Provera

For

AUCKLAND AIRPORT ADVERTISING SIGNS AND PRIME ENERGY LIMITED NZBN:9429031626552

Prepared by: Brett Piskulic

Date audit commenced: 2 April 2024

Date audit report completed: 28 May 2024

Audit report due date: 1 June 2024

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EXECUTIVE SUMMARY

This audit of the **Auckland Airport Advertising Signs (AIAL)** DUML database and processes was conducted at the request of **Prime Energy Limited (Prime)** 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 database exists in the form of a spreadsheet which is maintained by Prime. The customer, JCDecaux is expected to advise Prime when changes are made to the connected load.

The field audit findings are detailed in **sections 2.5** and **3.1**. The net impact of the discrepancies found result in the database wattage being higher than the wattage in the field by 0.825kW or 3.33%. The total impact is over submission by 7,227 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code. The number of errors found in the field indicate that the customer is not advising Prime when changes are made, and I repeat the recommendation from the previous audit that this process is reviewed.

The audit found one non-compliance and makes one recommendation. The audit risk rating indicates that the next audit be in 24 months. I have considered this in conjunction with Prime's comments and recommend an audit period of 24 months.

The matters raised will are detailed in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
All load recorded in the database	2.5	11(2A) of Schedule 15.3	One additional item of load identified in the field, resulting in a potential under submission of 1,357.8 kWh per annum.	Weak	Low	3	Investigating
					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	Clause	Recommendation
Database accuracy	3.1	15.2 and 15.37B(b)	Review the change management process to ensure that all changes are recorded in the spreadsheet for the correct date.

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.
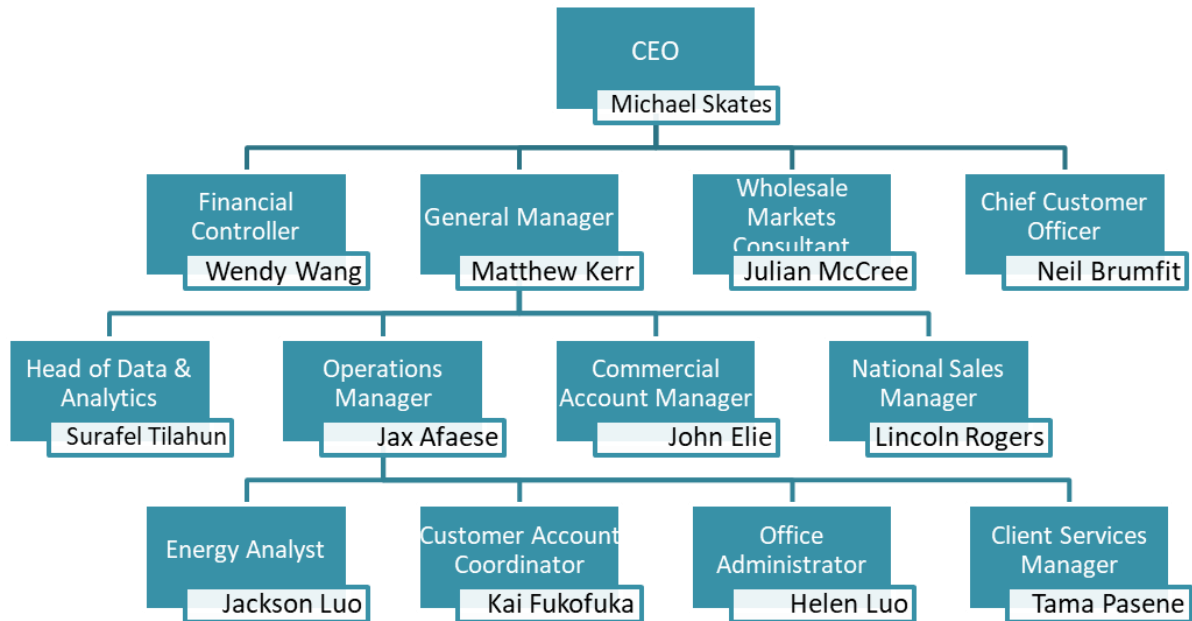
Audit observation

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

Audit commentary

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

1.2. Structure of Organisation

Prime provided a copy of their organisational structure.

1.3. Persons involved in this audit

Auditor:

Name	Title	Company
Brett Piskulic	Auditor	Provera

Other personnel assisting in this audit were:

Name	Title	Company
Jax Afaese	Operations Manager	Prime
Jackson Luo	Energy Analyst	Prime

1.4. Hardware and Software

Data is contained in a spreadsheet managed by Prime and JCDecaux (the customer for the DUML).

Backup is in accordance with standard industry protocols and on site and off site back up occurs.

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	Daily kWh
0000031344AAEF5	CAC44 ITB - ADVERTISING	AKL0331	RPS	74	594.6
Total				**74**	**594.6**

1.7. Authorisation Received

All information was provided directly by Prime.

