

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

SELWYN DISTRICT COUNCIL AND
MERCURY NZ LIMITED
NZBN: 9429037424398

Prepared by: Brett Piskulic

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Date audit report completed: 13 July 2024

Audit report due date: 17 August 2024

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EXECUTIVE SUMMARY

This audit of the **Selwyn District Council (SDC)** DUML database and processes was conducted at the request of **Mercury NZ Limited (Mercury)** in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

The streetlight database is managed by Orion on behalf of SDC, who is Mercury's customer. Fault, maintenance, new connection and upgrade work is completed by Orion's approved contractors. The contractors provide paperwork to Orion confirming that work is complete, and Orion uses this information to update the database.

Mercury reconciles this DUML load using the HHR profile. Mercury was granted exemption No. 233, which allowed them to provide HHR submission information instead of NHH submission information for DUML. Clause 8(g) of schedule 15.3 of the Code, which the exemption related to was removed from the Code in 2018, and the exemption is no longer valid. Mercury is planning to apply for a new profile which will allow them to continue to submit the DUML load as HHR.

The field audit undertaken on 11 June 2024 found just two wattage discrepancies, one missing and one additional light from the 405 items of load checked. All four discrepancies were corrected in the database prior to completion of the audit. The field audit confirmed that the database accuracy is within the allowable +/-5% threshold.

The audit found three non-compliances and makes no recommendations. The future risk rating of three indicates that the next audit be completed in 24 months. I have considered this in conjunction with Mercury's responses and agree with this recommendation.

The matters raised are detailed below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The DUML load is submitted using HHR profile, without an exemption in place.	Strong	Low	1	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	One additional light was found in the field.	Strong	Low	1	Cleared
Volume information accuracy	3.2	15.2 and 15.37B(c)	The DUML load is submitted using HHR profile, without an exemption in place.	Strong	Low	1	Identified
Future Risk Rating						3	

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

RECOMMENDATIONS

Subject	Section	Recommendation
		Nil

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

Current code exemptions were reviewed on the Electricity Authority website.

Audit commentary

Mercury was granted exemption No. 233, which allowed them to provide half-hour (“HHR”) submission information instead of non-half-hour (“NHH”) submission information for distributed unmetered load (“DUML”). Clause 8(g) of schedule 15.3 of the Code, which the exemption related to was removed from the Code in 2018, therefore the exemption is no longer valid.

Mercury currently submits the DUML load as HHR, which is non-compliant with clause 8(5) of schedule 15.3 of the Code, because the DUML load does not meet the requirements for use of the HHR profile:

For any unmetered load at an ICP for which it is responsible, regardless of the category of any metering installation at the ICP, a reconciliation participant must provide non-half-hour submission information to the reconciliation manager unless—

