

**ELECTRICITY INDUSTRY PARTICIPATION CODE
RECONCILIATION PARTICIPANT AUDIT REPORT**

For

**ELECTRIC KIWI LIMITED (ELKI)
(COMPANY #5029980)**

Prepared by: Ewa Glowacka of TEG & Associates Ltd

Date audit commenced: 24 May 2023

Date audit report completed: 20 June 2024

Audit report due date: 20-Jun-24

TABLE OF CONTENTS

Executive summary	6
Audit summary	7
Non-compliances	7
Recommendations	9
Issues 9	
1. Administrative	11
1.1. Exemptions from Obligations to Comply with Code (Section 11)	11
1.2. Structure of Organisation	11
1.3. Persons involved in this audit	11
1.4. Use of Agents (Clause 15.34)	11
1.5. Hardware and Software	12
1.6. Breaches or Breach Allegations	12
1.7. ICP Data	13
1.8. Authorisation Received	15
1.9. Scope of Audit	15
1.10. Summary of previous audit	16
2. Operational Infrastructure	21
2.1. Relevant information (Clause 10.6, 11.2, 15.2)	21
2.2. Provision of information (Clause 15.35)	23
2.3. Data transmission (Clause 20 Schedule 15.2)	24
2.4. Audit trails (Clause 21 Schedule 15.2)	24
2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)	25
2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))	26
2.7. Physical location of metering installations (Clause 10.35(1)&(2))	26
2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)	27
2.9. Connection of an ICP (Clause 10.32)	28
2.10. Temporary Electrical Connection of an ICP (Clause 10.33)	28
2.11. Electrical Connection of Point of Connection (Clause 10.33A)	29
2.12. Arrangements for line function services (Clause 11.16)	31
2.13. Arrangements for metering equipment provision (Clause 10.36)	32
2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5))	32
2.15. Electrical disconnection of ICPs (Clause 10.33B)	33
2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7)	33
2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2)	34
2.18. Use of ICP identifiers on invoices (Clause 11.30)	36
2.19. Provision of information on dispute resolution scheme (Clause 11.30A)	36
2.20. Provision of information on electricity plan comparison site (Clause 11.30B)	37
3. Maintaining registry information	38
3.1. Obtaining ICP identifiers (Clause 11.3)	38
3.2. Providing registry information (Clause 11.7(2))	38
3.3. Changes to registry information (Clause 10 Schedule 11.1)	39
3.4. Trader responsibility for an ICP (Clause 11.18)	41
3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)	42
3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1)	44

3.7.	Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)	45
3.8.	Management of “active” status (Clause 17 Schedule 11.1)	45
3.9.	Management of “inactive” status (Clause 19 Schedule 11.1)	46
3.10.	ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)	47
4.	Performing customer and embedded generator switching	48
4.1.	Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)	48
4.2.	Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)	48
4.3.	Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3) ...	50
4.4.	Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)	52
4.5.	Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)	54
4.6.	Disputes - standard switch (Clause 7 Schedule 11.3)	55
4.7.	Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)..	55
4.8.	Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)	56
4.9.	Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)	58
4.10.	Losing trader must provide final information - switch move (Clause 11 Schedule 11.3).....	59
4.11.	Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3) .	61
4.12.	Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)	63
4.13.	Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3) ...	64
4.14.	Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)	65
4.15.	Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)	65
4.16.	Metering information (Clause 21 Schedule 11.3)	67
4.17.	Switch protection (Clause 11.15AA to 11.15AB).....	68
5.	Maintenance of unmetered load.....	70
5.1.	Maintaining shared unmetered load (Clause 11.14)	70
5.2.	Unmetered threshold (Clause 10.14 (2)(b)).....	70
5.3.	Unmetered threshold exceeded (Clause 10.14 (5)).....	71
5.4.	Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)	72
6.	Gathering raw meter data	73
6.1.	Electricity conveyed & notification by embedded generators(Clause 10.13, Clause 10.24 and 15.13).....	73
6.2.	Responsibility for metering at GIP(Clause 10.26 (6), (7) and (8))	74
6.3.	Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3) ...	74
6.4.	Reporting of defective metering installations (Clause 10.43(2) and (3))	75
6.5.	Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)...	75
6.6.	Derivation of meter readings (Clause 3(1), 3(2) and 5 Schedule 15.2).....	76
6.7.	NHH meter reading application (Clause 6 Schedule 15.2).....	77
6.8.	Interrogate meters once (Clause 7(1) and (2) Schedule 15.2).....	78
6.9.	NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)	79
6.10.	NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)	80
6.11.	NHH meter interrogation log (Clause 10 Schedule 15.2).....	80
6.12.	HHR data collection (Clause 11(1) Schedule 15.2).....	81
6.13.	HHR interrogation data requirement (Clause 11(2) Schedule 15.2).....	81
6.14.	HHR interrogation log requirements (Clause 11(3) Schedule 15.2)	82
7.	Storing raw meter data	84

7.1.	Trading period duration (Clause 13 Schedule 15.2).....	84
7.2.	Archiving and storage of raw meter data (Clause 18 Schedule 15.2).....	84
7.3.	Non metering information collected / archived (Clause 21(5) Schedule 15.2)	85
8.	Creating and managing (including validating, estimating, storing, correcting and archiving) volume information	86
8.1.	Correction of NHH meter readings (Clause 19(1) Schedule 15.2)	86
8.2.	Correction of HHR metering information (Clause 19(2) Schedule 15.2)	86
8.3.	Error and loss compensation arrangements (Clause 19(3) Schedule 15.2).....	87
8.4.	Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)	88
9.	Estimating and validating volume information	90
9.1.	Identification of readings (Clause 3(3) Schedule 15.2)	90
9.2.	Derivation of volume information (Clause 3(4) Schedule 15.2)	90
9.3.	Meter data used to derive volume information (Clause 3(5) Schedule 15.2)	91
9.4.	Half hour estimates (Clause 15 Schedule 15.2)	91
9.5.	NHH metering information data validation (Clause 16 Schedule 15.2).....	92
9.6.	Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)	93
10.	Provision of metering information to the GRID OWNER in accordance with subpart 4 of Part 13 (clause 15.38(1)(f))	95
10.1.	Generators to provide HHR metering information (Clause 13.136).....	95
10.2.	Unoffered & intermittent generation provision of metering information (Clause 13.137) ...	95
10.3.	Loss adjustment of HHR metering information (Clause 13.138)	96
10.4.	Notification of the provision of HHR metering information (Clause 13.140).....	96
11.	Provision of submission information for reconciliation	97
11.1.	Buying and selling notifications (Clause 15.3)	97
11.2.	Calculation of ICP days (Clause 15.6)	97
11.3.	Electricity supplied information provision to the reconciliation manager (Clause 15.7)	99
11.4.	HHR aggregates information provision to the reconciliation manager (Clause 15.8).....	101
12.	Submission computation	104
12.1.	Daylight saving adjustment (Clause 15.36).....	104
12.2.	Creation of submission information (Clause 15.4)	104
12.3.	Allocation of submission information (Clause 15.5)	105
12.4.	Grid owner volumes information (Clause 15.9).....	107
12.5.	Provision of NSP submission information (Clause 15.10)	108
12.6.	Grid connected generation (Clause 15.11)	108
12.7.	Accuracy of submission information (Clause 15.12).....	108
12.8.	Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)	110
12.9.	Reconciliation participants to prepare information (Clause 2 Schedule 15.3).....	111
12.10.	Historical estimates and forward estimates (Clause 3 Schedule 15.3)	112
12.11.	Historical estimate process (Clause 4 and 5 Schedule 15.3)	113
12.12.	Forward estimate process (Clause 6 Schedule 15.3)	113
12.13.	Compulsory meter reading after profile change (Clause 7 Schedule 15.3)	114
13.	Submission format and timing.....	116
13.1.	Provision of submission information to the RM (Clause 8 Schedule 15.3).....	116
13.2.	Reporting resolution (Clause 9 Schedule 15.3).....	118
13.3.	Historical estimate reporting to RM (Clause 10 Schedule 15.3).....	119

Conclusion 120
Participant response 120

EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Electric Kiwi Limited (ELKI) to support their application for certification in accordance with clauses 5 and 7 of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.2 issued by the Electricity Authority.

Electric Kiwi trades using two codes, ELKI and EKCI. ELKI trades 68,142 HHR ICPs and EKCI traders 125 HHR ICPs. The company only accepts installations for which volumes are recorded by remotely read smart meters.

ELKI uses the Bikkie in-house system to manage day-to-day operations, reconciliation, and billing for all ICPs using the ELKI code.

EKCI traders ICPs with metering category 2 and above. AMS is an agent who provides reconciliation services and reads the majority of meters. As part of this audit, we reviewed the “AMS HHR Agent Report 2023” dated 23 July 2023. We requested AMS to provide a sample of data and respond to a few questions related to the scope of this audit. However, AMS did not respond by the time this audit report was finalized.

To verify the compliance of switching, registry updates, and reconciliation submission calculations, we conducted judgment-based sampling by selecting typical examples of the population or looking at extreme examples of non-compliance within switching transactions.

The audit found 17 non-compliance, for ELKI no issues and recommendations were raised. The level of compliance has definitely improved since the last audit.

The main issues identified during this audit were related to switching

- Late NW files sent later than two months from the event date
- Incorrect use of “AA” code in AN files
- Incorrect switch event meter readings and a read type flag

Only one no-compliance was identified for EKCI. It was alleged breach in November 2023, the breach related to inaccurate data.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 33 which results in an indicative audit frequency of 18 months. We agree with this result.

The audit period is 01/03/2023 to 31/03/2024.

We thank the Electric Kiwi staff for their complete cooperation in this audit.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	11.2	Some inaccurate information are recorded in the registry	Moderate	Low	2	Identified
Electrical Connection of Point of Connection	2.11	10.33A	14 reconnections were not certified within five business days.	Moderate	Low	2	Identified
Changes to registry information	3.3	10 of Schedule 11.1	<ul style="list-style-type: none"> 271 late updates to "Active" status 102 late updates to "Inactive" status 156 late trader updates 	Moderate	Low	2	Identified
Provision of information to the registry manager	3.5	9 of Schedule 11.1	34 late updates to ANZIC code	Strong	Low	1	Identified
Losing trader response to switch request and event dates - standard switch	4.2	3 of Schedule 11.3	<ul style="list-style-type: none"> 33.9% of AN files contained incorrect reason code 3 late AN files 	Moderate	Low	2	Identified
Losing trader must provide final information - standard switch	4.3	5 of Schedule 11.3	<ul style="list-style-type: none"> Calculation of average kWh per day does not comply with Registry Functional Specification v22.38 2 late CS files 2 ICPs had incorrect Switch Event 	Moderate	Low	2	Identified

			Meter Reading				
Retailers must use same reading - standard switch	4.4	6(1) of Schedule 11.3	1 RR file late	Strong	Low	1	Identified
Losing trader provides information - switch move	4.8	10(1) of Schedule 11.3	<ul style="list-style-type: none"> • 19.6% of AN files contained incorrect reason code • 4 AN files submitted late • 6 CS files submitted late • 3 E2 breaches • 5 T2 breaches • 2 ET breaches 	Weak	Low	3	Identified
Losing trader must provide final information - switch move	4.10	11 of Schedule 11.3	<ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38. • 3 ICPs had incorrect Switch Event Meter Reading or incorrect flag 	Moderate	Low	2	Identified
Gaining trader changes to switch meter reading - switch move	4.11	12 of Schedule 11.3	5 RR files late	Strong	Low	1	Identified
Withdrawal of switch requests	4.15	17&18 of Schedule 11.3	<ul style="list-style-type: none"> • 45 NA breaches • 10 SR breaches 	Strong	Low	1	Identified
NHH meter reading application	6.7	6 of Schedule 15.2	4 CS files were sent with the Switch Event Meter Reading incorrectly labelled as E instead A	Strong	Low	1	Identified

HHR aggregates information provision to the reconciliation manager	11.4	15.8	<ul style="list-style-type: none"> 13 ICPs submitted against incorrect NSP Volumes not submitted for 9 ICPs 	Weak	Low	3	Identified
Creation of submission information	12.2	15.4	Self-breach 2305ELK11-submission files late by 1 hour	Strong	Low	1	Cleared
Allocation of submission information	12.3	15.5	13 ICPs submitted against incorrect NSP	Weak	Low	3	Identified
Accuracy of submission information	12.7	15.12	EKCI <ul style="list-style-type: none"> Alleged breach 2311ELK11–inaccurate data EKCI <ul style="list-style-type: none"> Alleged breach 2311ELK11–inaccurate data 	Weak	Low	3	Identified
Provision of submission information to the RM	13.1	8 of Schedule 15.3	13 ICPs submitted against incorrect NSP	Weak	Low	3	Identified
Future Risk Rating						33	

Future risk rating	0-1	1-3	4-15	16-40	41-55	56+
Indicative audit frequency	36 months	24 months	18 months	12months	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.

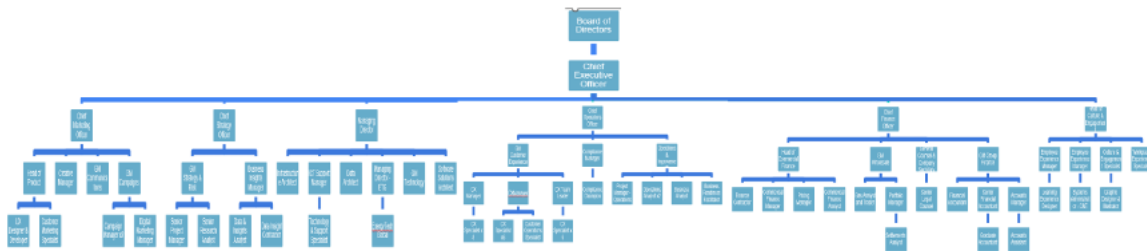
Audit observation

Electric Kiwi does not have any exemptions granted to exempt them from compliance with all or any of the clauses.

Audit commentary

Electric Kiwi did not apply for any exemptions. We checked the Electricity Authority website and confirmed that no exemptions are in place.

1.2. Structure of Organisation



1.3. Persons involved in this audit

Name	Title
Andrew McKenzie	Senior Operation Analyst
Kate McHugh	Risk Specialist
Ewa Glowacka	Electricity Authority Approved Auditor

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

ELKI does not use any agents to fulfil their obligations to obtain certification.

Audit commentary

ELKI does not use any agents. Electric Kiwi’s staff performs all functions. Meter readings are received from MEPS.

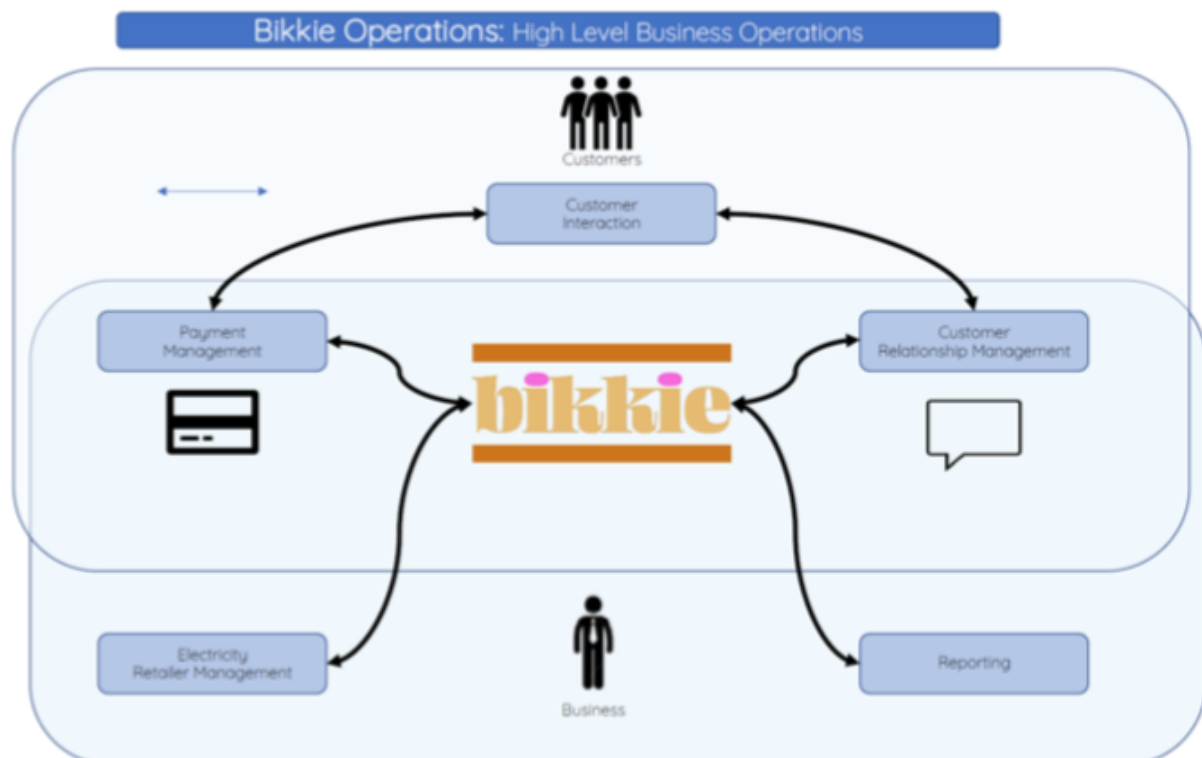
EKCI uses AMS to read C&I meters and provide reconciliation functions. As part of the Electric Kiwi audit, we reviewed the “AMS HHR Agent report 2023” dated 23 July 2023.

