

ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT



For

HALO NETWORKS LIMITED (HALO)  
NZBN: 9429051544195

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Audit report due date: 1 May 2024

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## EXECUTIVE SUMMARY

This distributor audit was conducted at the request of **Halo Networks Limited (HALO)** to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

The embedded network is managed by **Smart Power**, who assisted with this audit.

HALO is responsible for the HAV0011HALOEN embedded network in Auckland which was connected on 1 February 2024. Most of HALO's compliance is reliant on the compliance of **TEG & Associates (TEG)**, as a contractor to HALO. Their audit report is to be submitted with this audit.

All registry and NSP table activity during the audit period was reviewed as part of this audit, and I did not find any inaccurate information which had not been detected and corrected prior to the audit.

One non-compliance was recorded for late provision of some initial electrical connection dates. All of the late updates were corrections, populated on the date that the trader confirmed the correct initial electrical connection date. The controls over initial electrical connection dates are strong, and the non-compliance could not be avoided.

The audit risk rating of one recommends the next audit be in 36 months, and I agree with this recommendation.

The matters raised are detailed in the table below.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	23 of the 50 new ICPs created and electrically connected during the audit period did not have their initial electrical connection date populated on the registry within ten business days of initial electrical connection.	Strong	Low	1	Identified
Future Risk Rating						1	

Future risk rating	0-1	2-5	6-8	9-20	21-29	30+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

### RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

### ISSUES

Subject	Section	Issue	Description
		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 Authority website was checked to determine whether HALO has any Code exemptions in place.

#### Audit commentary

There are no exemptions in place for HALO.

### 1.2. Structure of Organisation

Smart Power provided an organisational structure for the purposes of the function being audited:

- Bruce Stubbing – Director, and
- Nick Oldham – GM Utility Solutions.

### 1.3. Persons involved in this audit

Auditor:

Name	Title	Organisation
Tara Gannon	Auditor	Provera

Personnel assisting in this audit were:

Name	Title	Organisation
Ewa Glowacka	Director	TEG and Associates
Nick Oldham	General Manager	Smart Power Limited T/A Energy Select

### 1.4. Use of contractors (Clause 11.2A)

#### Code reference

*Clause 11.2A*

#### Code related audit information

*A participant who uses a contractor*

- *remains responsible for the contractor's fulfilment of the participants Code obligations,*
- *cannot assert that it is not responsible or liable for the obligation due to the action of a contractor,*

- *must ensure that the contractor has at least the specified level of skill, expertise, experience, or qualification that the participant would be required to have if it were performing the obligation itself.*

#### Audit observation

TEG carries out HALO’s registry activities.

TEG does not complete all compliance activities on behalf of HALO. Specifically, TEG does not calculate loss factors but does load the loss factors provided by HALO onto the registry.

#### 1.5. Supplier list

TEG carries out HALO’s registry activities.

#### 1.6. Hardware and Software

This is covered in TEG’s audit report.

#### 1.7. Breaches or Breach Allegations

The Authority confirmed that HALO has not had any alleged breaches during the audit period.

#### 1.8. ICP and NSP Data

Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
HALO	HAV0011	110 Alfriston Rd Ak	TAK0331	VECT	HAV0011HALOE	E	1 February 2024	50

Status	Number of ICPs (2024)
New (999,0)	-
Ready (0,0)	-
Active (2,0)	50
Distributor (888,0)	-
Inactive – new connection in progress (1,12)	-
Inactive – electrically disconnected vacant property (1,4)	-
Inactive – electrically disconnected remotely by AMI meter (1,7)	-
Inactive – electrically disconnected at pole fuse (1,8)	-
Inactive – electrically disconnected due to meter disconnected (1,9)	-
Inactive – electrically disconnected at meter box fuse (1,10)	-
Inactive – electrically disconnected at meter box switch (1,11)	-

Inactive – electrically disconnected ready for decommissioning (1,6)	-
Inactive – reconciled elsewhere (1,5)	-
Decommissioned (3)	-

### 1.9. Authorisation Received

A letter of authorisation was provided.

### 1.10. Scope of Audit

This distributor audit was performed at the request of HALO, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

During the audit analysis I examined a registry list, event detail report, meter installation details report, and AC020 distributor compliance report for 1 February 2024 to 9 April 2024.

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

Functions Requiring Audit Under Clause 11.10(4) of Part 11	Contractors Involved in Performance of Tasks
The creation of ICP identifiers for ICPs.	HALO provide new ICPs to TEG & Associates, who update the registry.
The provision of ICP information to the registry and the maintenance of that information.	TEG & Associates.
The creation and maintenance of loss factors.	HALO calculate loss factors and TEG & Associates update the loss factor table with the values provided.

The most recent audit report for TEG will be submitted with this report. TEG confirmed that there have been no changes to their processes since their previous audit was conducted.

### 1.11. Summary of previous audit

This is HALO's first distributor audit.



## 2. OPERATIONAL INFRASTRUCTURE

### 2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1))

#### Code reference

*Clause 11.2(1) and 10.6(1)*

#### Code related audit information

*A participant must take all practicable steps to ensure that information that the participant is required to provide to any person under Parts 10 or 11 is:*

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

#### Audit observation

The management of this process is discussed in the TEG agent audit report. The registry list, event detail report, and audit compliance report were reviewed to identify inaccurate or incomplete data.

#### Audit commentary

Compliance is recorded in the TEG agent audit report. I saw evidence that errors are detected, and corrections are made as part of business-as-usual processes. I did not find any inaccurate information which had not been detected and corrected prior to the audit.

#### Audit outcome

Compliant

### 2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2))

#### Code reference

*Clause 11.2(2) and 10.6(2)*

#### Code related audit information

*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 management of this process is discussed in the TEG agent audit report. The registry list, event detail report and audit compliance report were reviewed to identify inaccurate or incomplete data.

