

ELECTRICITY INDUSTRY PARTICIPATION CODE
RECONCILIATION PARTICIPANT AUDIT REPORT



For

THE EMBEDDED NETWORK COMPANY
(TENC)

NZBN: 9429031389037

Prepared by: Rebecca Elliot

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EXECUTIVE SUMMARY

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of **The Embedded Network Company (TENC)**, to support application for renewal of certification in accordance with clauses 5 and 7 of Schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits version 7.2.

TENC is an embedded network operator and is therefore required to be a certified reconciliation participant in accordance with clause 15.38 of part 15. In this report I have only recorded those matters where issues were discovered, or where specific analysis was undertaken.

TENC switched retailer from Simply Energy to TENCO (TENR) from 1 October 2021. A material change audit was completed for the change of primary agent. The sub agent has not changed, and EMS continues to conduct all the relevant activities.

EMS' audit report records compliance in relation to the activities performed on behalf of TENC. I confirmed the following as part of TENC's audit:

- no defective meters have been identified during the audit period,
- no correction of volume data has occurred during the audit period, and
- no clock synchronisation errors outside the allowable tolerances have occurred during the audit period.

Two estimations of volume occurred during the audit period. Both were created using best endeavours.

A breach (2110TENC1) was alleged by the RM in relation to a decrease of 43,000 kWh in TENCO's submissions between July 2021 R1 and R3 for NSP TGN0011. This is under investigation by compliance with no result as yet. TENC had identified the large discrepancy in their review of the R3 submission but failed to take appropriate actions with EMS to resolve before submission for NSP TGN0011. The RM queried this, and it was found that the metered volume for 31 July 2021 only was submitted. This was revised against the retailer's submitted volumes and these revised volumes were submitted two days later.

The audit found two non-compliances and makes no recommendations. Both relate to the breach discussed above. The future risk rating is indicating that the next audit be due in 12 months. I have considered this in conjunction with TENC's response and agree with this recommendation.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	15.2(1)(a)	Inaccurate information was provided to the RM resulting in under submission of 64,029.20 kWh for NSP TGN0011.	Weak	High	9	Identified
Submission accuracy	12.7	15.12	Inaccurate information was provided to the RM resulting in under submission of 64,029.20 kWh for NSP TGN0011.	Weak	High	9	Identified
Future Risk Rating						18	

Future risk rating	0	1-3	4-14	16-40	41-55	55+
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

1.1. Exemptions from Obligations to Comply with Code (Section 11)

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

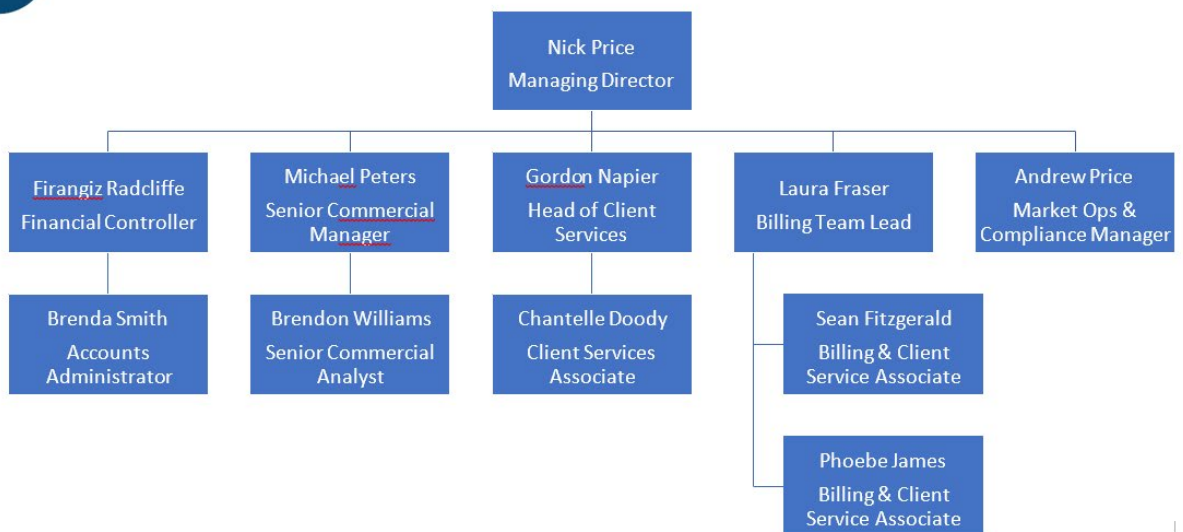
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

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

1.2. Structure of Organisation

TENCO provided an organisation chart:



1.3. Persons involved in this audit

Auditor:

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

Personnel assisting in this audit were:

Name	Title	Organisation
Nick Price	Managing Director	TENCO
Sunny Feng	Data Analyst	EMS

1.4. Use of Agents (Clause 15.34)

Code reference

Clause 15.34

Code related audit information

A reconciliation participant who uses an agent

- *remains responsible for the contractor's fulfilment of the participant's Code obligations*
- *cannot assert that it is not responsible or liable for the obligation due to something the agent has or has not done.*

Audit observation

EMS performs all TENC's responsibilities.

1.5. Hardware and Software

Hardware and software are discussed in EMS' audit report.

1.6. Breaches or Breach Allegations

The EA confirmed that three alleged breaches relevant to the scope of this audit occurred during the audit period:

Breach no	Breach of	Description	Outcome
2005TENC1	Part 15 clause 15.14 (2)	NSP change request was less than the minimum 1-month notice required under 15.14(2) before the effective date of the effective change.	early closure (Decision 15/10/2020)

Breach no	Breach of	Description	Outcome
2110TENC1	Part 15 clause 15.2 (1) (a)	The reconciliation manager checks noticed a decrease of 43 MWh in Tenco's submissions between July 2021 R1 and R3.	no result yet
2111TENC1	Part 15 clause 14 (2)	The Embedded Network Company (TENC) sent a request to the Reconciliation manager to add a new NSP (TTF0012-TENC EN) to the NSP mapping table with less than a month notice.	no result yet

In reference to breach number 2005TENC1 and 2111TENC1, this is examined as part of the 'Creation and Maintenance of NSPs' in **section 6** of the Distributor report. Breach number 2110TENC1 is recorded as non-compliance in **sections 2.1** and **12.7**.