We requested AMS to provide a sample of data and respond to a few questions related to the scope of this audit. However, AMS did not respond by the time this audit report was finalized.

1.5. Hardware and Software

ELKI uses an IT platform called Bikkie. This in-house system manages day-to-day operations, reconciliation, and billing

This is a cloud-based system and is continuously backed up. Access to systems is restricted using logins and passwords.



EKCI - AMS provided a list of all manufacturers of hardware and software that assist with or are used in the processes to be audited. The list is included on their audit report.

1.6. Breaches or Breach Allegations

There have been three alleged breaches relevant to the scope of this audit during the audit period.

Compliance portal all cases						
Report generated	21/05/2024 11:33					
Case id	Created date	Participant	Code clause(s)	Status	Result	Closed date
2403ELKI1	15/03/24	Electric Kiwi Limited	Part 15 clause 15.2(1)(a)	Fact finding	No result yet	
2311ELKI1	20/11/23	Electric Kiwi Limited	Part 15 clause 15.2(1)(a)	Closed	Closed 11(1)(c)	16/05/24
2305ELKI1	15/05/23	Electric Kiwi Limited	Part 15 clause 15.4(1)	Closed	Closed 11(1)(c)	28/08/23

The May 2023 breach was self-reported. Submission data was late by 1 hour. Electric Kiwi received a “no action” letter dated 4 September 2023

The November 2023 breach was related to inaccurate data submitted. EKCI was missing ICPDAYS on 5 NSPs and NHH ICPDAYS on 1 NSP in AV-110.

The March 2024 breach is still under investigation. It is related to inaccurate data submitted to RM. The ELKI HHR submission was inaccurate on 1 NSP in AV-090 and AV-140. Data for 0001110900PCFBD was overestimated by 529,295 MWh on CST0331. ELKI promptly rectified the situation by submitting corrected AV-090 and AV-140 reports within 3 hours of being notified of the breach. The error was caused by an estimated routine error, which resulted in the one-off incident of unusually high consumption.

1.7. ICP Data

ELKI

Metering Category	16/4/24	(2022)	(2021)	(2019)	(2018)	(2017)
1	68,781	79,746	72,413	34,115	19,522	6,814
2	16	13	17	9	8	4
3	0	0	0	0	0	0
4	0	0	0	0	0	0
5	0	0	0	0	0	0
9	2	0	9	14	6	0

Status	Number of ICPs (16/4/24)	Number of ICPs (2022)	Number of ICPs (2021)	Number of ICPs (2020)	Number of ICPs (2019)	Number of ICPs (2018)	Number of ICPs (2017)
Active (2,0)	68,142	79,759	72,430	48,735	33,858	19,141	6,675
Inactive – new connection in progress (1,12)	0	0	0	0	0	0	0
Inactive – electrically disconnected vacant property (1,4)	546	687	631	360	177	87	16
Inactive – electrically disconnected remotely by AMI meter (1,7)	75	43	44	61	65	289	125

Inactive – electrically disconnected at pole fuse (1,8)	4	3	0	1	1	2	1
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	1	0	0	0	0
Inactive – electrically disconnected at meter box fuse (1,10)	1	1	1	1	0	1	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0	1	0	0	1
Inactive – electrically disconnected ready for decommissioning (1,6)	70	60	12	4	2	2	0
Inactive – reconciled elsewhere (1,5)	0	0	0	0	0	0	0
Decommissioned (3)	498	300	166	77	35	14	2

EKCI

Metering Category	16/4/24	date	date
1	2	0	0
2	44	0	0
3	55	0	0
4	19	0	0
5	1	0	0
9	0	0	0

Status	Number of ICPs (16/4/24)	Number of ICPs	Number of ICPs
Active (2,0)	125	0	0
Inactive – new connection in progress (1,12)	0	0	0
Inactive – electrically disconnected vacant property (1,4)	0	0	0

Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	0
Inactive – electrically disconnected at pole fuse (1,8)	0	0	0
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	0
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	0	0	0
Inactive – reconciled elsewhere (1,5)	0	0	0
Decommissioned (3)	0	0	0

1.8. Authorisation Received

An authorization letter was not required.

1.9. Scope of Audit

This reconciliation participant audit was performed at Electric Kiwi’s request to encompass the Authority’s request for annual audits as required by clauses 5 and 7 Schedule 15.1 of the Code to assure compliance with the Electricity Industry Participation Code 2010.

The audit was carried out on 22/23 May 2024 at Ferry Building, Auckland

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Relevant to audit	Agents Involved in Performance of Tasks
(a) - Maintaining registry information and performing customer and embedded generator switching	✓	
(b) – Gathering and storing raw meter data	✓	EKCI - AMS
(c)(iii) - Creation and management of HHR and NHH volume information	✓	EKCI - AMS
(d)(i) – Calculation and delivery of ICP days under clause 15.6	✓	EKCI - AMS
(d)(ii) - delivery of electricity supplied information under clause 15.7	✓	
(d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	EKCI - AMS
(e) – Provision of submission information for reconciliation	✓	EKCI - AMS

1.10. Summary of previous audit

Rebecca Elliot of Veritek conducted the previous audit in May 2023. The following non-compliances were recorded.

Subject	Section	Clause	Non-Compliance	Comment
Relevant information	2.1	11.2 & 15.2	<p>Some inaccurate information is recorded on the registry.</p> <p>Validations not picking NSP changes being made at time of sign up resulting in submission being allocated to the incorrect NSP for the 15 ICPs sampled of a potential 1,543 ICPs.</p> <p>12 ICPs are confirmed to have distributed generation installed but generation has not been submitted or gifted.</p> <p>Estimation process not calculating best estimates where a meter is removed, as the data is being estimated using the CS file average daily figure rather than being estimated from the recent consumption history, as identified in the two examples provided.</p> <p>Over submission of 420kWh for ICP 0000193181TR57D due to the incorrect “active” status and volume estimated for the disconnected period.</p> <p>Volumes for three bridged meters not submitted due to estimations being replaced with zero values.</p>	Still exist

			Inactive consumption not submitted for one of a sample of seven ICPs checked due to ELKI only correcting volumes if for seven days or more. Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.	
Electrical Connection of Point of Connection	2.11	10.33A	Four reconnections were not certified within five business days.	Still exist
Connecting ICPs then withdrawing switch	2.14	10.33A(5)	Two ICPs reconnected by ELKI, and no withdrawal or NT ever sent to the registry and not disconnected.	Cleared
Meter bridging	2.17	2A of Schedule 15.2	Volumes for three bridged meters not submitted due to estimations being replaced with zero values.	Cleared
Providing registry information	3.2	11.7(2)	New connection electrically connected but not recorded on the registry.	Cleared
Changes to registry information	3.3	10 of Schedule 11.1	273 late updates to "active" status for reconnections. 108 late updates to "inactive" status. 180 late trader updates. Eight late ANZSIC code updates.	Still exist
Provision of information to the registry manager	3.5	9 of Schedule 11.1	ICP 0000053824WEF61 electrically connected but not "active" on the registry.	Still exist
ANZSIC codes	3.6	9(1)(k) of Schedule 11.1	All 20 sampled of a possible 277 ICPs with a construction ANZSIC code were confirmed to be incorrect. Four of a sample of 50 ICPs found to have the incorrect ANZSIC code.	Cleared
Management of "active" status	3.8	18 of Schedule 11.1	ICP 0000193181TR57D incorrectly recorded as "active" when it was "disconnected". Five of a possible 962 ICPs "disconnected" but recorded as "active" on the registry.	Cleared
Management of "inactive" status	3.9	19 of Schedule 11.1	ICP 0005987121RN8E3 incorrectly recorded as "disconnected" at the pole fuse instead of the meter due to human error. ICP 0485040972LCBE2 status not corrected to "active" to account for consumption recorded between disconnection and switch out date.	Cleared
Losing trader response to switch request and event dates - standard switch	4.2	3 and 4 of Schedule 11.3	19 of 20 ICPs sampled of a possible 10,999 TR ANs sent with the switch response code "AA" where an advanced meter is indicated. One TR AN sent with AA instead of PD. One AN breach.	Still exist
Losing trader must provide final information - standard switch	4.3	5 of Schedule 11.3	Calculation of average kWh per day does not comply with Registry Functional Specification v22.38.	Still exist

			<p>Incorrect average daily consumption sent for four ICPs with an incorrect average daily kWh value greater than 200kWh.</p> <p>All five sampled of a possible 70 CS files sent with the read incorrectly labelled as actual.</p> <p>Incorrect final reads of zero sent for ICPs that have had no actual reads during the period of supply.</p> <p>All five sampled of a possible nine CS files sent with the incorrect last read date.</p>	
Retailers must use same reading - standard switch	4.4	6(1) and 6A Schedule 11.3	One RR issued in error. One RR breach.	Still exist
Losing trader provides information - switch move	4.8	10(1) of Schedule 11.3	<p>19 of 20 ICPs sampled of a possible 8,797 MI AN sent with the switch response code "AA" where an advanced meter is indicated.</p> <p>Four E2 breaches. Six ET breaches. One T2 breach. One WR breach.</p>	Still exist
Losing trader must provide final information – switch move	4.10	11 of Schedule 11.3	<p>Calculation of average kWh per day does not comply with Registry Functional Specification v22.38.</p> <p>All five sampled of a possible 323 CS files sent with the read incorrectly labelled as actual.</p> <p>Three CS files sent with the incorrect last read date.</p>	Still exist
Gaining trader changes to switch meter reading - switch move	4.11	12 of Schedule 11.3	Two RR breaches.	Still exist
Withdrawal of switch requests	4.15	17 of Schedule 11.3	<p>20 NA breaches. 11 SR breaches.</p> <p>Two switch withdrawals requests incorrectly rejected.</p>	Still exist
Metering information	4.16	21 Schedule 11.3	<p>All five sampled of a possible 70 TR CS files sent with the read incorrectly labelled as actual.</p> <p>Incorrect final reads of zero sent for ICPs that have had no actual reads during period of supply.</p> <p>All five sampled of a possible 323 MI CS files sent with the read incorrectly labelled as actual.</p>	Cleared
Switch saving protection	4.17	17 and 18 Schedule 11.3	Customers are being asked their reason for switching away.	Cleared
Electricity conveyed & notification by embedded generators	6.1	10.13 & 15.2	Energy is not metered and quantified according to the code for bridged meters, some ICPs with distributed generation, one ICP with no meter for a period and 12 ICPs with distributed generation present.	Cleared

NHH meter reading application	6.7	6 Schedule 15.2	All five sampled of a possible 70 TR CS files sent with the read incorrectly labelled as actual. Incorrect final reads of zero sent for ICPs that have had no actual reads during period of supply. All five sampled of a possible 323 MI CS files sent with the read incorrectly labelled as actual.	Still exists
NHH meters 90% read rate	6.10	9(3) Schedule 15.2	No reporting of meter reading achievement provided to the Electricity Authority.	Cleared
Correction of HHR metering information	8.2	19(2) of Schedule 15.2	Estimations not calculated as expected where a meter is removed, as the data is being estimated using the CS file average daily figure, rather than being estimated from the recent consumption history as expected. Volumes for three bridged meters not submitted due to estimations being replaced with zero values.	Cleared
Identification of readings	9.1	3(3) Schedule 15.2	All five sampled of a possible 70 TR CS files sent with the read incorrectly labelled as actual. All five sampled of a possible 323 MI CS files sent with the read incorrectly labelled as actual.	Cleared
Electricity supplied information provision to the reconciliation manager	11.3	15.7	AV120 reporting incorrect for the months of October and November 2022.	Cleared
HHR aggregates information provision to the reconciliation manager	11.4	15.8	The initial aggregates file submitted for July 2022 was missing volume due to a system error. All 15 ICPs sampled of a possible 1,543 ICPs submitted against the incorrect NSP.	Still exists
Creation of submission information	12.2	15.4	Volumes for three bridged meters not submitted due to estimations being replaced with zero values. Inactive consumption not submitted for one of a sample of seven ICPs checked. 12 ICPs are confirmed to have distributed generation installed but generation has not been submitted or gifted. Alleged breach 2205ELKI1.	Still exists
Allocation of submission information	12.3	15.5	All 15 ICPs sampled of a possible 1,543 ICPs submitted against the incorrect NSP. 12 ICPs are confirmed to have distributed generation installed but generation has not been submitted or gifted.	Still exists
Accuracy of submission information	12.7	15.12	Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate. Estimation process not calculating best estimates where a meter is removed, as the data is being estimated using the CS file average daily figure rather than being estimated from the recent consumption history as identified in the two examples provided.	Still exists

			<p>Over submission of 420kWh for ICP 0000193181TR57D due to the incorrect "active" status and volume estimated for the disconnected period.</p> <p>Volumes for three bridged meters not submitted due to estimations being replaced with zero values.</p> <p>Inactive consumption not submitted for one of a sample of seven ICPs checked due to ELKI only correcting volumes if for seven days or more.</p> <p>12 ICPs are confirmed to have distributed generation installed but generation has not been submitted or gifted.</p> <p>Validations not picking NSP changes being made at time of sign up resulting in submission being allocated to the incorrect NSP for the 15 ICPs sampled of a potential 1,543 ICPs.</p>	
Reconciliation participants to prepare information	12.9	2 Schedule 15.3	Two NHH certified metered ICPs submitted using HHR data volume.	Cleared
Provision of submission information to the RM	13.1	8 Schedule 15.3	All 15 ICPs sampled of a possible 1,543 ICPs submitted against the incorrect NSP.	Still exits

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

To assess compliance with these clauses, we examined the process of validating information in the registry. The LIS file dated 16/04/2024 was examined to identify any inaccuracies. The Event Detail (EDA) file for the period of audit and the Audit Compliance report to determine how quickly Electric Kiwi provided information to the registry, correct information that was identified as inaccurate, and confirm that all information is correct and not misleading.

The process to find and correct incorrect information was examined. The registry validation process was examined in detail in relation to the achievement of this requirement.

Audit commentary

ELKI

To meet compliance with the above clauses, Electric Kiwi runs daily and weekly monitoring reports, as follows:

- Exception reporting for various parts of the business e.g., metering management (Flight Path) which is monitored daily, weekly, or monthly
- LIS file checker which is run weekly based on the LIS file provided by the registry
- Bikkie pulls in the EDA file daily with an audit trail recorded
- Tech team monitors the live Logs for any exceptions which are reported daily and resolved via the Powerhouse prioritisation dashboard
- Billed volumes versus Supplied volumes are monitored monthly

All exceptions identified are resolved as soon as possible.

The number of information inaccuracies identified during the audit are noted below

Section	Registry Discrepancy
3.3	• A small number of late status and trader updates
3.5	• 34 late updates to ANZIC code

4.2	<ul style="list-style-type: none"> • 33.9% of AN files contained incorrect reason code • 3 late AN files
4.3	<ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38 • 2 late CS files • 4 ICPs had incorrect Switch Event Meter Reading
4.8	<ul style="list-style-type: none"> • 19.6% of AN files contained incorrect reason code • 4 AN files submitted late • 6 CS files submitted late • 3 E2 breaches • 5 T2 breaches • 2 ET breaches
4.10	<ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38. • 2 ICPs had incorrect Switch Event Meter Reading or incorrect flag
4.15	<ul style="list-style-type: none"> • 45 NA breaches • 10 SR breaches

EKCI

Registry information was examined and we did not identified any inaccurate information in the registry.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: clause 11.2 From: 01-Mar-23 To: 31-Mar-24	ELKI – Some inaccurate information are recorded in the registry Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes.		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

Processes for the provision of information were reviewed and observed throughout the audit.

Audit commentary

Electric Kiwi is compliant with regard to the timeliness and format of information in accordance with Part 15. The company provided many examples to support this statement.

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

To assess compliance with this clause, we discussed it with ELKI and reviewed the AMS audit report who is EKCI's agent.

Audit commentary

ELKI

Once metering data is downloaded from an MEPS' server, it is uploaded to Bikkie. Any data transfer is fully automated.

We traced a sample of data for two ICPs per MEP (MTRX, FCLM, NGCM, and ARCS) from the source files to Bikkie to confirm the data transmission process. All volumes matched.

Reconciliation files are uploaded via the RM portal.

EKCI

We reviewed the AMS audit report, which stated that all meter and non-metering data transmission to participants and their agents is conducted electronically.