#### Audit commentary

Compliance is recorded in the TEG agent audit report. I saw evidence that errors are detected, and corrections are made as part of business-as-usual processes. I did not find any inaccurate information which had not been detected and corrected prior to the audit.

#### Audit outcome

Compliant

### 2.3. Removal or breakage of seals (Clause 48(1A) and 48(1B) of Schedule 10.7)

#### Code reference

Clause 48(1A) and 48(1B) of Schedule 10.7

#### Code related audit information

*If the distributor provides a load control signal to a load control switch in the metering installation, the distributor can remove or break a seal without authorisation from the MEP to bridge or unbridge the load control device or load control switch – as long as the load control switch does not control a time block meter channel.*

*If the distributor removes or breaks a seal in this way, it 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,*
- *notify the metering equipment provider and trader.*

#### Audit observation

The meter installation details report was examined to determine whether load control devices existed on the network.

#### Audit commentary

There are no load controls on the HALO network.

#### Audit outcome

Compliant

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

#### Code reference

Clause 11.30A

#### Code related audit information

*A distributor 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 distributor and consumer, the distributor needs to provide this information in at least one communication in that series.*

#### Audit observation

The Disputes Resolution information for HALO was examined to determine compliance.

#### Audit commentary

The email signature for Smart Power provides information about Utilities Disputes, including the link to the Utilities Disputes website. A voice recording which includes information on Utilities Disputes is played for inbound calls. HALO is a very small network; they do not usually have any direct interactions with consumers as these are normally handled by the retailer.

#### Audit outcome

Compliant

### 3. CREATION OF ICPS

#### 3.1. Distributors must create ICPS (Clause 11.4)

##### Code reference

Clause 11.4

##### Code related audit information

*The distributor must create an ICP identifier in accordance with clause 1 of schedule 11.1 for each ICP on the distributor's network. This includes an ICP identifier for the point of connection at which an embedded network connects to the distributor's network.*

##### Audit observation

The new connection process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

##### Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. 50 new ICPS were created during the audit period as required by this clause.

##### Audit outcome

Compliant

#### 3.2. Participants may request distributors to create ICPS (Clause 11.5(3))

##### Code reference

Clause 11.5(3)

##### Code related audit information

*The distributor, within three business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.*

##### Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

##### Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. All 50 new ICPS were requested by the client not the trader, and this clause did not apply.

##### Audit outcome

Compliant

#### 3.3. Provision of ICP Information to the registry manager (Clause 11.7)

##### Code reference

Clause 11.7

##### Code related audit information

*The distributor must provide information about ICPS on its network in accordance with schedule 11.1.*

### **Audit observation**

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### **Audit commentary**

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

All 50 new ICPs had a price category, ready status, an address, network and proposed trader information recorded on the registry prior to initial electrical connection.

23 of the 50 new ICPs created and connected during the audit period had late initial electrical connection date updates. All of the late updates were corrections, populated on the date that the trader confirmed the correct initial electrical connection date. The controls over initial electrical connection dates are strong, and the non-compliance could not be avoided. Non-compliance is recorded in **section 3.5**.

### **Audit outcome**

Compliant

## **3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule 11.1)**

### **Code reference**

*Clause 7(2) of Schedule 11.1*

### **Code related audit information**

*The distributor must provide information specified in Clauses 7(1)(a) to 7(1)(o) of Schedule 11.1 as soon as practicable and prior to electricity being traded at the ICP.*

### **Audit observation**

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### **Audit commentary**

Compliance is recorded in the TEG audit report in relation to this clause. All 50 new ICPs had a price category, ready status, an address, network and proposed trader information recorded on the registry prior to initial electrical connection.

### **Audit outcome**

Compliant

## **3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)**

### **Code reference**

*Clause 7(2A) of Schedule 11.1*

### **Code related audit information**

*The distributor must provide the information specified in subclause (1)(p) to the registry manager no later than ten business days after the date on which the ICP is initially electrically connected.*

### Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### Audit commentary

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

23 of the 50 new ICPs created and connected during the audit period had late initial electrical connection date updates. All of the late updates were corrections, populated on the date that the trader confirmed the correct initial electrical connection date. The controls over initial electrical connection dates are strong, and the non-compliance could not be avoided.

### Audit outcome

Non-compliant

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1  From: 02-Apr-24 To: 09-Apr-24	23 of the 50 new ICPs created and electrically connected during the audit period did not have their initial electrical connection date populated on the registry within ten business days of initial electrical connection.  Potential impact: None  Actual impact: None  Audit history: None  Controls: Strong  Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are strong because initial electrical connection dates are closely monitored, and the late updates were all corrections processed upon discovery of the errors.  The audit risk rating is low because there is no direct impact on submission and the late updates were made 12 to 16 business days after initial electrical connection.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
As mentioned above the late updates were revisions caused by confusion between the trader and MEP – we made the updates as soon as we were advised as to the correct dates by the Trader.		9 April 2024	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
This is an unusual situation which should not reoccur, but was also largely outside of our control.		N/A	

### 3.6. Connection of ICP that is not an NSP (Clause 11.17)

#### Code reference

Clause 11.17

#### Code related audit information

*A distributor must, when connecting an ICP that is not an NSP, follow the connection process set out in Clause 10.31.*

*The distributor must not connect an ICP (except for an ICP across which unmetered load is shared) unless a trader is recorded in the registry as accepting responsibility for the ICP.*

*In respect of ICPs across which unmetered load is shared, the distributor must not connect an ICP unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load, and all traders that are responsible for an ICP on the shared unmetered load have been advised.*

#### Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

#### Audit commentary

Compliance is recorded in the TEG audit report. Review of the registry data confirmed that a trader is recorded for all “active” ICPs, and there is no shared unmetered load on HALO’s network.

All 50 new ICPs created during the audit period had a proposed trader recorded on the registry prior to initial electrical connection.

