# ELECTRICITY INDUSTRY PARTICIPATION CODE
# DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

## VODAFONE AND MERCURY NZ LTD

Prepared by: Steve Woods

Date audit commenced: 10 May 2021

Date audit report completed: 10 August 2021

Audit report due date: 14-Sep-17

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## EXECUTIVE SUMMARY

This audit covers the **Vodafone** DUML database and processes and was conducted at the request of **Mercury NZ Limited (Mercury)** 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 database is for items of load supplying Vodafone's telecommunications network. Each item of load contains a transformer and the secondary side of the transformer supplies voltage to part of the Vodafone network. The wattage figures in the database were derived from measurements taken at the secondary side of the transformers, which means transformer losses are not considered. The voltage and current measurements should have been taken on the primary side of the transformers, which is a recommendation in this report. Incorrect wattage calculations have led to under submission by approx. 400,000 kWh per annum.

All other details in the database were confirmed as accurate.

The future risk rating indicates that the next audit be completed in three months. The timeframe for completing the voltage and current measurements for all 545 items of load could take longer than three months, therefore I recommend an audit period of six 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 |
|---|---|---|---|---|---|---|---|
| Distributed unmetered load audits | 1.10 | 16A.26 and 17.295F | Audit not conducted within the required timeframe. | Moderate | Medium | 4 | Cleared |
| Deriving submission information | 2.1 | 11(1) of Schedule 15.3 | Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database. | Moderate | High | 6 | Identified |
| Database accuracy | 3.1 | 15.2 and 15.37B(b) | Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database. | Moderate | High | 6 | Identified |
| Volume information accuracy | 3.2 | 15.2 and 15.37B(c) | Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database. | Moderate | High | 6 | Identified |
| Future Risk Rating | | | | | | 22 | |

| **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 |
|---|---|---|
| Deriving submission information | 2.1 | Conduct voltage and current measurements at the primary side and update all wattage figures. |

### ISSUES

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

# 1. ADMINISTRATIVE

## 1.1. Exemptions from Obligations to Comply with Code

### Code reference

*Section 11 of Electricity Industry Act 2010.*

### Code related audit information

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

### Audit observation

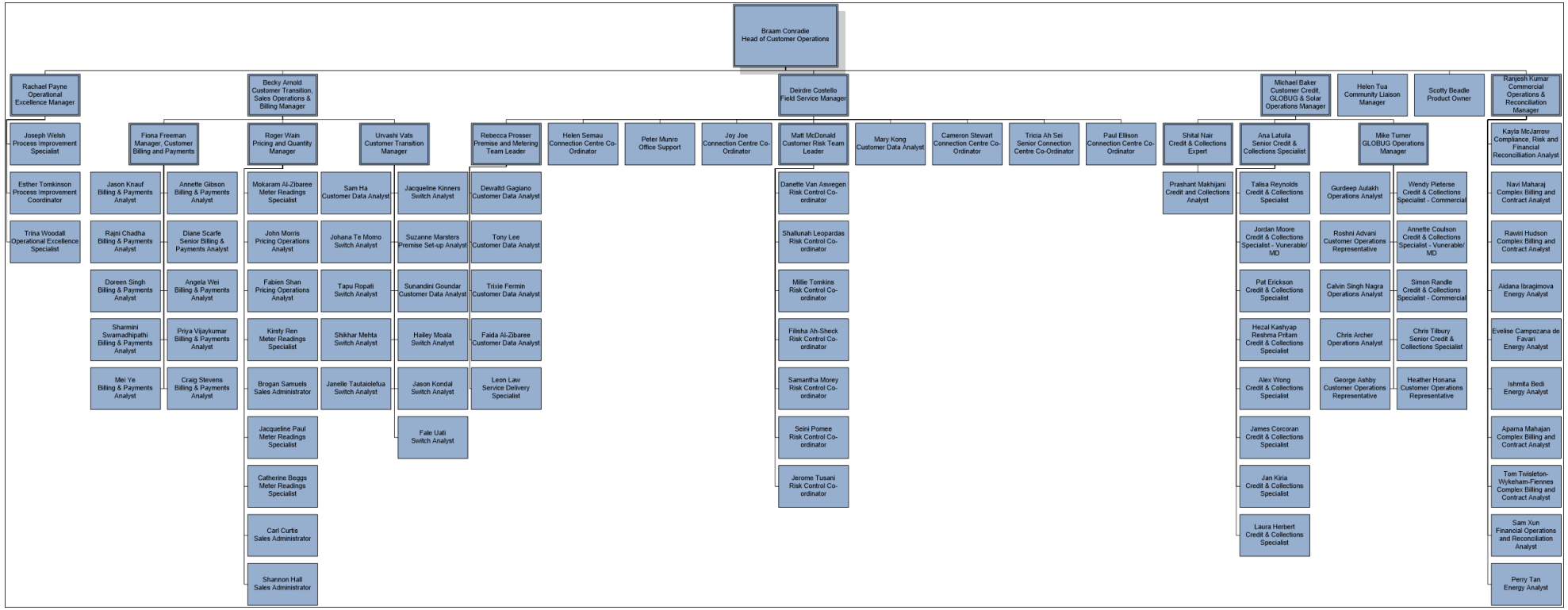
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