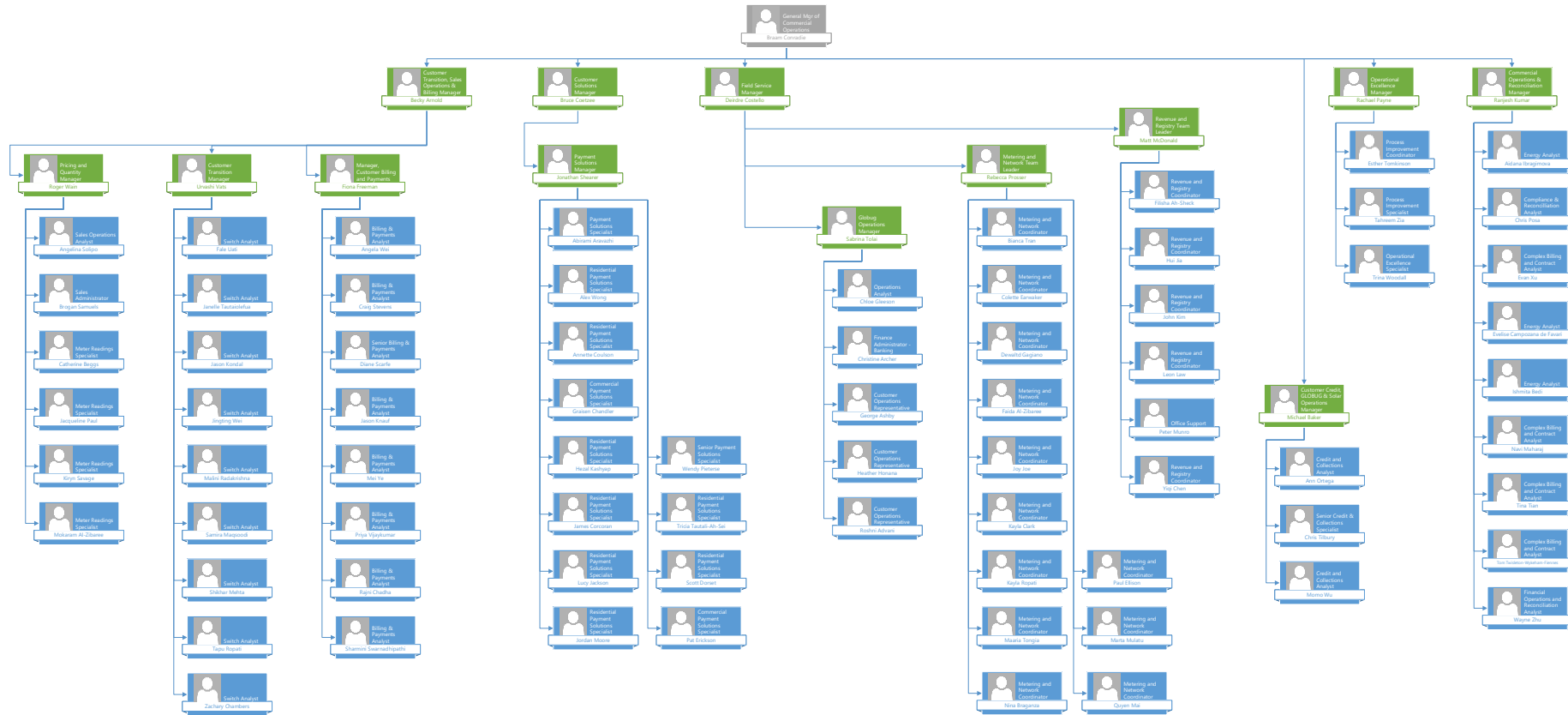
(a) the Authority has approved a profile for the unmetered load that allows the reconciliation participant to provide half hour submission information to the reconciliation manager for the unmetered load; and

(b) the reconciliation participant provides half hour submission information in accordance with the profile.

Mercury is planning to apply for a new profile which will allow them to continue to submit the DUML load as HHR.

1.2. Structure of Organisation

Mercury provided their current organisational structure:



1.3. Persons involved in this audit

Auditor:

Name	Company	Role
Brett Piskulic	Provera	Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Penny Lawrence	Connections Contract Manager	Orion
Chris Posa	Compliance Reconciliation Analyst	Mercury Energy Ltd

1.4. Hardware and Software

Orion use a purpose-built Oracle Streetlighting/DUML database for the management of the DUML information. Backup and restoration procedures are in place, and access to the Orion network (including the database) is restricted using logins and passwords.

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

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0007131640RN99E	Ref Orion_SDC GXP streetlight ICP - ISL0661 GXP SDC Street Lights	ISL0661	HHR	7,311	342,727.6
0007111135RN743	Ref Orion_SDC GXP streetlight ICP - Isl0331 Gxp Sdc Street Lights	ISL0331	HHR	852	47,461
0007111134RNB06	Ref Orion_SDC GXP streetlight ICP - Hor0331 Gxp Sdc Street Lights	HOR0331	HHR	657	34,151.5
0007152475RN996	Ref Orion_SDC GXP streetlight ICP Kimberley - West Coast Road	KBY0661	HHR	141	10,827
0007111132RNA89	Ref Orion_SDC GXP streetlight ICP - Gxplh 0111 Sdc Street Lights	CLH0111	HHR	44	1,595
0007111131RN649	Ref Orion_SDC GXP streetlight ICP - Aps0111 Gxp Sdc Street Lights	APS0111	HHR	36	4,877
0007111133RN6CC	Ref Orion_SDC GXP streetlight ICP - Col0111 Cxp Sdc Street Lights	COL0111	HHR	44	1,015
0007131637RN109	Ref Orion_SDC GXP streetlight ICP - HOR0661 GXP SDC Street Lights	HOR0661	HHR	0	0
0007203853RN720	Ref Orion_SDC GXP Smart Street Light ICP	ISL0661	HHR	4	127
0007210547RN38E	Ref Orion_SDC GXP Smart Street Light ICP	ISL0331	HHR	3	175
Total				9,092	442,956.1