This audit of the Auckland Airport Advertising Signs (AIAL) DUML database and processes was conducted at the request of Prime Energy Limited (Prime) 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 customer, JCDecaux, arranges any maintenance, replacements, removals or additions.   The spreadsheet is maintained by Prime and JCDecaux is expected to advise Prime of any changes that occur.

The diagram below shows the audit boundary for clarity.
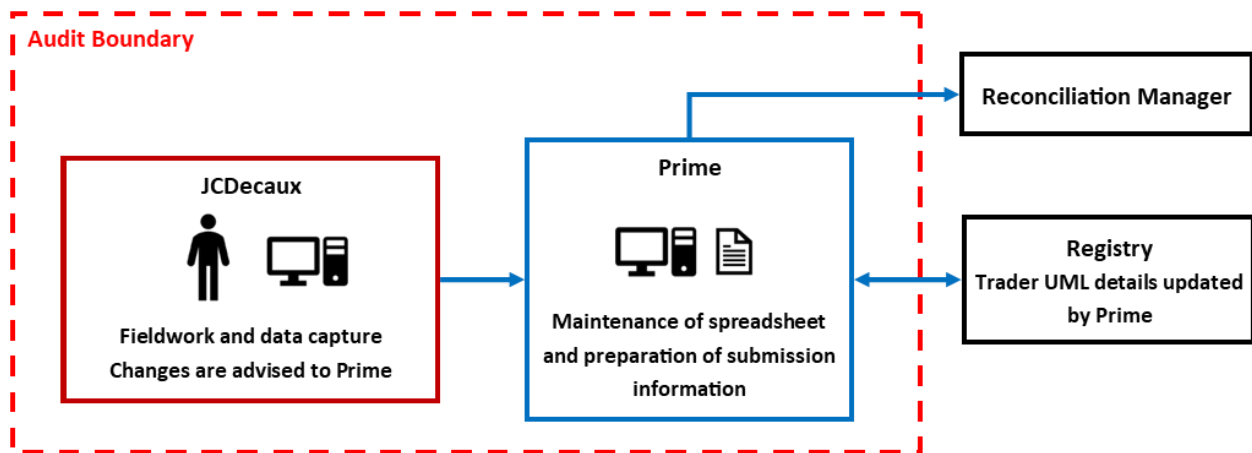
A field audit was undertaken of all 44 accessible items of load on 29 April and 7 May 2024. Some items are located in the boarding areas of the international terminal so were unable to be checked.

1.9.   Summary of previous audit

I reviewed the last audit report undertaken by Steve Woods of Veritek Limited in June 2022. The table below shows that one of the same issues is present this year, and the recommendation remains.

Subject	Section	Clause	Non-Compliance	Remedial Action
All load recorded in the database	2.5	11(2A) of Schedule 15.3	One additional item of load identified in the field, resulting in a potential under submission of 1,357.8 kWh per annum.	Still existing for different item of load
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify the user who made the data change.	Cleared

Subject	Section	Clause	Recommendation	
Database accuracy	3.1	15.2 and 15.37B(b)	Review the change management process to ensure that all changes are recorded in the spreadsheet for the correct date.	Still existing

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

Prime have requested Provera to undertake this DUML audit.

Audit commentary

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

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.

Audit commentary

Submission process and accuracy

Prime reconciles this DUML load using the RPS profile. The lights in the signs are on for 24 hours each day, therefore on/off times are not required. The daily kWh figure recorded in the registry, which is derived from the spreadsheet, is used for submission. I checked the accuracy of the submission information by multiplying the daily kWh by the number of hours in the month and comparing it to the figure in the registry for the month of February 2024. This confirmed the calculation methodology was correct.

Database accuracy

The field audit findings are detailed in **sections 2.5** and **3.1**. The net impact of the discrepancies found result in the database wattage being higher than the wattage in the field by 0.825kW or 3.33%. The total impact is over submission by 7,227 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

I have recommended in **section 3.1** that the change management process is reviewed to ensure future changes in the field are captured.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

An ICP is recorded for each item of load in the database.

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 DUML database must contain the location of each DUML item.

Audit observation

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

Audit commentary

The spreadsheet contains "Site ID", "Precinct & Site Description", and "Audience" fields and a photo of each item of load so it can be located.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage.

Audit commentary

The spreadsheet contains a description of the sign, details of the light fittings inside each sign, total wattage and kWh per day.

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

A field audit was undertaken of all 44 accessible items of load. Some items are located in the boarding areas of the international terminal so were unable to be checked.