#### Audit outcome

Compliant

### 3.7. Connection of ICP that is not an NSP (Clause 10.31)

#### Code reference

Clause 10.31

#### Code related audit information

*A distributor must not connect an ICP that is not an NSP unless requested to do so by the trader trading at the ICP, or if there is only shared unmetered load at the ICP and each trader has been advised.*

#### Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

#### Audit commentary

Compliance is recorded in the TEG audit report. Review of the registry data confirmed that a trader is recorded for all active ICPs, and there is no shared unmetered load on HALO’s network.

All 50 new ICPs created during the audit period had a proposed trader recorded on the registry prior to initial electrical connection.

#### Audit outcome

Compliant

### 3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A)

#### Code reference

Clause 10.31A

#### Code related audit information

*A distributor may only temporarily electrically connect an ICP that is not an NSP if requested by an MEP for a purpose set out in clause 10.31A(2), and the MEP:*

- *has been authorised to make the request by the trader responsible for the ICP; and*
- *the MEP has an arrangement with that trader to provide metering services.*

*If the ICP is only shared unmetered load, the distributor must advise the traders of the intention to temporarily connect the ICP unless:*

- *advising all traders would impose a material cost on the distributor, and*
- *in the distributor's reasonable opinion, the advice would not result in any material benefit to any of the traders.*

#### Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

#### Audit commentary

Compliance is recorded in the TEG agent report. 50 ICPs were initially electrically connected during the audit period, and the AC020 report did not identify any ICPs where the meter was certified prior to the initial electrical connection date.

There are no ICPs with shared unmetered load on the HALO network.

#### Audit outcome

Compliant

### 3.9. Connection of NSP that is not point of connection to grid (Clause 10.30)

#### Code reference

Clause 10.30

#### Code related audit information

*A distributor must not connect an NSP on its network that is not a point of connection to the grid unless requested to do so by the trader responsible for ensuring there is a metering installation for the point of connection.*

*The distributor that initiates the connection under Part 11 and connects the NSP must, within 5 business days of connecting the NSP that is not a point of connection to the grid, advise the reconciliation manager of the following in the prescribed form:*

- *the NSP that has been connected,*
- *the date of the connection,*
- *the participant identifier of the MEP for each metering installation for the NSP,*
- *the certification expiry date of each metering installation for the NSP.*

#### Audit observation

The management of this process is discussed in the TEG report. The NSP table was reviewed.

#### Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. New NSP HAV0011 was connected during the audit period, and the NSP, date of connection, MEP participant identifier and meter certification expiry date were all provided to the reconciliation manager and published on the NSP table within five business days of the NSP start date.

#### **Audit outcome**

Compliant

### 3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30A and 10.30B)

#### **Code reference**

*Clause 10.30A and 10.30B*

#### **Code related audit information**

*A distributor may only temporarily electrically connect an NSP that is not a point of connection to the grid if requested by an MEP for a purpose set out in clause 10.30A(3), and the MEP:*

- *has been authorised to make the request by the reconciliation participant responsible for the NSP; and*
- *the MEP has an arrangement with that reconciliation participant to provide metering services.*

*A distributor may only electrically connect an NSP if:*

- *each distributor connected to the NSP agrees,*
- *the trader responsible for delivery of submission information has requested the electrical connection,*
- *the metering installations for the NSP are certified and operational metering.*

#### **Audit observation**

The NSP table was reviewed, and whether the NSP was temporarily electrically connected was checked.

#### **Audit commentary**

Compliance is recorded in the TEG audit report in relation to this clause. New NSP HAV0011 was connected during the audit period, and Smart Power confirmed that it was not temporarily electrically connected.

#### **Audit outcome**

Compliant

### 3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1)

#### **Code reference**

*Clause 1(1) Schedule 11.1*

#### **Code related audit information**

*Each ICP created by the distributor in accordance with Clause 11.4 must have a unique identifier, called the "ICP identifier", determined in accordance with the following format:*

*xxxxxxxxxxccc where:*

- *xxxxxxxxxx is a numerical sequence provided by the distributor,*
- *xx is a code that ensures the ICP is unique (assigned by the Authority to the issuing distributor),*
- *ccc is a checksum generated according to the algorithm provided by the Authority.*

#### **Audit observation**



The ICP creation process is discussed in the TEG audit report.

**Audit commentary**

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

**Audit outcome**

Compliant

**3.12. Loss category (Clause 6 Schedule 11.1)**

**Code reference**

*Clause 6 Schedule 11.1*

**Code related audit information**

*Each ICP must have a single loss category that is referenced to identify the associated loss factors.*

**Audit observation**

The registry list was reviewed to determine compliance.

**Audit commentary**

All “active” ICPs have a single loss category (HNVL1), which clearly identifies the relevant loss factor.

**Audit outcome**

Compliant

**3.13. Management of “new” status (Clause 13 Schedule 11.1)**

**Code reference**

*Clause 13 Schedule 11.1*

**Code related audit information**

*The ICP status of “new” must be managed by the distributor to indicate:*

- *the associated electrical installations are in the construction phase (clause 13(a) of schedule 11.1),*
- *the ICP is not ready for activation (clause 13(b) of schedule 11.1).*

**Audit observation**

The ICP creation process was reviewed as part of the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

**Audit commentary**

Compliance is recorded in the TEG audit report. “New” status was not applied for any ICPs during the audit period.

**Audit outcome**

Compliant

**3.14. Monitoring of “new” & “ready” statuses (Clause 15 Schedule 11.1)**

**Code reference**

*Clause 15 Schedule 11.1*

### Code related audit information

*If an ICP has had the status of “new” or has had the status of “ready” for 24 months or more:*

- *the distributor must ask the trader who intends to trade at the ICP whether the ICP should continue to have that status (clause 15(2)(a) of schedule 11.1),*
- *the distributor must decommission the ICP if the trader advises that the ICP should not continue to have that status (clause 15(2)(b) of schedule 11.1).*

### Audit observation

Monitoring of “new” and “ready” status is discussed in the TEG report. The registry list, event detail report, and ACO20 distributor compliance report were examined to determine compliance.

### Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. ICPs at “new” or “ready” status for more than six months are followed up with the trader to determine whether they are still required. There are currently no ICPs at “new” or “ready” status.

### Audit outcome

Compliant

## 3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1)

### Code reference

*Clause 7(6) Schedule 11.1*

### Code related audit information

*If the ICP connects the distributor's network to an embedded generating station that has a capacity of 10 MW or more (clause 7(1)(f) of schedule 11.1):*

- *The loss category code must be unique; and*
- *The distributor must provide the following to the reconciliation manager:*
  - o *the unique loss category code assigned to the ICP,*
  - o *the ICP identifier of the ICP,*
  - o *the NSP identifier of the NSP to which the ICP is connected,*
  - o *the plant name of the embedded generating station.*

### Audit observation

The registry list was examined to determine compliance.

### Audit commentary

Review of the registry list confirmed that no ICPs have embedded generation.

### Audit outcome

Compliant

## 3.16. Electrical connection of a point of connection (Clause 10.33A)

### Code reference

*Clause 10.33A(4)*

### Code related audit information

*No participant may electrically connect a point of connection or authorise the electrical connection of a point of connection, other than a reconciliation participant.*

### **Audit observation**

Sub-clause (4) states that no participant may electrically connect a point of connection without the permission of the reconciliation participant. The registry list was reviewed to determine compliance.

### **Audit commentary**

HALO does not electrically connect any points of connection; connections are completed by the trader. There are no unmetered streetlight ICPs which could have additional load added to on this network.

### **Audit outcome**

Compliant

## **3.17. Electrical disconnection of a point of connection (Clause 10.30C and 10.31C)**

### **Code reference**

*Clause 10.30C and 10.31C*

### **Code related audit information**

*A distributor can only disconnect, or electrically disconnect an ICP on its network:*

- *if empowered to do so by legislation (including the Code),*
- *under its contract with the trader for that ICP or NSP,*
- *under its contract with the consumer for that ICP.*

### **Audit observation**

Processes were examined for the disconnection and electrical disconnection of ICPs and NSPs. HALO requires all requests for disconnection to be sent to the trader.

### **Audit commentary**

No disconnections have been completed for HALO ICPs.

### **Audit outcome**

Compliant

## **3.18. Meter bridging (Clause 10.33C)**

### **Code reference**

*Clause 10.33C*

### **Code related audit information**

*A distributor may only electrically connect an ICP in a way that bypasses a meter that is in place ("bridging") if the distributor has been authorised by the responsible trader.*

*The distributor can then only proceed with bridging the meter 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 distributor bridges a meter, the distributor must notify the responsible trader within one business day and include the date of bridging in its advice.*

### **Audit observation**

The HALO process for bridging control devices was examined. HALO requires all requests for meter bridging to be sent to the trader.

**Audit commentary**

All ICPs were initially electrically connected by the trader and have remained active since then. No meters have been bridged by HALO.

**Audit outcome**

Compliant

## 4. MAINTENANCE OF REGISTRY INFORMATION

### 4.1. Changes to registry information (Clause 8 Schedule 11.1)

#### Code reference

*Clause 8 Schedule 11.1*

#### Code related audit information

*If information held by the registry that relates to an ICP for which the distributor is responsible changes, the distributor must give written notice to the registry manager of that change.*

*Notification must be given by the distributor within three business days after the change takes effect, unless the change is to the NSP identifier of the NSP to which the ICP is usually connected (other than a change that is the result of the commissioning or decommissioning of an NSP).*

*In those cases, notification must be given no later than eight business days after the change takes effect.*

*If the change to the NSP identifier is for more than ten business days, the notification must be provided no later than the 13<sup>th</sup> business day and be backdated to the date the change took effect.*

*In the case of decommissioning an ICP, notification must be given by the later of three business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or three business days after the distributor has decommissioned the ICP.*

*In the case of a change to price category codes, where the change is backdated, no later than three business days after the distributor and the trader responsible for the ICP agree on the change.*

#### Audit observation

The management of this process is discussed in the TEG report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

#### Audit commentary

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

The AC020 report did not record any late network, address, pricing, or status updates apart from the 23 corrections to initial electrical connection dates which are recorded as non-compliance in **section 3.5**.

#### Audit outcome

Compliant

### 4.2. Notice of NSP for each ICP (Clauses 7(1),(4) and (5) Schedule 11.1)

#### Code reference

*Clauses 7(1), 7(4) and 7(5) Schedule 11.1*

#### Code related audit information

*Under clause 7(1)(b) of schedule 11.1, the distributor must provide to the registry manager the NSP identifier of the NSP to which the ICP is usually connected.*

*If the distributor cannot identify the NSP that an ICP is connected to, the distributor must nominate the NSP that the distributor thinks is most likely to be connected to the ICP, taking into account the flow of electricity within its network, and the ICP is deemed to be connected to the nominated NSP.*

#### Audit observation

The management of this process is discussed in the TEG report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### **Audit commentary**

Compliance is recorded in the TEG audit report in relation to this clause. Due to the nature of embedded networks, there is no uncertainty regarding the ICP and NSP relationships. All “active” ICPs are connected to HAV0011 and have the correct NSP assigned.

### **Audit outcome**

Compliant

## 4.3. Customer queries about ICP (Clause 11.31)

### **Code reference**

*Clause 11.31*

### **Code related audit information**

*The distributor must advise a customer (or any person authorised by the customer) or embedded generator of the customer or embedded generator's ICP identifier within three business days after receiving a request for that information.*

### **Audit observation**

The management of customer queries was examined.

### **Audit commentary**

HALO does not receive direct requests for ICP identifiers, but if they were received these would be provided immediately.

### **Audit outcome**

Compliant

## 4.4. ICP location address (Clause 2 Schedule 11.1)

### **Code reference**

*Clause 2 Schedule 11.1*

### **Code related audit information**

*Each ICP identifier must have a location address that allows the ICP to be readily located.*

### **Audit observation**

The process to determine correct and unique addresses was examined during the TEG agent audit. The AC020 distributor compliance report was examined to determine compliance.