1.7. Authorisation Received

All information was provided directly by Mercury or Orion.

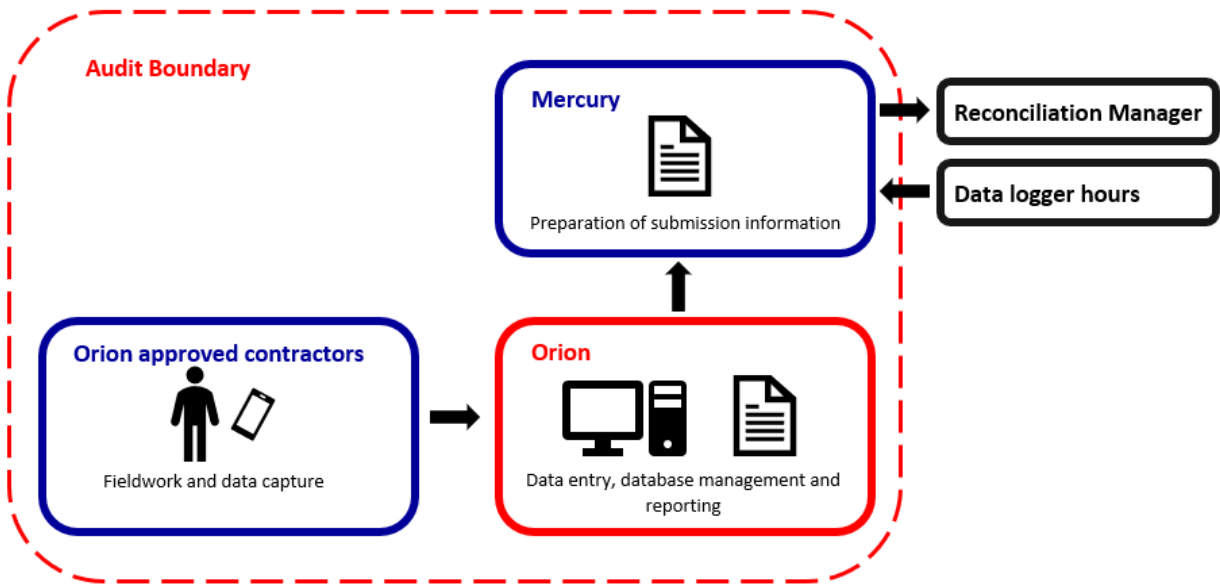
1.8. Scope of Audit

This audit of the SDC DUML database and processes was conducted at the request of Mercury in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied. The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A Streetlighting/DUML database is managed by Orion on behalf of SDC, who is Mercury’s customer.

SDC’s fault, maintenance, new connection and upgrade work is completed by Orion’s approved contractors. The contractors provide paperwork to Orion confirming that work is complete, and Orion uses this information to update the database. A monthly report from the database is provided to Mercury and used to calculate submissions. Changes are tracked on a daily basis within the database. Mercury submits the DUML load as HHR using the HHR profile. On hours are derived using data logger information.

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



The field audit was undertaken of a statistical sample of 405 items of load on 11 June 2024.

1.9. Summary of previous audit

The previous audit of this database was undertaken by Rebecca Elliot of Veritek Limited in August 2022. The summary table below shows the status of the non-compliance raised in the previous audit. No recommendations were made.

Table of Non-compliance

Subject	Section	Clause	Non-compliance	Status
All load recorded in database	2.5	11(2A) of Schedule 15.3	Five additional lights found in the field.	Cleared for the five lights found in the previous audit. Still existing for one additional light found in this audit.