Audit commentary

The field audit found six discrepancies as detailed in the table below:

Sign ID	Location description	Database kW	Field audit kW	Comments
I5	Food Court	0.155	0.31	Two signs found at this location, only one sign recorded in spreadsheet.
I2	General Public Check In	0.155	0	One sign recorded in spreadsheet not found in field audit.
I34	ITB Check In - Walkway Bulkhead	0.36	0	One sign recorded in spreadsheet not found in field audit.
D5	Jetstar Departure Lounge	0.155	0	One sign recorded in spreadsheet not found in field audit.
D9	Jetstar Arrivals Escalator	0.155	0	One sign recorded in spreadsheet not found in field audit.
D10	Jetstar Departures Lounge	0.155	0	One sign recorded in spreadsheet not found in field audit.

The field audit found one additional item of load in the field from a sample of 44 resulting in an annual under submission of 1,357.8 kWh, and this is recorded as non-compliance below.

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: unknown To: 29-Apr-24	One additional item of load identified in the field, resulting in a potential under submission of 1,357.8 kWh per annum. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as weak as the change management process has not identified changes made to the installed load. The impact is assessed to be low, based on the kWh values described above.

Actions taken to resolve the issue	Completion date	Remedial action status
We have advised our customer of the audit findings and are waiting to hear back regarding this billboard.	23/05/2024	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We are in the process of reviewing the way we manage the database and better communication updates with our customer so that we can improve the accuracy and timeliness of changes.	In progress	

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 spreadsheet contains an audit trail of all additions and changes. A "notes" field includes details of changes made to each item of load including the date of the change. A new sheet is created when any changes are made, and the initials of the Prime staff member who made the changes are recorded. Any changes made in the database that affect total wattage are updated on the registry for the same date, therefore changes will be tracked at a daily basis.

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

The spreadsheet contains an audit trail of all additions and changes. A "notes" field includes details of changes made to each item of load including the date of the change. A new sheet is created when any changes are made, and the initials of the Prime staff member who made the changes are recorded.

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 database includes items of load that are accessible by travelling international patrons only therefore I could not access all items of load or randomly select the field audit. The accuracy of the database was assessed by checking all 44 accessible items of load.

The change management processes were reviewed, and the determination of wattage was confirmed.

Audit commentary

Database accuracy

The field audit findings are detailed in the table below,

Sign ID	Location description	Database kW	Field audit kW	Comments
I5	Food Court	0.155	0.31	Two signs found at this location, only one sign recorded in spreadsheet.
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The net impact of the discrepancies found result in the database wattage being higher than the wattage in the field by 0.825kW or 3.33%. The total impact is over submission by 7,227 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

Change Management

Any changes are expected to be conducted in liaison with Prime. The number of errors found in the field indicate that the customer is not advising Prime when changes are made, and I repeat the recommendation from the previous audit that this process is reviewed.

Description	Recommendation	Audited party comment	Remedial action
Database Accuracy	Review the change management process to ensure that all changes are recorded in the spreadsheet for the correct date.	We agree with the audit findings and will be making improvements to the process as recommended such as better record keeping and bi-monthly or quarterly check-in with our customer to ensure the accuracy of data.	Investigating

Wattage Accuracy

The wattages were consistent with those recorded in previous audits and the process to calculate this is correct.

Audit outcome

Compliant

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:
- *volume information for the DUML is being calculated accurately,*
- *profiles for DUML have been correctly applied.*

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:
- checking the registry to confirm that all ICPs have the correct profile and submission flag, and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Submission process and accuracy

Prime reconciles this DUML load using the RPS profile. The lights in the signs are on for 24 hours each day, therefore on/off times are not required. The daily kWh figure recorded in the registry, which is derived from the spreadsheet, is used for submission. I checked the accuracy of the submission information by multiplying the daily kWh by the number of hours in the month and comparing it to the figure in the registry for the month of February 2024. This confirmed the calculation methodology was correct.

Database accuracy

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impact is over submission by 7,227 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code.

I have recommended in **section 3.1** that the change management process is reviewed to ensure future changes in the field are captured.

Audit outcome

Compliant

CONCLUSION

A database exists in the form of a spreadsheet which is maintained by Prime. The customer, JCDecaux is expected to advise Prime when changes are made to the connected load.

The field audit findings are detailed in **sections 2.5** and **3.1**. The net impact of the discrepancies found result in the database wattage being higher than the wattage in the field by 0.825kW or 3.33%. The total impact is over submission by 7,227 kWh per annum. Accuracy greater than 95% is considered to be compliant with the Code. The number of errors found in the field indicate that the customer is not advising Prime when changes are made, and I repeat the recommendation from the previous audit that this process is reviewed.

The audit found one non-compliance and makes one recommendation. The audit risk rating indicates that the next audit be in 24 months. I have considered this in conjunction with Prime's comments and recommend an audit period of 24 months.

PARTICIPANT RESPONSE

Prime has reviewed this report, and their comments are contained within its body.