1.7. NSP Data

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	CGA0011	48 GREYS AVENUE AUCKLAND	PEN1101	VECT	CGA0011TENCE	EN	1/09/2017	AMCI
TENC	CLN0011	351 LINCOLN ROAD ADDINGTON	ISL0661	ORON	CLN0011TENCE	EN	1/01/2016	AMCI
TENC	CPP0111	Central Park	PEN0331	VECT	CPP0111TENCE	EN	1/08/2018	AMCI
TENC	CRN0011	51 CORINTHIAN DRIVE PROPERTY	ALB0331	UNET	CRN0011TENCE	EN	1/10/2015	AMCI
TENC	HBS0011	1 Hobson St Auckland	HOB1101	VECT	HBS0011TENCE	EN	26/09/2019	AMCI
TENC	HGH0011	Highbury Shopping Centre	WRD0331	UNET	HGH0011TENCE	EN	1/06/2018	AMCI
TENC	KDH0011	10 WORLEY PLACE	HAM0331	WAIK	KDH0011TENCE	EN	1/06/2020	AMCI
TENC	KFA0111	21 Pitt Street	PEN1101	VECT	KFA0111TENCE	EN	1/01/2021	AMCI
TENC	KMW0011	KIWI MAJESTIC CENTRE	CPK0331	CKHK	KMW0011TENCE	EN	1/09/2019	AMCI
TENC	KNA0011	205 Queen Street Auckland	PEN1101	VECT	KNA0011TENCE	EN	1/02/2018	AMCI
TENC	KNW0111	North City Shopping Centre	TKR0331	CKHK	KNW0111TENCE	EN	9/07/2018	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	MSC0011	MERIDIAN SHOPPING CENTRE	HWB0331	DUNE	MSC0011TENCE	EN	1/08/2021	AMCI
TENC	MXS0011	South City Centre	ISL0661	ORON	MXS0011TENCE	EN	10/10/2019	AMCI
TENC	PAZ0111	ANZ CENTRE	HOB1101	VECT	PAZ0111TENCE	EN	1/06/2021	AMCI
TENC	PFB0011	55 Featherston Street Wellington	WIL0331	CKHK	PFB0011TENCE	EN	1/06/2018	FCLM
TENC	PHP0011	171 FEATHERSTON ST PROPERTY	CPK0331	CKHK	PHP0011TENCE	EN	14/09/2018	AMCI
TENC	PHS0011	195 Lambton Quay Wellington	KWA0111	CKHK	PHS0011TENCE	EN	1/06/2018	FCLM
TENC	PMK0011	Morrison Kent House Wellington	CPK0331	CKHK	PMK0011TENCE	EN	1/09/2021	AMCI
TENC	PPH0011	PASTORAL HOUSE	KWA0111	CKHK	PPH0011TENCE	EN	1/05/2020	AMCI
TENC	PTC0011	125 THE TERRACE	CPK0331	CKHK	PTC0011TENCE	EN	14/09/2018	AMCI
TENC	RTB0011	TELCO BUILDING	HOB1101	VECT	RTB0011TENCE	EN	26/09/2019	FCLM
TENC	STL0011	The Sentinel	WRD0331	UNET	STL0011TENCE	EN	1/10/2020	AMCI
TENC	TAA0011	50 Anzac Ave Auckland	PEN1101	VECT	TAA0011TENCE	EN	1/07/2017	AMCI
TENC	TAC0011	250 Tancred Street ASHBURTON	ASB0661	EASH	TAC0011TENCE	EN	1/07/2019	AMCI
TENC	TAQ0011	104 QUAY ST AUCKLAND	PEN1101	VECT	TAQ0011TENCE	EN	1/12/2016	AMCI
TENC	TAT0011	154 THE TERRACE WELLINGTON	CPK0331	CKHK	TAT0011TENCE	EN	14/09/2018	AMCI
TENC	TAW0011	TE AWA SHOPPING CENTRE	TWH0331	WAIK	TAW0011TENCE	EN	1/11/2014	AMCI
TENC	TBA0011	36-42 CUSTOMS ST EAST AUCKLAND	PEN1101	VECT	TBA0011TENCE	EN	15/09/2016	AMCI
TENC	TBC0011	BNZ CENTRE CHRISTCHURCH	ISL0661	ORON	TBC0011TENCE	EN	21/05/2018	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	TBD0011	DOMINION BUILDING	CPK0331	CKHK	TBD0011TENCE	EN	1/06/2015	AMCI
TENC	TBE0011	2-16 TAKU TAI SQUARE	PEN1101	VECT	TBE0011TENCE	EN	1/04/2021	AMCI
TENC	TBQ0011	2-8 White St Auckland	PEN1101	VECT	TBQ0011TENCE	EN	1/09/2019	AMCI
TENC	TBR0011	35 Brecon Street	FKN0331	DUNE	TBR0011TENCE	EN	21/06/2021	AMCI
TENC	TBS0011	26-28 CUSTOMS ST EAST	PEN1101	VECT	TBS0011TENCE	EN	1/11/2015	AMCI
TENC	TBV0011	The Botanic Retirement Village	SVL0331	UNET	TBV0011TENCE	EN	28/07/2021	AMCI
TENC	TBW0011	33 Broadway Newmarket Auckland	PEN0331	VECT	TBW0011TENCE	EN	1/10/2018	AMCI
TENC	TCA0011	CENTURY CITY APARTMENTS	CPK0331	CKHK	TCA0011TENCE	EN	2/04/2013	AMCI
TENC	TCB0011	4 Williamson Ave Auckland	ROS1101	VECT	TCB0011TENCE	EN	1/07/2017	AMCI
TENC	TCC0011	Coastlands Plaza Paraparaumu	PRM0331	ELEC	TCC0011TENCE	EN	1/06/2021	AMCI
TENC	TCD0011	Chaffers Dock	CPK0331	CKHK	TCD0011TENCE	EN	20/01/2012	AMCI
TENC	TCG0011	103 Carlton Gore Road	PEN0331	VECT	TCG0011TENCE	EN	1/01/2019	AMCI
TENC	TCH0011	46-58 Customs Street East Auck	PEN1101	VECT	TCH0011TENCE	EN	1/05/2017	AMCI
TENC	TCL0011	CHEWS LANE APARTMENTS	CPK0331	CKHK	TCL0011TENCE	EN	14/09/2018	AMCI
TENC	TCO0011	95 SWAYNE ROAD CAMBRIDGE	CBG0111	WAIP	TCO0011TENCE	EN	16/04/2018	AMCI
TENC	TCP0011	370 Oriental Parade Wellington	CPK0331	CKHK	TCP0011TENCE	EN	1/10/2017	AMCI
TENC	TCR0011	9 11 CORINTHIAN DR AUCKLAND	ALB0331	UNET	TCR0011TENCE	EN	1/02/2016	AMCI
TENC	TCS0011	11 Church Street Wellington	CPK0331	CKHK	TCS0011TENCE	EN	1/06/2021	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	TCT0011	TAURANGA CROSSING TAURIKURA DR	TGA0331	POCO	TCT0011TENCE	EN	15/03/2019	AMCI
TENC	TCU0011	50 Customhouse Quay Wellington	KWA0111	CKHK	TCU0011TENCE	EN	1/06/2019	AMCI
TENC	TDS0011	AWLY BUILDING 80 ARMAGH ST CHCH	ISL0661	ORON	TDS0011TENCE	EN	13/05/2018	AMCI
TENC	TDX0011	111 Dixon Street Wellington	CPK0111	CKHK	TDX0011TENCE	EN	11/11/2019	AMCI
TENC	TES0011	1-3 EDWARD STREET WELLINGTON	CPK0111	CKHK	TES0011TENCE	EN	1/12/2019	AMCI
TENC	TET0011	EAGLE TECHNOLOGY HOUSE	CPK0111	CKHK	TET0011TENCE	EN	14/09/2018	AMCI
TENC	TFJ0011	FUJITSU TOWER 141 THE TERRACE	CPK0331	CKHK	TFJ0011TENCE	EN	14/09/2018	AMCI
TENC	TFM0011	FIVE MILE SHOPPING CENTRE	FKN0331	DUNE	TFM0011TENCE	EN	8/07/2015	AMCI
TENC	TFS0011	152 FANSHAWE ST AUCKLAND	HOB1101	VECT	TFS0011TENCE	EN	26/09/2019	AMCI
TENC	TFS0012	155 Fanshawe St Akld	HOB1101	VECT	TFS0012TENCE	EN	1/06/2020	AMCI
TENC	TFS0013	136 Fanshawe Street AUCKLAND	HOB1101	VECT	TFS0013TENCE	EN	1/01/2021	NGCM
TENC	TFT0011	4 Fred Thomas Drive	WRD0331	UNET	TFT0011TENCE	EN	20/09/2019	AMCI
TENC	TGB0011	96 St Georges Bay Road Auckland	PEN1101	VECT	TGB0011TENCE	EN	1/02/2018	AMCI
TENC	TGC0011	THE GRAND ARCADE	CPK0331	CKHK	TGC0011TENCE	EN	14/09/2018	AMCI
TENC	TGD0011	Goddards Shopping Centre	TGA0331	POCO	TGD0011TENCE	EN	1/06/2019	AMCI
TENC	TGN0011	The Groves 4155 Great North Rd	HEP0331	UNET	TGN0011TENCE	EN	1/07/2021	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	TGR0011	141 CASHEL ST CHRISTCHURCH 8011	ISL0661	ORON	TGR0011TENCE	EN	13/05/2018	AMCI
TENC	TGS0011	650 Great South Rd Auckland	PEN0331	VECT	TGS0011TENCE	EN	1/09/2017	AMCI
TENC	TGT0011	Guardian Trust Building	CPK0331	CKHK	TGT0011TENCE	EN	14/09/2018	AMCI
TENC	TGW0011	31 Galway St AUCKLAND	PEN1101	VECT	TGW0011TENCE	EN	1/09/2020	AMCI
TENC	THD0011	Hazeldean Business Park	ISL0661	ORON	THD0011TENCE	EN	1/10/2019	AMCI
TENC	THH0011	21 Home Straight Te Rapa	TWH0331	WAIK	THH0011TENCE	EN	20/04/2021	AMCI
TENC	THP0012	7 Hopetoun Street Auckland	ROS1101	VECT	THP0012TENCE	EN	8/06/2018	AMCI
TENC	THS0011	THE HSBC TOWER	ISL0661	ORON	THS0011TENCE	EN	1/04/2015	AMCI
TENC	TJS0011	3-11 Hunter Street Wellington	CPK0331	CKHK	TJS0011TENCE	EN	14/09/2018	AMCI
TENC	TJW0011	243-261 Princes Street Dunedin	SDN0331	DUNE	TJW0011TENCE	EN	1/04/2018	AMCI
TENC	TKI0011	2 Kitchener St Auckland	PEN1101	VECT	TKI0011TENCE	EN	1/08/2017	AMCI
TENC	TKL0011	16 West Coast Rd Glen Eden Akld	HEP0331	UNET	TKL0011TENCE	EN	1/09/2019	AMCI
TENC	TKM0011	The Karori Mall	WIL0331	CKHK	TKM0011TENCE	EN	20/01/2012	AMCI
TENC	TKO0011	10 Waterloo Quay Wellington	WIL0331	CKHK	TKO0011TENCE	EN	12/07/2018	AMCI
TENC	TKS0011	KATE SHEPPARD APARTMENTS	WIL0331	CKHK	TKS0011TENCE	EN	1/03/2015	AMCI
TENC	TLB0011	88 Te Oneroa Way Auckland	ALB0331	UNET	TLB0011TENCE	EN	7/11/2018	AMCI
TENC	TLN0011	131 LINCOLN ROAD AUCKLAND	HEN0331	UNET	TLN0011TENCE	EN	1/07/2015	AMCI
TENC	TMA0011	123 Molesworth St Wellington	KWA0111	CKHK	TMA0011TENCE	EN	22/04/2021	AMCI
TENC	TMC0011	2 Connolly St Lower Hutt	MLG0111	CKHK	TMC0011TENCE	EN	22/08/2017	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	TML0011	1 MARKET LANE WELLINGTON	CPK0331	CKHK	TML0011TENCE	EN	1/04/2015	AMCI
TENC	TMM0111	80b BURWOOD RD MATAMATA	HIN0331	POCO	TMM0111TENCE	EN	8/07/2019	AMCI
TENC	TMT0011	65-93 Lakeside Road Wanaka Otago	CML0331	DUNE	TMT0011TENCE	EN	1/07/2020	AMCI
TENC	TMX0011	602 Great South Road Auckland	PEN0331	VECT	TMX0011TENCE	EN	1/01/2021	AMCI
TENC	TNU0011	8 Nugent Street Auckland	PEN1101	VECT	TNU0011TENCE	EN	28/04/2021	AMCI
TENC	TNV0011	NOUVO APARTMENTS MT COOK WLG	CPK0331	CKHK	TNV0011TENCE	EN	1/06/2016	AMCI
TENC	TOD0011	3-5 Oracle Drive Auckland	ALB0331	UNET	TOD0011TENCE	EN	1/04/2021	NGCM
TENC	TOM0011	226-240 Ormiston Rd Flatbush	OTA0221	VECT	TOM0011TENCE	EN	1/05/2020	AMCI
TENC	TOX0011	32 Oxford Terrace	ISL0661	ORON	TOX0011TENCE	EN	1/05/2019	AMCI
TENC	TPA0011	Pinnacle Apartments Wellington	CPK0111	CKHK	TPA0011TENCE	EN	1/08/2021	AMCI
TENC	TPK0011	Peak Apartments Wellington	CPK0111	CKHK	TPK0011TENCE	EN	1/08/2018	AMCI
TENC	TPM0011	THE PIERMONT/MONUMENT APARTMENTS	CPK0331	CKHK	TPM0011TENCE	EN	1/09/2013	AMCI
TENC	TPP0011	7 Gravatt Road Papamoa	MTM0331	POCO	TPP0011TENCE	EN	1/09/2021	AMCI
TENC	TPW0011	141 Pakenham St West Auck	PEN1101	VECT	TPW0011TENCE	EN	26/09/2017	AMCI
TENC	TPW0012	132 Halsey Street Auckland	HOB1101	VECT	TPW0012TENCE	EN	1/12/2018	AMCI
TENC	TPW0013	30 Madden Stage1	HOB1101	VECT	TPW0013TENCE	EN	1/01/2021	AMCI
TENC	TQB0011	51 WEBB STREET	CPK0111	CKHK	TQB0011TENCE	EN	14/09/2018	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	TQC0011	Queenstown Central	FKN0331	DUNE	TQC0011TENCE	EN	11/06/2018	AMCI
TENC	TQD0011	40-44 Queens Drive HUTT CENTRAL	MLG0111	CKHK	TQD0011TENCE	EN	1/05/2020	AMCI
TENC	TQS0011	246 QUEEN STREET AUCKLAND	PEN1101	VECT	TQS0011TENCE	EN	1/10/2019	AMCI
TENC	TQS0012	125 Queen Street Auckland	HOB1101	VECT	TQS0012TENCE	EN	1/07/2021	AMCI
TENC	TQW0011	CLYDE QUAY WHARF	CPK0331	CKHK	TQW0011TENCE	EN	1/10/2014	AMCI
TENC	TRM0011	RIVERSIDE MARKETS	ISL0661	ORON	TRM0011TENCE	EN	1/01/2022	AMCI
TENC	TRR0011	Riverside Residence Dunedin	CML0331	DUNE	TRR0011TENCE	EN	16/08/2021	AMCI
TENC	TRT0011	REPUBLIC BUILDING	CPK0331	CKHK	TRT0011TENCE	EN	1/06/2013	AMCI
TENC	TSA0011	46 Sales St Auckland	HOB1101	VECT	TSA0011TENCE	EN	1/07/2017	AMCI
TENC	TSB0011	66 THE SQUARE PALMERSTON NORTH	LTN0331	POCO	TSB0011TENCE	EN	17/04/2020	AMCI
TENC	TSG0011	THE SOUTHGATE MALL	TAK0331	VECT	TSG0011TENCE	EN	1/08/2013	AMCI
TENC	TSM0011	Silverdale Mall Auckland	SVL0331	UNET	TSM0011TENCE	EN	1/07/2021	AMCI
TENC	TSN0011	79 QUEEN STREET	PEN1101	VECT	TSN0011TENCE	EN	1/04/2021	AMCI
TENC	TSP0011	43 MULGRAVE ST WELLINGTON	CPK0331	CKHK	TSP0011TENCE	EN	14/09/2018	AMCI
TENC	TSQ0011	10 Ebor Street Te Aro Wellington	CPK0331	CKHK	TSQ0011TENCE	EN	1/02/2020	AMCI
TENC	TSS0011	34 SHORTLAND ST AUCKLAND	PEN1101	VECT	TSS0011TENCE	EN	1/12/2016	AMCI
TENC	TTA0011	19 College Street Wellington	CPK0331	CKHK	TTA0011TENCE	EN	1/07/2017	AMCI
TENC	TTC0011	THE CUBE	CPK0331	CKHK	TTC0011TENCE	EN	1/06/2013	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	TTF0011	Farmers-Tauranga Retail	TGA0331	POCO	TTF0011TENCE	EN	1/10/2021	AMCI
TENC	TTF0012	38 Elizabeth Street Tauranga	TGA0331	POCO	TTF0012TENCE	EN	1/10/2021	AMCI
TENC	TTH0011	THE HUB 398 MAIN SOUTH ROAD	ISL0331	ORON	TTH0011TENCE	EN	1/08/2014	AMCI
TENC	TTR0011	162 FLAT BUSH SCHOOL RD	PAK0331	VECT	TTR0011TENCE	EN	1/05/2016	AMCI
TENC	TTS0011	TAKAPUNA AUCKLAND	WRD0331	UNET	TTS0011TENCE	EN	21/09/2019	AMCI
TENC	TTT0011	TOURISM & TRAVEL HOUSE	CPK0331	CKHK	TTT0011TENCE	EN	14/09/2018	AMCI
TENC	TVN0011	City Lodge Apartments Wellington	CPK0331	CKHK	TVN0011TENCE	EN	13/10/2021	AMCI
TENC	TVP0011	166 VICTORIA ST Wellington	CPK0111	CKHK	TVP0011TENCE	EN	1/02/2020	AMCI
TENC	TVS0011	ORACLE BUILDING 162 VICTORIA ST	PEN1101	VECT	TVS0011TENCE	EN	1/08/2015	AMCI
TENC	TVT0011	VICTORIA ST AUCKLAND	PEN1101	VECT	TVT0011TENCE	EN	1/11/2015	AMCI
TENC	TWA0011	2026 STEWART DUFF DR Wellington	CPK0331	CKHK	TWA0011TENCE	EN	1/04/2021	AMCI
TENC	TWG0011	8 Wigan Street Wellington	CPK0111	CKHK	TWG0011TENCE	EN	1/06/2018	AMCI
TENC	TWM0011	WAITAKERE MEGA CENTRE AUCKLAND	HEP0331	UNET	TWM0011TENCE	EN	1/03/2016	AMCI
TENC	TWQ0011	14 WEST QUAY AHURIRI NAPIER	RDF0331	HAWK	TWQ0011TENCE	EN	1/08/2016	AMCI
TENC	TWS0011	Willbank house WELLINGTON	CPK0331	CKHK	TWS0011TENCE	EN	14/09/2018	AMCI
TENC	VGH0011	GHD CENTRE	HOB1101	VECT	VGH0011TENCE	EN	1/01/2021	AMCI
TENC	VWC0011	WATERCARE BUILDING	PEN0331	VECT	VWC0011TENCE	EN	1/01/2021	AMCI

