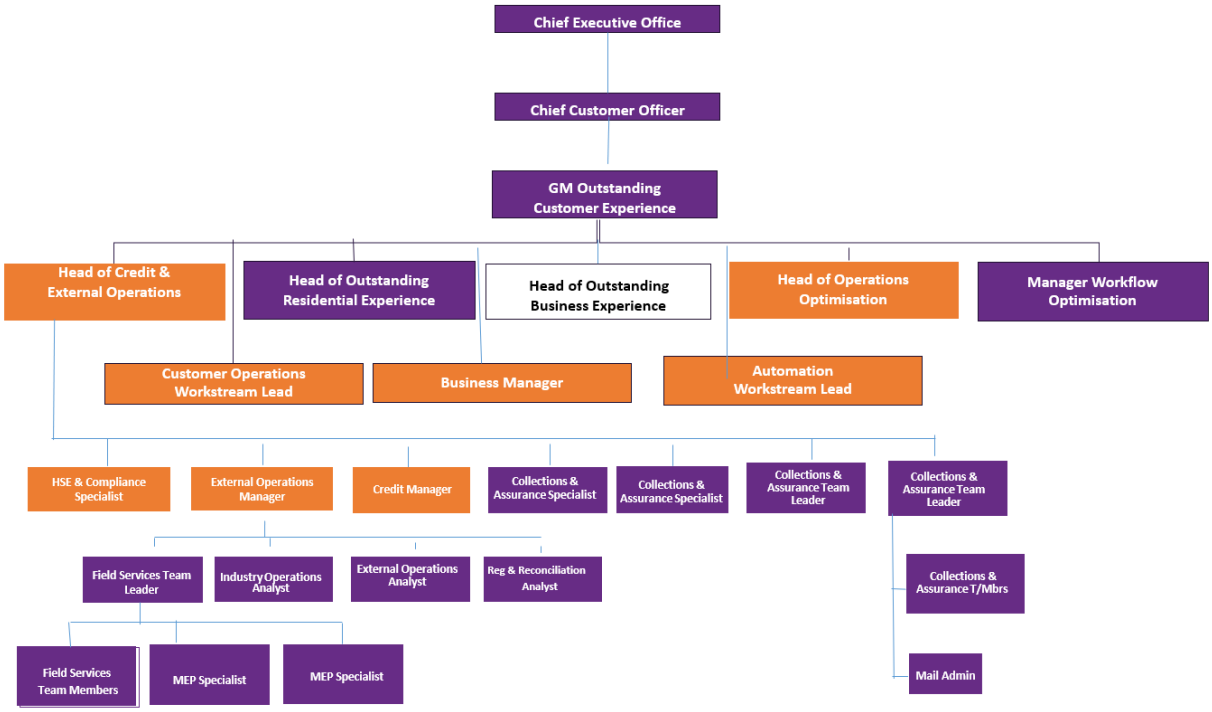
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

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

Structure of Organisation

1.2. Contact Energy provided a copy of their organisational structure.



Persons involved in this audit

Auditor:

1.3.

Name	Company	Role
Rebecca Elliot	Veritek Limited	Lead Auditor
Claire Stanley	Veritek Limited	Supporting Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Luke Cartmell-Gollan	Commercial Operations Manager	Contact Energy
Sarah Barnes	Regulatory Manager	Mainpower
Neil O'Loughlin	Surveyor/ Pricing Co-ordinator	Mainpower
Joel Hung	Commercial Analyst	Mainpower

Hardware and Software

1.4.

Section 1.8 shows that Mainpower maintains an Access database for the management of the DUML information. Backup and restoration procedures are in accordance with normal industry protocols.

Mainpower are no longer the field contractor and therefore will no longer be maintaining this DUML load in their database. A new database source needs to be sourced going forward.

1.5.