### **Audit commentary**

The AC020 report did not record any active ICPs where addresses were duplicates or could not be readily located.

### **Audit outcome**

Compliant

#### 4.5. Electrically disconnecting an ICP (Clause 3 Schedule 11.1)

##### Code reference

Clause 3 Schedule 11.1

##### Code related audit information

*Each ICP created after 7 October 2002 must be able to be electrically disconnected without electrically disconnecting another ICP, except for ICPs that are the point of connection between a network and an embedded network, or ICPs that represent the consumption calculated by the difference between the total consumption for the embedded network and all other ICPs on the embedded network.*

##### Audit observation

The management of this process was examined.

##### Audit commentary

HALO confirmed that all ICPs comply with this clause. They have a good understanding of this requirement, and as this network was created post this requirement, this scenario is unlikely to arise.

##### Audit outcome

Compliant

#### 4.6. Distributors to Provide ICP Information to the Registry manager (Clause 7(1) Schedule 11.1)

##### Code reference

Clause 7(1) Schedule 11.1

##### Code related audit information

*For each ICP on the distributor's network, the distributor must provide the following information to the registry manager:*

- *the location address of the ICP identifier (clause 7(1)(a) of schedule 11.1),*
- *the NSP identifier of the NSP to which the ICP is usually connected (clause 7(1)(b) of schedule 11.1),*
- *the installation type code assigned to the ICP (clause 7(1)(c) of schedule 11.1),*
- *the reconciliation type code assigned to the ICP (clause 7(1)(d) of schedule 11.1),*
- *the loss category code and loss factors for each loss category code assigned to the ICP (clause 7(1)(e) of schedule 11.1),*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (clause 7(1)(f) of schedule 11.1):*
  - a) *the unique loss category code assigned to the ICP,*
  - b) *the ICP identifier of the ICP,*
  - c) *the NSP identifier of the NSP to which the ICP is connected,*
  - d) *the plant name of the embedded generating station,*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (clause 7(1)(g) of schedule 11.1),*
- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (clause 7(1)(h) of schedule 11.1):*

- a) *a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity,*
- b) *a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period,*
- c) *if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-*
  - (i) no capacity value recorded in the registry field for the chargeable capacity; and*
  - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded,*
- d) *if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-*
  - (i) the annual capacity value recorded in the registry field for the chargeable capacity; and*
  - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded,*
- e) *the actual chargeable capacity of the ICP in any other case,*
- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (clause 7(1)(i) of schedule 11.1),*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (clause 7(1)(j) of schedule 11.1),*
- *the status of the ICP (clause 7(1)(k) of schedule 11.1),*
- *designation of the ICP as "dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under clause 7(1)(b) of schedule 11.1, or the ICP is a point of connection between a network and an embedded network (clause 7(1)(l) of schedule 11.1),*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (clause 7(1)(m) of schedule 11.1),*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (clause 7(1)(n) of schedule 11.1),*
- *if the ICP is capable of generating into the distributors network (clause 7(1)(o) of schedule 11.1):*
  - a) *the nameplate capacity of the generator; and*
  - b) *the fuel type,*
- *the initial electrical connection date of the ICP (clause 7(1)(p) of schedule 11.1).*

#### **Audit observation**

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

#### **Audit commentary**

Compliance is recorded in the TEG agent report. I saw evidence that errors are detected, and corrections are made as part of business-as-usual processes. I did not find any inaccurate information which had not been detected and corrected prior to the audit.



### **Distributed generation and unmetered load**

No ICPs have distributed generation or unmetered load indicated by the trader or distributor.

### **Initial electrical connection dates**

No discrepancies between the initial electrical connection date, trader's active status date or MEP's meter certification date were identified.

### **Event dates**

Event dates are applied as the date that the ICP attributes are effective from. I checked all 50 initial electrical connection date updates and confirmed that the correct event dates were applied. No other incorrect event dates were identified.

### **Audit outcome**

Compliant

## **4.7. Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)**

### **Code reference**

*Clause 7(3) Schedule 11.1*

### **Code related audit information**

*The distributor must provide the following information to the registry no later than ten business days after the trading of electricity at the ICP commences:*

- *the actual price category code assigned to the ICP (clause 7(3)(a) of schedule 11.1),*
- *the actual chargeable capacity of the ICP determined by the price category code assigned to the ICP (if any) (clause 7(3)(b) of schedule 11.1),*
- *the actual distributor installation details of the ICP determined by the price category code assigned to the ICP (if any) (clause 7(3)(c) of schedule 11.1).*

### **Audit observation**

The management of this process is discussed in the TEG report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### **Audit commentary**

Compliance is recorded in the TEG audit report in relation to this clause. All new ICPs created during the audit period had pricing information added before the initial electrical connection date.

### **Audit outcome**

Compliant

## **4.8. GPS coordinates (Clause 7(8) and (9) Schedule 11.1)**

### **Code reference**

*Clause 7(8) and (9) Schedule 11.1*

### **Code related audit information**

*If a distributor populates the GPS coordinates (optional), it must meet the NZTM2000 standard in a format specified by the Authority.*

### **Audit observation**

The registry list was examined to confirm compliance.

### **Audit commentary**

HALO's ICPs do not have GPS coordinates recorded on the registry.

