ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

CHRISTCHURCH CITY COUNCIL
MAINPOWER LIGHTS
AND
CONTACT ENERGY LIMITED
NZBN: 9429038549977

Prepared by: Rebecca Elliot

Date audit commenced: 9 March 2022

Date audit report completed: 17 March 2022

Audit report due date: 28 April 2022

TABLE OF CONTENTS

EXECUTIVE SUMMARY

This audit of the **Christchurch City Council (CCC) DUML database** on the Mainpower network 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 is using a report from the Mainpower database from February 2021. This database is no longer being maintained as Mainpower is no longer engaged as the streetlighting maintenance contractor, therefore they are no longer being advised of any changes to maintain the database. However, the Mainpower database was audited as this is the last extract that was provided to the trader and Contact have advised they will continue to use this information until they are able to source a current database. Contact is pursuing this with CCC.

This full field audit found a large number of discrepancies as the database is no longer maintained. The field audit found 22% less wattage than is recorded in the database. This is outside of the allowable +/- 5% allowable threshold and will be resulting in an estimated over submission of 5,950 kWh per annum.

Contact reconciles this DUML load using the DST profile. I checked the January 2022 submission data and confirmed that the calculation methodology was correct. I found that there was a difference between the wattage applied by Contact and the database extract I received from Mainpower. This will be resulting in an estimated under submission of 2,359 kWh per annum.

Simply Energy on behalf of Contact send the monthly kW values to EMS. EMS prepare the submission file using the data logger hours to determine the burn hours and the file is then sent to Simply Energy who submit the data under the CTCS code.

This audit found four non-compliances, and no recommendations were raised. The future risk rating of 20 indicates that the next audit be completed in three months. I have considered this in conjunction with Contact's responses and recommend that the next audit be in 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
Deriving submission information	2.1	11(1) of Schedule 15.3	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,359 kWh per annum of under submission. The database accuracy is assessed to be 22% less than is recorded in the database. Resulting in an estimated over submission of 5,950 kWh per annum (based on 4,271 annual burn hours). The monthly database used for submission is no longer being maintained so the monthly volumes being calculated do not take into account any changes.	None	Low	5	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	Eight additional lights found in the field from the 128 items of load sampled.	None	Low	5	Identified
Database accuracy	3.1	15.2 and 15.37B (b)	The database accuracy is assessed to be 22% less than is recorded in the database. Resulting in an estimated over submission of 5,950 kWh per annum (based on 4,271 annual burn hours). No change management in place as the Mainpower database is no longer being maintained.	None	Low	5	Identified
Volume information accuracy	3.2	15.2 and 15.37B (c)	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,359 kWh per annum of under submission. The database accuracy is assessed to be 22% less than is recorded in the database. Resulting in an estimated over submission of 5,950 kWh per annum (based on 4,271 annual burn hours). The monthly database used for submission is no longer being	None	Low	5	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			maintained so the monthly volumes being calculated do not take into account any changes.				
Future Risk Rating						20	

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

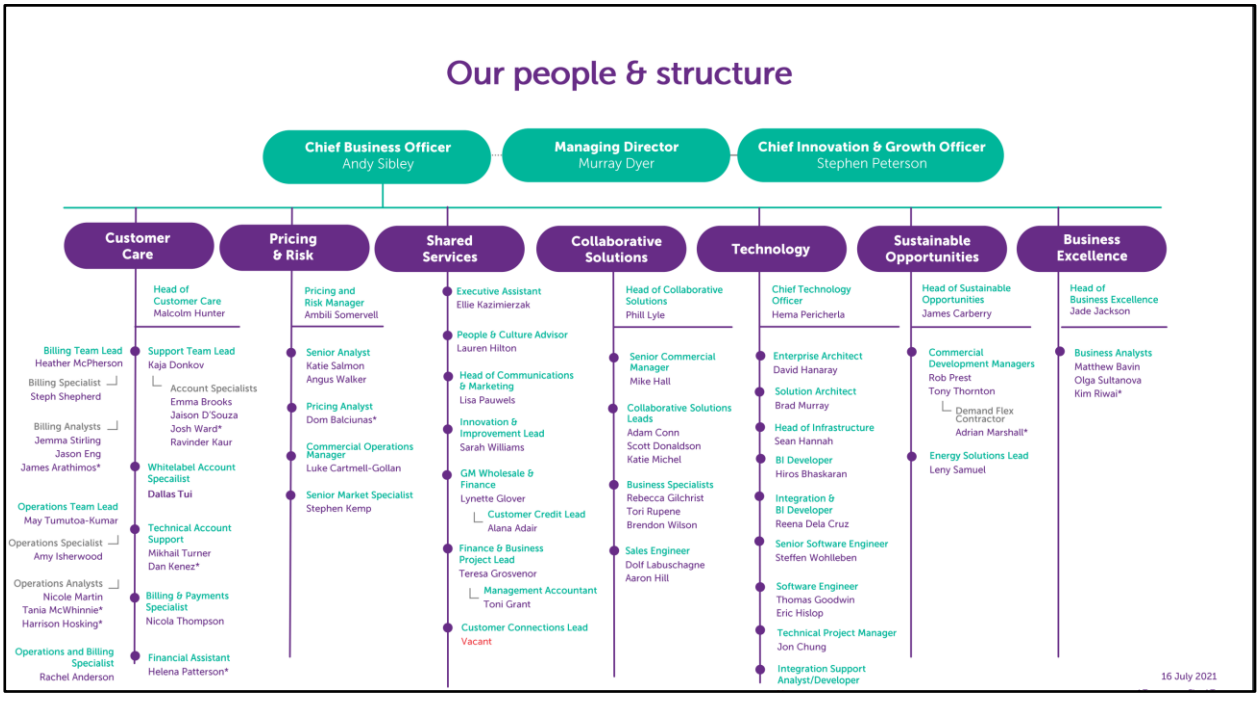
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