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

ELKI sends and receives data from and to the registry. It is an automated process. The software records each upload. Reconciliation files are uploaded via the RM portal, which records the date, time, and participant's login details. Bikkie automatically uploads metering data provided by MEPs. Once the data is uploaded, it is moved to an archive directory.

Electric Kiwi communicates with other participants via email, e.g., by notification when sending the RR file. Emails are archived.

AMS is an EKCI agent that provides services for the reconciliation participant's data gathering, validation, and processing functions.

Audit commentary

ELKI

Bikkie has built-in functionality to record a complete audit trail for all data gathering, validation, and processing. Audit trails include the activity identifier, date and time, and operator identifier.

EKCI

We reviewed the AMS audit report, which stated:

“A complete audit trail was viewed for all data gathering, validation and processing functions. The logs of these activities include the activity identifier, date and time and an operator identifier”. AMS is compliant with this clause.

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

We reviewed Electric Kiwi's current customer terms and conditions.

Audit commentary

Electric Kiwi published its Terms and Conditions on its website. The document states that the agreement applies from the agreed date to the date a customer applies to switch to another electricity supplier. The agreement covers any other participants, such as MEPs or a distributor.

Audit outcome

Compliant

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

We reviewed Electric Kiwi's current customer terms and conditions.

Audit commentary

Electric Kiwi's terms and conditions include consent to access for authorised parties for the duration of the contract. Electric Kiwi will give at least 10 BD notice if they or their representative or the network company need to construct, upgrade, repair, or maintain any equipment. A notice will be provided in writing, text message or email.

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

Electric Kiwi (ELKI) trades 68,432 category 1 metering installations and 16 category 2 metering installations.

Electric Kiwi (EKCI) trades 125 category 1 to 5 metering installations.

Audit commentary

ELKI

The LIS report showed that all the ICPs ELKI was responsible for were metered, and the MEPs were recorded in the registry. The agreements with the MEPs ensure that the ICPs have appropriate and approved metering designs installed. The company confirmed they do not have any installations to which metering data requires a loss compensation factor to be applied.

EKCI

The LIS report showed that all the ICPs but one (UML) for which EKCI was responsible were metered, and the MEPs were recorded in the registry. The agreements with the MEPs ensure that the ICPs have appropriate and approved metering designs installed. The company confirmed that they do not have any installations for which metering data requires a loss compensation factor to be applied.

Audit outcome

Compliant

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

We reviewed Electric Kiwi's current customer terms and conditions.

Audit commentary

Section 11.10 of the Terms and Conditions covers a situation where Electric Kiwi commit a relevant event of default as defined under the Code. Compliance is confirmed based on a review of the Terms and Conditions.

Audit outcome

Compliant

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 1 or more metering installations for the point of connection.*

Audit observation

We reviewed the EDA file and the Audit Compliance report for the audit period to identify all new connections and confirm process controls and compliance.

Electric Kiwi does not accept new connections except upon request from existing customers.

Audit commentary

ELKI

In the previous audit period, ELKI did take on a new connection, which was part of a deconsolidation of an ICP; this is not a regular occurrence and a manual process to work with the MEP and network to "activate" the ICP was used.

No new connections were accepted during this audit period.

EKCI

One new connection was accepted during the audit period - 1000615008PCC7D. It is a Racecourse Entrance Lighting in Palmerston North; this connection is not metered. EKCI accepted this connection at the request of their existing customer, Awapuni Function Centre (0000037985CPE35).

Audit outcome

Compliant

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

We reviewed the EDA file and the Audit Compliance report for the audit period to identify all new connections and confirm process controls and compliance.

Electric Kiwi does not accept new connections except upon request from existing customers.

Audit commentary

ELKI

Electric Kiwi did not complete any new connections during the audit period, so it did not ask to temporarily electrically connect a point of connection.

EKCI

One new connection was made during the audit period - 1000615008PCC7D. It is a Racecourse Entrance Lighting in Palmerston North; this connection is not metered. EKCI accepted this connection at the request of their existing customer, Awapuni Function Centre (0000037985CPE35).

EKCI did not ask to connect this ICP temporarily electrically.

Audit outcome

Compliant

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:

- *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*
- *if the ICP has metered load, 1 or more certified metering installations are in place*
- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the electrical connection.*

Audit observation

We reviewed the EDA file and the Audit Compliance report for the audit period to identify uncertified metering installations.

Audit commentary

ELKI

The Audit Compliance report identified 14 uncertified installations that were reconnected during the audit period. This represents an increase compared to the last audit, which identified 4 uncertified installations that were reconnected during the audit period. When gaining “Inactive” ICP, ELKI switching process does not include checking if the metering installation is certified.

AMS recertified most of the identified installations in March 2024 using the statistical sampling process. Two installations still have expired certifications, and ELKI is working with AMS to resolve them.

32 ICPs had bridged meters during the audit period. ELKI requests that the meter be unbridged; it is up to the MEP technician to determine what is required. Most of the time (unless damaged), it is just an unbridged one with no meter replacement.

ELKI provided 5 examples of bridged meters. I reviewed the correspondence with MEPs. In all examples, meters were not replaced. Bikkie estimated data.

EKCI

EKCI accepted one new unmetered street light connection in Palmerston North.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.11 With: clause 10.33A From: 01-Mar-23 To: 31-Mar-24	ELKI - 14 reconnections were not certified within 5 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have an automated FlightPath report to check for expired meters and send automated messages to MEPs when found, to request they recertify. This was previously a manual process.		31 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Designing a FlightPath report to identify incoming customers with expired meters. This will be added into the automation process to communicate with MEPs.		2024	

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

The LIS files for the audit period were reviewed to identify all networks Electric Kiwi has traded on and what MEP provided services. The process to ensure an arrangement is in place before trading commences on a network was examined. ELKI/EKCI did not gain any ICPs which were not previously traded on a new network.

Audit commentary

Electric Kiwi stated that they have arrangements in place for line function services where they intend to trade. MEP arrangements are in place with all relevant MEPs.

Compliance confirmed based on Electric Kiwi's statement.

Audit outcome

Compliant

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 LIS file was reviewed to identify the MEPs for Electric Kiwi ICPs during the audit period.

The process to ensure an arrangement is in place with the metering equipment provider before an ICP can be created or switched in.

Audit commentary

MEP arrangements are in place with all relevant MEPs. Electric Kiwi demonstrated that arrangements are in place with all relevant MEPs.

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

The switching process was reviewed, and the LIS, EDA files and registry were checked.

Audit commentary

ELKI

Electric Kiwi ensures that a switch is in progress before arranging reconnection.

If an ICP was reconnected as part of the switching process and the switch was later withdrawn, Electric Kiwi would restore the disconnection and reimburse the losing trader for any direct costs incurred, if requested.

EKCI

No NW files were sent by EKCI during the audit period.

Audit outcome

Compliant

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

The disconnection process was examined. Traders can only update ICP status for event dates where they are responsible for the ICP on the registry.

Audit commentary

ELKI/EKCI

Electric Kiwi checks that they are listed as the current trader in the registry before initiating a disconnection.

Audit outcome

Compliant

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 unbridge a load control switch – if the load control switch does not control a time block meter channel*
- *electrically connect load or generation, if 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 personnel 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

This was discussed with the Electric Kiwi staff during the audit. We reviewed policies and processes for the removal and breakage of seals. A sample of disconnections, reconnections, and bridged meters was checked for compliance.

Audit commentary

ELKI

Every meter in NZ is certified and sealed by an MEP technician upon installation, repair, or any other work that involves the seal being broken. Customers can only request this through their retailer (except COUP meters, which are requested directly by the customer through COUP).

Electric Kiwi documented the process in detail.

- *We need to have the customer accept the fees and ask for the following details to be able to raise a service request;*
- *Electrician name, contact number and company name -*
- *Inspector details -*
- *Meter location -*
- *Are there any access issues? (locked gates, dog on site, etc) -*
- *Why does the meter need to be resealed (what work has been done that resulted in the seal being broken)?*
- *Once we have these details, raise a service request from Bikkie*

A sample of bridged meters were checked. We found that the MEP had completed the work where the seals were confirmed to be removed or broken.

EKCI

No broken seals were noted for EKCI customers. If one occurs, the same process will apply as used for ELKI customers.

Audit outcome

Compliant

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 1 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

This was discussed with the Electric Kiwi staff during the audit. We reviewed policies and processes for meter bridging. There are two common scenarios when Electric Kiwi identify the possibility of a bridged meter;

- It's used by MEP contractors on on-site visits when they need to bypass a faulty meter or hot water relay to temporarily avoid disruption to the supply. This is always documented by the contractor in the SR completion paperwork and may require Electric Kiwi to raise another SR to have the faulty meter/ripple relay replaced
- Upon investigating, Electric Kiwi may see that an unauthorised meter bridge was done by the property occupant after being disconnected for vacancy/credit

Audit commentary

Meters are bridged when the customer urgently requires electricity and a remote reconnection cannot be completed. In the case of a bridged meter service request, this may result in unbridging the existing meter or replacing it with a new one. In all cases, the MEP was notified.

Bridged meters are identified using the following method.

- Notification from the network or MEP
- As part of a non-comm check, the customer confirms that they are using power, but Electric Kiwi are receiving actual zero consumption
- Identified via 'A customer has consecutive zero data in consumption records' Flight Path report

Consumption during bridged periods is calculated using the following methodologies:

- if register reads are not available, the consumption is expected to be estimated based on consumption history for the ICP
- if there is no read history available, then the average daily kWh figure from the CS file is used,
- if there is no profile history, the residual profile shape is used, and

- if register reads are available, the intervals are estimated so that the total kWh matches the difference between register reads, and the profile for the intervals is the same as the same day of the previous week; however, if a meter has been bridged and the MEP provides the missing actual zero value data for the bridged period then this overwrites the estimated value resulting in no volume being submitted for the bridged period (three examples are detailed below of this occurring).

ELKI provided 6 examples of bridged meters. Existing meters were recertified for unbridging. Data was estimated.

EKCI

No bridged meters were noted for EKCI customers. If one occurs, the same process will apply as used for ELKI customers.

Audit outcome

Compliant

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

This was discussed with Electric Kiwi. A sample invoice was provided.

Audit commentary

ELKI/EKCI

Checks confirm the relevant ICP identifier is printed on every invoice or document.

Audit outcome

Compliant

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

This was discussed with Electric Kiwi. We reviewed a copy of the Terms and Conditions and invoice and customer sign up form. The Electric Kiwi website was reviewed.

Audit commentary

Clear and prominent information on Utilities Disputes is provided:

- in Electric Kiwi's Terms and Conditions
- on Electric Kiwi's website under Legal
- on Electric Kiwi's invoices
- as part of Electric Kiwi's email footers for outbound email communications

Audit outcome

Compliant

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

This was discussed with Electric Kiwi. We reviewed a copy of the Terms and Conditions and invoice and customer sign up form. The Electric Kiwi website was reviewed.

Audit commentary

Clear and prominent information on Power Switch is provided:

- on Electric Kiwi's website under Legal
- on Electric Kiwi's invoices
- as part of Electric Kiwi's email footers for outbound email communications

Audit outcome

Compliant

3. MAINTAINING REGISTRY INFORMATION

3.1. Obtaining ICP identifiers (Clause 11.3)

Code reference

Clause 11.3

Code related audit information

The following participants must, before assuming responsibility for certain points of connection on a local network or embedded network, obtain an ICP identifier for the point of connection:

- a) a trader who has agreed to purchase electricity from an embedded generator or sell electricity to a consumer*
- b) an embedded generator who sells electricity directly to the clearing manager*
- c) a direct purchaser connected to a local network or an embedded network*
- d) an embedded network owner in relation to a point of connection on an embedded network that is settled by differencing*
- e) a network owner in relation to a shared unmetered load point of connection to the network owner's network*
- f) a network owner in relation to a point of connection between the network owner's network and an embedded network.*

ICP identifiers must be obtained for points of connection at which any of the following occur:

- a consumer purchases electricity from a trader 11.3(3)(a)*
- a trader purchases electricity from an embedded generator 11.3(3)(b)*
- a direct purchaser purchases electricity from the clearing manager 11.3(3)(c)*
- an embedded generator sells electricity directly to the clearing manager 11.3(3)(d)*
- a network is settled by differencing 11.3(3)(e)*
- there is a distributor status ICP on the parent network point of connection of an embedded network or at the point of connection of shared unmetered load. 11.3(3)(f)*

Audit observation

We reviewed the EDA file and the Audit Compliance report for the audit period to identify all new connections and confirm process controls and compliance.

Electric Kiwi does not accept new connections and does not intend to conduct any in the future. The only new connections that would be accepted are those existing customers request.

Audit commentary

ELKI

No new connections were accepted during the audit period.

EKCI

One new connection was made during the audit period - 1000615008PCC7D. It is a Racecourse Entrance Lighting in Palmerston North; this connection is not metered. EKCI accepted this connection at the request of their existing customer, Awapuni Function Centre (0000037985CPE35).

Audit outcome

Compliant

3.2. Providing registry information (Clause 11.7(2))

Code reference

Clause 11.7(2)

Code related audit information

Each trader must provide information to the registry manager about each ICP at which it trades electricity in accordance with Schedule 11.1.

Audit observation

The new connection process was discussed, and the registry list, event detail report and Audit Compliance Report were reviewed to determine compliance.

Audit commentary

ELKI

No new connections were identified during the audit period.

EKCI

One new connection was made during the audit period - 1000615008PCC7D. It is a Racecourse Entrance Lighting in Palmerston North; this connection is not metered. EKCI accepted this connection at the request of their existing customer, Awapuni Function Centre (0000037985CPE35). EKCI provided all information to the registry. The late status and ANZSIC code updates were recorded as non-compliance in section 3.5.

Audit outcome

Compliant

3.3. Changes to registry information (Clause 10 Schedule 11.1)

Code reference

Clause 10 Schedule 11.1

Code related audit information

If information provided by a trader to the registry manager about an ICP changes, the trader must provide written notice to the registry manager of the change no later than 5 business days after the change.

Audit observation

We examined the LIS and EDA files and the Audit Compliance report for the period covered by this audit. We sampled the most backdated registry updates. It was discussed with Electric Kiwi.

Audit commentary

ELKI

Status updates "Active"

The table below sets out the timeliness of status updates to "Active" (no new connections).

Type of update	Date of audit	ICPs	Percentage Compliance	Average Business Days between Status Event and Status Input Dates
Status "Active"	2022	262	93.57%	1.95
	2023	273	85.33%	3.26
	2024	271	89.6%	3.95

The EDA file records 1,996 updates to the “Active” status. Of these, 31 (1.5 %) were manual updates using the registry web interface, and Bikkie created 1,965 status updates.

Some late updates were the result of backdated switches. We discussed with ELKI 10 late updated to “Active” status. About 50% of backdated status changes were not processed by a team and were rectified the monthly LIS file check process. Some other late updates occurred when tenants were vacating the premises, and a new tenant was moving in.

Status updates “In-active”

The timeliness of status updates to “Inactive” is set out in the table below.

Type of update	Date of audit	ICPs	Percentage Compliance	Average Business Days between Status Event and Status Input Dates
Status “Inactive”	2022	101	98.82%	0.70
	2023	108	95.71%	3.39
	2024	102	79.06	13.20

The EDA file records 2,887 updates to the “Inactive” status. Of these, 222 (7.7 %) were manual updates using the registry web interface, and Bikkie created 2,665 status updates.

All ICPs updated to have a status of 1.4 have been disconnected due to vacancy, while those updated to 1.7 have been disconnected for reasons other than vacancy (credit). Although there are one-off disconnections, ELKI generally sends disconnections for both Vacant and Credit in bulk as these are easier to manage with the MEPs.

Once the MEP confirms, ELKI will process the disconnection within Bikkie to close down the billing status and automatically update the registry in bulk.

It is evident in the Audit Compliance report that Bikkie updates ICP statuses to “inactive” e.g. 33 ICPs on 14/03/, 39 ICPs on 29/03/24 or 19 ICPs on 22/03/2024.

Remote disconnections are done manually in batches via the registry web interface.

Trader updates

Type of update	Date of audit	ICPs	Percentage Compliance	Average Business Days between Status Event and Status Input Dates
Status “Trader”	2022	226	93.95%	1.75
	2023	180	86.9%	3.94
	2024	156	84.03	6.95

The EDA file recorded 22,049 entries; 156 updates were identified as non-compliant in the Audit Compliance report. Some updates were done manually, but Bikkie created the majority of them.

Almost all recent updates were related to the MEP nomination, which is recorded in the registry once the new MEP confirms that a new meter was installed.

EKCI

No late changes to the registry information were noted in the Audit Compliance Report.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 271 late updates to “Active” status • 102 late updates to “Inactive” status • 156 late trader updates Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as the process is partly manual therefore open to human error and mostly is done when automation for some reason does not work The audit risk rating is recorded as low as overall the level of compliance is high.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

3.4. Trader responsibility for an ICP (Clause 11.18)

Code reference

Clause 11.18

Code related audit information

A trader becomes responsible for an ICP when the trader is recorded in the registry as being responsible for the ICP.