### **Audit outcome**

Compliant

## 4.9. Management of "ready" status (Clause 14 Schedule 11.1)

### **Code reference**

*Clause 14 Schedule 11.1*

### **Code related audit information**

*The ICP status of "ready" must be managed by the distributor and indicates that:*

- *the associated electrical installations are ready for connecting to the electricity supply (clause 14(1)(a) of schedule 11.1); or*
- *the ICP is ready for activation by a trader (clause 14(1)(b) of schedule 11.1).*

*Before an ICP is given the "ready" status in accordance with clause 14(1) of schedule 11.1, the distributor must:*

- *identify the trader that has taken responsibility for the ICP (clause 14(2)(a) of schedule 11.1),*
- *ensure the ICP has a single price category (clause 14(2)(b) of schedule 11.1).*

### **Audit observation**

Processes to manage ICPs at "ready" status were reviewed as part of the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### **Audit commentary**

Compliance is recorded in the TEG audit report in relation to this clause. All ICPs are created at "ready" status once the details of the proposed trader details have been provided to TEG. "Ready" status was correctly applied to ICPs as part of the new connection process.

### **Audit outcome**

Compliant

## 4.10. Management of "distributor" status (Clause 16 Schedule 11.1)

### **Code reference**

*Clause 16 Schedule 11.1*

### **Code related audit information**

*The ICP status of "distributor" must be managed by the distributor and indicates that the ICP record represents a shared un-metered load installation or the point of connection between an embedded network and its parent network.*

### Audit observation

Processes to manage ICPs at “distributor” status were reviewed as part of the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### Audit commentary

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

It is unlikely that HALO will deal with any ICPs with a “distributor” status because they do not deal with shared unmetered load, and there are no embedded networks connected to the existing embedded network. The “distributor” status was not used during the audit period.

### Audit outcome

Compliant

## 4.11. Management of “decommissioned” status (Clause 20 Schedule 11.1)

### Code reference

*Clause 20 Schedule 11.1*

### Code related audit information

*The ICP status of “decommissioned” must be managed by the distributor and indicates that the ICP is permanently removed from future switching and reconciliation processes (clause 20(1) of schedule 11.1).*

*Decommissioning only occurs when:*

- *electrical installations associated with the ICP are physically removed (clause 20(2)(a) of schedule 11.1); or*
- *there is a change in the allocation of electrical loads between ICPs with the effect of making the ICP obsolete (clause 20(2)(b) of schedule 11.1); or*
- *in the case of a distributor only ICP for an embedded network, the embedded network no longer exists (clause 20(2)(c) of schedule 11.1).*

### Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

### Audit commentary

Compliance is recorded in the TEG agent report. No ICPs were decommissioned during the audit period.

### Audit outcome

Compliant

## 4.12. Maintenance of price category codes (Clause 23 Schedule 11.1)

### Code reference

*Clause 23 Schedule 11.1*

### Code related audit information

*The distributor must keep up to date the table in the registry of the price category codes that may be assigned to ICPs on each distributor’s network by entering in the table any new price category codes.*

*Each entry must specify the date on which each price category code takes effect, which must not be earlier than two months after the date the code is entered in the table.*

*A price category code takes effect on the specified date.*

**Audit observation**

The management of this process is discussed in the TEG agent report. The price category code table on the registry was examined to determine compliance.

**Audit commentary**

Compliance is recorded in the TEG agent report. Four new price category codes were created, and no price category codes have been changed. All the new pricing category codes were created on time and were for ICPs connected to new NSP HAV0011.

**Audit outcome**

Compliant

## 5. CREATION AND MAINTENANCE OF LOSS FACTORS

### 5.1. Updating table of loss category codes (Clause 21 Schedule 11.1)

#### Code reference

Clause 21 Schedule 11.1

#### Code related audit information

*The distributor must keep the registry up to date with the loss category codes that may be assigned to ICPs on the distributor's network.*

*The distributor must specify the date on which each loss category code takes effect.*

*A loss category code takes effect on the specified date.*

#### Audit observation

The management of this process is discussed in the TEG agent report. The loss category code table on the registry was examined to determine compliance.

#### Audit commentary

Compliance is recorded in the TEG agent report. New loss factor HNVL1 was created on 12 January 2024 with a start date of 1 January 2024 for ICPs connected to new NSP HAV0011. The loss factor did not apply to any ICPs until 12 March 2024, and the required notice was provided.

#### Audit outcome

Compliant

### 5.2. Updating loss factors (Clause 22 Schedule 11.1)

#### Code reference

Clause 22 Schedule 11.1

#### Code related audit information

*Each loss category code must have a maximum of two loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.*

*If the distributor wishes to replace an existing loss factor on the table in the registry, the distributor must enter the replaced loss factor on the table in the registry.*

#### Audit observation

The management of this process is discussed in the TEG agent report. The loss category code table on the registry was examined to determine compliance.

#### Audit commentary

Compliance is recorded in the TEG agent report. The loss factor values for HNVL1 changed effective from 1 May 2024, and notification was provided on time. There was only one loss factor per loss category code per month.

#### Audit outcome

Compliant

## 6. CREATION AND MAINTENANCE OF NSPS (INCLUDING DECOMMISSIONING OF NSPS AND TRANSFER OF ICPS)

### 6.1. Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1)

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

*If the distributor is creating or decommissioning an NSP that is an interconnection point between two local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.*

*If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between two embedded networks, the embedded network owner must give written notice to the reconciliation manager of the creation or decommissioning.*

*If the distributor is creating or decommissioning an NSP that is a point of connection between an embedded network and another network, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.*

*The notice provided to the reconciliation manager must be provided no later than 30 days prior to the intended date of creation or decommissioning.*

*If the intended date of creation or decommissioning changes the distributor must provide an updated notice as soon as possible.*

*If the distributor wishes to change the record in the registry of an ICP that is not recorded as being usually connected to an NSP in the distributor's network, so that the ICP is recorded as being usually connected to an NSP in the distributor's network, the distributor must:*

- *give written notice to the reconciliation manager,*
- *give written notice to the Authority,*
- *give written notice to each affected reconciliation participant,*
- *comply with schedule 11.2.*

#### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table and notifications were examined to determine compliance.

#### Audit commentary

Compliance is recorded in the TEG agent report.

New NSP HAV0011HALOEN was created during the audit period, and I confirmed that the required notice was provided at least 30 days prior to the start date, by reviewing the Reconciliation Manager's news items.