Dist	NSP POC	Description	Parent POC	Parent Dist	Balancing Area	Network Type	Start Date	MEP
TENC	WGF0011	GLENFIELD SHOPPING CENTRE	WRD0331	UNET	WGF0011TENCE	EN	1/02/2016	AMCI
TENC	WPK0011	WESTFIELD PAKURANGA	PAK0331	VECT	WPK0011TENCE	EN	1/04/2013	AMCI
TENC	WSC0011	WESTFIELD SHORE CITY	WRD0331	UNET	WSC0011TENCE	EN	21/09/2019	AMCI
TENC	WWC0011	WESTFIELD WESTCITY	HEP0331	UNET	WWC0011TENCE	EN	1/03/2018	AMCI

1.8. Authorisation Received

A letter of authorisation was provided.

1.9. Scope of Audit

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of TENC, to support application for renewal of certification in accordance with clauses 5 and 7 of Schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits version 7.2.

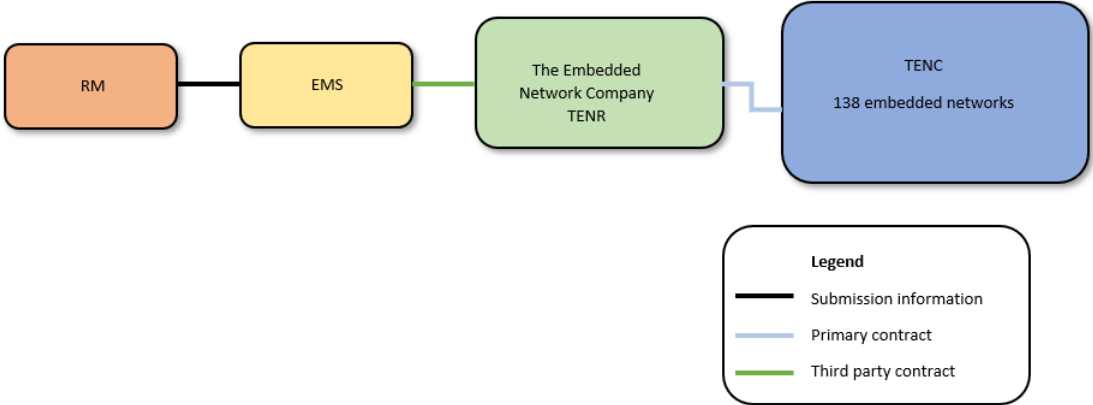
TENC is an embedded network operator and is therefore required to be a certified reconciliation participant in accordance with clause 15.38 of part 15.

The scope of the audit is shown in the table below:

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Agents Involved in Performance of Tasks
(b) – Gathering and storing raw meter data	EMS
(c)(i) - Creation and management of HHR volume information	
(e) – Provision of submission information for reconciliation	

As of 1 October 2021, the main agent for TENC has changed from Simply Energy to TENCO (TNR). A material change audit was completed. The sub agent has not changed, and EMS continues to conduct all the relevant activities.

