

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

WAIMEA RETIREMENT VILLAGE AND
CONTACT ENERGY

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Audit report due date: 01-Dec-22

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EXECUTIVE SUMMARY

This audit of the **Waimea Retirement Village (Waimea)** Unmetered Streetlights DUML database and processes was conducted at the request of **Contact Energy Limited (Contact)**, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

Contact provided a spreadsheet for all of the lamps at Waimea Village. Contact use the distributor's recorded wattage from the registry to maintain the registry's daily unmetered load value which is used for submission purposes.

Any changes made to the field were previously notified by Bill Ashton, to Network Tasman who then updated the database and if required the unmetered load value on the registry. There is no process in place now for Waimea Village or Bill Ashton to notify Contact of any changes.

Contact maintain a spreadsheet that is considered the database. No changes have been advised to Contact.

Contact has advised that Waimea Village will be switching to Simply with an expected transition date of 1 January 2023.

The field audit was undertaken of the entire Waimea database, consisting of 43 items of load on 3rd October 2022. The field audit recorded 100% accuracy.

The submission was found to match the database provided, which matches the registry daily unmetered load value.

There were two non-compliances found and a repeat of one recommendation. The future risk rating of 10 indicates that the next audit be completed in 12 months. I have considered this in conjunction with Contact's responses and recommend that the next audit be in two years.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Tracking of load changes	2.6	11(3) of Schedule 15.3	No process for tracking changes.	None	Low	5	Investigating
Audit trail	2.7	11(4) of Schedule 15.3	No audit trails.	None	Low	5	Investigating
Future Risk Rating						10	

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

RECOMMENDATIONS

Subject	Section	Recommendation	Status
Audit Trail	2.7	Add another sheet to the spreadsheet to record any changes that are notified.	Investigating

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

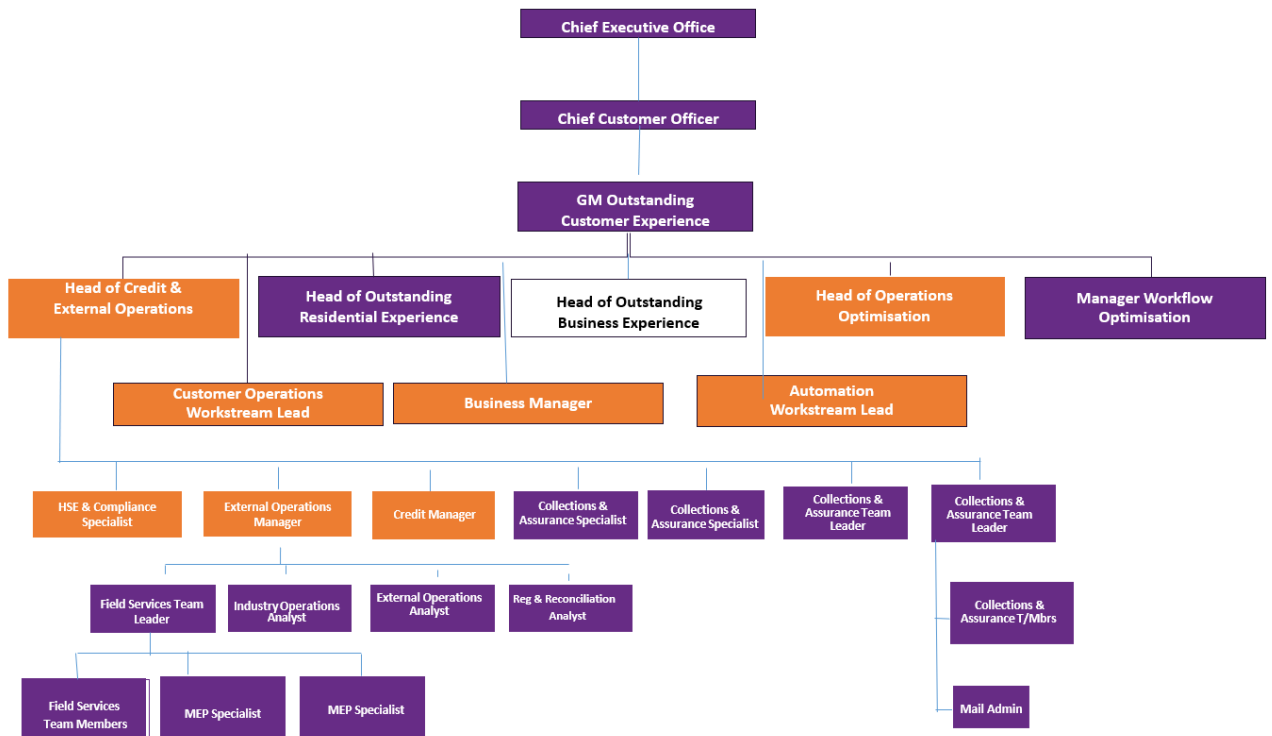
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit commentary