### Audit commentary

Mercury has no exemptions in place in relation to the ICPs covered by this audit report.

## 1.2. Structure of Organisation

Mercury provided an organisational structure:



## 1.3. Persons involved in this audit

Auditors:

| Name | Title |
|---|---|
| Steve Woods | Lead Auditor |

Other personnel assisting in this audit were:

| Name | Title | Company |
|---|---|---|
| Kayla McJarrow | Compliance, Risk and Financial Reconciliation Analyst | Mercury NZ Ltd |
| Sarah Dark | Business Development Manager – Large Commercial | Mercury NZ Ltd |
| Christian White | Access DevOps Engineer, Platforms - Fixed Access Network | Vodafone |

## 1.4. Hardware and Software

The streetlight data for Vodafone 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.

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

| ICP Number | Description | NSP | Profile | Number of items of load | Database wattage (watts) |
|---|---|---|---|---|---|
| 0000161894CK3EF | VODAFONE DUML GXP CPK0331 | CPK0331 | RPS | 107 | 43,427 |
| 0000161895CKFAA | VODAFONE DUML GXP GFD0331 | GFD0331 | RPS | 60 | 23,085 |
| 0000161896CK36A | VODAFONE DUML GXP KWA0111 | KWA0111 | RPS | 10 | 3,598 |
| 0000161897CKF2F | VODAFONE DUML GXP HAY0331 | HAY0331 | RPS | 20 | 7,741 |
| 0000161898CK0F1 | VODAFONE DUML GXP TKR0331 | TKR0331 | RPS | 42 | 15,483 |
| 0000161899CKCB4 | VODAFONE DUML GXP UHT0331 | UHT0331 | RPS | 41 | 16,352 |
| 0000161900CK406 | VODAFONE DUML GXP WIL0331 | WIL0331 | RPS | 43 | 16,706 |
| 0000164960CKCD6 | VODAFONE DUML GXP CPK0111 | CPK0111 | RPS | 14 | 5,183 |
| 0000190118TR62B | VODAFONE DUML GXP MLG0331 | MLG0331 | UML | 49 | 19,273 |
| 0001261460UN08E | VODAFONE BULK UNMETERED | WRD0331 | UML | 9 | 4,555 |

| | | | | | |
|---|---|---|---|---|---|
| 0001393839UN86B | VODAFONE DUML GXP HAY0111 | HAY0111 | UML | 21 | 7,680 |
| 0001409085UN545 | VODAFONE BULK UNMETERED | ALB0331 | UML | 11 | 5,452 |
| 0007106261RN1C3 | Clear Mux Box | ISL0661 | UML | 1 | 368 |
| 0007145198RN5F3 | Telstra Clear Cabinet | ISL0661 | UML | 1 | 312 |
| 0007146145RN50A | Telstra Clear Cabinet | ISL0661 | UML | 1 | 273 |
| 0015723581ELA43 | TELSTRACLEAR LTD | PRM0331 | RPS | 94 | 39,345 |
| 1001146090UN1CE | VODAFONE DUML GXP MLG0111 | MLG0111 | UML | 21 | 7,314 |
| | | | | **545** | **216,146** |

## 1.7. Authorisation Received

All information was provided directly by Mercury.

## 1.8. Scope of Audit

This audit covers the Vodafone DUML database and processes and was conducted at the request of Mercury NZ Limited (Mercury) 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 spreadsheet is maintained by Vodafone and an updated version is expected to be sent to Mercury each month.

A field audit of 140 items of load was carried out on May 10th, 2021.

## 1.9. Summary of previous audit

This is the first audit for this database.

## 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**

Mercury has requested Veritek to undertake this street lighting audit.