A trader ceases to be responsible for an ICP if:

- *another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or*
- *the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).*

- *if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):*
 - o *arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and*
 - o *advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).*

A trader who is responsible for an ICP (excluding UML) must ensure that an MEP is recorded in the registry for that ICP (clause 11.18(4)).

A trader must not trade at an ICP (excluding UML) unless an MEP is recorded in the registry for that ICP (clause 11.18(5)).

Audit observation

We examined the LIS file, the Audit Compliance report and the EDA file for the audit period to identify any rejected MEP nominations and any “Active” ICPs that do not have MEP recorded in the registry.

The MEP nomination and decommissioning processes were examined and discussed with Electric Kiwi’s staff.

Audit commentary

ELKI

We confirm that all ICPs had a valid MEP recorded in the registry. ELKI nominates the MEP based on the notification of meter changes received by the relevant MEP. No MEP nominations were rejected during this audit period. ELKI is always asked to nominate a new MEP after replacing the meter.

The decommissioning process describes Electric Kiwi’s obligation before an installation is decommissioned. Electric Kiwi arranges a meter interrogation prior to or upon meter removal and notifies the MEP. There are some situations when a final read can’t be obtained because of a house fire, or an unknown person removing the meter. The date used for the “1,6” status would be either the date the Network/MEP advises us the decommissioning is happening or the date the reads stop coming through.

If someone later updated ELKI to confirm the date was different, ELKI would not change it (although there would likely be exceptions to this if the date was pushed way out/cancelled, etc.). The company always requests MEP to provide a final meter read.

We sampled 3 ICPs which were decommissioned during the audit period and discussed with ELKI. We reviewed a confirmation from networks and confirm the final read was received.

EKCI

We confirm that all ICPs except one had a valid MEP recorded in the registry. The ICP without an MEP is an unmetered single street light.

Audit outcome

Compliant

3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)

Code reference

Clause 9 Schedule 11.1

Code related audit information

Each trader must provide the following information to the registry manager for each ICP for which it is recorded in the registry as having responsibility:

- a) *the participant identifier of the trader, as approved by the Authority (clause 9(1)(a))*
- b) *the profile code for each profile at that ICP, as approved by the Authority (clause 9(1)(b))*
- c) *the metering equipment provider for each category 1 metering or higher (clause 9(1)(c))*
- d) *the type of submission information the trader will provide to the RM for the ICP (clause 9(1)(ea))*
- e) *if a settlement type of UNM is assigned to that ICP, either:*
 - *the code ENG if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*
 - *in all other cases, the daily average kWh of unmetered load at the ICP (clause 9(1)(f)(ii)).*
 - *the type and capacity of any unmetered load at each ICP (clause 9(1)(g))*
 - *the status of the ICP, as defined in clauses 12 to 20 (clause 9(1)(j))*
 - *except if the ICP exists for the purposes of reconciling an embedded network or the ICP has distributor status, the trader must provide the relevant business classification code applicable to the customer (clause 9(1)(k)).*

The trader must provide information specified in (a) to (j) above within 5 business days of trading (clause 9(2)).

The trader must provide information specified in 9(1)(k) no later than 20 business days of trading (clause 9(3))

Audit observation

The LIS file and the Audit Compliance report from the audit period were examined to assess compliance. This was discussed with the Electric Kiwi staff.

Audit commentary

ELKI

No new connections were identified during the audit period.

The Code requires the trader to update the ANZSIC code within 20 business days of trading at the ICP commencing. 34 ANZSIC codes were updated more than 20 business days after trading commenced. Almost all of them were changed from "E301" to "0000".

EKCI

One new connection was identified: an unmetered single street light. The Audit Compliance report did not identify any non-compliances.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: : 9 of Schedule 11.1 From: 01-Mar-23 To: 31-Mar-24	ELKI - 34 late updates to ANZIC code Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong. The updates were as follow up after the last audit to comply with clause 11.2. The audit risk rating is recorded as low as no impact on settlement outcome		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner. We note that some changes were identified in the prior audit and therefore changed within this audit period, a duplication not indicative of weakened controls.		Ongoing	

3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1)

Code reference

Clause 9 (1(k) of Schedule 11.1

Code related audit information

Traders are responsible to populate the relevant ANZSIC code for all ICPs for which they are responsible.

Audit observation

The LIS file and the Audit Compliance report from the audit period were examined to assess compliance. This was discussed with the Electric Kiwi staff.

Electric Kiwi has a process for contacting customers to confirm the type of premise so that they have the correct information in the registry. Quite often, customers don't reply to emails.

We checked a diverse sample of 22 ICPs, both EKCI and ELKI, to assess the validity of the ANZSIC codes selected.

Audit commentary

ELKI

We confirm that the ANZIC code assigned to sampled ICPs was correct. The last audit identified 277 ICPs with codes E301* and E302*. All of them were validated and changed to "0" if appropriate.

The Audit Compliance Report identified 2 ICPs with the ANZSIC code "T994". It was corrected during the audit.

EKCI

We confirm that the ANZIC code assigned to sampled ICPs was correct. 37% of customers are education providers.

Audit outcome

Compliant

3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)

Code reference

Clause 9(1)(f) of Schedule 11.1

Code related audit information

if a settlement type of UNM is assigned to that ICP, the trader must populate:

the code ENG - if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or

the daily average kWh of unmetered load at the ICP - in all other cases (clause 9(1)(f)(ii)).

Audit observation

The process for identifying and monitoring unmetered load was discussed. The registry files and the Audit Compliance report were reviewed to identify all ICPs with unmetered load.

Audit commentary

ELKI

No UML was traded and there are no plans for the future.

EKCI

During the audit period, EKCI traded a single UML ICP. It is a private light at Racecourse Entrance Lighting (Bridge) in Palmerston North. EKCI accepted this connection at the request of their existing customer, Awapuni Function Centre (0000037985CPE35). We checked the registry information and confirmed that a description and Daily Unmetered kWh were calculated correctly.

Audit outcome

Compliant

3.8. Management of "active" status (Clause 17 Schedule 11.1)

Code reference

Clause 17 Schedule 11.1

Code related audit information

The ICP status of "active" is be managed by the relevant trader and indicates that:

- the associated electrical installations are electrically connected (clause 17(1)(a))
- the trader must provide information related to the ICP in accordance with Part 15, to the reconciliation manager for the purpose of compiling reconciliation information (clause 17(1)(b)).

Before an ICP is given the “active” status, the trader must ensure that:

- the ICP has only 1 customer, embedded generator, or direct purchaser (clause 17(2)(a))
- the electricity consumed is quantified by a metering installation or a method of calculation approved by the Authority (clause 17(2)(b)).

Audit observation

The ICP connection process was examined and discussed with Electric Kiwi staff. The EDA files for the audit period were analysed. Each ICP has only one customer. All ICPs are metered, and volumes are submitted to the reconciliation manager.

Audit commentary

ELKI

ELKI changes the status of an ICP to “active” once confirmation has been received from the MEP. All status updates to Bikkie are manually entered and uploaded to the registry. In exceptional situations, the status is changed manually. Each person who updates the registry manually has an individual login, which allows the company to provide them additional training if required.

ELKI monitors all reconnection jobs, and the contractor is followed up if the job is not closed out as expected.

The Audit Compliance report identified ICP 0000012855EA82A, which had the Initial Electrical Connection Date populated but had the “Ready” status. ELKI is recorded as a proposed retailer. It is a pump. This ICP was created in 2020 as part of the ICP deconsolidation project, requiring each point of connection to have its own ICP. ELKI has been nominated as the proposed trader as they trade the original ICP. This is a paperwork-only new connection, as the meter associated with the new ICP is being reconciled against the original ICP. ELKI will collaborate with Electricity Ashburton to address this issue, which has been reported in several previous instances but remains unresolved.

EKCI

All ICPs traded under the EKCI code have “Active” status in the registry.

Audit outcome

Compliant

3.9. Management of “inactive” status (Clause 19 Schedule 11.1)

Code reference

Clause 19 Schedule 11.1

Code related audit information

The ICP status of “inactive” must be managed by the relevant trader and indicates that:

- electricity cannot flow at that ICP (clause 19(a)); or
- submission information related to the ICP is not required by the reconciliation manager for the purpose of compiling reconciliation information (clause 19(b)).

Audit observation

To assess compliance, the disconnection process, the LIS file, and the Audit Compliance report from the audit period were examined. This was discussed with ELKI staff. We sampled 10 ICPs with “Inactive” status.

Audit commentary

ELKI

The Audit Compliance Report identified 4 ICPs with a status reason of “Electrically disconnected remotely by AMI meter,” where AMI metering is not recorded in the registry. We checked the registry metering records and confirmed that the Audit Compliance Report was incorrect. At the time ELKI requested disconnection, meters were communicating with the MEP back office, so remote disconnection was possible.

We also checked ICPs where consumption was present on inactive ICPs. Reporting is in place to identify these examples, and the status is corrected as required. We sampled 5 inactive ICPs and confirmed that volumes were submitted to the reconciliation manager. Electric Kiwi’s process is to submit data for all ICPs regardless of status.

The sampling of 10 ICPs with the status “Inactive”

EKCI

No ICP traded by EKCI were disconnected.

Audit outcome

Compliant

3.10. ICPs at new or ready status for 24 months (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 "Ready" for 24 calendar months or more, the distributor must ask the trader whether it should continue to have that status, and must decommission the ICP if the trader advises the ICP should not continue to have that status.

Audit observation

It is a distributor’s code obligation to monitor an ICP which has had the status of “New” or “Ready” for 24 calendar months or more. It is expected that a trader be able to respond to such queries from distributors. Electric Kiwi does not sign up new connections.

Audit commentary

Electric Kiwi’s strategy is not to trade new connections. The only new connections that would be accepted are those requested by existing customers.

Audit outcome

Compliant

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)

Code reference

Clause 2 Schedule 11.3

Code related audit information

The standard switch process applies where a trader and a customer or embedded generator enters into an arrangement in which the trader commences trading electricity with the customer or embedded generator at a non-half hour or unmetered ICP at which another trader supplies electricity, or the trader assumes responsibility for such an ICP.

If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.

A gaining trader must advise the registry manager of a switch no later than 2 business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and 1 or more profile codes associated with that ICP.

Audit observation

The EDA file was reviewed to determine whether any standard switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Standard Switch process was examined and discussed with Electric Kiwi staff.

Electric Kiwi processes are compliant with the requirements of Section 36M of the Fair Trading Act 1986. NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

Audit commentary

ELKI

ELKI sent 7,296 NTTR files within 2 business days of the date the arrangement with the customer became effective.

EKCI

EKCI did not use the Standard Switch process to gain new customers during the audit period.

Audit outcome

Compliant

4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)

Code reference

Clauses 3 and 4 Schedule 11.3

Code related audit information

Within 3 business days after receiving notice of a switch from the registry manager, the losing trader must establish a proposed event date. The event date must be no more than 10 business days after the date of receipt of such notification, and in any 12 month period, at least 50% of the event dates must be no more than 5 business days after the date of notification. The losing trader must then:

- *provide acknowledgement of the switch request by (clause 3(a) of Schedule 11.3):*
- *providing the proposed event date to the registry manager and a valid switch response code (clause 3(a)(i) and (ii) of Schedule 11.3); or*
- *providing a request for withdrawal of the switch in accordance with clause 17 (clause 3(c) of Schedule 11.3).*

When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice from the registry manager under clause 22(a) the losing trader had been responsible for less than 2 months.

Audit observation

The EDA file was reviewed to determine whether any standard switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Standard Switch process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI received 15,014 NTTR from the gaining traders, to which ELKI responded by sending AN files. The Switch Breach report identified 3 AN files that were just one business day late.

Upon reviewing the AN files, we identified that 33.9% of switches used the incorrect response code, "AA," instead of the correct code, "AD," when smart meters were installed.

We confirmed that the company met clause 4(b) of Schedule 11.3 obligations. On average, 99.77% of switches event dates were less than 5 business days after the date of notification.

EKCI

EKCI did not receive any NTTR files from gaining traders.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.2 With: clause 3 of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 33.9% of AN files contained incorrect reason code • 3 late AN files Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. The change to the AN codes expected to be made post the last audit has not progressed and the incorrect AA code has continued to be sent for 33.9 % switches with advanced metering present. The audit risk rating is assessed to be low as the registry details indicate to a gaining trader whether an ICP has an advanced meter or not. In most cases this information is not used by other traders because majority of installed meters are smart meters.		
Actions taken to resolve the issue		Completion date	Remedial action status
Training staff on manual processes to ensure we reduce lateness.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes. We do not believe the 'reason code' is a material test. The registry details indicate to a gaining trader the relevant information and as per the Auditor's comment, in most cases this information is not used by other traders.		Ongoing	

4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)

Code reference

Clause 5 Schedule 11.3

Code related audit information

If the losing trader provides information to the registry manager in accordance with clause 3(a) of Schedule 11.3 with the required information, no later than 5 business days after the event date, the losing trader must complete the switch by:

- *providing event date to the registry manager (clause 5(a)); and*
- *provide to the gaining trader a switch event meter reading as at the event date, for each meter or data storage device that is recorded in the registry with accumulator of C and a settlement indicator of Y (clause 5(b)); and*
- *if a switch event meter reading is not a validated reading, provide the date of the last meter reading (clause 5(c)).*

Audit observation

The EDA file was reviewed to determine whether any standard switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Standard Switch process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI sent 14,239 CS files to gaining traders. The Switch Breach report recorded 2 late CS files.

CS files with average daily kWh that were “0” (42 ICPs) or over 100 kWh (38 ICPs) were identified.

We sampled 10 ICPs with average daily consumption greater than 100 kWh or “0” kWh and confirmed it was correct.

The accuracy of the content of the CS files was confirmed by checking 15 CS files. The content checked included:

- correct identification of meter readings and correct date of last meter reading
- accuracy of meter readings
- accuracy of average daily consumption
- read type flag

We identified one ICP for which Switch Event Meter Reading was incorrect. The read was a final read from a previously removed meter.

2 ICPs had a wrong flag assigned to Switch Event Meter Reading. It was discussed during the audit. One reason for assigning an incorrect read flag is the way Bikkie is programmed. Bikkie checks the type of flag for the read one day after the switch, which in the samples case was “NC”(non-communicating”), which was translated to “E.”

In 98.8% CS files, Swich Event Meter Reading is Actual.

The methodology used to calculate an average daily consumption was incorrect for AMI reads because ELKI calculates an average daily consumption over 30 days. The Code expects the average daily consumption to be calculated between two actual reads, which for AMI meters usually is two days. In our opinion, it is a technical breach because the methodology used by ELKI provides more accurate information to a gaining trader.

EKCI

EKCI did not send any CS files to gaining traders as they did not lose customers during the audit period. Most of their customers are on long-term contracts.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: clause 5 of Schedule 11.3</p> <p>From: 01-Mar-23</p> <p>To: 31-Mar-24</p>	<p>ELKI</p> <ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38. • 2 late CS files • 2 ICPs had incorrect Switch Event Meter Reading <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as moderate as the process is partly manual therefore open to human error</p> <p>The audit risk rating is recorded as low as overall the level of compliance is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Continued improvement and monitoring of controls including consistent training on manual processes.</p> <p>We note that the memo to auditors providing clarification on the calculation for average kWh/day states that the “Code requires participants to take all practicable steps to ensure that information they provide is accurate, which includes the average daily consumption”, which we are confident ELKI does. We would consider the calculation prescribed be taken as a minimum standard and where participants provide accurate information, a breach provides no effective value.</p>		Ongoing	

4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)

Code reference

Clause 6(1) and 6A Schedule 11.3

Code related audit information

The losing trader and the gaining trader must both use the same switch event meter reading as determined by the following procedure:

- *if the switch event meter reading provided by the losing trader differs by less than 200 kWh from a value established by the gaining trader, the gaining trader must use the losing trader's validated meter reading or permanent estimate (clause 6(a)); or*
- *the gaining trader may dispute the switch meter reading if the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more. (clause 6(b)).*

If the gaining trader disputes a switch meter reading because the switch event meter reading provided by the losing trader differs by 200 kWh or more, the gaining trader must, within 4 calendar months of the registry manager giving the gaining trader written notice of having received information about the switch completion, provide to the losing trader a changed switch event meter reading supported by 2 validated meter readings.

- *the losing trader can choose not to accept the reading, however must advise the gaining trader no later than 5 business days after receiving the switch event meter reading from the gaining trader (clause 6A(a)); or*
- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 6A(b)).*

Audit observation

The EDA file was reviewed to determine whether any standard switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Standard Switch process and the management of RR files was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI sent 474 files to the losing trader. All Switch Event Reading had the flag "A". 13.3% of RR files were rejected. ELKI policy is to send an RR file where Switch Event Reading is actual twice, and if it is still rejected, it uses its own final read for reconciliation purposes. We checked a sample of five accepted and five rejected RR files and confirmed they were supported by the files were supported by two validated actual reads

The Switch Breach Report noted one RR file late.

