

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTED UNMETERED LOAD AUDIT REPORT**

For

**AUCKLAND AIRPORT ADVERTISING SIGNS  
AND PRIME ENERGY LIMITED**

Prepared by: Steve Woods

Date audit commenced: 1 June 2022

Date audit report completed: 2 June 2022

Audit report due date: 1 June 2022

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## EXECUTIVE SUMMARY

This audit of the Auckland Airport Advertising Signs DUMML database and processes was conducted at the request of Prime Energy Limited (Prime) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

A database exists in the form of a spreadsheet, and it has an audit trail. A new sheet is saved if any changes are made. The discrepancies identified during the previous audit have been addressed.

The field audit findings are detailed in **section 2.5**. The database accuracy was found to be potentially 1.97% lower than what was found in the field. The total impact is under submission by 1,357.8 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

The audit found two non-compliances and makes one recommendation. The audit risk rating indicates that the next audit be in 24 months. I agree with this recommendation.

The matters raised will be detailed in the table below.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
All load recorded in the database	2.5	11(2A) of Schedule 15.3	One additional item of load identified in the field, resulting in a potential under submission of 1,357.8 kWh per annum.	Strong	Low	1	Cleared
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify the user who made the data change.	Strong	Low	1	Cleared
<b>Future Risk Rating</b>						<b>2</b>	

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

### RECOMMENDATIONS

Subject	Section	Clause	Recommendation
Database accuracy	3.1	15.2 and 15.37B(b)	Review the change management process to ensure that all changes are recorded in the spreadsheet for the correct date.

### 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.

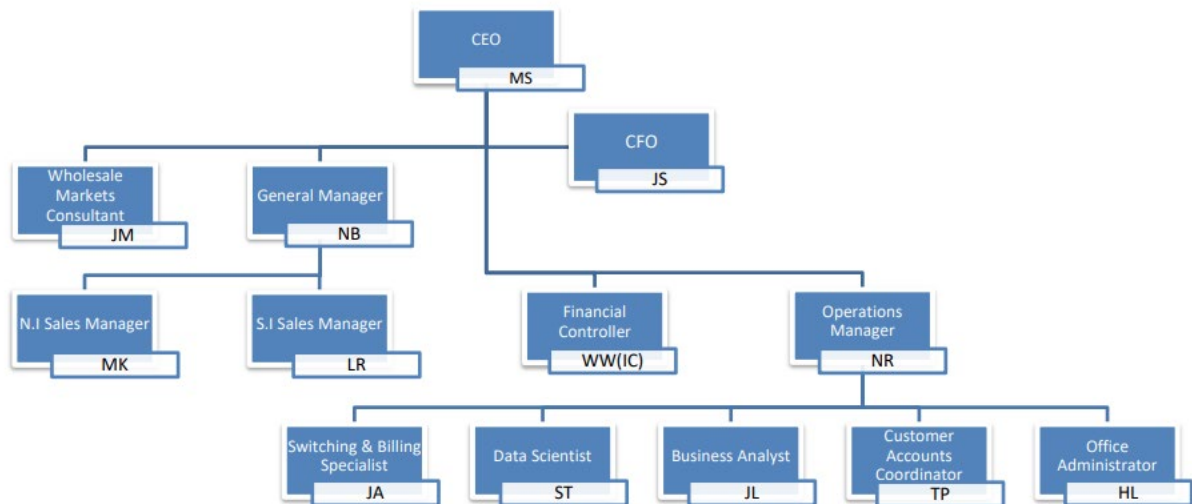
#### Audit commentary

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

### 1.2. Structure of Organisation

Prime provided a copy of their organisational structure.

#### Prime Energy Organizational Structure 2022



### 1.3. Persons involved in this audit

Auditor:

**Steve Woods**

**Veritek Limited**

**Electricity Authority Approved Auditor**

Other personnel assisting in this audit were:

Name	Title	Company
Shainaz Rafiq	Retail Operations Manager	Prime

### 1.4. Hardware and Software

Data is contained in a spreadsheet managed by Prime and APN (the customer for the DUML)

Backup is in accordance with standard industry protocols and on site and off site back up occurs.

### 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	Number of items of load	Daily kWh
0000031344AAEF5	CAC44 ITB - ADVERTISING	AKL0331	74	594.6
<b>Total</b>			<b>74</b>	<b>594.6</b>

### 1.7. Authorisation Received

All information was provided directly by Prime.

### 1.8. Scope of Audit

This audit of the Auckland Airport Advertising Signs DUML database and processes was conducted at the request of Prime Energy Limited (Prime) 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 database exists in the form of a spreadsheet, and it has an audit trail. A new sheet is saved if any changes are made.

### 1.9. Summary of previous audit

I reviewed the last audit report undertaken by Rebecca Elliot of Veritek Limited in June 2021. The table below shows that the same issues are present this year.

Subject	Section	Clause	Non-Compliance	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The database is outside the allowable +/-5% accuracy threshold resulting in a potential estimated over submission of 12,264 kWh per annum.	Cleared
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify the user who made the data change.	Still existing
Database accuracy	3.1	15.2 and 15.37B(b)	The database is outside the allowable +/-5% accuracy threshold resulting in a potential estimated over submission of 12,264 kWh per annum.	Cleared
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database is outside the allowable +/-5% accuracy threshold resulting in a potential estimated over submission of 12,264 kWh per annum.	Cleared

Subject	Section	Clause	Recommendation	
Database accuracy	3.1	15.2 and 15.37B(b)	Review the change management process to ensure that all changes are recorded in the spreadsheet for the correct date.	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**

Prime have requested Veritek to undertake this DUML 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

Prime reconciles this DUML load using the RPS profile. The lights in the signs are on for 24 hours each day, therefore on/off times are not required.