The scope of the audit is shown in the diagram below:



1.10. Summary of previous audit

The previous audit was conducted in February 2020 by Tara Gannon of Veritek Limited. One non-compliance was recorded, and no recommendations were raised. The current status of the non-compliance is listed below.

Subject	Section	Clause	Non-Compliance	Status
Provision of NSP submission information	12.5	15.10	Submission data was provided one business day late for revision submissions in December 2017, initial submissions in February 2018, and the initial submission for TSB0011 in April 2019.	Cleared

2. OPERATIONAL INFRASTRUCTURE

2.1. Relevant information (Clause 10.6, 11.2, 15.2)

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

A participant must take all practicable steps to ensure that information that the participant is required to provide is:

- a) complete and accurate*
- b) not misleading or deceptive*
- c) not likely to mislead or deceive.*

If the participant becomes aware that in providing information under this Part, the participant has not complied with that obligation, the participant must, as soon as practicable, provide such further information as is necessary to ensure that the participant does comply.

Audit observation

The process to find and correct incorrect information was discussed.

Audit commentary

Compliance is recorded in the EMS audit report in relation to this clause.

Any instances of incorrect, incomplete, and misleading information are expected to be resolved as they arise.

A breach (2110TENC1) was alleged by the RM in relation to a decrease of 43,000 kWh in TENCO's submissions between July 2021 R1 and R3 for NSP TGN0011. This is under investigation by compliance with no result as yet.

I examined this incident and found that incorrect July 2021 R3 submission information was sent for NSP TGN0011:

Revisions	kWh submitted
R1	45,086.40
R3	1,390.29
Resubmitted R3	65,419.49

EMS confirmed there was estimated volumes generated from 1 July 2021 to 30 July 2021 due to a meter not being installed from the start date of NSP TGN0011. As this was a new NSP, there was no historical data that could be used to calculate an estimate. In this instance they used the total of the Retailer's kWh submitted to estimate the volume. The initial R3 submission did not include the estimated period from 1 July 2021 to 30 July 2021 resulting in under submission. TENC had identified the large discrepancy in their review of the R3 submission but failed to take appropriate actions with EMS to resolve before submission. The RM queried the difference, and it was found that only the metered volume for 31 July 2021 was submitted. This was revised against the Retailer's submitted volumes and these revised volumes were submitted two days later. The RM has alleged a breach against TENC in relation to this incident. This is still under investigation. This is recorded as non-compliance below and in **section 12.7**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 15.2(1)(a) From: 19-Oct-21 To: 21-Oct-21	Inaccurate information was provided to the RM resulting in under submission of 64,029.20 kWh for NSP TGN0011. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are recorded as weak as such a discrepancy should have been investigated and corrected before submission. The impact on settlement and participants was high and the RM breached TENCO in relation to this event.		
Actions taken to resolve the issue		Completion date	Remedial action status
On the 21/10/2021 following a query of the incorrect submission in the R3 file Tenco worked with EMS to resubmit a revised R3 file.		21/10/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
For this instance, in both the R7 and R14 submissions Tenco via EMS will estimate the unavailable quantities based on retailer submissions. To avoid this on a go forward Tenco will not notify a new embedded network until we have proof the metering is installed. This does slow down our process, but we understand market impact of this. Tenco has developed a new data warehouse. One of the measures and KPIs we have put in place is monitoring the differences between retailer submissions, NSPVOLs and metered kWh.		Ongoing	

2.2. Provision of information (Clause 15.35)

Code reference

Clause 15.35

Code related audit information

If an obligation exists to provide information in accordance with Part 15, a participant must deliver that information to the required person within the timeframe specified in the Code, or, in the absence of any such timeframe, within any timeframe notified by the Authority. Such information must be delivered in the format determined from time to time by the Authority.

Audit observation

The process to find and correct incorrect information was discussed.

Audit commentary

This area is discussed in a number of sections in this report.

Audit outcome

Compliant

2.3. Data transmission (Clause 20 Schedule 15.2)

Code reference

Clause 20 Schedule 15.2

Code related audit information

Transmissions and transfers of data related to metering information between reconciliation participants or their agents, for the purposes of the Code, must be carried out electronically using systems that ensure the security and integrity of the data transmitted and received.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

2.4. Audit trails (Clause 21 Schedule 15.2)

Code reference

Clause 21 Schedule 15.2

Code related audit information

Each reconciliation participant must ensure that a complete audit trail exists for all data gathering, validation, and processing functions of the reconciliation participant.

The audit trail must include details of information:

- *provided to and received from the registry manager*
- *provided to and received from the reconciliation manager*
- *provided and received from other reconciliation participants and their agents.*

The audit trail must cover all archived data in accordance with clause 18.

The logs of communications and processing activities must form part of the audit trail, including if automated processes are in operation.

Logs must be printed and filed as hard copy or maintained as data files in a secure form, along with other archived information.

The logs must include (at a minimum) the following:

- *an activity identifier (clause 21(4)(a))*
- *the date and time of the activity (clause 21(4)(b))*
- *the operator identifier for the person who performed the activity (clause 21(4)(c)).*

Audit observation

This is discussed in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit

Audit outcome

Compliant

2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)

Code reference

Clause 10.4

Code related audit information

If a participant must obtain a consumer's consent, approval, or authorisation, the participant must ensure it:

- *extends to the full term of the arrangement*
- *covers any participants who may need to rely on that consent.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))

Code reference

Clause 10.7(2),(4),(5) and (6)

Code related audit information

The responsible reconciliation participant must, if requested, arrange access for the metering installation to the following parties:

- *the Authority*
- *an ATH*
- *an auditor*
- *an MEP*
- *a gaining metering equipment provider.*

The trader must use its best endeavours to provide access:

- *in accordance with any agreements in place*
- *in a manner and timeframe which is appropriate in the circumstances.*

If the trader has a consumer, the trader must obtain authorisation from the customer for access to the metering installation, otherwise it must arrange access to the metering installation.

The reconciliation participant must provide any necessary facilities, codes, keys or other means to enable the party to obtain access to the metering installation by the most practicable means.

Audit observation

I discussed TENC's policy in relation to allowing access to metering and if any requests had been received during the audit period.

Audit commentary

Arrangements for access to metering are completed as necessary. There have been no cases where access could not be arranged.

Audit outcome

Compliant

2.7. Physical location of metering installations (Clause 10.35(1)&(2))

Code reference

Clause 10.35(1)&(2)

Code related audit information

A reconciliation participant responsible for ensuring there is a category 1 metering installation or category 2 metering installation must ensure that the metering installation is located as physically close to a point of connection as practical in the circumstances.

A reconciliation participant responsible for ensuring there is a category 3 or higher metering installation must:

- a) *if practical in the circumstances, ensure that the metering installation is located at a point of connection; or*
- b) *if it is not practical in the circumstances to locate the metering installation at the point of connection, calculate the quantity of electricity conveyed through the point of connection using a loss compensation process approved by the certifying ATH.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)

Code reference

Clause 11.15B

Code related audit information

A trader must at all times ensure that the terms of each contract between a customer and a trader permit:

- *the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and*
- *the terms of the assigned contract to be amended on such an assignment to—*
- *the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or*
- *such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and*
- *the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and*
- *the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and*
- *the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).*

The terms specified in subclause (1) must be expressed to be for the benefit of the Authority for the purposes of the Contracts (Privacy) Act 1982, and not be able to be amended without the consent of the Authority (clause 11.15B(2)).

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.9. Connection of an ICP (Clause 10.32)

Code reference

Clause 10.32

Code related audit information

A reconciliation participant must only request the connection of a point of connection if they:

- *accept responsibility for their obligations in Parts 10, 11 and 15 for the point of connection; and*
- *have an arrangement with an MEP to provide one or more metering installations for the point of connection.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.10. Temporary Electrical Connection of an ICP (Clause 10.33)

Code reference

Clause 10.33(1)

Code related audit information

A trader may temporarily electrically connect a point of connection, or authorise a MEP to temporarily electrically connect a point of connection, only if:

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
 - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*
 - o *if the ICP has metered load, 1 or more certified metering installations are in place*
 - o *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.11. Electrical Connection of Point of Connection (Clause 10.33A)

Code reference

Clause 10.33A(1)

Code related audit information

A reconciliation participant may electrically connect or authorise the electrical connection of a point of connection only if:

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
 - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*
 - o *if the ICP has metered load, 1 or more certified metering installations are in place*
 - o *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the electrical connection.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.12. Arrangements for line function services (Clause 11.16)

Code reference

Clause 11.16

Code related audit information

Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must ensure that it, or its customer, has made any necessary arrangements for the provision of line function services in relation to the relevant ICP

Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must have entered into an arrangement with an MEP for each metering installation at the ICP.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.13. Arrangements for metering equipment provision (Clause 10.36)

Code reference

Clause 10.36

Code related audit information

A reconciliation participant must ensure it has an arrangement with the relevant MEP prior to accepting responsibility for an installation.

Audit observation

The NSP supply point table as of 7 December 2021 was examined, and the MEP details are recorded in **section 1.7**.

Audit commentary

All connected embedded networks have an MEP recorded.