ELKI received 46 RR files from gaining traders, two of them were rejected.

EKCI

EKCI did not send or receive RR files

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: clause 6(1) of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI - 1 late RR file Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. The system implemented by the company is automated. There is a small number (5) of RR files entered manually to the registry. Audit risk rating is recorded as low as no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)

Code reference

Clause 6(2) and (3) Schedule 11.3

Code related audit information

If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry: and

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b));*
- *the gaining trader within 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading.*

Audit observation

The EDA file was reviewed to determine whether any standard switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Standard Switch process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI/EKCI

ELKI and EKCI are only an HHR retailer; other traders cannot issue read change requests to ELKI under clause 6(2) and (3) Schedule 11.3.

Audit outcome

Compliant

4.6. Disputes - standard switch (Clause 7 Schedule 11.3)

Code reference

Clause 7 Schedule 11.3

Code related audit information

A losing trader or gaining trader may give written notice to the other that it disputes a switch event meter reading provided under clauses 1 to 6. Such a dispute must be resolved in accordance with clause 15.29 (with all necessary amendments).

Audit observation

We discussed with Electric Kiwi whether there were any disputes that needed to be resolved in accordance with this clause.

Audit commentary

ELKI/EKCI

Electric Kiwi stated that no disputes needed to be resolved in accordance with this clause.

Audit outcome

Compliant

4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)

Code reference

Clause 9 Schedule 11.3

Code related audit information

The switch move process applies where a gaining trader has an arrangement with a customer or embedded generator to trade electricity at an ICP using non half-hour metering or an unmetered ICP, or to assume responsibility for such an ICP, and no other trader has an agreement to trade electricity at that ICP, this is referred to as a switch move and the following provisions apply:

If the "uninvited direct sale agreement" applies, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.

In the event of a switch move, the gaining trader must advise the registry manager of a switch and the proposed event date no later than 2 business days after the arrangement comes into effect.

In its advice to the registry manager the gaining trader must include:

- a proposed event date (clause 9(2)(a)); and
- that the switch type is "MI" (clause 9(2)(b)); and
- one or more profile codes of a profile at the ICP. (clause 9(2)(c))

Audit observation

The EDA file was reviewed to determine whether any switch move occurred. The Switch Breach report was reviewed to identify any non-compliances. The Switch Move process was examined and discussed with Electric Kiwi staff.

Electric Kiwi processes are compliant with the requirements of Section 36M of the Fair Trading Act 1986. NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

Audit commentary

ELKI

Customers sign up via the ELKI website. At the time of sign-up, the customer must indicate if they are moving in or switching from another trader. ELKI asks the customer to specify a date of move-in. ELKI does not impose any restriction if the customer's move-in data is in the past.

ELKI sent 16,124 NTMI files within 2 business days of the date the arrangement with the customer became effective.

We checked the 10 most backdated switch move NTs and found the switch type was correct. The NT was sent within two business days of pre-conditions being cleared.

EKCI

EKCI sent 37 NTTR files within 2 business days of the date the arrangement with the customer became effective. Some NT files were backdated because EKCI accepts NHH ICP only if it is an additional connection to HHR ICP. The timeline for switching HHR customers is different for Switch Move. The Code allows the proposed event date to be up to 90 days as long as this date is agreed upon between the losing and gaining traders.

Audit outcome

Compliant

4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)

Code reference

Clause 10(1) Schedule 11.3

Code related audit information

10(1) Within 5 business days after receiving notice of a switch move request from the registry manager—

- *10(1)(a) If the losing trader accepts the event date proposed by the gaining trader, the losing trader must complete the switch by providing to the registry manager:
 - o *confirmation of the switch event date; and*
 - o *a valid switch response code; and*
 - o *final information as required under clause 11; or**
- *10(1)(b) If the losing trader does not accept the event date proposed by the gaining trader, the losing trader must acknowledge the switch request to the registry manager and determine a different event date that—
 - o *is not earlier than the gaining trader's proposed event date, and*
 - o *is no later than 10 business days after the date the losing trader receives notice; or**
- *10(1)(c) request that the switch be withdrawn in accordance with clause 17.*

Audit observation

The EDA file was reviewed to determine whether any switch move occurred. The Switch Breach report was reviewed to identify any non-compliances. The Switch Move process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI received 17,557 NTMI from gaining traders. ELKI responded by sending AN files.

The review of the Switch Breach report and the EDA file showed the following:

- 4 AN files were sent later than 5 business days
- 6 CS files were late
- 3 E2 breaches – the event date proposed by the losing trader was not accepted; the event date was earlier than requested. 0007169232RNE33 by 2 business days and 0000108405UN6C by 12 days. It was a human error
- 5 T2 breaches – AN file was sent late, CS was sent immediately after AN but it was outside it's allowed timeframe
- 2 ET breaches - the date in the AN file was earlier than requested

Upon reviewing the AN files, we identified that 19.6% of switches used the incorrect response code, "AA," instead of the correct code, "AD," when smart meters were installed.

Overall, the Switch Move process is not as well managed as the Transfer Switch process.

EKCI

EKCI did not lose any customers during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.8 With: clause 10(1) of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 19.6% of AN files contained incorrect reason code • 4 AN files submitted late • 6 CS files submitted late • 3 E2 breaches • 5 T2 breaches • 2 ET breaches <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak. The change to the AN codes expected to be made post the last audit has not progressed and the incorrect AA code has continued to be sent for 19.6% switches with advanced metering present.</p> <p>The audit risk rating is assessed to be low as the registry details indicate to a gaining trader whether an ICP has an advanced meter or not. In most cases this information is not used by other traders because majority of installed meters are smart meters.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per 4.2 Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)

Code reference

Clause 10(2) Schedule 11.3

Code related audit information

If the losing trader determines a different date, then within 10 business days of receiving notice the losing trader must also complete the switch by providing to the registry manager as described in subclause (1)(a):

- *the event date proposed by the losing trader; and*
- *a valid switch response code; and*
- *final information as required under clause 1.*

Audit observation

The EDA file was reviewed to determine whether any switch move occurred. The Switch Breach report was reviewed to identify any non-compliances. The Switch Move process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI sent 15,774 AN files to the gaining trader.

10,002 (63.5%) AN files had the proposed event date was not accepted. These AN files had a compliant proposed event date within 10 business days.

3 ICPs had event dates before the gaining trader's requested date and are recorded as non-compliant in **section 4.8**.

EKCI

EKCI did not lose any customers during the audit period.

Audit outcome

Compliant

4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)

Code reference

Clause 11 Schedule 11.3

Code related audit information

The losing trader must provide final information to the registry manager for the purposes of clause 10(1)(a)(ii), including—

- *the event date (clause 11(a)); and*
- *a switch event meter reading as at the event date for each meter or data storage device that is recorded in the registry with an accumulator type of C and a settlement indicator of Y (clause 11(b)); and*
- *if the switch event meter reading is not a validated meter reading, the date of the last meter reading of the meter or storage device. (clause (11(c)).*

Audit observation

The EDA file was reviewed to determine whether any switch move occurred. The Switch Breach report was reviewed to identify any non-compliances. The Switch Move process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI sent 15,529 CS files to gaining traders.

CS files with average daily kWh that were “0” (602 ICPs) or over 100 kWh (10 ICPs) were identified.

We sampled 10 ICPs with average daily consumption greater than 100 kWh or “0” kWh and confirmed it was correct.

The accuracy of the content of the CS files was confirmed by checking 7 CS files. The content checked included:

- correct identification of meter readings and correct date of last meter reading
- accuracy of meter readings
- accuracy of average daily consumption
- read type flag

We identified one ICP (0005924960RN206) for which the Switch Event Meter Reading was incorrect and two had incorrect read flag.

In 97.3% of CS files, the Switch Event Meter Reading is Actual.

The methodology used to calculate an average daily consumption was incorrect for AMI reads because ELKI calculates an average daily consumption over 30 days. The Code expects the average daily consumption to be calculated between two actual reads, which for AMI meters usually is two days. In our opinion, it is a technical breach because the methodology used by ELKI provides more accurate information to a gaining trader.

EKCI

EKCI did not lose any customers during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.10 With: clause 11 of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38. • 3 ICPs had incorrect Switch Event Meter Reading or incorrect flag Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per 4.3, we disagree with the calculation breach given that ELKI provides accurate information as is the Code requirement. Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

4.11. Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)

Code reference

Clause 12 Schedule 11.3

Code related audit information

The gaining trader may use the switch event meter reading supplied by the losing trader or may, at its own cost, obtain its own switch event meter reading. If the gaining trader elects to use this new switch event meter reading, the gaining trader must advise the losing trader of the switch event meter reading and the actual event date to which it refers as follows:

- *if the switch meter reading established by the gaining trader differs by less than 200 kWh from that provided by the losing trader, both traders must use the switch event meter reading provided by the gaining trader (clause 12(2)(a)); or*
- *if the switch event meter reading provided by the losing trader differs by 200 kWh or more from a value established by the gaining trader, the gaining trader may dispute the switch meter reading. In this case, the gaining trader, within 4 calendar months of the date the registry manager gives the gaining trader written notice of having received information about the switch completion, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by 2 validated meter readings and the losing trader must either (clause 12(2)(b) and clause 12(3)):*
- *advise the gaining trader if it does not accept the switch event meter reading and the losing trader and the gaining trader must resolve the dispute in accordance with the disputes procedure in clause 15.29 (with all necessary amendments) (clause 12(3)(a)); or*
- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 12(3)(b)).*

12(2A) If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry,

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 12(2A)(b));*
- *the gaining trader no later than 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading. (clause 12(2B)).*

Audit observation

The EDA file was reviewed to determine whether any switch move occurred. The Switch Breach report was reviewed to identify any non-compliances. The Switch Move process the management of RR files was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI sent 3,153 files to the losing trader. Switch Event Reading for all ICPs except 4 ICPs , had the flag "A". 6.24% of RR files were rejected. ELKI policy is to send an RR file where Switch Event Reading is Actual twice, and if it is still rejected, it uses its own final read for reconciliation purposes. We checked a sample of five accepted and five rejected RR files and confirmed they were supported by the files were supported by two validated actual reads

The Switch Breach Report noted 5 RR files late.

ELKI received 94 RR files from gaining traders, six of them were rejected.

EKCI

EKCI did not lose any customers during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.11 With: clause 12 of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI - 5 late RR files Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, process is well controlled, automated. Audit risk rating noted as low as no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

4.12. Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)

Code reference

Clause 14 Schedule 11.3

Code related audit information

The gaining trader switch process applies when a trader has an arrangement with a customer or embedded generator to trade electricity at an ICP at which the losing trader trades electricity with the customer or embedded generator, and one of the following applies at the ICP:

- the gaining trader will trade electricity through a half hour metering installation that is a category 3 or higher metering installation; or
- the gaining trader will trade electricity through a non-AMI half hour metering installation and the losing trader trades electricity through a non-AMI non half hour metering installation; or
- the gaining trader will trade electricity through a non-AMI non half hour metering installation and the losing trader trades electricity through a non-AMI half hour metering installation

If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.

A gaining trader must advise the registry manager of the switch and expected event date no later than 3 business days after the arrangement comes into effect.

14(2) The gaining trader must include in its advice to the registry manager:

- a) a proposed event date; and*
- b) that the switch type is HH.*

14(3) The proposed event date must be a date that is after the date on which the gaining trader advises the registry manager, unless clause 14(4) applies.

14(4) The proposed event date is a date before the date on which the gaining trader advised the registry manager, if:

14(4)(a) – the proposed event date is in the same month as the date on which the gaining trader advised the registry manager; or

14(4)(b) – the proposed event date is no more than 90 days before the date on which the gaining trader advises the registry manager and this date is agreed between the losing and gaining traders.

Audit observation

The EDA file was reviewed to determine whether gaining trader switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Gaining Trader process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI did not send any NTHH files to the registry. ELKI trades ICPs metering categories 1 and 2 only.

EKCI

EKCI sent 53 NTHH during the audit period. The Switch Breach Report identified data inconsistency between NT Proposed Transfer Date, AN expected Transfer Date and NT arrival Date.

Audit outcome

Compliant

4.13. Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)

Code reference

Clause 15 Schedule 11.3

Code related audit information

Within 3 business days after the losing trader is informed about the switch by the registry manager, the losing trader must:

15(a) - provide to the registry manager a valid switch response code as approved by the Authority; or

15(b) - provide a request for withdrawal of the switch in accordance with clause 17.

Audit observation

The EDA file was reviewed to determine whether gaining trader switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Gaining Trader process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI trades ICPs metering categories 1 and 2 only.

EKCI

EKCI did not get any request from a gaining trader.

Audit outcome

Compliant

4.14. Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)

Code reference

Clause 16 Schedule 11.3

Code related audit information

The gaining trader must complete the switch no later than 3 business days, after receiving the valid switch response code, by advising the registry manager of the event date.

If the ICP is being electrically disconnected, or if metering equipment is being removed, the gaining trader must either-

16(a)- give the losing trader or MEP for the ICP an opportunity to interrogate the metering installation immediately before the ICP is electrically disconnected or the metering equipment is removed; or

16(b)- carry out an interrogation and, no later than 5 business days after the metering installation is electrically disconnected or removed, advise the losing trader of the results and metering component numbers for each data channel in the metering installation.

Audit observation

The EDA file was reviewed to determine whether gaining trader switches occurred. The Switch Breach report was reviewed to identify any non-compliances. The Gaining Trader process was examined and discussed with Electric Kiwi staff.

Audit commentary

ELKI

ELKI trades ICPs metering categories 1 and 2 only.

EKCI

The Switch Breach Report did not identify any non-compliances. EKCI finalised all switches as required by this clause.

Audit outcome

Compliant

4.15. Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)

Code reference

Clauses 17 and 18 Schedule 11.3

Code related audit information

A losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 2 calendar months after the event date of the switch.

If a trader requests the withdrawal of a switch, the following provisions apply:

- *for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):*
 - o *the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and*
 - o *the withdrawal advisory code published by the Authority. (clause 18(c)(ii))*
- *within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal. (clause 18(d))*
- *on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c). All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request. (clause 18(e))*
- *if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16. (clause 18(f))*

Audit observation

The EDA file and Switch Breach Report for the period covered by this audit were analysed to assess compliance. The switch withdrawal process was analysed and discussed with Electric Kiwi's staff.

The document describing the NW_AW process describes in detail what advisory code should be used in what circumstances.

Audit commentary

ELKI

The Switch Breach Report noted

- 45 NA breaches
- 10 SR breaches

It was discussed with the ELKI staff.

The NA breaches mostly relate to switching incorrect the ICP. It can take a long time to identify an error in some cases, as some addresses in the registry are not detailed enough. Previously, ELKI used to request a customer to confirm a meter serial number. Now, ELKI provides the customer with the meter serial number and asks for confirmation. However, not all customers reply.

The SR breaches – 6 out of 10 were result of unauthorised switch (CE code), 2 breaches were caused by switching incorrect premise.

ELKI send 3,828 NW files during the audit period. 142 (3.7%) of NWs were rejected.

The table below shows the breakdown of reason codes used by ELKI. 170 NW files (3.66 %) were rejected by the other trader.

Reason code	Number of ICPs	Percentage
CE	601	15.7%
CX	892	23.3%
DF	498	13.0%
MI	9	0.2%
WP	554	14.5%
WS	1274	33.3%

ELKI received 2,259 NW files, 19.2% of which were rejected. The main reason code use was “CE” and “WP”.

EKCI

EKCI did not send any NW files.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.15 With: clause 17&18 of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> 45 NA breaches 10 SR breaches Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as these are managed individually by an operator. The audit risk rating is assessed to be low as minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

4.16. Metering information (Clause 21 Schedule 11.3)

Code reference

Clause 21 Schedule 11.3

Code related audit information

For an interrogation or validated meter reading or permanent estimate carried out in accordance with Schedule 11.3:

21(a)- the trader who carries out the interrogation, switch event meter reading must ensure that the interrogation is as accurate as possible, or that the switch event meter reading is fair and reasonable.

21(b) and (c) - the cost of every interrogation or switch event meter reading carried out in accordance with clauses 5(b) or 11(b) or (c) must be met by the losing trader. The costs in every other case must be met by the gaining trader.

Audit observation

Meter readings are received from MEPs. Electric Kiwi relies on MEPs to provide accurate readings but as is described in relevant sections, extensive validation is conducted upon uploading readings to Bikkie.

Electric Kiwi's policy regarding the management of meter reading expenses is compliant.

Audit commentary

ELKI

All meter readings used in the switching process are validated meter readings or permanent estimates. The cost of additional interrogation is covered in a commercial agreement between ELKI and MEPs.

All meters are read by MEPs, and Bikkie downloads meter readings daily.

EKCI

All meters are read by AMS. All meter readings used in the switching process are validated meter readings or permanent estimates. The cost of additional interrogation is covered in a commercial agreement between EKCI and MEPs.