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Mercury have requested Provera to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- *DUML database is up to date,*
- *methodology for deriving submission information complies with schedule 15.5.*

Audit observation

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

Audit commentary

Submission data accuracy

Mercury reconciles this DUML load using the HHR profile. Mercury was granted exemption No. 233, which allowed them to provide HHR submission information instead of NHH submission information for DUML. Clause 8(g) of schedule 15.3 of the Code, which the exemption related to was removed from the Code in 2018, and the exemption is no longer valid. Mercury is planning to apply for a new profile which will allow them to continue to submit the DUML load as HHR.

Wattages are derived from monthly database extracts provided by Orion on behalf of SDC. On and off times are derived from a data logger. Changes are tracked on a daily basis within the database. I confirmed the calculation for May 2024 was correct.

The current monthly report is compliant, and Mercury completes revision submissions where corrections are required.

Database accuracy

The review of database accuracy in **section 3.1** found that the database is likely to be accurate within $\pm 5\%$. The field audit found just two wattage discrepancies, one missing and one additional light from the 405 items of load checked. All four discrepancies were corrected in the database prior to completion of the audit.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 07-May-24 To: 11-Jun-24	The DUML load is submitted using HHR profile, without an exemption in place. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong as the database management process is robust and ensures that submission information is accurate. Mercury is working on the development of a new profile to enable HHR submission.</p> <p>The use of an unapproved profile is not expected to have an impact on the accuracy of submission volumes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Completing our draft applications has been delayed due to having to prioritise other tasks, however this is still progressing with the plan being to submit the applications to the EA as soon as possible.		July/August 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		N/A	

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

Code reference

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

Code related audit information

The DUMML database must contain:

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

Audit observation

The database was checked to confirm an ICP was recorded against each item of load. The database contains the POC for each light and this maps to a table recording the ICP.

Audit commentary

All items of load have an ICP recorded against them.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database contains fields for the street name, number, and GPS coordinates. All items of load have GPS coordinates and are locatable.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The database was checked to confirm that:

- it contained a field for light type and wattage capacity,
- wattage capacities include any ballast or gear wattage, and
- each item of load has a light type, light wattage, and gear wattage recorded.

Audit commentary

The extract provided has fields for lamp type and total wattage and all were populated.

The lamp type in the extract corresponds with a description and total lamp wattage including ballast wattage. The accuracy of the recorded wattages is discussed in **section 3.1**.

Audit outcome

Compliant

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of 405 items of load on 11 June 2024 using the statistical sampling methodology.

Audit commentary

The field audit found just two wattage discrepancies, one missing and one additional light from the 405 items of load checked. All four discrepancies were corrected in the database prior to completion of the audit. The four discrepancies are detailed in the table below:

Address	Database count	Field count	Count differences	Wattage differences	Comments
Eastfield Dr opp	2	2	-	1	2 x 150W HPS recorded in database. 1 x 150W HPS and 1 x 76.5W LED found in the field.
Broadway Parade	11	12	+1	1	4 x 100W LED, 5 x 14W LED, 1 x 76W LED and 1 x 80W LED recorded in database. 6 x 100W LED, 5 x 14W LED and 1 x 76W LED found in the field.
SH 1/Two Chain Rd	1	0	-1	-	1 x 150W HPS not found in field.
Grand Total	405	405	2(+1, -1)	2	

The field audit found one additional item of load in the field of 405 items of load sampled. This is recorded as non-compliance below.

Discrepancies were also found in two streets shown in the table below, but it was confirmed that the lamps had been upgraded to LED after the extract had been provided for this audit and before the field audit was conducted. As the discrepancies were due to the timing of the extract versus the field audit, the field and database wattage values were recorded in the "database auditing tool" with the same pre-LED upgrade values.

Address	Database count	Field count	Count differences	Wattage differences	Comments
Russ Dr	6	6	-	5	5 x 60W COS and 1 x 27W LED recorded in database. 5 x 21W LED and 1 x 27W LED found in the field.
Turi Pl	4	4	-	4	4 x 60W NGMH recorded in database. 4 x 21W LED found in the field.