Audit outcome

Compliant

2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5))

Code reference

Clause 10.33B

Code related audit information

If a trader connects an ICP it is in the process of switching and the switch does not proceed or is withdrawn the trader must:

- *restore the disconnection, including removing any bypass and disconnecting using the same method the losing trader used*
- *reimburse the losing trader for any direct costs incurred*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.15. Electrical disconnection of ICPs (Clause 10.33B)

Code reference

Clause 10.33B

Code related audit information

Unless the trader is recorded in the registry or is meeting its obligation under 10.33A(5) it must not disconnect or electrically disconnect the ICP or authorise the metering equipment provider to disconnect or electrically disconnect the ICP.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7)**Code reference**

Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7

Code related audit information

A trader can remove or break a seal without authorisation from the MEP to:

- *reset a load control switch, bridge or un-bridge a load control switch – if the load control switch does not control a tome block meter channel*
- *electrically connect load or generation, of the load or generation has been disconnected at the meter*
- *electrically disconnect load or generation, if the trader has exhausted all other appropriate methods of electrical disconnection*
- *bridge the meter*

A trader that removes or breaks a seal in this way must:

- *ensure personal are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code*
- *replace the seal with its own seal*
- *have a process for tracing the new seal to the personnel*
- *update the registry (if the profile code has changed)*
- *notify the metering equipment provider*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2)

Code reference

Clause 10.33C and 2A of Schedule 15.2

Code related audit information

A trader, or a distributor or MEP which has been authorised by the trader, may only electrically connect an ICP in a way that bypasses a meter that is in place (“bridging”) if, despite best endeavours:

- *the MEP is unable to remotely electrically connect the ICP*
- *the MEP cannot repair a fault with the meter due to safety concerns*
- *the consumer will likely be without electricity for a period which would cause significant disadvantage to the consumer*

If the trader bridges a meter, the trader must:

- *determine the quantity of electricity conveyed through the ICP for the period of time the meter was bridged*
- *submit that estimated quantity of electricity to the reconciliation manager*
- *within one business day of being advised that the meter is bridged, notify the MEP that they are required to reinstate the meter so that all electricity flows through a certified metering installation.*

The trader must determine meter readings as follows:

- *by substituting data from an installed check meter or data storage device*
- *if a check meter or data storage device is not installed, by using half hour data from another period where the trader considers the pattern of consumption is materially similar to the period during which the meter was bridged*
- *if half hour data is not available, a non-half hour estimated reading that the trader considers is the best estimate during the bridging period must be used.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.18. Use of ICP identifiers on invoices (Clause 11.30)

Code reference

Clause 11.30

Code related audit information

Each trader must ensure the relevant ICP identifier is printed on every invoice or document relating to the sale of electricity.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.19. Provision of information on dispute resolution scheme (Clause 11.30A)

Code reference

Clause 11.30A

Code related audit information

A retailer must provide clear and prominent information about Utilities Disputes:

- *on their website*
- *when responding to queries from consumers*
- *in directed outbound communications to consumers about electricity services and bills.*

If there are a series of related communications between the retailer and consumer, the retailer needs to provide this information in at least one communication in that series.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

2.20. Provision of information on electricity plan comparison site (Clause 11.30B)

Code reference

Clause 11.30B

Code related audit information

A retailer that trades at an ICP recorded on the registry must provide clear and prominent information about Powerswitch:

- *on their website*
- *in outbound communications to residential consumers about price and service changes*
- *to residential consumers on an annual basis*
- *in directed outbound communications about the consumer's bill.*

If there are a series of related communications between the retailer and consumer, the retailer needs to provide this information in at least one communication in that series.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

3. MAINTAINING REGISTRY INFORMATION

This audit report is for NSP gate volumes only. No ICPs are traded therefore this section has been deleted.

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

This audit report is for NSP gate volumes only. No ICPs are traded therefore this section has been deleted.

5. MAINTENANCE OF UNMETERED LOAD

This audit report is for NSP gate volumes only. No ICPs are traded therefore this section has been deleted.

6. GATHERING RAW METER DATA

6.1. Electricity conveyed & notification by embedded generators (Clause 10.13, Clause 10.24 and 15.13)

Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

Code related audit information

A participant must use the quantity of electricity measured by a metering installation as the raw meter data for the quantity of electricity conveyed through the point of connection.

This does not apply if data is estimated or gifted in the case of embedded generation under clause 15.13.

A trader must, for each electrically connected ICP that is not also an NSP, and for which it is recorded in the registry as being responsible, ensure that:

- *there is one or more metering installations*
- *all electricity conveyed is quantified in accordance with the Code*
- *it does not use subtraction to determine submission information for the purposes of Part 15.*

An embedded generator must give notification to the reconciliation manager for an embedded generating station, if the intention is that the embedded generator will not be receiving payment from the clearing manager or any other person through the point of connection to which the notification relates.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.2. Responsibility for metering at GIP (Clause 10.26 (6), (7) and (8))

Code reference

Clause 10.26 (6), (7) and (8)

Code related audit information

For each proposed metering installation or change to a metering installation that is a connection to the grid, the participant, must:

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least three months for the grid owner to review and comment on the design*
- *respond within three business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

The participant responsible for the metering installation must:

- *advise the reconciliation manager of the certification expiry date not later than 10 business days after certification of the metering installation*
- *become the MEP or contract with a person to be the MEP*
- *advise the reconciliation manager of the MEP identifier no later than 20 days after entering into a contract or assuming responsibility to be the MEP.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.3. Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)

Code reference

Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3

Code related audit information

The reconciliation participant must advise the metering equipment provider if a control device is used to control load or switch meter registers.

The reconciliation participant must ensure the control device is certified prior to using it for reconciliation purposes.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.4. Reporting of defective metering installations (Clause 10.43(2) and (3))

Code reference

Clause 10.43(2) and (3)

Code related audit information

If a participant becomes aware of an event or circumstance that lead it to believe a metering installation could be inaccurate, defective, or not fit for purpose they must:

- *advise the MEP*
- *include in the advice all relevant details.*

Audit observation

This is covered in the EMS audit report.

Information on inaccurate or defective meters during the period from January 2020 to December 2021 was requested.

Audit commentary

EMS confirmed that no inaccurate or defective meters were identified for TENC during the audit period.

Audit outcome

Compliant

6.5. Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)

Code reference

Clause 2 Schedule 15.2

Code related audit information

Only a certified reconciliation participant may collect raw meter data, unless only the MEP can interrogate the meter, or the MEP has an arrangement which prevents the reconciliation participant from electronically interrogating the meter:

2(2) - The reconciliation participant must collect raw meter data used to determine volume information from the services interface or the metering installation or from the MEP.

2(3) - The reconciliation participant must ensure the interrogation cycle is such that it does not exceed the maximum interrogation cycle in the registry.

2(4) - The reconciliation participant must interrogate the meter at least once every maximum interrogation cycle.

2(5) - When electronically interrogating the meter the participant must:

- a) ensure the system is to within +/- 5 seconds of NZST or NZDST*
- b) compare the meter time to the system time*
- c) determine the time error of the metering installation*
- d) if the error is less than the maximum permitted error, correct the meter's clock*
- e) if the time error is greater than the maximum permitted error then:
 - i) correct the metering installation's clock*
 - ii) compare the metering installation's time with the system time*
 - iii) correct any affected raw meter data.**
- f) download the event log.*

2(6) – The interrogation systems must record:

- the time*
- the date*
- the extent of any change made to the meter clock.*

Audit observation

This is covered in the EMS audit report.

Audit commentary

EMS confirmed that there have been no clock synchronisation errors outside permissible limits during the audit period.

Audit outcome

Compliant

6.6. Derivation of meter readings (Clauses 3(1), 3(2) and 5 Schedule 15.2)

Code reference

Clauses 3(1), 3(2) and 5 Schedule 15.2

Code related audit information

All meter readings must in accordance with the participants certified processes and procedures and using its certified facilities be sourced directly from raw meter data and, if appropriate, be derived and calculated from financial records.

All validated meter readings must be derived from meter readings.

A meter reading provided by a consumer may be used as a validated meter reading only if another set of validated meter readings not provided by the consumer are used during the validation process.

During the manual interrogation of each NHH metering installation the reconciliation participant must:

- a) obtain the meter register*
- b) ensure seals are present and intact*
- c) check for phase failure (if supported by the meter)*
- d) check for signs of tampering and damage*
- e) check for electrically unsafe situations.*

If the relevant parts of the metering installation are visible and it is safe to do so.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.7. NHH meter reading application (Clause 6 Schedule 15.2)

Code reference

Clause 6 Schedule 15.2

Code related audit information

For NHH switch event meter reads, for the gaining trader the reading applies from 0000 hours on the day of the relevant event date and for the losing trader at 2400 hours at the end of the day before the relevant event date.

In all other cases, All NHH readings apply from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.8. Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)

Code reference

Clause 7(1) and (2) Schedule 15.2

Code related audit information

Each reconciliation participant must ensure that a validated meter reading is obtained in respect of every meter register for every non half hour metered ICP for which the participant is responsible, at least once during the period of supply to the ICP by the reconciliation participant and used to create volume information.

This may be a validated meter reading at the time the ICP is switched to, or from, the reconciliation participant.

If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 7(1).

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.9. NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)

Code reference

Clause 8(1) and (2) Schedule 15.2

Code related audit information

At least once every 12 months, each reconciliation participant must obtain a validated meter reading for every meter register for non-half hour metered ICPs, at which the reconciliation participant trades continuously for each 12-month period.

If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 8(1).

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.10. NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)

Code reference

Clause 9(1) and (2) Schedule 15.2

Code related audit information

In relation to each NSP, each reconciliation participant must ensure that for each NHH ICP at which the reconciliation participant trades continuously for each 4 months, for which consumption information is required to be reported into the reconciliation process. A validated meter reading is obtained at least once every 4 months for 90% of the non-half hour metered ICPs.

A report is to be sent to the Authority providing the percentage, in relation to each NSP, for which consumption information has been collected no later than 20 business days after the end of each month.

If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 9(1).

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.11. NHH meter interrogation log (Clause 10 Schedule 15.2)

Code reference

Clause 10 Schedule 15.2

Code related audit information

The following information must be logged as the result of each interrogation of the NHH metering:

10(a) - the means to establish the identity of the individual meter reader

10(b) - the ICP identifier of the ICP, and the meter and register identification

10(c) - the method being used for the interrogation and the device ID of equipment being used for interrogation of the meter.