Audit outcome

Compliant

4.17. Switch protection (Clause 11.15AA to 11.15AB)

Code reference

Clause 11.15AA to 11.15AC

Code related audit information

A losing retailer (including any party acting on behalf of the retailer) must not initiate contact to save or win back any customer who is switching away or has switched away for 180 days from the date of the switch.

The losing retailer may contact the customer for certain administrative reasons and may make a counteroffer only if the customer initiated contact with the losing retailer and invited the losing retailer to make a counteroffer.

The losing retailer must not use the customer contact details to enable any other retailer (other than the gaining retailer) to contact the customer.

Audit observation

The event detail report and registry lists with history were analysed to identify all withdrawn switches with a CX code applied within 180 days of switch completion where ELKI was the losing trader. We checked randomly chosen 10 examples.

Audit commentary

ELKI

The last audit identified non-compliance with this clause, so Electric Kiwi changed its processes. As of February 2023, Electric Kiwi stopped sending customers surveys asking for feedback. ELKI does not have and never has had win-back processes.

ELKI provided 5 examples of correspondence with a customer when NWCX was used. We confirmed that the code was used correctly.

EKCI

EKCI did not send NWCX files during the audit period.

Audit outcome

Compliant

5. MAINTENANCE OF UNMETERED LOAD

5.1. Maintaining shared unmetered load (Clause 11.14)

Code reference

Clause 11.14

Code related audit information

The trader must adhere to the process for maintaining shared unmetered load as outlined in clause 11.14:

11.14(2) - The distributor must give written notice to the traders responsible for the ICPs across which the unmetered load is shared, of the ICP identifiers of the ICPs.

11.14(3) - A trader who receives such a notification from a distributor must give written notice to the distributor if it wishes to add or omit any ICP from the ICPs across which unmetered load is to be shared.

11.14(4) - A distributor who receives such a notification of changes from the trader under (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.

11.14(5) - If a distributor becomes aware of any 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 as soon as practicable after that change or decommissioning.

11.14(6) - Each trader who receives such a notification must, as soon as practicable after receiving the notification, adjust the unmetered load information for each ICP in the list for which it is responsible to ensure that the entire shared unmetered load is shared equally across each ICP.

11.14(7) - A trader must take responsibility for shared unmetered load assigned to an ICP for which the trader becomes responsible as a result of a switch in accordance with Part 11.

11.14(8) - A trader must not relinquish responsibility for shared unmetered load assigned to an ICP if there would then be no ICPs left across which that load could be shared.

11.14(9) - A trader can change the status of an ICP across which the unmetered load is shared to inactive status, as referred to in clause 19 of Schedule 11.1. In that case, the trader is not required to give written notice to the distributor of the change. The amount of electricity attributable to that ICP becomes UFE.

Audit observation

The process was discussed with Electric Kiwi staff. The audit period's LIS file was reviewed to determine if Electric Kiwi traded a shared unmetered load.

Audit commentary

ELKI/EKCI

No shared unmetered load was traded during the audit period.

Audit outcome

Compliant

5.2. Unmetered threshold (Clause 10.14 (2)(b))

Code reference

Clause 10.14 (2)(b)

Code related audit information

The reconciliation participant must ensure that unmetered load does not exceed 3,000 kWh per annum, or 6,000 kWh per annum if the load is predictable and of a type approved and published by the Authority.

Audit observation

The process was discussed with Electric Kiwi staff. The audit period's LIS file was reviewed to determine if Electric Kiwi traded an unmetered load.

Audit commentary

ELKI

ELKI did not trade unmetered load during this audit period.

EKCI

ELKI has traded a single unmetered load connection. ICP 1000615008PCC7D is a Racecourse Entrance Lighting in Palmerston North.

Audit outcome

Compliant

5.3. Unmetered threshold exceeded (Clause 10.14 (5))

Code reference

Clause 10.14 (5)

Code related audit information

If the unmetered load limit is exceeded the retailer must:

- within 20 business days, commence corrective measure to ensure it complies with Part 10
- within 20 business days of commencing the corrective measure, complete the corrective measures
- no later than 10 business days after it becomes aware of the limit having been exceeded, advise each participant who is or would be expected to be affected of:
 - o the date the limit was calculated or estimated to have been exceeded
 - o the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.

Audit observation

The process was discussed with Electric Kiwi staff. The audit period's LIS file was reviewed to determine if Electric Kiwi traded an unmetered load.

Audit commentary

ELKI

ELKI did not trade unmetered load during this audit period.

EKCI

ELKI has traded a single unmetered load connection. ICP 1000615008PCC7D is a Racecourse Entrance Lighting in Palmerston North. Daily Unmetered kWh is 1.992

Audit outcome

Compliant

5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)

Code reference

Clause 11 Schedule 15.3, Clause 15.37B

Code related audit information

An up-to-date database must be maintained for each type of distributed unmetered load for which the retailer is responsible. The information in the database must be maintained in a manner that the resulting submission information meets the accuracy requirements of clause 15.2.

A separate audit is required for distributed unmetered load data bases.

The database must satisfy the requirements of Schedule 15.5 with regard to the methodology for deriving submission information.

Audit observation

The process was discussed with Electric Kiwi staff. The LIS file for the audit period was reviewed to assess if Electric Kiwi traded distributed unmetered load.

Audit commentary

Electric Kiwi does not supply any ICPs with distributed unmetered load and does not intend to. Compliance was not assessed.

Audit outcome

Compliant

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 1 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

We reviewed the registry and submission files (HHRAGGR) . We also reviewed the process for file submissions and distributed generation, which was discussed with Electric Kiwi.

Audit commentary

ELKI

At the time of the audit, ELKI was trading 2,129 ICPs with generation, all of which had import/export meters installed. We cross-checked submission files against registry files. We identified 26 ICPs for which “I” volumes were not submitted In March 2023. It was discussed with ELKI.

ELKI’s policy is that if the customer has an E/I meter installed and receives consumption on that channel, the company will provide the customer with solar buyback payments. Once per month, ELKI sends the list of ICPs for which a customer won’t receive a solar payment because the company can’t calculate their generation.

We identified 26 ICPs for which distributors notified the registry that distributed generation is connected. The close analyses of registry information revealed as follows:

- 4 ICPs—I/E meters were installed in April/May 2024. Volumes will be submitted as soon as MEPS provide data.
- 22 ICPs - no I/E meters installed yet. Distributors incorrectly notified the registry about solar (VECT and ORON); it is probably a date when a customer applied to have solar installed.
- The reconciliation manager was informed that the remaining 26 ICPs for which “I” flow is not recorded won’t receive solar buyback payment (energy is gifted).

Subtraction is not used to determine submission information.

The previous audit identified recorded non-compliance with this clause in relation to submitting volumes for distributed generation. We discussed this with ELKI, who confirmed that a monthly gifting process was established and that distributor registry information was monitored.

EKCI

All EKCI installations are metered and read remotely by MEPs and AMCI. Only one installation, a single street light, is not metered.

EKCI trades 5 ICPs with distributed generation.

Subtraction is not used to determine submission information.

Audit outcome

Compliant

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 3 months for the grid owner to review and comment on the design*
- *respond within 3 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

This clause is not applicable.

Audit commentary

This clause is 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

We reviewed the registry files to confirm which profiles are used in the submission files.

Audit commentary

ELKI

ELKI used only the HHR profile, which does not require certified control devices.

EKCI

EKCI used only HHR and RPS profiles which do not require certified control devices.

Audit outcome

Compliant

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

We reviewed the process related to defective metering and discussed it with Electric Kiwi.

Audit commentary

ELKI

Electric Kiwi conducts a validation process that includes looking for faulty meters or bridged meters. Flight Path catches consecutive "0" reads from the MEP. Any unusual patterns or "zero" data are analysed, and appropriate action is taken, such as contacting a customer or talking to the relevant MEP.

ELKI provided 4 examples of potentially defective meters. In all cases SR was raised, and the MEP advised. The company provided an extract of correspondence between all parties.

EKCI

No defective metering was identified during the audit period. EKCI trades installations metering category 2 and above, which are closely monitored.

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

The MEP audits included reviewing the data collection and clock synchronisation processes. We also reviewed the AMS HHR agent audit report to confirm compliance.

Audit commentary

ELKI

It was discussed during the audit. HHR data is provided by MEPs. ELKI stated that MEPs did not advise them of clock synchronisation events.

MEPs inform ELKI about clock synchronization events, which are then reviewed and necessary actions are taken accordingly.

EKCI

AMS acts as EKCI's agent for collecting data. They collect data for 92% of customers.

AMS synchronises MV90 against an internet time source at 15-minute intervals prior to any interrogation cycle. During interrogation, the data logger and MV90 clocks are compared. The audit report confirmed compliance.

Audit outcome

Compliant

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

Code reference

Clause 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

The registry files were reviewed. We discussed with Electric Kiwi if any meters are read manually.

Audit commentary

ELKI

All ELKI meters are read remotely by MEPs. ELKI does not conduct reconciliation participant reads. ELKI asks customers for a photo read if their meters can't be read for a long time period. Customer reads are treated as estimates. They are labelled in Bikkie as ME (manual reads). ELKI provided 5 examples.

EKCI

No reconciliation participant reads are conducted and no customer were ask to provide photos of meter registers.

Audit outcome

Compliant

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

We reviewed the process of the application of meter readings. It was discussed with Electric Kiwi.

Audit commentary

ELKI

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 except in the case of a switch event meter reading which applies to the end of the day prior to the event date for the losing trader and the start of the event date for the gaining trader as required by this clause. All AMI systems have a clock synchronisation function, which ensures correct timestamping.

In **section 4.3 & 4.10**, we examined the contents of randomly chosen CS files. We identified 4 ICPs with incorrect flag types; the Switch Event Meter Readings were uploaded as E instead of A (Actual).

EKCI

EKCI did not lose any customers during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.7 With: 6 of Schedule 15.2 From: 01-Mar-23 To: 31-Mar-24	ELKI – 4 CS files were sent with the Switch Event Meter Reading incorrectly labelled as E instead A Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, process is well controlled. Audit risk rating noted as low as no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

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

Electric Kiwi has not traded NHH ICPs during the audit period. The only exemption is a single unmetered street light traded by EKCI.

Audit commentary

ELKI

ELKI did not trade NHH ICPs during the audit period.

EKCI

EKCI meters are read regularly by AMS or MEPS. During the audit period, EKCI did not lose any customers.

Audit outcome

Compliant

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

Electric Kiwi has not traded NHH ICPs during the audit period. The only exemption is a single unmetered street light traded by EKCI.

Audit commentary

ELKI

ELKI did not trade NHH ICPs during the audit period.

EKCI

EKCI meters are read regularly by AMS or MEPS. During the audit period, EKCI did not lose any customers.

Audit outcome

Compliant

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

Electric Kiwi has not traded NHH ICPs during the audit period. The only exemption is a single unmetered street light traded by EKCI.

Audit commentary

ELKI

ELKI did not trade NHH ICPs during the audit period. The last audit report recorded non-compliance for not submitting Meter Frequency Reports. It was discussed with ELKI. The company has not submitted any MRF for the audit period. "We do not see this as non-compliance. According to clause 9(2) Schedule 15.2, if exceptional circumstances, such as the lack of NHH ICPs in this case, prevent a participant from obtaining a validated meter reading, they are not required to comply with clause 9(1)."

EKCI

EKCI meters are read regularly by AMS or MEPs. During the audit period, EKCI did not lose any customers.

Audit outcome

Compliant

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

Electric Kiwi has not traded NHH ICPs during the audit period. The only exemption is a single unmetered street light traded by EKCI.

Audit commentary

ELKI

ELKI did not trade NHH ICPs during the audit period.

EKCI

EKCI meters are read regularly by AMS or MEPs. During the audit period, EKCI did not lose any customers.

Audit outcome

Compliant

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

HHR data is provided by MEPs or AMCI.

Audit commentary

ELKI

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits.

EKCI

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits. The review of the AMS HHR agent audit report confirmed compliance.

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 data is provided by MEPs or AMCI.

Audit commentary

ELKI

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits.

EKCI

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits. The review of the AMS HHR agent audit report confirmed compliance.

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 data is provided by MEPs or AMCI.

Audit commentary

ELKI

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits.

EKCI

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits. The review of the AMS HHR agent audit report confirmed compliance.

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

HHR data is provided by MEPs or AMCI. Interrogation requirements and clock synchronisation were reviewed as part of MEP audits and the AMS HHR Agent audit

Audit commentary

ELKI

MEPs are responsible for trading period duration, and compliance is recorded in their audit reports. We reviewed data provided by MEPs and confirm that the trading period duration is 30 minutes.

EKCI

MEPs are responsible for trading period duration, and compliance is recorded in their audit reports. We reviewed data provided by MEPs and confirm that the trading period duration is 30 minutes. Most of the metering data is provided by AMCI, their audit report confirms compliance with this clause.

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

The processes for archiving and storing raw meter data were reviewed during the MEP audits. The MEPs are compliant with this clause.

Audit commentary

ELKI

We checked that meter readings cannot be modified in Bikkie without an audit trail and viewed archived meter reading data.

EKCI

AMS is EKCI agent to gather data and archived it. We reviewed their audit report which confirm compliance with this clause.

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

The registry data was reviewed and discussed with Electric Kiwi.

Audit commentary

ELKI

ELKI does not deal with any non-metering information.

EKCI

The AMS HHR agent audit report states:

The only non-metering information dealt with by AMS is street lighting data (on/off times) and this data is archived in accordance with these clauses.

Audit outcome

Compliant

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

We reviewed registry files to assess compliance. Electric Kiwi did not trade NHH ICPs during the audit period. The only exemption is a single unmetered street light traded by EKCI.

Audit commentary

ELKI

ELKI did not trade NHH ICPs during the audit period.

EKCI

The only NHH ICP traded by EKCI is a single unmetered street light in Palmerston North.

Audit outcome

Compliant

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

Processes for correction and estimation were reviewed and discussed with Electric Kiwi's staff.

The company provided examples of 5 ICPs meter readings . It was a mixture of defective or bridged meters. We reviewed all of them to confirm the correction process.

Audit commentary

ELKI

Faulty or bridged meters were identified through the data validation process, missing reads process, or information provided by the customer, or by network, or MEP. Where errors are detected, replacement data is estimated in accordance with the code.

The process for estimation/corrections is as follows:

- if register reads are not available, the consumption is estimated based on consumption history for the ICP
- if there is no profile history, the residual profile shape is used
- if register reads are available, the intervals are estimated so that the total kWh matches the difference between register reads, the profile for the intervals is the same as the same day of the previous week,

Each of the estimated methods takes into account HoP (Hour of Power), which is an hour of free power which each Electric Kiwi gets every day.

We reviewed the estimation calculation methodology for 5 meters provided by the company and found it correct.

When an MEP provides actual metering data, estimates are replaced with actuals as part of the normal schedule of revision submissions. Every month (day 13) revision files are submitted for month 3, 7, and 14. We observed that if actual data is provided by MEPs it overrides estimates.

The previous audit noted that if a meter has been bridged and the MEP provides the actual zero value data for the bridged period, this data will overwrite the estimated value. As a result, no volume will be submitted for the tampered period. This issue was discussed with ELKI. As special routine was created to address it.

EKCI

EKCI stated that data was not corrected or estimated during the audit period. All consumption has been actual data.

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

The registry list file was examined to confirm compliance. It was discussed with Electric Kiwi.

Audit commentary

ELKI

ELKI trades metering categories 1 and 2. There are no ICPs where loss compensation is required.

EKCI

EKCI stated that they don't trade ICPs for which loss compensation had to be used to determine accurate data. Their agent, AMS, report says:

AMS has robust processes to ensure compensation factors are correct. Firstly, the certification records are checked and also the HHR load check will identify discrepancies if an incorrect factor is being applied.

Audit outcome

Compliant

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

Electric Kiwi trades HHR ICPs. The only exemption is a single unmetered street light traded by EKCI.

Raw meter data retention for MEPs and agents was reviewed as part of their own audits.

Audit commentary

ELKI

Raw meter data is held by the MEPs, and compliance was confirmed as part of their MEP audits.

ELKI only corrects working data and keeps an appropriate audit trail. Audit trails within Bikkie are compliant.

EKCI

AMS HHR agent audit report stated that raw meter data is not overwritten and is archived as required by this clause.

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

We reviewed meter readings in Bikkie to assess compliance. It was discussed with Electric Kiwi.

Audit commentary

ELKI

Bikkie has a built-in function that identifies actual and estimated readings. At the time of audit, the system has been assigning a type of reading flag per day. If part of the day had to be estimated, Bikkie displays estimated readings on a separate screen with “E” flag.

In **section 4.10**, we examined the contents of randomly chosen CS files. We identified 2 ICPs with incorrect flag types; the Switch Event Meter Readings were uploaded as E instead of A (Actual).

EKCI

The AMS HHR agent audit report noted that all estimated data was correctly identified.