The database accuracy is discussed in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 07-May-24 To: 11-Jun-24	One additional light was found in the field. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>Controls are rated as strong, the small number of exceptions indicated that controls are sufficient to ensure that all lamps are recorded in the database most of the time. All field audit discrepancies were cleared prior to completion of the audit.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Selwyn DC confirmed that they have arranged to have it plotted by their GIS Team and have the databased updated to include this light.		July 2024	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Selwyn DC have very strong processes and these occurrences are rare and quickly rectified when identified.		Ongoing	

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database functionality achieves compliance with the code.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

Orion has demonstrated a complete audit trail of all additions and changes to the database information.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

Plan Item	Comments
Area of interest	Selwyn DC streetlights
Strata	The database contains 9,092 items of load in the Selwyn DC region. The management process is the same for all lights. I created three strata: <ul style="list-style-type: none"> • Street names A-G, • Street names H to P, and • Street names Q to Z.
Area units	I created a pivot table of the roads, and I used a random number generator in a spreadsheet to select a total of 73 sub-units.
Total items of load	405 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority, and the manufacturer's specifications or in the case of LED lights against the LED light specification.

The process to manage changes made in the field being updated in the database was examined.

Audit commentary

Database accuracy

The field audit found just two wattage discrepancies, one missing and one additional light from the statistical sample of 405 items of load checked. All four discrepancies were corrected in the database prior to completion of the audit.

The "database auditing tool" was used to analyse the results, which are shown in the table below.

Result	Percentage	Comments
The point estimate of R	99.4	Wattage from the survey is lower than the database wattage by 0.6%
R _L	96.4	With a 95% level of confidence, it can be concluded that the error could be between -3.6% and +1.5%.
R _H	101.5	

These results were categorised in accordance with the “Distributed Unmetered Load Statistical Sampling Audit Guideline”, effective from 1 February 2019. The table below shows that Scenario A (detailed below) applies, and the best available estimate indicates that the database is accurate within $\pm 5.0\%$.

In absolute terms the installed capacity is estimated to be 3 kW higher than the database indicates.

There is a 95% level of confidence that the installed capacity is between 16 kW lower and 7 kW higher than the database.

In absolute terms, total annual consumption is estimated to be 11,600 kWh lower than the DUML database indicates.

There is a 95% level of confidence that the annual consumption is between 68,800 kWh lower and 28,200 kWh higher than the database indicates.

Scenario	Description
A - Good accuracy, good precision	<p>This scenario applies if:</p> <ul style="list-style-type: none"> (a) R_H is less than 1.05; and (b) R_L is greater than 0.95 <p>The conclusion from this scenario is that:</p> <ul style="list-style-type: none"> (a) the best available estimate indicates that the database is accurate within $\pm 5\%$; and (b) this is the best outcome.
B - Poor accuracy, demonstrated with statistical significance	<p>This scenario applies if:</p> <ul style="list-style-type: none"> (a) the point estimate of R is less than 0.95 or greater than 1.05 (b) as a result, either R_L is less than 0.95 or R_H is greater than 1.05. <p>There is evidence to support this finding. In statistical terms, the inaccuracy is statistically significant at the 95% level</p>
C - Poor precision	<p>This scenario applies if:</p> <ul style="list-style-type: none"> (a) the point estimate of R is between 0.95 and 1.05 (b) R_L is less than 0.95 and/or R_H is greater than 1.05 <p>The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within $\pm 5\%$</p>

Light description and capacity accuracy

The database was checked against the published standardised wattage table, and manufacturer’s specifications where available.

As discussed in **section 2.4**, all lights have a lamp and gear wattage recorded. All wattages and ballasts were recorded correctly.

Address location accuracy

As discussed in **section 2.3**, all lights have an address recorded.

Change management process findings

Processes to track changes to the database were reviewed.

Fault, maintenance, new connection, and upgrade work is completed by Orion's approved contractors. The contractors provide paperwork to Orion confirming that work is complete, and Orion uses this information to update the Streetlighting/DUML database and GIS. For new subdivisions, this paperwork includes "as built" plans.