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

1.2. Structure of Organisation

Contact Energy provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditor:

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

1.4. Hardware and Software

Mainpower are no longer the field contractor and are no longer maintaining this DUML load in their database.

The Mainpower database was audited as this is the last extract that was provided to the trader in February 2021. A new database source needs to be sourced going forward.

Systems used by the trader and their agent 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)
0000366681MPA69	Mainpower - KAI0111 Riverlea Estate Dr	KAI0111	DST	20	400
0000366751MPE2F	Mainpower - KAI0111 Street Lights	KAI0111	DST	108	7,296
Total				128	7,696

1.7. Authorisation Received

All information was provided directly by Contact.

1.8. Scope of Audit

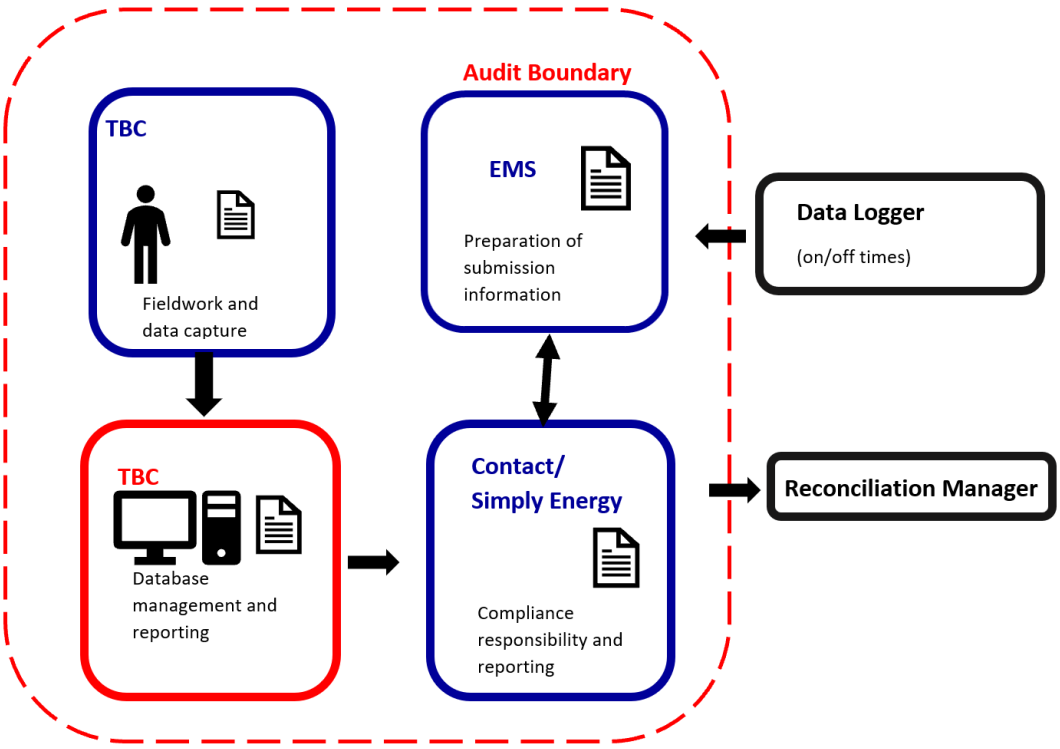
This audit of the CCC DUML database and processes was conducted at the request of Contact in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied. The audit was conducted in accordance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

Electricity is supplied in the CCC region by Mainpower. Mainpower previously managed the database of unmetered load information on behalf of CCC, who is Contact's customer. 128 unmetered items of load are connected to Mainpower's network in Kainga.