### Audit commentary

This audit report was due within three months of these ICPs switching to Mercury. The switch in date was 18 October 2019 for some ICPs and 14 June 2017 for ICP 0015723581ELA43. Therefore, this audit report is late. The main reason is that there was no database in place and Mercury has had to work with Vodafone to develop one.

### Audit outcome

Non-compliant

<table>
<tr><th>Non-compliance</th><th colspan="3">Description</th></tr>
<tr><td>Audit Ref: 1.10<br>With: Clause 16A.26 and 17.295F<br><br>From: 14-Sep-17<br>To: 17-May-21</td><td colspan="3">Audit not conducted within the required timeframe.<br>Potential impact: Medium<br>Actual impact: Medium<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 4</td></tr>
<tr><th>Audit risk rating</th><th colspan="3">Rationale for audit risk rating</th></tr>
<tr><td>Medium</td><td colspan="3">The controls are recorded as moderate because Mercury has had to develop a database from scratch and this process started as soon as the ICPs switched in.<br>The impact on settlement and participants is moderate; therefore, the audit risk rating is medium.</td></tr>
<tr><th colspan="2">Actions taken to resolve the issue</th><th>Completion date</th><th>Remedial action status</th></tr>
<tr><td colspan="2">When Mercury inherited these connections, there was no unmetered database in place despite having been connected for many years under other retailers.<br>Mercury began working with Vodafone as soon as these ICPs were switched in, to establish a compliant DUML database to ensure for accurate submission and compliance with the code. This has been a lengthy process and has required coordination among different parties. A number of new ICPs have been created to comply with DUML database requirements and Vodafone have completed full field audits to ensure connections details are recorded correctly.</td><td>N/A</td><td rowspan="3">Cleared</td></tr>
<tr><th colspan="2">Preventative actions taken to ensure no further issues will occur</th><th>Completion date</th></tr>
<tr><td colspan="2">This is a complex one-off instance and we believe we have adequate process in place to comply in normal circumstances.</td><td>N/A</td></tr>
</table>

## 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**

This clause requires that the distributed unmetered load database must satisfy the requirements of schedule 15.5 regarding the methodology for deriving submission information. Mercury reconciles this DUML load using the RPS and UML profiles. I checked the accuracy of the submission information from the database with the submission for the month of April 2021 to confirm the volume was calculated correctly.

Submission is based on the registry for 16 of the 17 ICPs and for ICP 0015723581ELA43, there is one metered cabinet, where the consumption is multiplied by 101. The expected consumption for April 2021 for this ICP, based on the database wattages, is 28,323 kWh, but the actual submission was 25,564 kWh, which is under submission of 2,765 kWh.

The registry daily kWh figure is incorrect for five of the 16 ICPs where the figure is used. The table below shows the differences.

| ICP | Database daily kWh | Registry daily kWh | kWh difference for April 2021 |
|---|---|---|---|
| 0001261460UN08E | 109.33 | 64.8 | 1,336 |
| 0001409085UN545 | 130.84 | 79.2 | 1,549 |
| 0007106261RN1C3 | 8.83 | 84 | -2,255 |
| 0007145198RN5F3 | 7.50 | 27.6 | -603 |
| 0007146145RN50A | 6.54 | 27.6 | -632 |

The net difference of April 2021, including ICP 0015723581ELA43 is under submission of 2,164 kWh. This equates to annual under submission of 26,329 kWh.

Each item of load contains a transformer and the secondary side of the transformer supplies voltage to part of the Vodafone network. The wattage figures in the database were derived from measurements taken at the secondary side of the transformers, which means transformer losses are not considered. The voltage and current measurements should have been taken on the primary side of the transformers. I compared the calculated consumption for 20 metered items of load, where the measurements were taken at the secondary side of the transformers, against the actual metered consumption and found the metered consumption was 17.5% higher than the calculated consumption. There are 10 items of load where measurements were taken at both the primary and secondary sides of the transformer and these

results showed a difference of 21%. Even taking the lower figure of 17.5%, the total under submission is 400,000 kWh per annum. I recommend the voltage and current measurements are repeated at the primary side of each item of load to ensure the accurate calculation of kWh.

| Recommendation | Description | Audited party comment | Remedial action |
|---|---|---|---|
| Regarding Clause 11(1) of Schedule 15.3 | Conduct voltage and current measurements at the primary side and update all wattage figures. | We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. | Identified |