Breaches or Breach Allegations

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

ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000366461MPAD4	CUL0331 STREET LIGHTS	CUL0331	UML	54	9,735
0000366463MPA51	KKA0331 STREET LIGHTS	KKA0331	RPS	115	18,855
0000366462MP614	KAI0111 STREET LIGHTS	KAI0111	UML	429	98,628
0000366464MP79B	SBK0331 STREET LIGHTS	SBK0331	RPS	32	6,061

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000366465MPBDE	WPR0331 STREET LIGHTS	WPR0331	RPS	90	20,985
0000366466MP71E	STREETLIGHTS WPR0661	WPR0661	RPS	60	14,352
0000304742MP95A	STREETLIGHTS ASY0111	ASY0111	UML	1	278
Total				**781**	**168,894**

Authorisation Received

1.7. All information was provided directly by Contact and Mainpower.

Scope of Audit

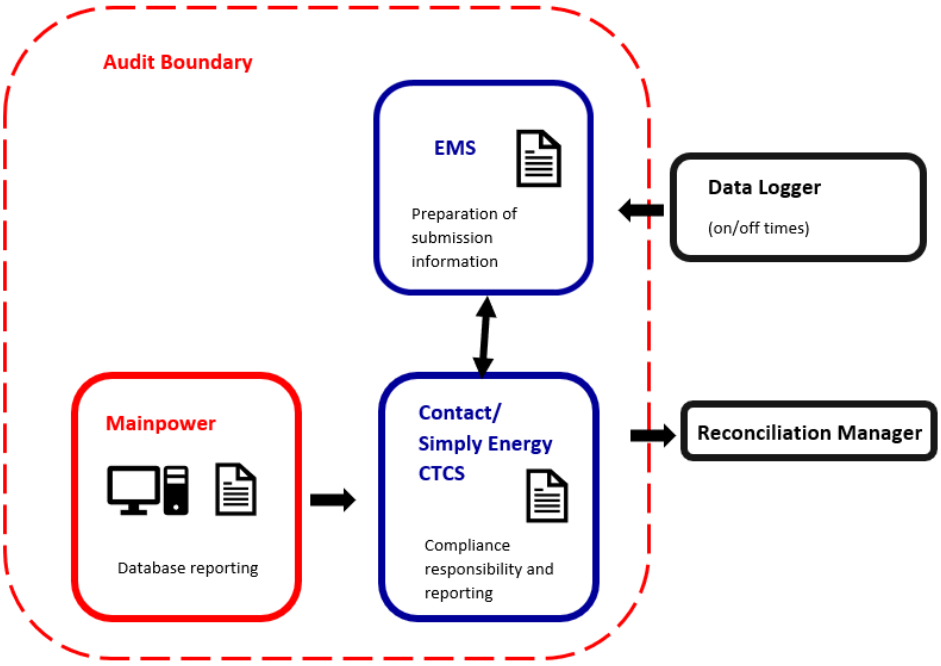
1.8. This audit of the NZTA Mainpower DUML database and processes was conducted at the request of Contact, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

The items of load are located on the Mainpower network. Mainpower is no longer engaged as the streetlighting maintenance contractor, therefore they are no longer being advised of any changes to maintain the database. Mainpower have advised they are providing a deadline date when they will stop providing reporting. The Mainpower database was audited as they continue to provide monthly reporting to the trader.

Previously Ohoka Downs 0000366150MP46C was included in this audit, it is now audited separately.

The diagram below shows the flow of information and the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 105 items of load on 14 April 2021.

1.9. Summary of previous audit

The previous audit was conducted in May 2019 by Steve Woods of Veritek. The current status of the issues raised in that audit are detailed below.

Table of Non-compliance

Subject	Section	Clause	Non-Compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	Submission not occurring for ICP 0000366150MP46C leading to under submission of 7,423 kWh per annum.	Still existing
Location of items of load	2.3	11(2)(b) of Schedule 15.3	Location information insufficient to locate at least 106 items of load.	Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	Submission not occurring for ICP 0000366150MP46C leading to under submission of 7,423 kWh per annum.	Still existing

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

1.10. *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 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

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

2.1. *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.

Audit commentary

These ICPs were switched to the CTCS participant code from 1 October 2020. Simply Energy manages the submission of this data on behalf of Contact Energy. This load is now submitted as NHH using the UNM profile for ICPs 0000304742MP95A, 0000366461MPAD4, and 0000366462MP614. The RPS profile is used for ICPs 0000366463MPA51, 0000366464MP79B, 0000366465MPBDE and 0000366466MP71E.