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

We discussed the process with Electric Kiwi. All readings for ELKI are received from the MEPs are validated upon upload to Bikkie. Volume information for EKCI are created by AMS.

Audit commentary

ELKI

Volume information is derived from validated HHR readings provided by the MEP. Bikkie has the functionality to create reconciliation files using both validated and estimated readings. All readings and interval data are correctly identified.

EKCI

AMS as the EKCI's agent creates reconciliation files. The report noted that all data is sourced from validated or estimated data.

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

We reviewed data received from MEPs and uploaded to Bikkie.

Audit commentary

ELKI

ELKI receives data from MEPs and downloads it to Bikkie. The MEPs retain the raw, unrounded data. Compliance with this clause is assessed during their audits. Sampling of metering data confirmed that ELKI does not round or truncate data.

EKCI

AMS HHR agent report noted that AMS retains the raw unrounded meter data, which is used to derive volume information.

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

The HHR estimate process was examined, and a sample of 5 estimates were reviewed. The sampling covered various scenarios.

Audit commentary

ELKI

All HHR data and register reads are provided by MEPs. Electric Kiwi closely monitors completeness and accuracy of data. If there are any intervals missing the relevant MEP is contacted and asked for catch-up data. In most cases MEPs are not able to provide it. In such a situation metering data is estimated.

The process for estimation/corrections is as follows:

- if register reads are not available, the consumption is estimated based on consumption history for the ICP
- if there is no profile history, the residual profile shape is used
- if register reads are available, the intervals are estimated so that the total kWh matches the difference between register reads, the profile for the intervals is the same as the same day of the previous week

Each of the estimates methods takes into account HoP (Hour of Power), which is an hour of free power which each Electric Kiwi client receives every day.

A sample of 5 estimates provided for each type of estimation to show how volumes are calculated were reviewed. The different scenarios were used. We compared data stored in Bikkie before and after estimation.

We found that Electric Kiwi used reasonable endeavours to ensure that submitted information was within the percentage specified by the Authority in all cases reviewed

Estimates provided by Metrix are not used, and no other MEPs provided any estimated data.

EKCI

AMS as EKCI's agent estimates data if required. The AMS HHR agent audit report found the methodology of data estimation compliant.

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

We reviewed registry files to assess compliance. Electric Kiwi did not trade NHH ICPs during the audit period. The only exemption is a single unmetered street light traded by EKCI.

Audit commentary

ELKI

ELKI did not trade NHH ICPs during the audit period.

EKCI

The only NHH ICP traded by EKCI is a single unmetered street light in Palmerston North.

Audit outcome

Compliant

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 0 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

The process of HHR data validation was reviewed and discussed with Electric Kiwi.

Audit commentary

ELKI

Electronic meter reading information is provided by MEPs. Meters are interrogated regularly, most of them daily. Bikkie validates data upon import, checking for missing data, checking for invalid dates and times. Any files which fail validation are not imported, a special report is created which is analysed.

This screenshot of Flight Path shows some validation conducted.

Business Optimisation - Priority 1 - Metering Management

Business optimisation reports to be executed daily


P1 - Metering Management

A customer has active unmetered load (reconciliation)	A customer has active unmetered load against their connection previously. NEST does not support unmetered load so the customer must be requested to leave, this report was built to for reconcile a_customer_has_active_unmetered_load_reconcile	Primary owner : Reynold	Exit criteria :
A consumption record has a negative value	A consumption record has negative values. Negative values are not supported by NEST and these should be manually updated using a manual estimation routine a_consumption_record_has_a_negative_value	Primary owner : Josh	Exit criteria :
A customer has consecutive zero data in consumption records	A meter is sending constant zero data to NEST for the last 5 days, or more. Its highly likely that the meter is not communicating a_customer_has_consecutive_zero_data_in_consumption_reads	Primary owner : Reynold	Exit criteria :
AMI Comms Flag Set to N	The MEP has updated the AMI Comms flag to N in the registry. Please confirm if this meter is truly non communicating. If the flag stays N, then the customer will need to switch away ami_comms_flag_set_to_n	Primary owner : Josh	Exit criteria :
Negative RR Start Read	Nest has calculated the daily read start read as negative, which means the customer could be billed more. Please review and correct if required. negative_rr_start_read	Primary owner : Mike	Exit criteria :
ICP has signed up with an invalid MEP	An ICP has made it through sign up, but has an MEP or proposed MEP which cannot be served. Please review the ICP. If it's only a nomination, we can correct by setting back to the original MEP. Otherwise we need to switch the ICP away. icp_has_signed_up_with_an_invalid_mep	Primary owner : Alden	Exit criteria :
An ICP has an NHH Meter	An ICP with a NHH meter has signed up recently or the MEP has incorrectly updated the metering installation type. We need to investigate and ensure that the data issue is resolved or replace the meter with an HHR one. an_icp_has_an_nhh_meter	Primary owner : Pauline	Exit criteria :
BOPE meters with EG consumption and Installation Type L	BOPE meters with EG consumption and Installation Type L BOPE_meters_with_EG_consumption_and_Installation_Type_L	Primary owner : Josh	Exit criteria :
Expired meters	metres that have expired or will expire in the next 2 weeks Expired_metres	Primary owner : Mike	Exit criteria : metres that have expired or will expire in the next 2 weeks

Electric Kiwi receives logs from MEPs, which provide a weekly report of verified faults

EKCI

AMS HHR agent audit report noted a comprehensive data validation. Main points are listed below:

- checks for missing data which are identified on the “outstanding list”
- checks for invalid dates and times which are conducted through the clock synchronisation process
- below minimum VA including checks of unexpected zero values
- 120% or more of maximum VA
- a review of meter and data logger event list with any event that could have affected the integrity of metering being investigated, including phase failures and tamper flags  comparison with expected or previous flow patterns are viewed graphically where possible issues are identified through other checks.

In situations where data fails validation, and a logical reason cannot be found, the issue is referred to the trader for further investigation into possible site-specific reasons for the anomaly.

The report confirms compliance.

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

The NSP table in the registry was reviewed.

Audit commentary

Electric Kiwi is neither a generator nor embedded generator. They are not responsible for any NSPs. This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

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

The NSP table in the registry was reviewed.

Audit commentary

Electric Kiwi is neither a generator nor embedded generator. They are not responsible for any NSPs. This clause is not applicable. Compliance was not assessed.

Audit outcome

RP Audit Report v13

95

Compliant

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

The NSP table in the registry was reviewed.

Audit commentary

Electric Kiwi is neither a generator nor embedded generator. They are not responsible for any NSPs. This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

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

The NSP table in the registry was reviewed.

Audit commentary

Electric Kiwi is neither a generator nor embedded generator. They are not responsible for any NSPs. This clause is not applicable. Compliance was not assessed.

Audit outcome

Compliant

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

Processes to create buying and selling notifications were discussed.

I checked whether any breach allegations had been made in relation to buying and selling notifications.

Audit commentary

ELKI

ELKI has only used the HHR profile and trading notifications are not required.

EKCI

ELKI has only used the HHR and RPS profile and trading notifications are not required.

Audit outcome

Compliant

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

The process for calculating ICP days was examined by checking 7 NSPs with a small number of ICPs to confirm that the calculation was correct.

We reviewed the GR-100 report provided by the reconciliation manager for the audit period.

Audit commentary

ELKI

The process for calculating ICP days was examined by checking 7 NSPs and a small number of ICPs against the active days for ICPs connected to the NSP on the registry LIS file for the audit period. The ICP days calculation was confirmed to be correct for the sample checked. Electric Kiwi has a stringent process in place to validate the ICP days calculation performed by Bikkie.

GR100 differences for the past 13 months are shown below:

Month	R0	R1	R3	R7	R14
Mar-23	0.00%	0.01%	0.00%	0.00%	
Apr-23	0.00%	0.01%	0.00%	0.00%	
May-23	-0.01%	0.01%	0.00%	0.00%	
Jun-23	0.00%	0.01%	0.00%	0.00%	
Jul-23	0.01%	0.01%	0.00%	0.00%	
Aug-23	0.01%	0.00%	0.00%	0.00%	
Sep-23	0.00%	0.00%	0.00%		
Oct-23	0.00%	0.00%	0.00%		
Nov-23	-0.01%	0.00%	0.00%		
Dec-23	0.00%	-0.01%	0.00%		
Jan-24	-0.01%	-0.01%			
Feb-24	-0.02%	-0.02%			
Mar-24	0.00%				

The small differences between ICPs days calculated between the registry and Bikkie were caused by late, backdated or withdrawn switches.

EKCI

AMS submit ICPDAYS file on behalf of EKCI. The agent audit was reviewed, compliance with this clause was confirmed.

Month	R0	R1	R3	R7	R14
Mar-23	0.00%	0.00%	0.00%	0.00%	
Apr-23	25.00%	0.00%	0.00%	0.00%	
May-23	0.00%	0.00%	10.00%	0.00%	
Jun-23	10.00%	10.00%	8.33%	10.00%	
Jul-23	0.00%	8.33%	14.78%	15.38%	
Aug-23	8.33%	8.33%	3.84%	0.00%	
Sep-23	0.00%	0.00%	-2.84%		
Oct-23	-2.92%	-5.67%	7.92%		
Nov-23	8.00%	8.00%	0.00%		
Dec-23	7.02%	6.90%	0.00%		
Jan-24	4.76%	4.69%			
Feb-24	6.98%				
Mar-24	0.00%				

Audit outcome

Compliant

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.

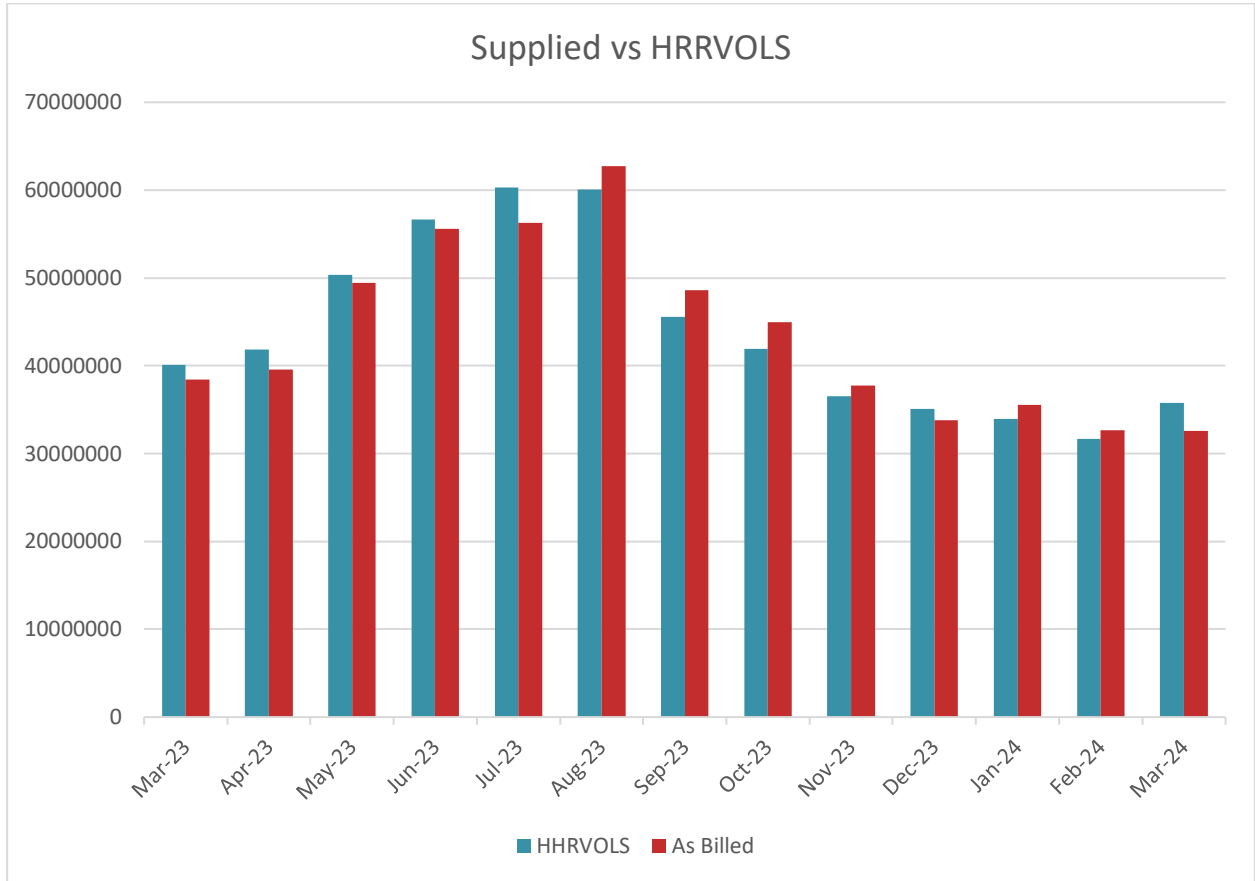
Audit observation

Electric Kiwi submits BILLED files monthly for both ELKI and EKCI. We examined the process for calculating “as billed” volumes. We confirm Electric Kiwi submits for all revisions. The table below shows a comparison between volumes submitted and supplied (billed).

Audit commentary

ELKI

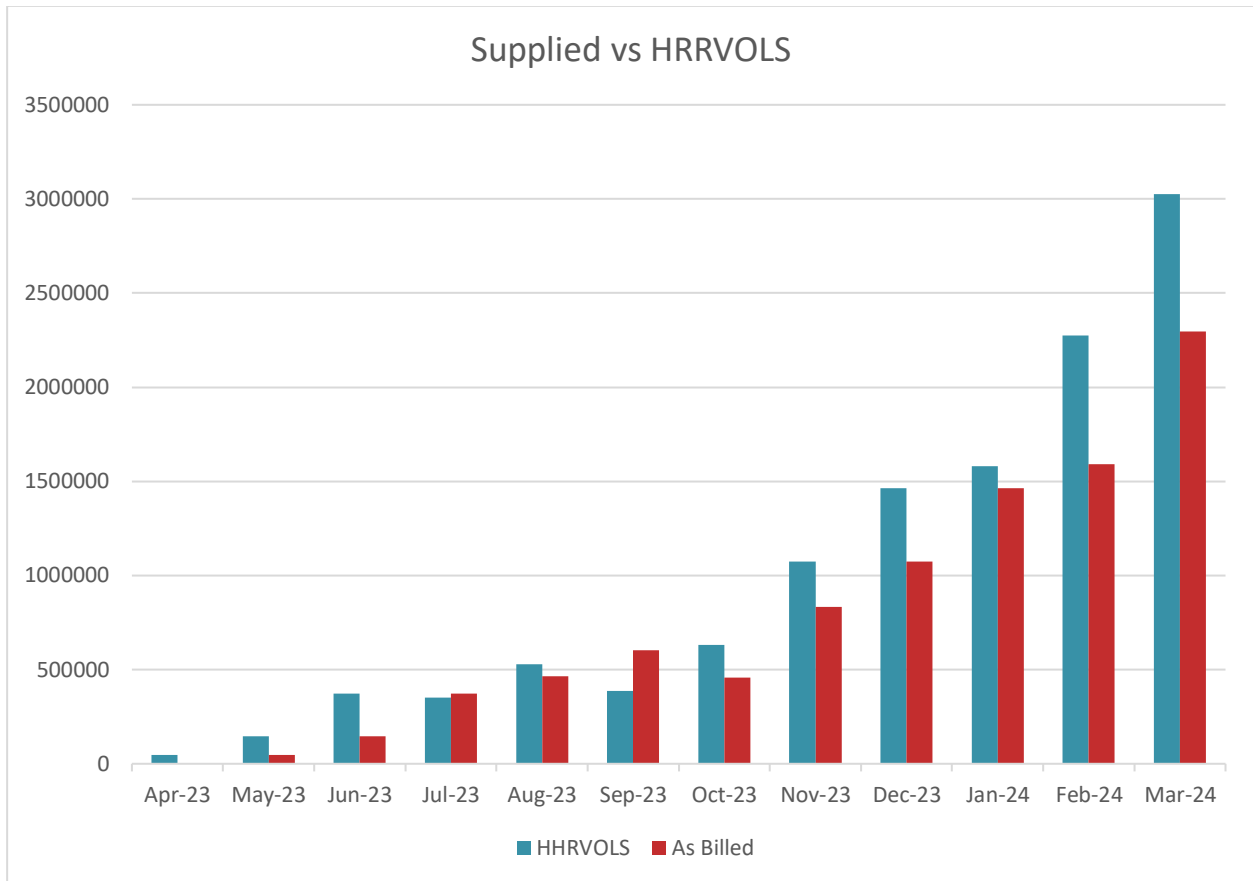
The graph below shows a comparison between volumes submitted and supplied.