10(d) - the date and time of the meter interrogation.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

6.12. HHR data collection (Clause 11(1) Schedule 15.2)

Code reference

Clause 11(1) Schedule 15.2

Code related audit information

Raw meter data from all electronically interrogated metering installations must be obtained via the services access interface.

This may be carried out by a portable device or remotely.

Audit observation

Data collection is carried out by the MEP.

Audit commentary

Data collection is carried out by the MEP, and compliance is recorded in the EMS audit report.

Audit outcome

Compliant

6.13. HHR interrogation data requirement (Clause 11(2) Schedule 15.2)

Code reference

Clause 11(2) Schedule 15.2

Code related audit information

The following information is collected during each interrogation:

11(2)(a) - the unique identifier of the data storage device

11(2)(b) - the time from the data storage device at the commencement of the download unless the time is within specification and the interrogation log automatically records the time of interrogation

11(2)(c) - the metering information, which represents the quantity of electricity conveyed at the point of connection, including the date and time stamp or index marker for each half hour period. This may be limited to the metering information accumulated since the last interrogation

11(2)(d) - the event log, which may be limited to the events information accumulated since the last interrogation

11(2)(e) - an interrogation log generated by the interrogation software to record details of all interrogations.

The interrogation log must be examined by the reconciliation participant responsible for collecting the data and appropriate action must be taken if problems are apparent or an automated software function flags exceptions.

Audit observation

HHR interrogation data was reviewed as part of EMS' audit.

Audit commentary

Compliance is recorded in the EMS audit report in relation to this clause.

Audit outcome

Compliant

6.14. HHR interrogation log requirements (Clause 11(3) Schedule 15.2)

Code reference

Clause 11(3) Schedule 15.2

Code related audit information

The interrogation log forms part of the interrogation audit trail and, as a minimum, must contain the following information:

11(3)(a)- the date of interrogation

11(3)(b)- the time of commencement of interrogation

11(3)(c)- the operator identification (if available)

11(3)(d)- the unique identifier of the meter or data storage device

11(3)(e)- the clock errors outside the range specified in Table 1 of clause 2

11(3)(f)- the method of interrogation

11(3)(g)- the identifier of the reading device used for interrogation (if applicable).

Audit observation

HHR interrogation logs were reviewed as part of EMS' audit.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

7. STORING RAW METER DATA

7.1. Trading period duration (Clause 13 Schedule 15.2)

Code reference

Clause 13 Schedule 15.2

Code related audit information

The trading period duration, normally 30 minutes, must be within $\pm 0.1\%$ (± 2 seconds).

Audit observation

Trading period duration is the responsibility of the MEP.

Audit commentary

Trading period duration is the responsibility of the MEP.

As recorded in **section 6.5**, no clock synchronisation events outside the allowable threshold were identified during the period reviewed.

Audit outcome

Compliant

7.2. Archiving and storage of raw meter data (Clause 18 Schedule 15.2)

Code reference

Clause 18 Schedule 15.2

Code related audit information

A reconciliation participant who is responsible for interrogating a metering installation must archive all raw meter data and any changes to the raw meter data for at least 48 months, in accordance with clause 8(6) of Schedule 10.6.

Procedures must be in place to ensure that raw meter data cannot be accessed by unauthorised personnel.

Meter readings cannot be modified without an audit trail being created.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

7.3. Non metering information collected / archived (Clause 21(5) Schedule 15.2)

Code reference

Clause 21(5) Schedule 15.2

Code related audit information

All relevant non-metering information, such as external control equipment operation logs, used in the determination of profile data must be collected, and archived in accordance with clause 18.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

8. CREATING AND MANAGING (INCLUDING VALIDATING, ESTIMATING, STORING, CORRECTING AND ARCHIVING) VOLUME INFORMATION

8.1. Correction of NHH meter readings (Clause 19(1) Schedule 15.2)

Code reference

Clause 19(1) Schedule 15.2

Code related audit information

If a reconciliation participant detects errors while validating non-half hour meter readings, the reconciliation participant must:

19(1)(a) - confirm the original meter reading by carrying out another meter reading

19(1)(b) - replace the original meter reading the second meter reading (even if the second meter reading is at a different date)

19(1A) if a reconciliation participant detects errors while validating non half hour meter readings, but the reconciliation participant cannot confirm the original meter reading or replace it with a meter reading from another interrogation, the reconciliation participant must:

- substitute the original meter reading with an estimated reading that is marked as an estimate; and*
- subsequently replace the estimated reading in accordance with clause 4(2)*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

8.2. Correction of HHR metering information (Clause 19(2) Schedule 15.2)

Code reference

Clause 19(2) Schedule 15.2

Code related audit information

If a reconciliation participant detects errors while validating half hour meter readings, the reconciliation participant must correct the meter readings as follows:

19(2)(a) - if the relevant metering installation has a check meter or data storage device, substitute the original meter reading with data from the check meter or data storage device; or

19(2)(b) - if the relevant metering installation does not have a check meter or data storage device, substitute the original meter reading with data from another period provided:

- (i) The total of all substituted intervals matches the total consumption recorded on a meter, if available; and*
- (ii) The reconciliation participant considers the pattern of consumption to be materially similar to the period in error*

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

EMS confirmed that there have been no corrections required for TENC during the audit period.

Audit outcome

Compliant

8.3. Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)

Code reference

Clause 19(3) Schedule 15.2

Code related audit information

A reconciliation participant may use error compensation and loss compensation as part of the process of determining accurate data. Whichever methodology is used, the reconciliation participant must document the compensation process and comply with audit trail requirements set out in the Code.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

8.4. Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)

Code reference

Clause 19(4) and (5) Schedule 15.2

Code related audit information

In correcting a meter reading in accordance with clause 19, the raw meter data must not be overwritten. If the raw meter data and the meter readings are the same, an automatic secure backup of the affected data must be made and archived by the processing or data correction application.

If data is corrected or altered, a journal must be generated and archived with the raw meter data file. The journal must contain the following:

19(5)(a)- the date of the correction or alteration

19(5)(b)- the time of the correction or alteration

19(5)(c)- the operator identifier for the person within the reconciliation participant who made the correction or alteration

19(5)(d)- the half-hour metering data or the non-half hour metering data corrected or altered, and the total difference in volume of such corrected or altered data

19(5)(e)- the technique used to arrive at the corrected data

19(5)(f)- the reason for the correction or alteration.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

EMS confirmed that there have been no corrections required for TENC during the audit period.

Audit outcome

Compliant

9. ESTIMATING AND VALIDATING VOLUME INFORMATION

9.1. Identification of readings (Clause 3(3) Schedule 15.2)

Code reference

Clause 3(3) Schedule 15.2

Code related audit information

All estimated readings and permanent estimates must be clearly identified as an estimate at source and in any exchange of metering data or volume information between participants.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

9.2. Derivation of volume information (Clause 3(4) Schedule 15.2)

Code reference

Clause 3(4) Schedule 15.2

Code related audit information

Volume information must be directly derived, in accordance with Schedule 15.2, from:

3(4)(a) - validated meter readings

3(4)(b) - estimated readings

3(4)(c) - permanent estimates.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

9.3. Meter data used to derive volume information (Clause 3(5) Schedule 15.2)

Code reference

Clause 3(5) Schedule 15.2

Code related audit information

All meter data that is used to derive volume information must not be rounded or truncated from the stored data from the metering installation.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

9.4. Half hour estimates (Clause 15 Schedule 15.2)

Code reference

Clause 15 Schedule 15.2

Code related audit information

If a reconciliation participant is unable to interrogate an electronically interrogated metering installation before the deadline for providing submission information, the submission to the reconciliation manager must be the reconciliation participant's best estimate of the quantity of electricity that was purchased or sold in each trading period during any applicable consumption period for that metering installation.

The reconciliation participant must use reasonable endeavours to ensure that estimated submission information is within the percentage specified by the Authority.

Audit observation

Estimation processes were reviewed.

Information on temporary and permanent estimates created during the audit period was requested.

Audit commentary

Compliance is recorded in EMS' audit report.

EMS confirmed estimated volumes were generated from 26 April 2021 to 20 July 2021 due to a meter error on TCD0011. The estimation process used was compliant, the estimated data was 12 weeks of data used to calculate the estimated volume. This takes into account the season, day of week and any public holidays. Actual data was gained and replaced for the estimated period. Reasonable endeavours were made.

EMS confirmed there was estimated volumes generated from 1 July 2021 to 30 July 2021 due to a meter not being installed from the start date of NSP TGN0011. As this was a new NSP, there was no historical data that could be used to calculate an estimate. In this instance they used the total of the Retailer's kWh submitted to estimate the volume. The initial R3 submission did not include the estimated period from 1 July 2021 to 30 July 2021 resulting in under submission. TENC had identified the large discrepancy in their review of the R3 submission but failed to take appropriate actions with EMS to resolve before submission. The RM queried the difference, and it was found that only the metered volume for 31 July 2021 was submitted. This was revised against the Retailer's submitted volumes and these revised volumes were submitted two days later. The RM has alleged a breach against TENC in relation to this incident. This is still under investigation. This is recorded as non-compliance in **sections 2.1 and 12.7**.

Audit outcome

Compliant

9.5. NHH metering information data validation (Clause 16 Schedule 15.2)

Code reference

Clause 16 Schedule 15.2

Code related audit information

Each validity check of non-half hour meter readings and estimated readings must include the following:

16(2)(a) - confirmation that the meter reading or estimated reading relates to the correct ICP, meter, and register

16(2)(b) - checks for invalid dates and times

16(2)(c) - confirmation that the meter reading or estimated reading lies within an acceptable range compared with the expected pattern, previous pattern, or trend

16(2)(d) - confirmation that there is no obvious corruption of the data, including unexpected 0 values.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

9.6. Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)

Code reference

Clause 17 Schedule 15.2

Code related audit information

Each validity check of electronically interrogated meter readings and estimate readings must be at a frequency that will allow a further interrogation of the data storage device before the data is overwritten within the data storage device and before this data can be used for any purpose under the Code.