Simply Energy manages unmetered loads by creating dummy meters. If there is no dummy meter in their DA software, then the volume is estimated at 55kWh/day. This is resulting in a significant volume of under submission. I checked the volumes submitted for February 2021:

ICP	Database monthly kWh value	CTCS volume submitted	kWh volume difference
0000304742MP95A	91.70	1.54	90.16
0000366461MPAD4	3,210.99	1.54	3,209.45
0000366463MPA51	6,219.13	1.54	6,217.59
0000366462MP614	32,531.46	1.54	32,529.92
0000366464MP79B	1,999.16	1.54	1,997.62
0000366465MPBDE	6,921.69	1.54	6,920.15
0000366466MP71E	4,733.86	1.54	12.81
		Total	50,977.71

Simply Energy is investigating a solution to correct this. This has been occurring since October 2020 and will have resulted in an estimated under submission of 274,918.08 kWh up to February 2021. This is recorded as non-compliance below.

The field audit confirmed the database accuracy is within the allowable threshold, but Mainpower are no longer the field contractor and are not maintaining this database going forward, therefore any changes going forward are not being tracked until a new database source is determined. This is discussed further in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 28-May-19 To: 28-Feb-21	Estimated 274,918.08 kWh of under submission since switching to the CTCS profile from October 2020 up to February 2021. Potential impact: High Actual impact: High Audit history: Once Controls: None Breach risk rating: 12
Audit risk rating	**Rationale for audit risk rating**
High	The controls were rated as none, because they were not sufficient to ensure that submission data is calculated accurately. The impact is assessed to be high due to the level of submission inaccuracy.

Actions taken to resolve the issue	Completion date	Remedial action status
Under submissions related to Simply Energy's systems for unmetered management were corrected straight after the Material change audit was completed in August 2021.	31/8/21	Identified
Submission issues relating to poor database management continue to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network.	Unknown	
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 an ICP is recorded for each item of load.

Audit commentary

An ICP is recorded for each item of load. Mainpower's database contains a customer number that is linked to the relevant ICP in the customer table in Access.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

2.3. **Code related audit information**

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

Audit observation

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

Audit commentary

The database contains the street, a description of the location and GPS coordinates.

61 items of load do not have GPS details recorded, 51 of these records do not have a unique location description, meaning the location information is insufficient to physically identify the item of load.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 28-May-19 To: 01-Apr-21	Location information insufficient to locate at least 51 items of load. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3		
Audit risk rating	**Rationale for audit risk rating**		
Low	The controls are recorded as weak because there are still many lights without sufficient information to locate them. The impact is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**
Unfortunately, this issue continues to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network.		Unknown	Investigating
Preventative actions taken to ensure no further issues will occur		**Completion date**	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

The database contains two records for wattage, firstly the lamp wattage and secondly the gear wattage, which represents ballast losses. I identified 41 lamps with no wattage recorded:

Model	Expected Wattage	Wattage recorded	Discrepancy
Blank	Unknown	None	41 lights with no wattage recorded resulting in under submission of 28,047 kWh. [Based on burn 4271 burn hours].

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 28-May-19 To: 01-Apr-21	41 lights with no wattage recorded resulting in under submission of 28,047 kWh. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
Unfortunately, this issue continues to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network. We will update our current and historic submissions to match the values found by Veritek in their audit process as this is likely to be more accurate than the values we have been using (*in lieu of regular files from NZTA)	Unknown	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of a statistical sample of 105 items of load on 14 April 2021.

Audit commentary

The field audit discrepancies are detailed in the table below:

Address	Database count	Field count	Count difference	Wattage difference	Comments
MAIN NORTH ROAD	10	10		10	10x incorrect wattage recorded as 82W LED but 78W LED found in the field

There were no additional items of load located. The accuracy of the database is detailed in section 3.1

Audit outcome

Compliant

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

Code reference

2.6. *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.

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 database has a complete and compliant audit trail.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

Plan Item	Comments
Area of interest	NZTA Mainpower
Strata	The database contains items of load for NZTA lighting on the Mainpower network The processes for the management of all NZTA lighting is the same, but I decided to create three strata, as follows: 1. Kaiapoi 2. Woodend, Amberly 3. Small town.
Area units	I created a pivot table of the roads, and I used a random number generator in a spreadsheet to select a total of 5 sub-units.
Total items of load	105 items of load were checked.