Mainpower is no longer engaged as the streetlighting maintenance contractor, therefore they are no longer being advised of any changes to maintain the database. The Mainpower database was audited as this is the last extract that was provided to the trader by Mainpower.

Contact is using a report last provided by Mainpower in February 2021 to calculate submissions. Contact have advised they will continue to use this information until they are able to get updated information.

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 diagrams below show the audit boundaries for clarity.



A field audit was undertaken for all 128 items of load for Mainpower on 15 March 2022.

1.9. Summary of previous audit

The previous audit of this database was undertaken by Rebecca Elliot of Veritek Limited in May 2021. The current status of the issues raised in that audit are detailed below.

Subject	Section	Clause	Non-compliance	Status
Distributed Unmetered Load audit	1.10	16A.26	Submission data was not provided within the required time frame.	Cleared
Deriving submission information	2.1	11(1) of Schedule 15.3	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,368 kWh per annum of under submission. The database accuracy is assessed to be 48% less than is recorded in the database. Resulting in an estimated over submission of 10,699 kWh per annum (based on 4,271 annual burn hours). The monthly database extract used for submission does not track changes at a daily basis and is provided as a snapshot.	Still existing Still existing Still existing
Database accuracy	3.1	15.2 and 15.37B (b)	The database accuracy is assessed to be 48% less than is recorded in the database. Resulting in an estimated over submission of 10,699 kWh per annum (based on 4,271 annual burn hours). Load changes no longer tracked in the Mainpower database.	Still existing Still existing
Volume information accuracy	3.2	15.2 and 15.37B (c)	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,368 kWh per annum of under submission. The database accuracy is assessed to be 48% less than is recorded in the database. Resulting in an estimated over submission of 10,699 kWh per annum (based on 4,271 annual burn hours). The monthly database extract used for submission does not track changes at a daily basis and is provided as a snapshot.	Still existing Still existing 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 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.

Audit commentary

Contact reconciles this DUML load using the DST profile. Simply Energy on behalf of Contact send the monthly kW values to EMS. EMS prepare the submission file using the data logger hours to determine the burn hours and the file is then sent to Contact who submit the data under the CTCS code.

I checked the January 2022 submission data for ICPs 0000366681MPA69 and 0000366751MPE2F and confirmed that the calculation methodology was correct. The February 2021 data is the last copy of the database provided by Mainpower to Contact. I found that there was a difference between the wattage applied by Contact and the database extract I received from Mainpower as detailed below:

ICP Number	kWh Value	Expected kWh value	kWh difference
0000366681MPA69	113.8	141.64	27.84
0000366751MPE2F	1,878.6	2,047.30	168.71
Total			196.55

Contact do not record the number of items of load, so I am unable to determine if the difference is due to a light count or wattage difference. This will be resulting in an estimated under submission of 2,359 kWh per annum. This is recorded as non-compliance.

The field audit found 22% less wattage than is recorded in the database. This is outside of the allowable +/-5% allowable threshold and will be resulting in an estimated over submission of 5,950 kWh per annum. This is recorded as non-compliance.

On 18 June 2019, the Electricity Authority issued a memo confirming that the code requirement to calculate the correct monthly load must:

- take into account when each item of load was physically installed or removed, and
- wash up volumes must take into account where historical corrections have been made to the DUML load and volumes.

The monthly report is no longer being provided as the database is not being maintained therefore any changes made in the field since February 2021 will not be captured.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 04-May-21 To: 09-Feb-22	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,359 kWh per annum of under submission. The database accuracy is assessed to be 22% less than is recorded in the database. Resulting in an estimated over submission of 5,950 kWh per annum (based on 4,271 annual burn hours). The monthly database used for submission is no longer being maintained so the monthly volumes being calculated do not take into account any changes. Potential impact: Low Actual impact: Low Audit history: Multiple times previously 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
Upon receipt, a reconciliation between the datasets will be completed and the revision submissions will be updated to reflect the more accurate capacities. As an interim step before transitioning to CMS, the Council will start providing an up-to-date extract from their RAMM database that underpins the CMS, which will be used for the basis for submission until the transition to CMS is complete.	30/4/2022	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
The lights in the Mainpower Network are connected to CCC's CMS system and will therefore start to be reconciled via the new profile and process once that has been set up.	31/7/2022	

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 was recorded against each item of load.