No ICPs transferred from other networks to HAV0011HALOEN.

#### Audit outcome

Compliant

## 6.2. Provision of NSP information (Clause 26(1) and (2) Schedule 11.1)

### Code reference

*Clause 26(1) and (2) Schedule 11.1*

### Code related audit information

*If the distributor wishes to create an NSP or transfer an ICP as described above, the distributor must request that the reconciliation manager create a unique NSP identifier for the relevant NSP.*

*The request must be made at least ten business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between two local networks. In all other cases, the request must be made at least one month before the NSP is electrically connected or the ICP is transferred.*

### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table and notifications were examined to determine compliance.

### Audit commentary

Compliance is recorded in the TEG agent report.

New NSP HAV0011HALOEN was created during the audit period, and I confirmed that the required notice was provided at least ten days prior to the start date by reviewing the Reconciliation Manager's news items.

### Audit outcome

Compliant

## 6.3. Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1)

### Code reference

*Clause 24(1) and Clause 26(3) Schedule 11.1*

### Code related audit information

*If a participant has notified the creation of an NSP on the distributor's network, the distributor must give written notice to the reconciliation manager of the following:*

- *if the NSP is to be located in a new balancing area, all relevant details necessary for the new balancing area to be created and notification that the NSP to be created is to be assigned to the new balancing area,*
- *in all other cases, notification of the balancing area in which the NSP is located.*

### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table and notifications were examined to determine compliance.

### Audit commentary

Compliance is recorded in the TEG agent report.

New balancing area HAV0011HALOE was created for new NSP HAV0011HALOEN, and notification of the balancing area was provided as required by this clause. No balancing area changes occurred during the audit period.

### Audit outcome

Compliant

#### 6.4. Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1)

##### Code reference

Clause 26(4) Schedule 11.1

##### Code related audit information

*If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must give notice to the reconciliation manager at least one month before the creation or transfer of:*

- *the network on which the NSP will be located after the creation or transfer (clause 26(4)(a)),*
- *the ICP identifier for the ICP that connects the network and the embedded network (clause 26(4)(b)),*
- *the date on which the creation or transfer will take effect (cause 26(4)(c)).*

##### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table and RM portal notifications were examined to determine compliance.

##### Audit commentary

New NSP HAV0011HALOEN was created during the audit period, and I confirmed that the notice of the network, NSP, LE ICP and creation date was provided at least 30 days prior to the start date, by reviewing the Reconciliation Manager's news items and notifications from TEG to the Reconciliation Manager.

##### Audit outcome

Compliant

#### 6.5. Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1)

##### Code reference

Clause 24(2) and (3) Schedule 11.1

##### Code related audit information

*The distributor must give written notice to the reconciliation manager of any change to balancing areas associated with an NSP supplying the distributor's network. The notification must specify the date and trading period from which the change takes effect and be given no later than three business days after the change takes effect.*

##### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table was examined.

##### Audit commentary

Compliance is recorded in the TEG agent report. No balancing areas were changed during the audit period.

##### Audit outcome

Compliant



## 6.6. Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1)

### Code reference

Clause 27 Schedule 11.1

### Code related audit information

*If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least one month before the transfer.*

### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table was reviewed.

### Audit commentary

Compliance is recorded in the TEG agent report. No existing ICPs became NSPs during the audit period.

### Audit outcome

Compliant

## 6.7. Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2)

### Code reference

Clause 1 to 4 Schedule 11.2

### Code related audit information

*If the distributor wishes to transfer an ICP, the distributor must give written notice to the Authority in the prescribed form, no later than three business days before the transfer takes effect.*

### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table and registry list were reviewed.

### Audit commentary

Compliance is recorded in the TEG agent report. No ICPs were transferred during the audit period.

### Audit outcome

Compliant

## 6.8. Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3))

### Code reference

Clause 10.25(1) and 10.25(3)

### Code related audit information

*A network owner must, for each NSP that is not a point of connection to the grid for which it is responsible, ensure that:*

- *there is one or more metering installations (clause 10.25(1)(a)); and*
- *the electricity is conveyed and quantified in accordance with the Code (clause 10.25(1)(b)).*

For each NSP covered in 10.25(1) the network owner must, no later than 20 business days after a metering installation at the NSP is recertified advise the reconciliation manager of:

- the reconciliation participant for the NSP,
- the participant identifier of the metering equipment provider for the metering installation,
- the certification expiry date of the metering installation.

#### Audit observation

The management of this process is discussed in the TEG agent report. The NSP supply point table was examined.

#### Audit commentary

Compliance is recorded in the TEG agent report. TEG monitors meter certification expiry dates for all of the networks they act as the registry agent for, and compliance is recorded in their agent report. Review of the NSP table confirmed that the NSP has current meter certification, and the certification expiry date has not changed during the audit period.

Distributor	NSP POC	Description	MEP	Certification Expiry
HALO	HAV0011	110 Alfriston Rd Auckland	AMCI	24 January 2034

#### Audit outcome

Compliant

6.9. Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2))

#### Code reference

Clause 10.25(2)

#### Code related audit information

If the network owner proposes the creation of a new NSP which is not a point of connection to the grid it must:

- assume responsibility for being the metering equipment provider (clause 10.25(2)(a)(i)); or
- contract with a metering equipment provider to be the MEP (clause 10.25(2)(a)(ii)); and
- no later than 20 business days after identifying the MEP advise the reconciliation manager in the prescribed form of the reconciliation participant for the NSP (clause 10.25(2)(b)); and
- no later than five business days after the date of certification of each metering installation, advise the reconciliation manager of
  - a) the MEP for the NSP (clause 10.25(2)(c)(i)); and
  - b) the NSP of the certification expiry date (clause 10.25(2)(c)(ii)).

#### Audit observation

The management of this process is discussed in the TEG agent report. The NSP table on the registry was examined.