The last audit identified non-compliance with this clause. It was discussed with Electric Kiwi. That was resolved shortly after the last audit; ELKI had been basing the report on only consumption that was invoiced for that month, not the consumption that was invoiced, with the creation of a prepay plan that changed how the numbers looked and made it obvious that there was an issue. In August 2022 ELKI launched our new Movemaster post-pay plan, this led to large numbers of customers shifting from prepay plan of Stay Ahead 200 to the Movemaster post-pay plan. The issue has been resolved.

EKCI

The graph below shows a comparison between volumes submitted and supplied.



There is a distinction between the volumes that are submitted and those that are supplied. We have had a discussion with Electric Kiwi regarding this matter. The difference is simply explained: Electric Kiwi is responsible for 3 SB ICPs, and the volumes for these are determined by the reconciliation manager. The SB volumes calculated by the RM are utilized for customer billing and are included in the BILLED file.

Audit outcome

Compliant

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

Code reference

Clause 15.8

Code related audit information

A retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity supplied 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

We examined the process for calculating and aggregating HHR data. We compared the HHR aggregates information with the HHR volume data for four submissions. We discussed the process with the Electric Kiwi staff.

Audit commentary

ELKI

We compared volumes in HHRAGGR and HHRVOLS files for Dec 2023, January 2024, and February 2024. The volumes were very close.

Regarding the GR90, the ETG team checks it in conjunction with the LIS file monthly to update either Bikkie or the registry so that both are aligned. This is normally done a couple of days before the wash-up files for the RM are generated.

The GR090 ICP missing files for March 2024 was examined. We cross-checked with HHRAGGR for the same month.

A sample of 18 missing or incorrectly allocated ICPs in March 2024 was reviewed to determine their reasons for being missing. We discussed it with Electric Kiwi staff.

- 6 ICPs were not included because CS files from losing traders were uploaded to the registry very close to the of the month. Volumes will be accounted for in the day 14 submission
- 3 ICPs switched out in January and February 2024
- 2 ICP – CS files were received in mid-March but volumes are not included in this HHRAGGR
- 7 ICP; volumes were not included, they switched in in previous months - ELKI commented that most of them are due to internal concerns with NWS, which led to delayed starts and have been sending reconciliations from April/May.
- 7 ICPs - incorrect NSP because the NSP was updated in April 2024 backdating to March 2024
- 7 ICPs – incorrect NSP assigned for some time – ELKI confirmed that it was corrected
- 6 ICPs – volumes should be split across two NSPs

EKCI

HHRAGGR files are created and submitted to the reconciliation manager by AMS. The AMS agent audit report confirmed compliance with this clause. AMS reviews GR-090 after each submission, and any exceptions are followed up.

We compared volumes in HHRAGGR and HHRVOLS files for Dec 2023, February 2024, and March 2024. The volumes differed by around 3 kWh.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 13 ICPs submitted against incorrect NSP • Volumes not submitted for 9 ICPs Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as they are not working as expected and this is affecting submission accuracy.</p> <p>The audit risk rating has been assessed to be low as the issues identified were either corrected at the next revision or related to the incorrect NSP, but it is likely these were in the same balancing area, so this has no direct impact on submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>ELKI will receive a daily EDA file from the registry and review any changes or updates from the previous version. All ICPs with changes will undergo an ICP sync process within Bikkie. However, if an ICP is altered in the registry before becoming an active ICP in Bikkie, the ICP sync will not occur. This issue affects ICPs in Bikkie that are not yet active, which can happen during the switching process. When an ICP is updated in the registry but not yet active in Bikkie, the automated sync does not take place.</p> <p>To address this, Bikkie is programmed to perform an ICP sync on the day EK receives the Switch CS file from the losing retailer. Occasionally, the automation may miss some active ICPs. These missed ICPs are identified when the switching team reviews GR-090 alongside LIS files.</p>		Jan 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

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 1 of the techniques set out in clause 15.36(3) specified by the Authority.

Audit observation

MEPs provide HHR data, which is already adjusted for NZDT. The MEPs' daylight savings processes were reviewed as part of their audits and found to be compliant.

Audit commentary

ELKI/EKCI

Daylight savings processes for the MEPs were reviewed as part of their audits and found to be compliant.

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

We reviewed the submission file for March 2023 to February 2024 (ELKI) and July 2023 to March 2024 (EKCI) to assess compliance. Electric Kiwi trades category 1 to 5 metering installations All ICPs are reconciled as HHR.

AMS submits volumes on behalf of EKCI.

Audit commentary

ELKI

One breach was recorded for the late provision of submission information in May 2023. It was self-reported and is noted in **section 1.6**.

We confirmed that Electric Kiwi volumes information was submitted on day 4 and day 13 (all relevant revisions)

We reviewed reconciliation files HHRAGGR, HHRVOLS, NNHVOLS, ICPDAYS, and corresponding RM files GR-100, GR-090, and GR-170HHR to assess compliance. We confirm that all revisions were submitted as prescribed by this clause.

EKCI

AMS submitted volume information to the reconciliation manager. No late submissions were noted. We confirm that all revisions were submitted as prescribed by this clause. AMS conducts a set of validations, including comparing revisions and the previous month.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 12.2 With: 15.4 From: 01-May-23 To: 05-May-23	ELKI Self-breach 2305ELK11- submission files late by 1 hour Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. It was self-reported, it was caused by problem with IT system. The audit risk rating has been assessed to be low as the issues identified had no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Issue with system resolved and we create reports earlier to ensure resolution within timeframes.		May 2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Controls implemented since last audit have improved control risk rating. We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

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

We reviewed the HHR volumes and aggregates validation process, including historic validations.

Audit commentary

ELKI

ELKI has a process in place to compare data recorded in the registry and data stored in Bikkie during the month and before each reconciliation run. ELKI demonstrated that if they subsequently obtain more accurate information, they provide it to the reconciliation manager as part of the normal schedule of revision submissions. Every month, before day 13, revision files are submitted for months 3, 7, and 14.

An EDA file is uploaded to Bikkie daily to update records. Additionally every month, ELKI downloads GR090 from the reconciliation manager portal to verify if volumes were allocated for each ICP to the NSP indicated by the data held in the registry.

We sampled 5 NSPs and confirmed the correct NSP was allocated as per the data held in the registry.

As detailed in **section 6.1**, we identified 26 ICPs for which distributors notified the registry that distributed generation is connected. The close analyses of registry information revealed as follows:

- 4 ICPs—I/E meters were installed in April/May 2024. Volumes will be submitted as soon as MEPS provide data.
- 22 ICPs - no I/E meters installed yet. Distributors incorrectly notified the registry about solar (VECT and ORON); it is probably a date when a customer applied to have solar installed.
- The reconciliation manager was informed that the remaining 26 ICPs for which “I” flow is not recorded won’t receive solar buyback payment (energy is gifted).

As detailed in **section 11.4**, a sample of 18 missing or incorrectly allocated ICPs in March 2024 was reviewed to determine their reasons for being missing. It was identified that 13 ICP volumes were allocated to incorrect NSPs.

EKCI

AMS prepares and submits information to the reconciliation manager on behalf of EKCI. The AMS agent report confirmed compliance with this clause. We cross-checked the allocation of NSP for March 2024.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 12.3 With: 15.5 From: 01-Mar-23 To: 31-Mar-24	ELKI 13 ICPs submitted against incorrect NSP Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as they are not working as expected and this is affecting submission accuracy. It has been identified in previous audits. The audit risk rating has been assessed to be low as the issues identified were either corrected at the next revision or related to the incorrect NSP, but it is likely these were in the same balancing area, so this has no direct impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per 11.4			

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

A review of the NSP table confirmed that Electric Kiwi is not a grid owner.

Audit commentary

This clause is not applicable. Compliance was not assessed.

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

The review of NSP table confirmed that ELKI does not own any local or embedded network.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

We reviewed the registry NSP table. Electric Kiwi is not a grid connected generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

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

Electric Kiwi provided reconciliation data that was submitted during the audit period.

Alleged breaches during the audit period were reviewed to determine whether reconciliation submissions were late.

Audit commentary

ELKI

A review of alleged breaches confirmed two alleged breaches

Electric Kiwi mainly uses actual data provided by MEPs. If data is not available, Bikkie will provide estimates. As soon as an MEP provides actual metering data, estimates are replaced.

Electric Kiwi demonstrated that if they subsequently obtain more accurate information, they provide it to the reconciliation manager as part of the normal revision submission schedule. Every month, before day 13, revision files are submitted for months 3, 7, and 14.

The last audit identified non-compliance with this clause.

ELKI trades 80 ICPs which use Arc meters. It is 0.1% of all ELKI ICPs; monthly volume is around 332,000 kWh, which is 0.93% of total ELKI volume; all installations are category 1. The previous audit noted 614 "Active" ICPs with HHR settled Arc meters. It is well known there is an issue with ARC Innovations meters when used for HHR settlement; they are not considered to be accurate in accordance with clause 15.2. Many years ago, this type of meters were certified and deemed to be fit for a purpose. We considered it a technical breach because all ARCS meters are being replaced by more modern meters, but it takes time, and ELKI does not have any influence on timing when these meters are replaced. There is always an option not to accept customers whose consumption is measured by Arc meters, but really it is not an option from a customer service point of view.

As detailed in **section 6.1**, we reviewed distributed generation and concluded that the submissions are correct. ELKI submits data for ICPs, which have I/E meters installed, and MEPs provide the data.

As detailed in **section 11.4**, a sample of 18 missing or incorrectly allocated ICPs in March 2024 was reviewed to determine their reasons for being missing. It was identified that 13 ICP volumes were allocated to incorrect NSPs.

We discussed with ELKI the allocation of volumes for vacant sites for which consumption is recorded. ELKI keeps a list of such ICPs, which is updated daily. They are sites they can't be disconnected for various reasons; there is no customer who signs up with ELKI but somebody is using energy. At the time of this audit, there were about 300 ICPs with consumption but no a customer. There ICPs status is "Active" and ELKI provide volumes to the reconciliation manager.

EKCI

AMS prepares and submits information to the reconciliation manager on behalf of EKCI. The AMS agent report confirmed compliance with this clause.

As noted in **section 1.6**, in November 2023, RM lodged an alleged breach related to inaccurate data submission. EKCI was missing ICPDAYS on 5 NSPs and NHH ICPDAYS on 1 NSP in AV-110.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 12.7 With: clause 15.12 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> Alleged breach 2403ELKI1– inaccurate data 13 ICPs volumes allocated to incorrect NSP EKCI <ul style="list-style-type: none"> Alleged breach 2311ELKI1– inaccurate data Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as weak. Twice inaccurate data was provided to RM. The current process to monitor NSP changes does not mitigate risk effectively. Audit risk rating was assign as low because RM submission were promptly corrected.		
Actions taken to resolve the issue		Completion date	Remedial action status
EKCI – compare high level month to month data to check anomalies.		Nov 23	Identified
ELKI – automated sync process in place and monthly check between NSPs for regular monitoring.		March 24	
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes. We note the technical breach due to ARC meters and highlight the Auditor’s comment that “ELKI does not have any influence on timing when these meters are replaced”. This is an ineffective audit test. Incorrect NSP’s are as per 11.4.		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

LIS and EDA files were examined to assess compliance.

Audit commentary

ELKI

ELKI has not submitted any NHH volumes.

EKCI

EKCI trades only one NHH ICP, which is an unmetered street light. It was made “Active” on 1 August 2023.

This clause is not applicable

Audit outcome

Not applicable

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)(ac) to 2(1)(ae)):*
 - 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 use volume information (clause 2(3))
- to calculate volume information the reconciliation participant must apply raw meter data :
 - a) for each ICP, the compensation factor that is recorded in the registry (clause 2(4)(a))
 - b) for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(4)(b))

Audit observation

ELKI provided submission files submitted for the audit period. The company submitted HHRVOLS, HHRAGGR, ICPDAYS.

AMS provides submission files as EKCI's agent.

Audit commentary

ELKI

We assessed compliance with this clause and confirm as follows:

- all Electric Kiwi's metered ICPs are submitted as HHR. .
- no profiles requiring a certified control device were used
- no loss or compensation arrangements were required
- no UML ICPs were traded
- aggregation of HHRAGGR and HHRVOLS is compliant
- 16 ICPs are category 2 metering installations, which require the application of a multiplier to raw data provided by MEPS. We sampled 2 ICPs and confirmed that submission volumes were correctly calculated

EKCI

AMS submits HHRVOLS, HHRAGGR, ICPDAYS, and NHHVOLS as EKCI's agent.

- all EKCI metered ICPs are submitted as HHR. .
- no profiles requiring a certified control device were used
- no loss or compensation arrangements were required
- one UML ICPs was traded
- aggregation of HHRAGGR and HHRVOLS is compliant

AMS HHR Agent report confirmed compliance with this clause.

Audit outcome

Compliant

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 following techniques to create historical estimates and forward estimates. (clause 3(1))

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

LIS and EDA files were examined to assess compliance.

Audit commentary

ELKI

ELKI has not submitted any NHH volumes.

EKCI

EKCI trades only one NHH ICP which is unmetered street light.

This clause is 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 historic estimates of volume information for each ICP when the relevant seasonal adjustment shape is available.

If a seasonal adjustment shape is not available, 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

LIS and EDA files were examined to assess compliance.

Audit commentary

ELKI

ELKI has not submitted any NHH volumes.

EKCI

EKCI trades only one NHH ICP which is unmetered street light.

This clause is 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

LIS and EDA files were examined to assess compliance.

Audit commentary

ELKI

ELKI has not submitted any NHH volumes.

EKCI

EKCI trades only one NHH ICP which is unmetered street light.

This clause is 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

Audit commentary

ELKI

Volumes for all ICPs were submitted using the HHR profile in the registry. The profile did not change.

EKCI

All ICP volumes were submitted using the HHR profile in the registry. An exception was the newly acquired connection of a single unmetered street light. The volumes for this ICP are calculated by multiplying the number of days in a month by daily unmetered kWh recorded in the registry. Volumes are submitted using the RPS profile.

Audit outcome

Compliant

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

We reviewed the submission file for March 2023 to February 2024 to assess compliance. ELKI trades category 1 and 2 metering installations only. All ICPs are reconciled as HHR.

AMS submits volumes on behalf of EKCI.

Audit commentary

ELKI

ELKI submits HHRAGGR and HHRVOLS files. Submission information is provided to the reconciliation manager in the appropriate format and is aggregated to the following levels:

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

EKCI

AMS submits HHRAGGR, HHRVOLS, and NHHVOLS. Submission information is provided to the reconciliation manager in the appropriate format and is aggregated to the following levels:

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

AMS also submits NHHVOLS for a single unmetered street light. The volumes for this ICP are calculated by multiplying the number of days in a month by daily unmetered kWh recorded in the registry. Volumes are submitted using the RPS profile.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 13.1 With: 8 of Schedule 15.3 From: 01-Mar-23 To: 31-Mar-24	ELKI - 13 ICPs submitted against incorrect NSP Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak. The current process to monitor NSP changes does not mitigate risk effectively. The audit risk rating has been assessed to be low as the issues identified were either corrected at the next revision or related to the incorrect NSP, but it is likely these were in the same balancing area, so this has no direct impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per 11.4			

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 2 decimal places.

If the unrounded digit to the right of the second decimal place is greater than or equal to 5, the second digit is rounded up, and

If the digit to the right of the second decimal place is less than 5, the second digit is unchanged.

Audit observation

We reviewed the rounding of data on HHRAGGR and HHRVOLS files as part of the aggregation checks.

Audit commentary

ELKI

Submission volumes are rounded to no more than two decimal places. During the audit, it was discussed how submission information was calculated, and ELKI confirmed that submission volumes are rounded, using a method prescribed by this clause, at the end of calculations.

EKCI

Submission volumes are submitted by AMS on behalf of EKCI. The AMS HHR agent report states that a review of HHR volumes confirmed that submission information is appropriately rounded to two decimal places.

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

This was discussed with Electric Kiwi. The registry files were checked.

Audit commentary

ELKI

ELKI does not trade NHH ICPs.

EKCI

EKCI submits NHH volumes for a single unmetered street light. This clause is not applicable.

Audit outcome

Not applicable

CONCLUSION

PARTICIPANT RESPONSE

We thank Ewa for her time. Our comments relating to specific items are contained within the relevant report sections.

Electric Kiwi have comments relating to the audit standards in general. We appreciate these may not be a high priority to amend and so the intent is to ask the EA to consider how these points are treated within audit until amendments can be made.

- With regards to 'reason code' errors in the switch process, we note the Auditor's point that the registry details now provide a gaining retailer the relevant information and so we query the materiality of this as an ongoing audit test.
- With regards to points garnered across sections due to the same issue we ask for consideration of a materiality threshold. This would also apply to low risk breaches with high compliance, on a % basis e.g. 4.4. – 1 x late RR - we would argue this is not a material audit point.
- In relation to clause 2.11, retailers do not have the ability to certify meters. Auditing retailers on aspects of the industry which they have no control or remit is an unfair practice. This point is also made for 12.7's technical breach due to Arc meters, which the Auditor also notes is outside of ELKI's remit to control.