### Audit outcome

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 2.1<br>With: 11(1) of Schedule 15.3<br><br><br><br>From: 14-Jun-17<br>To: 15-May-21 | Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database.<br>Potential impact: High<br>Actual impact: High<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **High** | The controls in place are rated as moderate because there was a wattage calculation, but it was based on incorrect inputs.<br>The impact is assessed to be high based on the under submission of 400,000 kWh per annum. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|

| | | |
|---|---|---|
| On further analysis, we believe our total unmetered kWh values prior to March 2021, will have been in line with the estimated consumption calculated from this audit.<br><br>We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. As this is unlikely to be a quick process, we have inflated our kWh values for each ICP by 17.5% (from March21) to more accurately reflect the correct volumes in our submissions. Once the correct wattages have been confirmed following Vodafone's second field audit, the corrections will be processed in revision files.<br><br>Vodafone has now completed an audit of ICP 0015723581ELA43 and all unmetered connections have been added to the DUML database and our system. We are currently in the process of working with the relevant parties to update the registry accordingly. This ICP will also be included in Vodafone's second field audit. | March 2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| As above. | As above. | |

## 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 spreadsheet was checked to confirm the correct ICP was recorded correctly for the load.

**Audit commentary**

The spreadsheet contains correct ICP identifiers.

**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 spreadsheet was checked to confirm the location is recorded for all items of load.

**Audit commentary**

The spreadsheet contains the street address for each item of load, which is sufficient to locate them.

**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 spreadsheet was checked to confirm that it contained fields for load type and wattage.

**Audit commentary**

The spreadsheet contains fields for wattage and a description of the type of load.

**Audit outcome**

Compliant

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

**Code reference**

*Clause 11(2A) of Schedule 15.3*

**Code related audit information**

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

**Audit observation**

A field audit was undertaken of 140 items of load.

**Audit commentary**

No discrepancies were identified.

**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 spreadsheets was examined.

**Audit commentary**

The spreadsheet contains a separate sheet for recording changes. Vodafone advised that the voltage and current figures will be re-checked when any changes to the load are conducted.

**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 spreadsheet was checked for audit trails.

**Audit commentary**

The spreadsheet includes a change log for each ICP which records the date of any change, action taken, person making the change and the details.

**Audit outcome**

Compliant

## 3. ACCURACY OF DUML DATABASE

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

**Code reference**

*Clause 15.2 and 15.37B(b)*

**Code related audit information**

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

**Audit observation**

A field audit of all 140 items of load was undertaken to confirm the accuracy of the spreadsheet. I checked the wattage calculations to ensure accuracy.

**Audit commentary**

**Field Audit Findings**

No discrepancies were identified.

**Wattage accuracy**

Each item of load contains a transformer and the secondary side of the transformer supplies voltage to part of the Vodafone network. The wattage figures in the database were derived from measurements taken at the secondary side of the transformers, which means transformer losses are not considered. The voltage and current measurements should have been taken on the primary side of the transformers. I compared the calculated consumption for 20 metered items of load, where the measurements were taken at the secondary side of the transformers, against the actual metered consumption and found the metered consumption was 17.5% higher than the calculated consumption. There are 10 items of load where measurements were taken at both the primary and secondary sides of the transformer and these results showed a difference of 21%. Even taking the lower figure of 17.5%, the total under submission is 400,000 kWh per annum.

**Audit outcome**

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 3.1<br>With: 15.2 and 15.37B(b)<br><br><br><br>From: 14-Jun-17<br>To: 15-May-21 | Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database.<br>Potential impact: High<br>Actual impact: High<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **High** | The controls in place are rated as moderate because there was a wattage calculation, but it was based on incorrect inputs.<br>The impact is assessed to be high based on the under submission of 400,000 kWh per annum. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| On further analysis, we believe our total unmetered kWh values prior to March 2021, will have been in line with the estimated consumption calculated from this audit.<br><br>We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. As this is unlikely to be a quick process, we have inflated our kWh values for each ICP by 17.5% (from March21) to more accurately reflect the correct volumes in our submissions. Once the correct wattages have been confirmed following Vodafone's second field audit, the corrections will be processed in revision files.<br><br>Vodafone has now completed an audit of ICP 0015723581ELA43 and all unmetered connections have been added to the DUML database and our system. We are currently in the process of working with the relevant parties to update the registry accordingly. This ICP will also be included in Vodafone's second field audit. | March 2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| As above. | As above. | |

### 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 expected kWh against the submitted figure to confirm accuracy.

**Audit commentary**

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

**Audit commentary**

This clause requires that the distributed unmetered load database must satisfy the requirements of schedule 15.5 regarding the methodology for deriving submission information. Mercury reconciles this DUML load using the RPS and UML profiles. I checked the accuracy of the submission information from the database with the submission for the month of April 2021 to confirm the volume was calculated correctly.