#### Audit commentary

Compliance is recorded in the TEG agent report. New NSP HAV0011HALOEN was created during the audit period, and review of the NSP mapping table confirmed that the meter certification and MEP details were provided within five business days of connection.

### **Audit outcome**

Compliant

## 6.10. Obligations concerning change in network owner (Clause 29 Schedule 11.1)

### **Code reference**

*Clause 29 Schedule 11.1*

### **Code related audit information**

*If a network owner acquires all or part of a network, the network owner must give written notice to:*

- *the previous network owner (clause 29(1)(a) of schedule 11.1),*
- *the reconciliation manager (clause 29(1)(b) of schedule 11.1),*
- *the Authority (clause 29(1)(c) of schedule 11.1),*
- *every reconciliation participant who trades at an ICP connected to the acquired network or part of the network acquired (clause 29(1)(d) of schedule 11.1).*

*At least one month notification is required before the acquisition (clause 29(2) of schedule 11.1).*

*The notification must specify the ICPs to be amended to reflect the acquisition and the effective date of the acquisition (clause 29(3) of schedule 11.1).*

### **Audit observation**

The management of this process is discussed in the TEG agent report. The NSP table on the registry was examined.

### **Audit commentary**

Compliance is recorded in the TEG agent report. HALO has not acquired any networks.

### **Audit outcome**

Compliant

## 6.11. Change of MEP for embedded network gate meter (Clause 10.22(1)(b))

### **Code reference**

*Clause 10.22(1)(b)*

### **Code related audit information**

*If the MEP for an ICP which is also an NSP changes the participant responsible for the provision of the metering installation under clause 10.25, the participant must advise the reconciliation manager and the gaining MEP.*

### **Audit observation**

The MEP change process was reviewed as part of the TEG agent audit. The NSP table was examined.

### **Audit commentary**

Compliance is recorded in the TEG audit report in relation to this clause. There have been no MEP changes during the audit period.

### **Audit outcome**

Compliant

## 6.12. Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2)

### Code reference

*Clauses 5 and 8 Schedule 11.2*

### Code related audit information

*The distributor must give the Authority confirmation that it has received written consent to the proposed transfer from:*

- *the distributor whose network is associated with the NSP to which the ICP is recorded as being connected immediately before the notification (unless the notification relates to the creation of an embedded network) (clause 5(a) of schedule 11.2),*
- *every trader trading at an ICP being supplied from the NSP to which the notification relates (clause 5(b) of schedule 11.2).*

*The notification must include any information requested by the Authority (clause 8 of schedule 11.2).*

### Audit observation

The ICP transfer process was reviewed as part of the TEG agent audit. The NSP table and the registry list were examined.

### Audit commentary

Compliance is recorded in the TEG agent report. No ICPs have been transferred during the audit period.

### Audit outcome

Compliant

## 6.13. Transfer of ICPs for embedded network (Clause 6 Schedule 11.2)

### Code reference

*Clause 6 Schedule 11.2*

### Code related audit information

*If the notification relates to an embedded network, it must relate to every ICP on the embedded network.*

### Audit observation

The ICP transfer process was reviewed as part of the TEG agent audit. The registry list was examined.

### Audit commentary

Compliance is recorded in the TEG agent report. No ICP transfers were initiated by HALO during the audit period.

### Audit outcome

Compliant

## 7. MAINTENANCE OF SHARED UNMETERED LOAD

### 7.1. Notification of shared unmetered load ICP list (Clause 11.14(2) and (4))

#### Code reference

*Clause 11.14(2) and (4)*

#### Code related audit information

*The distributor must give written notice to the registry manager and each trader responsible for the ICPs across which the unmetered load is shared of the ICP identifiers of those ICPs.*

*A distributor who receives notification from a trader relating to a change under Clause 11.14(3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared of the addition or omission of the ICP.*

#### Audit

The registry list file was examined to determine compliance.

#### Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

#### Audit outcome

Compliant

### 7.2. Changes to shared unmetered load (Clause 11.14(5))

#### Code reference

*Clause 11.14(5)*

#### Code related audit information

*If the distributor becomes aware of a change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change or decommissioning as soon as practicable after the change or decommissioning.*

#### Audit observation

The registry list was examined to determine compliance.

#### Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

#### Audit outcome

Compliant

## 8. CALCULATION OF LOSS FACTORS

### 8.1. Creation of loss factors (Clause 11.2)

#### Code reference

Clause 11.2

#### Code related audit information

A participant must take all practicable steps to ensure that information that the participant is required to provide to any person under Part 11 is:

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

#### Audit observation

The calculation of loss factors was reviewed.

#### Audit commentary

Smart Power derives the loss factor for loss code HNVL1 from the published parent network loss factors for similar installations. It is expected that ICPs on embedded networks will have the same loss factor as a similar type of connection on the parent network.

To do this, Smart Power determines the gateway loss factor from the LE ICP 1002186273LC8DC's loss factor, then determines the local network loss factor which would be likely to apply to the embedded network ICPs if they were connected to the local network. Smart Power then calculates the embedded network loss factor as:

$$\frac{\text{Loss factor for a similar ICP on the parent network}}{\text{LE ICP loss factor}} = \text{Embedded network loss factor}$$

I confirmed that all published HALO loss factors values for HNVL1 were calculated based on the loss factors for the parent network.

#### Audit outcome

Compliant

## CONCLUSION

All registry and NSP table activity during the audit period was reviewed as part of this audit, and I did not find any inaccurate information which had not been detected and corrected prior to the audit.

One non-compliance was recorded for late provision of some initial electrical connection dates. All of the late updates were corrections, populated on the date that the trader confirmed the correct initial electrical connection date. The controls over initial electrical connection dates are strong, and the non-compliance could not be avoided.

The audit risk rating of one recommends the next audit be in 36 months, and I agree with this recommendation.

## PARTICIPANT RESPONSE

Smart Power have reviewed this audit report on behalf of HALO and their comments are contained within its body.