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

1.2. Structure of Organisation

Contact provided a copy of their organisational structure:



1.3. Persons involved in this audit

Auditor:

Name	Title
Steve Woods	Lead Auditor
Claire Stanley	Supporting Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Allie Jones	Retail Revenue	Contact Energy
Aaron Wall	Portfolio Analyst	Contact Energy

1.4. Hardware and Software

Contact have a spreadsheet that is accessible via a folder structure that is protected by password access. The directory is secure by way of password protection and is backed up as part of BAU processes.

Systems used by Contact to calculate submissions are assessed as part of their reconciliation participant audits.

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	Profile	Number of items of load	Database wattage (watts)
0000036536NT7F0	UNMETERED STREET LIGHTS WAIMEA VILLAGE	RPS	43	603
Total			43	603

1.7. Authorisation Received

All information was provided directly by Contact.

1.8. Scope of Audit

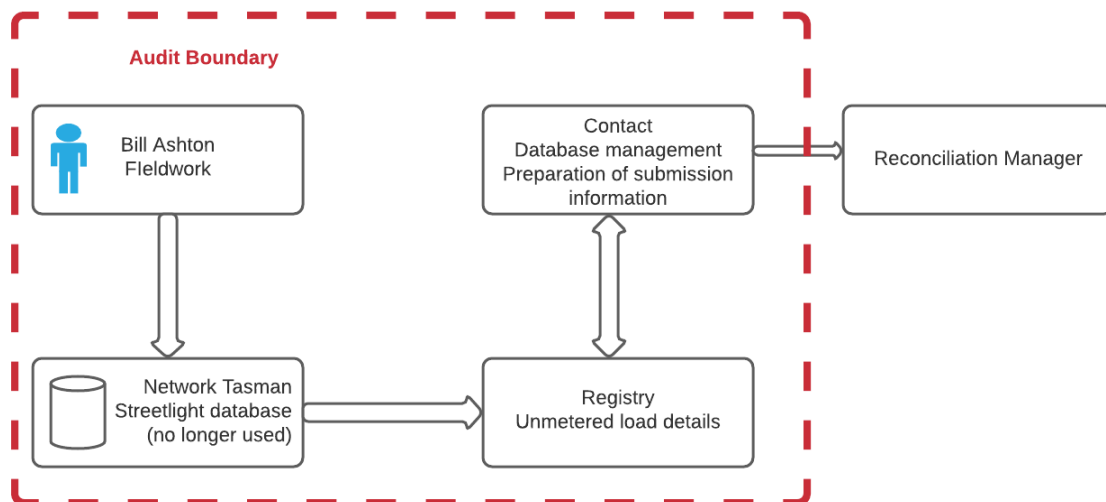
This audit of the Waimea Village DUML database and processes was conducted at the request of Contact, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

Contact provided a spreadsheet for all of the lamps at Waimea Village. They use this information to maintain the registry's unmetered load value. Contact use the distributor's recorded wattage from the registry for submission purposes.

Any changes made to the field were previously notified by Bill Ashton, to Network Tasman who then updated the database and if required the unmetered load value on the registry. No changes have been advised to Contact. Contact's spreadsheet is considered the database.

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting. The diagram below shows the audit boundary for clarity.



The field audit was undertaken of the entire Waimea Village spreadsheet, consisting of 43 items of load on 3rd October 2022.

1.9. Summary of previous audit

The previous audit was completed in October 2021 by Steve Woods of Veritek Limited. The audit found two non-compliances and one associated recommendation was made. These issues are still present.

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Tracking of load changes	2.6	11(3) of Schedule 15.3	No process for tracking changes.	Still existing
Audit trail	2.7	11(4) of Schedule 15.3	No audit trails.	Still existing

Table of Recommendations

Subject	Section	Recommendation	Status
Audit Trail	2.7	Add another sheet to the spreadsheet to record any changes that are notified.	Not adopted

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)
2. within three months of submission to the reconciliation manager (for new DUML)
3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.

Audit observation

Contact have requested Veritek to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database within the required timeframe. Compliance is confirmed.

2. DUMML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- *DUMML database is up to date*
- *methodology for deriving submission information complies with Schedule 15.5.*

Audit observation

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

Audit commentary

Contact reconciles this DUMML load using the RPS profile.