Submission is based on the registry for 16 of the 17 ICPs and for ICP 0015723581ELA43, there is one metered cabinet, where the consumption is multiplied by 101. The expected consumption for April 2021 for this ICP, based on the database wattages, is 28,323 kWh, but the actual submission was 25,564 kWh, which is under submission of 2,765 kWh.

The registry daily kWh figure is incorrect for five of the 16 ICPs where the figure is used. The table below shows the differences.

| ICP | Database daily kWh | Registry daily kWh | kWh difference for April 2021 |
|---|---|---|---|
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The net difference of April 2021, including ICP 0015723581ELA43 is under submission of 2,164 kWh. This equates to annual under submission of 26,329 kWh.

Each item of load contains a transformer and the secondary side of the transformer supplies voltage to part of the Vodafone network. The wattage figures in the database were derived from measurements taken at the secondary side of the transformers, which means transformer losses are not considered. The voltage and current measurements should have been taken on the primary side of the transformers. I compared the calculated consumption for 20 metered items of load, where the measurements were taken at the secondary side of the transformers, against the actual metered consumption and found the metered consumption was 17.5% higher than the calculated consumption. There are 10 items of load where measurements were taken at both the primary and secondary sides of the transformer and these results showed a difference of 21%. Even taking the lower figure of 17.5%, the total under submission is 400,000 kWh per annum. I recommend the voltage and current measurements are repeated at the primary side of each item of load to ensure the accurate calculation of kWh.

### Audit outcome

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 3.2<br>With: 15.2 and 15.37B(c)<br><br><br><br>From: 14-Jun-17<br>To: 15-May-21 | Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database.<br>Potential impact: High<br>Actual impact: High<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |

| | |
|---|---|
| **High** | The controls in place are rated as moderate because there was a wattage calculation, but it was based on incorrect inputs.<br><br>The impact is assessed to be high based on the under submission of 400,000 kWh per annum. |

| **Actions taken to resolve the issue** | **Completion date** | **Remedial action status** |
|---|---|---|
| On further analysis, we believe our total unmetered kWh values prior to March 2021, will have been in line with the estimated consumption calculated from this audit.<br><br>We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. As this is unlikely to be a quick process, we have inflated our kWh values for each ICP by 17.5% (from March21) to more accurately reflect the correct volumes in our submissions. Once the correct wattages have been confirmed following Vodafone's second field audit, the corrections will be processed in revision files.<br><br>Vodafone has now completed an audit of ICP 0015723581ELA43 and all unmetered connections have been added to the DUML database and our system. We are currently in the process of working with the relevant parties to update the registry accordingly. This ICP will also be included in Vodafone's second field audit. | March 2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| As above. | As above. | |

## CONCLUSION

This database is for items of load supplying Vodafone's telecommunications network. Each item of load contains a transformer and the secondary side of the transformer supplies voltage to part of the Vodafone network. The wattage figures in the database were derived from measurements taken at the secondary side of the transformers, which means transformer losses are not considered. The voltage and current measurements should have been taken on the primary side of the transformers, which is a recommendation in this report. Incorrect wattage calculations have led to under submission by approx. 400,000 kWh per annum.

All other details in the database were confirmed as accurate.

The future risk rating indicates that the next audit be completed in three months. The timeframe for completing the voltage and current measurements for all 545 items of load could take longer than three months, therefore I recommend an audit period of six months.

## PARTICIPANT RESPONSE

Mercury would like to thank all parties who have contributed to the establishment of this DUML database. This has been a complex and lengthy process. Special thanks to The EA and Steve Woods for providing support and advice, and to Vodafone for their co-operation.

Following the findings from this audit, Mercury has taken the proactive steps of inflating our unmetered kWh values by 17.5% to more accurately reflect the estimated volumes of this database. We will be working with Vodafone again to conduct another field audit of all connections to record the correct wattage values. Corrections will be reflected in revision files as we expect to have this completed by Mar22.

We would like to note that all other database details have been confirmed as accurate which shows Vodafone & Mercury's commitment to establishing a compliant database and request that the EA consider an appropriate audit period to allow sufficient time for Vodafone to complete another full field audit which is not a quick and easy task.