Upon receipt, paperwork is checked for completeness and accuracy and any issues are followed up with the contractor. The information is sent to the GIS team so that the GIS can be updated, and then returned to the connections team to update the Streetlighting/DUML database from the date the change or new connection was effective. Once data entry is complete, the values loaded are checked against the paperwork provided. Paperwork is normally promptly provided electronically and processed within five days of receipt.

All jobs are tracked using job numbers by the connections team as part of the works management process. Late paperwork from contractors, and late updates by the GIS team are followed up. A checklist is followed to ensure that all steps in the process are completed.

Orion's approved contractors have access to a web-based version of the Streetlighting/DUML database in the field and advise Orion's connections team if they notice any discrepancies in the data recorded. Orion's operation team acts on these notifications and checks and updates the data where necessary.

The LED upgrade project is mostly completed, and the contractor is working through the remaining lights still to be changed in batches of 80 to 100 at a time.

Six monthly outage patrols are completed by Orion's contractors as part of the Selwyn maintenance programme. Outages are also reported by residents within the Selwyn region and work orders are raised with contractors as required.

Festive lights

No festive lights are used in the Selwyn DC region.

Private lights

New private lights are not accepted, and where existing private lights are identified Orion arranges for standard or shared unmetered load to be created. In the meantime, private unmetered lights are recorded in the database against the correct ICP and therefore these are not included in the council DUML load.

Audit outcome

Compliant

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

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

Audit commentary

Submission data accuracy

Mercury reconciles this DUML load using the HHR profile. Mercury was granted exemption No. 233, which allowed them to provide HHR submission information instead of NHH submission information for DUML. Clause 8(g) of schedule 15.3 of the Code, which the exemption related to was removed from the Code in 2018, and the exemption is no longer valid. Mercury is planning to apply for a new profile which will allow them to continue to submit the DUML load as HHR.

Wattages are derived from monthly database extracts provided by Orion on behalf of SDC. On and off times are derived from a data logger. Changes are tracked on a daily basis within the database. I confirmed the calculation for May 2024 was correct.

The current monthly report is compliant, and Mercury completes revision submissions where corrections are required.

Database accuracy

The review of database accuracy in **section 3.1** found that the database is likely to be accurate within ± 5%. The field audit found just two wattage discrepancies, one missing and one additional light from the 405 items of load checked. All four discrepancies were corrected in the database prior to completion of the audit.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 07-May-24 To: 11-Jun-24	The DUML load is submitted using HHR profile, without an exemption in place. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	Controls are rated as strong as the database management process is robust and ensures that submission information is accurate. Mercury is working on the development of a new profile to enable HHR submission. The use of an unapproved profile is not expected to have an impact on the accuracy of submission volumes.

Actions taken to resolve the issue	Completion date	Remedial action status
Completing our draft applications has been delayed due to having to prioritise other tasks, however this is still progressing with the plan being to submit the applications to the EA as soon as possible.	July/August	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	N/A	

CONCLUSION

The streetlight database is managed by Orion on behalf of SDC, who is Mercury's customer. Fault, maintenance, new connection and upgrade work is completed by Orion's approved contractors. The contractors provide paperwork to Orion confirming that work is complete, and Orion uses this information to update the database.

Mercury reconciles this DUML load using the HHR profile. Mercury was granted exemption No. 233, which allowed them to provide HHR submission information instead of NHH submission information for DUML. Clause 8(g) of schedule 15.3 of the Code, which the exemption related to was removed from the Code in 2018, and the exemption is no longer valid. Mercury is planning to apply for a new profile which will allow them to continue to submit the DUML load as HHR.

The field audit undertaken on 11 June 2024 found just two wattage discrepancies, one missing and one additional light from the 405 items of load checked. All four discrepancies were corrected in the database prior to completion of the audit. The field audit confirmed that the database accuracy is within the allowable +/-5% threshold.

The audit found three non-compliances and makes no recommendations. The future risk rating of three indicates that the next audit be completed in 24 months. I have considered this in conjunction with Mercury's responses and agree with this recommendation.

PARTICIPANT RESPONSE

Thank you to Brett for his work on the audit. Selwyn DC has a record of high compliance which continues here and we are happy with the result.