Contact provided a spreadsheet for all of the lamps at Waimea Village. Contact use the distributor's recorded wattage from the registry to maintain the registry's daily unmetered load value and for submission purposes.

The information on the registry matches to the values in the database. I checked the submission calculation provided by Contact against the data extract, and registry, and it matches.

Audit outcome

Compliant

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUMML database must contain:

- *each ICP identifier for which the retailer is responsible for the DUMML*
- *the items of load associated with the ICP identifier.*

Audit observation

The database was checked to confirm an ICP was recorded against each item of load.

Audit commentary

All items of load have an ICP recorded against them.

outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database has a field for street name and a location description, both of which are populated for all items.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

The database contains a Lamp Type, Lamp Size and Total Watts fields. These fields are populated for every item in the spreadsheet.

The accuracy of wattage and ballasts in the database is discussed in **section 3.1**.

Audit outcome

Compliant

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of the entire database of 43 items of load on 3rd October 2022.

Audit commentary

The field audit findings are detailed in the table below:

Street/Area	Database Count	Field Count	Lamp no. difference	No of incorrect lamp wattage	Comments
Ashcroft Place	2	2			
Birchwood Grove	4	4			
Conifer Court	3	3			
Dellwood Green	3	3			
Elmsdale Close	3	3			
Fernlea Rise	2	2			
Gardenia Place	2	2			
Gladstone Road entrance	2	2			
Hawthorn Way	5	5			
Ivy Crescent	6	6			
Juniper Street	1	1			
The Drive	10	10			
Grand Total	43	43	0	0	

The wattage is recorded correctly in the database. There were no items missing from the database.

Audit outcome

Compliant

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The maintenance of the Waimea Village lights is managed by Bill Ashton as the subcontractor. Any changes made to the field were previously notified by Bill Ashton to Network Tasman.

There is no process in place now for Waimea Village or Bill Ashton to notify Contact of any changes.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.6 With: 11(3) of Schedule 15.3 From: 08-Oct-21 To: 03-Oct-22	No process for tracking changes. Potential impact: Low Actual impact: Low Audit history: Once Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as none as there is no process for tracking changes. The impact is minor as this is a small database and there are not expected to be many changes; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy are taking over the supply of this DUMML ICP 1 st January 2023 and are in discussions with the Village and Network Tasman about management of the database moving forward.		31/1/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

The data is contained in a spreadsheet, which contains all relevant fields, but it does not contain an audit trail to record changes. I repeat the recommendation from the previous audit for Contact to add an additional sheet to the spreadsheet to record any changes.

Subject	Recommendation	Audited party comment	Remedial action
Audit Trail	Add another sheet to the spreadsheet to record any changes that are notified.	Simply Energy are taking over the supply of this DUML ICP 1 st January 2023 and are in discussions with the Village and Network Tasman about management of the database moving forward	Investigating

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.7 With: 11(4) of Schedule 15.3 From: 08-Oct-21 To: 03-Oct-22	No audit trail. Potential impact: Low Actual impact: Low Audit history: Once Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as none as there is no audit trail of changes. The impact is minor as this is a small database and there are not expected to be many changes; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy are taking over the supply of this DUML ICP 1 st January 2023 and are in discussions with the Village and Network Tasman about management of the database moving forward		31/1/2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

A 100% field audit was undertaken of the database.

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

Audit commentary

The 100% field audit found all 43 items of load. The database is 100% accurate.

Wattages for all items of load were checked against the published standardised wattage table produced by the Electricity Authority and found to be correct.

Audit outcome

Compliant

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- *volume information for the DUML is being calculated accurately*
- *profiles for DUML have been correctly applied.*

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that the ICP has the correct profile and submission flag, and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Contact reconciles this DUML load using the RPS profile.

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Audit outcome

Compliant

CONCLUSION

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

Contact provided a spreadsheet for all of the lamps at Waimea Village. Contact use the distributor's recorded wattage from the registry to maintain the registry's daily unmetered load value which is used for submission purposes.

Any changes made to the field were previously notified by Bill Ashton, to Network Tasman who then updated the database and if required the unmetered load value on the registry. There is no process in place now for Waimea Village or Bill Ashton to notify Contact of any changes.

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PARTICIPANT RESPONSE

This is a small DUML database in a Village that has not been altering its assets for some time and had a 100% compliance between field audit and the database. Whilst communication between parties has been poor and the “database” does not have an audit trail, 10 points and a 12 month audit timeline seem excessively harsh given the wider context and accuracy of this particular DUML client. Simply Energy will be taking over this client from 1st January 2023 and will be working with them on improving the administration of their DUML requirements under the code.