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

Audit commentary

Database accuracy based on the field audit

A field audit was conducted of a statistical sample of 105 items of load. The "database auditing tool" was used to analyse the results, which are shown in the table below.

Result	Percentage	Comments
The point estimate of R	99.7	Wattage from survey is lower than the database wattage by 0.2%
R_L	99.3	With a 95% level of confidence, it can be concluded that the error could be between -0.3% and -0.2%
R_H	99.7	

These results were categorised in accordance with the "Distributed Unmetered Load Statistical Sampling Audit Guideline", effective from 01/02/19 and the table below shows that Scenario A (detailed below) applies.

The conclusion from Scenario A is that the variability of the sample results across the strata means that the true wattage (installed in the field) could be between 0.3% and 0.7% lower than the wattage recorded in the DUML database. Compliance is recorded.

In absolute terms the installed capacity is estimated to be 0.1 kW lower than the database indicates.

There is a 95% level of confidence that the installed capacity is 1 kW lower than the database.

In absolute terms, total annual consumption is estimated to be 2,400 kWh lower than the DUML database indicates.

There is a 95% level of confidence that the annual consumption is between 2,400 kWh p.a. to 4,900 kWh p.a. lower than the database indicates.

Scenario	**Description**
A - **Good accuracy, good precision**	This scenario applies if: (a) R_H is less than 1.05; and (b) R_L is greater than 0.95 The conclusion from this scenario is that: (a) the best available estimate indicates that the database is accurate within +/- 5 %; and (b) this is the best outcome.
B - **Poor accuracy, demonstrated with statistical significance**	This scenario applies if: (a) the point estimate of R is less than 0.95 or greater than 1.05 (b) as a result, either R_L is less than 0.95 or R_H is greater than 1.05. There is evidence to support this finding. In statistical terms, the inaccuracy is statistically significant at the 95% level
C - **Poor precision**	This scenario applies if: (a) the point estimate of R is between 0.95 and 1.05 (b) R_L is less than 0.95 and/or R_H is greater than 1.05 The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within +/- 5 %

Lamp description and capacity accuracy

As discussed in **section 2.4**, there were 41 lights with no wattage recorded resulting in an estimated 28,047 kWh of under submission. These were corrected during the audit.

I identified ten lights with ballast recorded where a ballast is not expected.

Model	Expected Wattage	Wattage recorded	Discrepancy
NXT 72M 350 mA	78W	78W + 4W ballast	10 x 4W over submission

This will be resulting in a very minor estimated under submission of 171 kWh per annum.

ICP accuracy

As discussed in **section 2.2**, all lights have a GXP and corresponding ICP recorded. The ICP and corresponding GXP number are assigned based on information provided during the connection process.

Address Location accuracy

As discussed in **section 2.3**, 61 items of load do not have GPS details recorded, 51 of these records do not have a unique location description, meaning the location information is insufficient to physically identify the item of load.

Change management process findings

Mainpower is no longer engaged as the streetlighting maintenance contractor, therefore they are no longer being advised of any changes to maintain the database.

Outage patrols are no longer conducted by Mainpower.

The new connections require when Mainpower was the field contractor was that a proposed plan be provided and an "as built" plan once the development was complete. Once installed, the information was passed to Mainpower and processed within two days of receipt. Mainpower added the records to their database immediately as 'proposed' and they were updated within a day of livening. Mainpower has no visibility of any recent new connections for NZTA. A new database source is required and once determined the change management process will need to be assessed.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 28-May-19 To: 01-Apr-21	41 lights with no wattage recorded resulting in under submission of 28,047 kWh [based on burn 4271 burn hours]. Ten lamps have ballast added where this is not required, resulting in a very minor estimated under submission of 40W or 171 kWh p.a. based on 4,271 burn hours. 51 items of load with insufficient information to locate these. Load changes no longer tracked in the Mainpower database. Potential impact: High Actual impact: Low Audit history: None Controls: None Breach risk rating: 5
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as none as this database is no longer being maintained. The impact is assessed to be low, based on the potential kWh variances detailed above but this will increase until an alternative database is found to manage this load .