Each validity check of a meter reading obtained by electronic interrogation, or an estimated reading must include:

17(4)(a) - checks for missing data

17(4)(b) - checks for invalid dates and times

17(4)(c) - checks of unexpected zero values

17(4)(d) - comparison with expected or previous flow patterns

17(4)(e) - comparisons of meter readings with data on any data storage device registers that are available

17(4)(f) - a review of the meter and data storage device event log for any event that could have affected the integrity of metering data

17(4)(g) – a review of the relevant metering data where there is an event that could have affected the integrity of the metering data

If there is an event that could affect the integrity of the metering data (including events reported by MEPs but excluding where the MEP is responsible for investigating and remediating the event) the reconciliation must investigate and remediate any events.

If the event may affect the integrity or operation of the metering installation the reconciliation participant must notify the metering equipment provider.

Audit observation

Validation processes were reviewed as part of EMS' audit. Information on meter events that could affect meter accuracy during the period from January 2020 to December 2021 was requested.

Audit commentary

Compliance is recorded in the EMS audit report in relation to this clause.

There were no meter events that could affect meter accuracy that occurred during the period reviewed.

Audit outcome

Compliant

10. PROVISION OF METERING INFORMATION TO THE GRID OWNER IN ACCORDANCE WITH SUBPART 4 OF PART 13 (CLAUSE 15.38(1)(F))

10.1. Generators to provide HHR metering information (Clause 13.136)

Code reference

Clause 13.136

Code related audit information

The generator (and/or embedded generator) must provide to the grid owner connected to the local network in which the embedded generator is located, half hour metering information in accordance with clause 13.138 in relation to generating plant that is subject to a dispatch instruction:

- *that injects electricity directly into a local network; or*
- *if the meter configuration is such that the electricity flows into a local network without first passing through a grid injection point or grid exit point metering installation.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

10.2. Unoffered & intermittent generation provision of metering information (Clause 13.137)

Code reference

Clause 13.137

Code related audit information

Each generator must provide the relevant grid owner half-hour metering information for:

- *any unoffered generation from a generating station with a point of connection to the grid 13.137(1)(a)*
- *any electricity supplied from an intermittent generating station with a point of connection to the grid. 13.137(1)(b)*

The generator must provide the relevant grid owner with the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of that generator's volume information (clause 13.137(2)).

If such half-hour metering information is not available, the generator must provide the pricing manager and the relevant grid owner a reasonable estimate of such data (clause 13.137(3)).

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

10.3. Loss adjustment of HHR metering information (Clause 13.138)

Code reference

Clause 13.138

Code related audit information

The generator must provide the information required by clauses 13.136 and 13.137,

13.138(1)(a)- adjusted for losses (if any) relative to the grid injection point or, for embedded generators the grid exit point, at which it offered the electricity

13.138(1)(b)- in the manner and form that the pricing manager stipulates

13.138(1)(c)- by 0500 hours on a trading day for each trading period of the previous trading day.

The generator must provide the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of the generator's volume information.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

10.4. Notification of the provision of HHR metering information (Clause 13.140)

Code reference

Clause 13.140

Code related audit information

If the generator provides half-hourly metering information to a grid owner under clauses 13.136 to 13.138, or 13.138A, it must also, by 0500 hours of that day, advise the relevant grid owner.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

11.1. Buying and selling notifications (Clause 15.3)

Code reference

Clause 15.3

Code related audit information

Unless an embedded generator has given a notification in respect of the point of connection under clause 15.3, a trader must give notice to the reconciliation manager if it is to commence or cease trading electricity at a point of connection using a profile with a profile code other than HHR, RPS, UML, EG1, or PV1 at least five business days before commencing or ceasing trader.

The notification must comply with any procedures or requirements specified by the reconciliation manager.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

11.2. Calculation of ICP days (Clause 15.6)

Code reference

Clause 15.6

Code related audit information

Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of:

15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

The ICP days information must be calculated using the data contained in the retailer or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

11.3. Electricity supplied information provision to the reconciliation manager (Clause 15.7)

Code reference

Clause 15.7

Code related audit information

A retailer must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each NSP, aggregated by invoice month, for which it has provided submission information to the reconciliation manager, including revised submission information for that period as non-loss adjusted values in respect of:

15.7(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

11.4. HHR aggregates information provision to the reconciliation manager (Clause 15.8)

Code reference

Clause 15.8

Code related audit information

Using relevant volume information, each retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity consumed for each half hourly metered ICP for which it has provided submission information to the reconciliation manager, including:

15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12. SUBMISSION COMPUTATION

12.1. Daylight saving adjustment (Clause 15.36)

Code reference

Clause 15.36

Code related audit information

The reconciliation participant must provide submission information to the reconciliation manager that is adjusted for NZDT using one of the techniques set out in clause 15.36(3) specified by the Authority.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

12.2. Creation of submission information (Clause 15.4)

Code reference

Clause 15.4

Code related audit information

By 1600 hours on the 4th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all NSPs for which the reconciliation participant is recorded in the registry as having traded electricity during the consumption period immediately before that reconciliation period (in accordance with Schedule 15.3).

By 1600 hours on the 13th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all points of connection for which the reconciliation participant is recorded in the registry as having traded electricity during any consumption period being reconciled in accordance with clauses 15.27 and 15.28, and in respect of which it has obtained revised submission information (in accordance with Schedule 15.3).

Audit observation

This clause refers to ICPs. This audit is for NSP volumes only.

Audit commentary

This clause refers to ICPs. This audit is for NSP volumes only.

Audit outcome

Not applicable

12.3. Allocation of submission information (Clause 15.5)

Code reference

Clause 15.5

Code related audit information

In preparing and submitting submission information, the reconciliation participant must allocate volume information for each ICP to the NSP indicated by the data held in the registry for the relevant consumption period at the time the reconciliation participant assembles the submission information. Volume information must be derived in accordance with Schedule 15.2.

However, if, in relation to a point of connection at which the reconciliation participant trades electricity, a notification given by an embedded generator under clause 15.13 for an embedded generating station is in force, the reconciliation participant is not required to comply with the above in relation to electricity generated by the embedded generating station.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12.4. Grid owner volumes information (Clause 15.9)

Code reference

Clause 15.9

Code related audit information

The participant (if a grid owner) must deliver to the reconciliation manager for each point of connection for all of its GXPs, the following:

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.9(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period (clause 15.9(b)).*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12.5. Provision of NSP submission information (Clause 15.10)

Code reference

Clause 15.10

Code related audit information

The participant (if a local or embedded network owner) must provide to the reconciliation manager for each NSP for which the participant has given a notification under clause 25(1) Schedule 11.1 (which relates to the creation, decommissioning, and transfer of NSPs) the following:

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.10(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period (clause 15.10(b)).*

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in the EMS audit report.

The EA confirmed that three alleged breaches relevant to the scope of this audit occurred during the audit period.

As recorded in **section 1.6**, breach number 2005TENC1 and 2111TENC1, are examined as part of the 'Creation and Maintenance of NSPs' in Section 6 of the Distributor report.

A breach (2110TENC1) was alleged by the RM in relation to a decrease of 43,000 kWh in TENCO's submissions between July 2021 R1 and R3 for NSP TGN0011. This is under investigation by compliance with no result as yet. TENC advised that when reviewing the July 2021 R3 submission, they noted the large discrepancy but failed to take appropriate actions with EMS to resolve before submitting. Once the RM had raised it with TENC, they liaised with EMS then resubmitted the corrected volumes on 21 October 2021. This is recorded as non-compliance in **sections 2.1** and **12.7**.

Audit outcome

Compliant

12.6. Grid connected generation (Clause 15.11)

Code reference

Clause 15.11

Code related audit information

The participant (if a grid connected generator) must deliver to the reconciliation manager for each of its points of connection, the following:

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.11(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period (clause 15.11(b)).*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12.7. Accuracy of submission information (Clause 15.12)

Code reference

Clause 15.12

Code related audit information

If the reconciliation participant has submitted information and then subsequently obtained more accurate information, the participant must provide the most accurate information available to the reconciliation manager or participant, as the case may be, at the next available opportunity for submission (in accordance with clauses 15.20A, 15.27, and 15.28).

Audit observation

Accuracy of submission information was reviewed as part of EMS' audit.

Audit commentary

Compliance is recorded in the EMS audit report.

A breach (2110TENC1) was alleged by the RM in relation to a decrease of 43,000 kWh in Tenco's submissions between July 2021 R1 and R3 for NSP TGN0011. This is under investigation by compliance with no result as yet. TENC advised that when reviewing the July 2021 R3 submission, they noted the large discrepancy but failed to take appropriate actions with EMS to resolve before submitting. Once the RM had raised it with TENC, they liaised with EMS then resubmitted the corrected volumes on 21 October 2021. This is recorded as non-compliance below and in **section 2.1**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 12.7 With: Clause 15.12 From: 19-Oct-21 To: 21-Oct-21	Inaccurate information was provided to the RM resulting in under submission of 64,029.20 kWh for NSP TGN0011. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are recorded as weak as such a discrepancy should have been investigated and corrected before submission. The impact on settlement and participants was high and the RM breached TENCO in relation to this event.		
Actions taken to resolve the issue		Completion date	Remedial action status
On the 21/10/2021 following a query of the incorrect submission in the R3 file Tenco worked with EMS to resubmit a revised R3 file.		21/10/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
For this instance, in both the R7 and R14 submissions Tenco via EMS will estimate the unavailable quantities based on retailer submissions. To avoid this on a go forward Tenco will not notify a new embedded network until we have proof the metering is installed. This does slow down our process, but we understand market impact of this. Tenco has developed a new data warehouse. One of the measures and KPIs we have put in place is monitoring the differences between retailer submissions, NSPVOLs and metered kWh.		Ongoing	

12.8. Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)

Code reference

Clause 4 Schedule 15.2

Code related audit information

Only volume information created using validated meter readings, or if such values are unavailable, permanent estimates, has permanence within the reconciliation processes (unless subsequently found to be in error).