The submission totals were checked for April and May 2022, and both matched the database.

The field audit findings are detailed in **section 2.5**. The database accuracy was found to be potentially 1.97% lower than what was found in the field. The total impact is under submission by 1,357.8 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

#### Audit outcome

Compliant

### 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 in the database.

#### 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 spreadsheet contains a street address and a photo of each item of load so it can be located.

#### **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 lamp type and wattage capacity and included any ballast or gear wattage.

#### **Audit commentary**

The spreadsheet contains a description of the sign, details of the light fittings inside each sign, total wattage and kWh per day.

#### **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.*

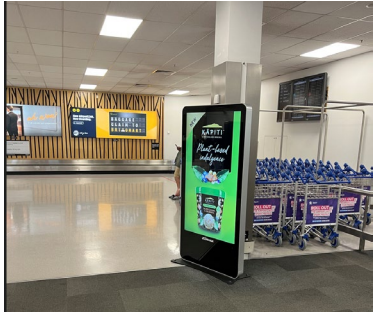
#### **Audit observation**

A field audit was undertaken of all accessible items of load. Some items are located in the boarding areas of both the domestic and international terminals so were unable to be checked.

### Audit commentary

The field audit found the following discrepancies:

The field audit found one discrepancy as detailed in the table below:

Sign ID	Location description	kW	kWh per day	Comments	Photo
N/A	Domestic regional baggage claim ground floor	0.155	3.72	Additional sign identified	

One additional sign was identified out of a sample of 29. The total annual kWh impact is under submission of 1,357.8 kWh.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 01-Jun-21 To: 02-Jun-22	One additional item of load identified in the field, resulting in a potential under submission of 1,357.8 kWh per annum.  Potential impact: Medium  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as weak as the change management process requires review.  The impact is assessed to be low, based on the kWh values described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
This has been added to the database & submission value has been adjusted accordingly		1/5/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>We knew the signs were moved around as part of the Airport renovation which is still in process. Due to the signs being in restricted areas, its hard to confirm the changes unless one is travelling &amp; has a boarding pass. Covid lockdowns &amp; restrictions at the airport didn't help either. Our client has recently gone through some management changes that has allowed them to take on more staff &amp; have a dedicated person we can deal with about these changes. Also hoping to workout some sort of authorised AXS with AIAL to visit these signs ourselves &amp; monitor the changes. Not sure if this will be possible.</p>	<p>Jan2023</p>	
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## 2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

### Code reference

*Clause 11(3) of Schedule 15.3*

### Code related audit information

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

### Audit observation

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

### Audit commentary

The spreadsheet tracks changes at a daily level.

### Audit outcome

Compliant

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

### Code reference

*Clause 11(4) of Schedule 15.3*

### Code related audit information

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

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

### Audit observation

The database was checked for audit trails.

### Audit commentary

The spreadsheet contains an audit trail of all additions and changes. A new sheet is created when any changes are made, however the user is not specified. This is recorded as non-compliance.

### Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3</p> <p>From: 01-Jun-18 To: 02-Jun-22</p>	<p>The available audit trails do not specify the user who made the data change.</p> <p>Potential impact: Low Actual impact: None Audit history: Twice previously Controls: Strong Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<p><b>Low</b></p>	<p>Controls are rated as strong, because there is typically one person who updates the spreadsheet.</p> <p>The impact is assessed to be low based on the nature and type of the non-compliance.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Since this audit, we started capturing the user name in the audit trail.</p>		<p>07/2022</p>	<p>Cleared</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Since only 1 person has authority &amp; write access to the file, we didn't see the need to record user's names. Everyone knew who was making the changes. However; we have made the change now.</p>		<p>07/2022</p>	

### 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 database includes items of load that are accessible by travelling patrons only therefore I could not randomly select the field audit. The accuracy of the database was assessed by checking all 29 accessible items.

The change management processes were reviewed, and the determination of wattage was confirmed.

##### Audit commentary

The field audit findings are detailed in **section 2.5**. The database accuracy was found to be potentially 1.97% lower than what was found in the field. The total impact is under submission by 1,357.8 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

##### Change Management

Any changes are expected to be conducted in liaison with Prime. The number of errors found in the field indicate that the customer is not advising Prime when changes are made, and I recommend that this process is reviewed.

Description	Recommendation	Audited party comment	Remedial action
Database Accuracy	Review the change management process to ensure that all changes are recorded in the spreadsheet for the correct date.	The client has been really good keeping us updated about the changes in the past. However; WFH with limited access to info, & no site access for them resulted in a non-compliance for us. We have already spoken to our client about this & they are doing everything they can to inform us of any change before it takes place.	Cleared

##### Wattage Accuracy

The wattages were consistent with those recorded in the last audit and the process to calculate this is correct.

##### Audit outcome

Compliant

### 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
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

#### **Audit commentary**

Prime reconciles this DUML load using the RPS profile. The lights in the signs are on for 24 hours each day, therefore on/off times are not required.

The submission totals were checked for April and May 2022, and both matched the database.

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#### **Audit outcome**

Compliant

## CONCLUSION

A database exists in the form of a spreadsheet, and it has an audit trail. A new sheet is saved if any changes are made. The discrepancies identified during the previous audit have been addressed.

The field audit findings are detailed in **section 2.5**. The database accuracy was found to be potentially 1.97% lower than what was found in the field. The total impact is under submission by 1,357.8 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

The audit found two non-compliances and makes one recommendation. The audit risk rating indicates that the next audit be in 24 months. I agree with this recommendation.



## PARTICIPANT RESPONSE