Audit commentary

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

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 databases were checked to confirm the location is recorded for all items of load.

Audit commentary

All items of load have street and most have an area recorded. The database contains GPS coordinates for most items of load, and the 20 items without GPS coordinates have a pole or nearest house location recorded, so they can be located.

Address accuracy is discussed further in **section 3.1**.

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

The database contained light type which corresponded to lamp wattage, gear wattage and size (total wattage) information recorded in the SLType table. All items of load had a light type recorded, and all light types have a size (total wattage) recorded in the SLType table.

In the previous audit it was confirmed that for the lights identified in the field with a label of 36W, this is the installed wattage but not programmed wattage, the lights are programmed down to 29W as confirmed by the 'as built' report.

I confirmed that no light types had an invalid zero or blank total wattage recorded, and all light types which required a gear wattage had a valid lamp and gear wattage recorded. The accuracy of the recorded wattages 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

A field audit included all 128 items of load and was undertaken on 15 March 2022.

Audit commentary

The field audit discrepancies are detailed in the table below.

Road	Database count	Field count	Light count difference	Wattage recorded incorrectly	Comments
MAIN NORTH RD	18	25	+7	14	1 x 150W HPS recorded in the database but 1 x 150W LED found in the field 1 x 158W LED recorded in the database but 1 x 113W LED found in the field 4 x 250W HPS recorded in the database but 4 x 150W LED found in the field 3 x 250W HPS recorded in the database but 3 x 158W LED found in the field 5 x 70W HPS recorded in the database but 5 x 29W LED found in the field 6 x 150W LED not recorded in the database but located in the field 1 x 131W LED not recorded in the database but located in the field
KAINGA RD	51	49	-2	4	2 x 136W LED recorded in the database but 2 x 29W LED found in the field 1 x 70W HPS recorded in the database but not located in the field 1 x 29W LED recorded in the database but not located in the field 2 x 23W LED recorded in the database but 2 x 29W LED located in the field
LINK ROAD	4	5	+1		1 x29W LED not recorded in the database but found in the field
PINE AVE	3	3		1	1 x 110W HPS recorded in the database but 1 x 29W LED found in the field
MAIN RD-KAINGA RD	3	3		3	3 x 150W HPS recorded in the database but 3 x 29W LED found in the field

Road	Database count	Field count	Light count difference	Wattage recorded incorrectly	Comments
OLD MAIN NORTH RD	8	8		8	8 x 70W HPS recorded in the database but 8 x 29W LED found in the field
Grand Total	**128**	**136**	**10 (+8, -2)**	**30**	

I found eight additional lamps in the field than were recorded in the database, and 30 lamps with incorrect wattages for all of the 128 items of load checked. The items missing from the database are recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 04-May-21 To: 09-Feb-22	Eight additional lights found in the field from the 128 items of load sampled. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as none as the database is not being maintained. The impact is assessed to be medium due to the number of additional lights found in the field for the size of the database.

Actions taken to resolve the issue	Completion date	Remedial action status
Our expectation is these lights will exist on the RAMM extracts that CCC will start providing. If they do not a field audit will be completed by CCC to determine if the lights are Council owned and where required, the RAMM database will be updated to include any missing lights for historic and future submissions.	31/5/2022	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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 achieved compliance with the code when it was being managed by Mainpower.

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 had a complete and compliant audit trail when it was being managed by Mainpower.

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

The field audit was undertaken of all 128 items of unmetered load items recorded in the database on the 15 March 2022.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority or LED light specifications where available against the DUML database.

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

Audit commentary

Database accuracy

The field audit found a large number of errors as this database is no longer being maintained. Many lights were recorded as 70W HPS and have since been replaced with 29W LEDs, and a number of other lights have been replaced, as were also reported in the last audit. Eight new lights have been installed and these are not recorded in the database. These are detailed in **section 2.5.**

The database was found to have 22% less wattage in than is recorded in the database. This is outside of the allowable +/-5% allowable threshold and will be resulting in an estimated over submission of 5,950 kWh per annum. This is recorded as non-compliance.

Lamp description and capacity accuracy

As discussed in **section 2.4**, wattages for all items of load were checked against the published standardised wattage table produced by the Electricity Authority or LED light specifications and found to be correct.