The relevant reconciliation participant must, at the earliest opportunity, and no later than the month 14 revision cycle, replace volume information created using estimated readings with volume information created using validated meter readings.

If, despite having used reasonable endeavours for at least 12 months, a reconciliation participant has been unable to obtain a validated meter reading, the reconciliation participant must replace volume information created using an estimated reading with volume information created using a permanent estimate in place of a validated meter reading.

Audit observation

This is covered in EMS' audit report.

Audit commentary

As discussed in **section 9.4**, compliance is recorded in EMS' audit report.

EMS confirmed estimated volumes were generated from 26 April 2021 to 20 July 2021 due to a meter error on TCD0011. The estimation process used was compliant, the estimated data was 12 weeks of data used to calculate the estimated volume. This takes into account the season, day of week and any public holidays. Actual data was gained and replaced for the estimated period.

EMS confirmed there was estimated volumes generated from 1 July 2021 to 30 July 2021 due to a meter not being installed from the start date of NSP TGN0011. As this was a new NSP, there was no historical data that could be used to calculate an estimate. In this instance they used the total of the Retailer's kWh submitted against this ICP and these will be permanent estimates as there was no meter installed during this period.

The initial R3 submission did not include the estimated period from 1 July 2021 to 30 July 2021 resulting in under submission. The RM has alleged a breach against TENC in relation to this incident. This is still under investigation. This is recorded as non-compliance in **sections 2.1** and **12.7**.

Audit outcome

Compliant

12.9. Reconciliation participants to prepare information (Clause 2 Schedule 15.3)

Code reference

Clause 2 Schedule 15.3

Code related audit information

If a reconciliation participant prepares submission information for each NSP for the relevant consumption periods in accordance with the Code, such submission information for each ICP must comprise the following:

- *half hour volume information for the total metered quantity of electricity for each ICP notified in accordance with clause 11.7(2) for which there is a category 3 or higher metering installation (clause 2(1)(a)) for each ICP about which information is provided under clause 11.7(2) for which there is a category 1 or category 2 metering installation (clause 2(1)(b)):*
 - a) *any half hour volume information for the ICP; or*
 - b) *any non-half hour volumes information calculated under clauses 4 to 6 (as applicable).*
 - c) *unmetered load quantities for each ICP that has unmetered load associated with it derived from the quantity recorded in the registry against the relevant ICP and the number of days in the period, the distributed unmetered load database, or other sources of relevant information. (clause 2(1)(c))*
- *to create non half hour submission information a reconciliation participant must only use information that is dependent on a control device if (clause 2(2)):*
 - a) *the certification of the control device is recorded in the registry; or*
 - b) *the metering installation in which the control device is location has interim certification.*
- *to create submission information for a point of connection the reconciliation participant must apply to the raw meter data (clause 2(3)):*
 - a) *for each ICP, the compensation factor that is recorded in the registry (clause 2(3)(a))*
 - b) *for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(3)(b))*

Audit observation

This clause refers to ICPs. This audit is for NSP volumes only.

Audit commentary

This clause refers to ICPs. This audit is for NSP volumes only.

Audit outcome

Not applicable

12.10. Historical estimates and forward estimates (Clause 3 Schedule 15.3)

Code reference

Clause 3 Schedule 15.3

Code related audit information

For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the techniques described in clauses 4 to 7 to create historical estimates and forward estimates.

Each estimate that is a forward estimate or a historical estimate must clearly be identified as such (clause 3(2)).

If validated meter readings are not available for the purpose of clauses 4 and 5, permanent estimates may be used in place of validated meter readings (clause 3(3)).

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12.11. Historical estimate process (Clause 4 and 5 Schedule 15.3)

Code reference

Clause 4 and 5 Schedule 15.3

Code related audit information

The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historical estimates of volume information for each ICP when the relevant seasonal adjustment shape is available, and the reconciliation participant is not using an approved profile in accordance with clause 4A.

If the Authority has approved a profile for the purpose of apportioning volume information (in kWh) to part or full consumption periods, a reconciliation participant may use the profile despite the relevant seasonal adjustment shape being available; and if it uses the profile, must otherwise prepare the historical estimate in accordance with the methodology in clause 4.

*If a seasonal adjustment shape is not available, and the **reconciliation participant** is not using an approved **profile** under clause 4A, the methodology for preparing an historical estimate of volume information for each ICP must be the same as in clause 4, except that the relevant quantities kWh_{px} must be prorated as determined by the reconciliation participant using its own methodology or on a flat shape basis using the relevant number of days that are within the consumption period and within the period covered by kWh_{px}.*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12.12. Forward estimate process (Clause 6 Schedule 15.3)**Code reference**

Clause 6 Schedule 15.3

Code related audit information

Forward estimates may be used only in respect of any period for which an historical estimate cannot be calculated.

The methodology used for calculating a forward estimate may be determined by the reconciliation participant, only if it ensures that the accuracy is within the percentage of error specified by the Authority.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

12.13. Compulsory meter reading after profile change (Clause 7 Schedule 15.3)**Code reference**

Clause 7 Schedule 15.3

Code related audit information

If the reconciliation participant changes the profile associated with a meter, it must, when determining the volume information for that meter and its respective ICP, use a validated meter reading or permanent estimate on the day on which the profile change is to take effect.

The reconciliation participant must use the volume information from that validated meter reading or permanent estimate in calculating the relevant historical estimates of each profile for that meter.

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

13. SUBMISSION FORMAT AND TIMING

13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3)

Code reference

Clause 8 Schedule 15.3

Code related audit information

For each category 3 of higher metering installation, a reconciliation participant must provide half hour submission information to the reconciliation manager.

For each category 1 or category 2 metering installation, a reconciliation participant must provide to the reconciliation manager:

- *Half hour submission information; or*
- *Non half hour submission information; or*
- *A combination of half hour submission information and non-half hour submission information*

However, a reconciliation participant may instead use a profile if:

- *The reconciliation participant is using a profile approved in accordance with clause Schedule 15.5; and*
- *The approved profile allows the reconciliation participant to provide half hour submission information from a non-half hour metering installation; and*
- *The reconciliation participant provides submission information that complies with the requirements set out in the approved profile.*

Half hour submission information provided to the reconciliation manager must be aggregated to the following levels:

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *trading period*

The non-half hour submission information that a reconciliation participant submits must be aggregated to the following levels:

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *consumption period or day*

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

13.2. Reporting resolution (Clause 9 Schedule 15.3)

Code reference

Clause 9 Schedule 15.3

Code related audit information

When reporting submission information, the number of decimal places must be rounded to not more than two decimal places.

If the unrounded digit to the right of the second decimal place is greater than or equal to five, the second digit is rounded up, and

If the digit to the right of the second decimal place is less than five, the second digit is unchanged.

Audit observation

This is covered in EMS' audit report.

Audit commentary

Compliance is recorded in EMS' audit report.

Audit outcome

Compliant

13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)

Code reference

Clause 10 Schedule 15.3

Code related audit information

By 1600 hours on the 13th business day of each reconciliation period the reconciliation participant must report to the reconciliation manager the proportion of historical estimates per NSP contained within its non-half hour submission information.

The proportion of submission information per NSP that is comprised of historical estimates must (unless exceptional circumstances exist) be:

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*
- *100% for revised data provided at the month 14 revision. (clause 10(3)(c))*

Audit observation

Not applicable

Audit commentary

Not applicable

Audit outcome

Not applicable

CONCLUSION

TENC is an embedded network operator and is therefore required to be a certified reconciliation participant in accordance with clause 15.38 of part 15. In this report I have only recorded those matters where issues were discovered, or where specific analysis was undertaken.

TENC switched retailer from Simply Energy to TENCO (TENR) from 1 October 2021. A material change audit was completed for the change of primary agent. The sub agent has not changed, and EMS continues to conduct all the relevant activities.

EMS' audit report records compliance in relation to the activities performed on behalf of TENC. I confirmed the following as part of TENC's audit:

- no defective meters have been identified during the audit period,
- no correction of volume data has occurred during the audit period, and
- no clock synchronisation errors outside the allowable tolerances have occurred during the audit period.

Two estimations of volume occurred during the audit period. Both were created using best endeavours.

A breach (2110TENC1) was alleged by the RM in relation to a decrease of 43,000 kWh in TENCO's submissions between July 2021 R1 and R3 for NSP TGN0011. This is under investigation by compliance with no result yet. TENC had identified the large discrepancy in their review of the R3 submission but failed to take appropriate actions with EMS to resolve before submission for NSP TGN0011. The RM queried this, and it was found that the metered volume for 31 July 2021 only was submitted. This was revised against the Retailer's submitted volumes and these revised volumes were submitted two days later.

The audit found two non-compliances and makes no recommendations. Both relate to the breach discussed above. The future risk rating is indicating that the next audit be due in 12 months. I have considered this in conjunction with TENC's response and agree with this recommendation.

PARTICIPANT RESPONSE

The Embedded Network Company Ltd (Tenco) has reviewed the above audit report and are in agreement with the findings contained within it.