Actions taken to resolve the issue	Completion date	Remedial action status
Unfortunately, these issue continues to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network. We will update our current and historic submissions to match the values found by Veritek in their audit process as this is likely to be more accurate than the values we have been using (*in lieu of regular files from NZTA)	Unknown	Investigating
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 all ICPs have 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

These ICPs were switched to the CTCS participant code from 1 October 2020. Simply Energy manages the submission of this data on behalf of Contact Energy. This load is now submitted as NHH using the UNM profile for ICPs 0000304742MP95A, 0000366461MPAD4, and 0000366462MP614. The RPS profile is used for ICPs 0000366463MPA51, 0000366464MP79B, 0000366465MPBDE and 0000366466MP71E.

Simply Energy manages unmetered loads by creating dummy meters. If there is no dummy meter in their DA software, then the volume is estimated at 55kWh/day. This is resulting in a significant volume of under submission. I checked the volumes submitted for February 2021:

ICP	Database monthly kWh value	CTCS volume submitted	kWh volume difference
0000304742MP95A	91.70	1.54	90.16
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		Total	50,977.71

Simply Energy is investigating a solution to correct this. This has been occurring since October 2020 and will have resulted in an estimated under submission of 274,918.08 kWh up to February 2021. This is recorded as non-compliance below.

The field audit confirmed the database accuracy is within the allowable threshold, but Mainpower are no longer the field contractor and are not maintaining this database going forward, therefore any changes going forward are not being tracked until a new database source is determined. This is discussed further in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)) From: 28-May-19 To: 28-Feb-21	Estimated 274,918.08 kWh of under submission since switching to the CTCS profile from October 2020 up to February 2021. Potential impact: High Actual impact: High Audit history: Once Controls: None Breach risk rating: 12
Audit risk rating	**Rationale for audit risk rating**
High	The controls were rated as none, because they were not sufficient to ensure that submission data is calculated accurately. The impact is assessed to be high due to the level of submission inaccuracy.

Actions taken to resolve the issue	Completion date	Remedial action status
Under submissions related to Simply Energy's systems for unmetered management were corrected straight after the Material change audit was completed in August 2021.	31/8/21	Identified
Submission issues relating to poor database management continue to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network.	Unknown	
Preventative actions taken to ensure no further issues will occur	**Completion date**	

CONCLUSION

This DUML database switched from Contact Energy's CTCT participant code to the CTCS code on 1 October 2020. This is managed by Contact Energy's subsidiary Simply Energy. Contact Energy carried out a material change audit in relation to the ICPs that were switched to the CTCS code. This did not include the management of unmetered load. Therefore, a material change should have been undertaken prior to this. This is recorded as non-compliance in Contact Energy's Reconciliation Participant audit. This audit examines submission since it switched to the CTCS participant code.

Simply Energy manages unmetered loads by creating dummy meters. If there is no dummy meter their DA software estimates the volume at 55kWh/day. This is resulting in an estimated under submission of 274,918.08 kWh since these ICPs were switched to the CTCS participant code in October 2020. Simply Energy is investigating a solution to ensure accurate submissions.

Mainpower are no longer the field contractor and are not maintaining this database going forward, therefore any changes going forward are not being tracked until a new database source is determined.

This audit found five non-compliances, and no recommendations were raised. The future risk rating of 34 indicates that the next audit be completed in three months. I have considered this in conjunction with Contact Energy's responses. The report due date was 1st June 2021, it is very overdue and has extended beyond the recommended period, I recommend that the next audit is completed in three months.

PARTICIPANT RESPONSE

We have been working off the last information Mainpower submitted since they ceased management of these DUML lights and have had had no additional information since then. We will update our records and submissions to match the findings from the Veritek audit and the new volumes will flow through in the usual submission process.

NZTA has recently appointed an external energy manager. We will be working with them across the country to resolve all issues related to NZTA ICPs – standard unmetered, metered and DUML. This will include implementing a management programme for the DUML in the Waimkariri region (Mainpower network).