Change management process findings

This audit is assessing the last extract provided by Mainpower in February 2021. Mainpower is no longer engaged as the streetlighting maintenance contractor, therefore they are no longer being advised of any changes to maintain the database. Contact are working with CCC to source a current database. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 04-May-21 To: 09-Feb-22	The database accuracy is assessed to be 22% less than is recorded in the database. Resulting in an estimated over submission of 5,950 kWh per annum (based on 4,271 annual burn hours). No change management in place as the Mainpower database is no longer being maintained. Potential impact: Low Actual impact: Low Audit history: Multiple times previously 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
As an interim step before transitioning to CMS, the Council will start providing an up-to-date extract from their RAMM database that underpins the CMS, which will be used for the basis for submission until the transition to CMS is complete.	31/5/2022	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 this DUML load using the DST profile. Simply Energy on behalf of Contact send the monthly kW values to EMS. EMS prepare the submission file using the data logger hours to determine the burn hours and the file is then sent to Contact who submit the data under the CTCS code.

I checked the January 2022 submission data for ICPs 0000366681MPA69 and 0000366751MPE2F and confirmed that the calculation methodology was correct. The February 2021 data is the last copy of the database provided by Mainpower to Contact. I found that there was a difference between the wattage applied by Contact and the database extract I received from Mainpower as detailed below:

ICP Number	kWh Value	Expected kWh value	kWh difference
0000366681MPA69	113.8	141.64	27.84
0000366751MPE2F	1,878.6	2,047.30	168.71
Total			196.55

Contact do not record the number of items of load, so I am unable to determine if the difference is due to a light count or wattage difference. This will be resulting in an estimated under submission of 2,359 kWh per annum. This is recorded as non-compliance.

The field audit found 22% less wattage than is recorded in the database. This is outside of the allowable +/-5% allowable threshold and will be resulting in an estimated over submission of 5,950 kWh per annum. This is recorded as non-compliance.

On 18 June 2019, the Electricity Authority issued a memo confirming that the code requirement to calculate the correct monthly load must:

- take into account when each item of load was physically installed or removed, and
- wash up volumes must take into account where historical corrections have been made to the DUML load and volumes.

The monthly report is no longer being provided as the database is not being maintained therefore any changes made in the field since February 2021 will not be captured.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 04-May-21 To: 09-Feb-22	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,359 kWh per annum of under submission. The database accuracy is assessed to be 22% less than is recorded in the database. Resulting in an estimated over submission of 5,950 kWh per annum (based on 4,271 annual burn hours). The monthly database used for submission is no longer being maintained so the monthly volumes being calculated do not take into account any changes. Potential impact: Low Actual impact: Low Audit history: Three times previously 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
Upon receipt, a reconciliation between the datasets will be completed and the revision submissions will be updated to reflect the more accurate capacities.	30/4/2022	Identified
As an interim step before transitioning to CMS, the Council will start providing an up-to-date extract from their RAMM database that underpins the CMS, which will be used for the basis for submission until the transition to CMS is complete.	31/5/2022	
Preventative actions taken to ensure no further issues will occur	**Completion date**	
The lights in the Mainpower Network are connected to CCC's CMS system and will therefor start to be reconciled via the new profile and process once that has been set up.	31/7/2022	

CONCLUSION

Contact is using a report from the Mainpower database from February 2021. This database is no longer being maintained as Mainpower is no longer engaged as the streetlighting maintenance contractor, therefore they are no longer being advised of any changes to maintain the database. However, the Mainpower database was audited as this is the last extract that was provided to the trader and Contact have advised they will continue to use this information until they are able to source a current database. Contact is pursuing this with CCC.

This full field audit found a large number of discrepancies as the database is no longer maintained. The field audit found 22% less wattage than is recorded in the database. This is outside of the allowable +/- 5% allowable threshold and will be resulting in an estimated over submission of 5,950 kWh per annum.

Contact reconciles this DUML load using the DST profile. I checked the January 2022 submission data and confirmed that the calculation methodology was correct. I found that there was a difference between the wattage applied by Contact and the database extract I received from Mainpower. This will be resulting in an estimated under submission of 2,359 kWh per annum.

Simply Energy on behalf of Contact send the monthly kW values to EMS. EMS prepare the submission file using the data logger hours to determine the burn hours and the file is then sent to Simply Energy who submit the data under the CTCS code.

This audit found four non-compliances, and no recommendations were raised. The future risk rating of 20 indicates that the next audit be completed in three months. I have considered this in conjunction with Contact's responses and recommend that the next audit be in six months

PARTICIPANT RESPONSE

As a result of the field audit by Veritek we now have a comparative dataset and historic submissions will be reviewed and updated where appropriate.