

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

MOUNTAIN POWER LIMITED

NZBN: 9429035258995

Prepared by: Tara Gannon

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EXECUTIVE SUMMARY

This distributor audit was conducted at the request of **Mountain Power Ltd (Mountain Power)** to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

Mountain Power has two embedded networks situated in Twizel. The parent network (**Alpine Energy**) creates ICPs and performs registry maintenance as Mountain Power's agent. Alpine Energy's processes for Mountain Power were reviewed as part of their October 2023 distributor audit and confirmed as part of this audit.

The audit found five non-compliances and repeats two recommendations. The non-compliance relates to a small number of late updates, mostly due to corrections, and some incorrect event dates, initial electrical connection dates and NSP flags. The previous audit non-compliance relating to loss factors has been resolved.

The audit risk rating of eight indicates that the next audit be due in 18 months. Many of the non-compliances relate to only a small number of ICPs. I have considered this in conjunction with Mountain Power's responses, the size of the network and recommend that the next audit be in at least 18 months' time on 28 January 2026.

The matters raised are recorded in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1) and 10.6(1)	Five ICPs have incorrect initial electrical connection dates recorded. Three ICPs have incorrect network event dates recorded. Six ICPs have incorrect dedicated NSP flags recorded.	Moderate	Low	2	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	Clause 7(2) of Schedule 11.1	ICP 0000010831MO5DE created in 2021 was not moved to “ready” status prior to the 5 December 2022 initial electrical connection date, due to confusion about whether the ICP was still required.	Strong	Low	1	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	ICP 0000010714MOACB had its initial electrical connection date populated 16 business days after the initial electrical connection date.	Strong	Low	1	Identified
Changes to registry information	4.1	8 Schedule 11.1	23 late updates to correct the dedicated NSP flag. Three late additions, removals or changes to generation details for ICPs 0000010004MOF64, 0000013365MOD32 and 0000010125MO770.	Moderate	Low	2	Identified
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	Five ICPs have incorrect initial electrical connection dates recorded. Three ICPs have incorrect network event dates recorded. Six ICPs have incorrect dedicated NSP flags recorded.	Moderate	Low	2	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Future Risk Rating						8	

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

RECOMMENDATIONS

Subject	Section	Recommendation	Description	Comment
Distributors to Provide ICP Information to the Registry manager	4.6	Dedicated NSP status	Change dedicated status to Y for remaining six ICPs set to N.	Adopted. All the affected ICPs have their dedicated NSP flag updated to Y.
Distributors to Provide ICP Information to the Registry manager	4.6	Distributor unmetered load details	Liaise with the trader to confirm load details and then update the unmetered load details for 0000022015MOBEO.	Work in progress. To be completed within the next few weeks as Trader has yet to respond to MOPO's request for load information.

ISSUES

Subject	Section	Issue	Description
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code (Section 11)

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

The Electricity Authority website was checked to determine whether Mountain Power has any Code exemptions in place.

Audit commentary

Review of exemptions on the Electricity Authority website confirmed that there are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

The Mountain Power operation is managed by Andrew Hocken, and Grant Hocken is the Network Manager. This is not a large business and does not have an organisation chart.

1.3. Persons involved in this audit

Auditor:

Name	Role	Organisation
Tara Gannon	Auditor	Provera

Personnel assisting in this audit were:

Name	Title	Organisation
Andrew Hocken	Operations Manager	Mountain Power
Peter Bennett	Metering Officer	Alpine Energy

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

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

Audit observation

The use of contractors was discussed with Mountain Power.

Audit commentary

Alpine Energy is engaged for creation of ICPs and registry management.

1.5. Supplier list

Alpine Energy is engaged for creation of ICPs and registry management.

1.6. Hardware and Software

Mountain Power does not have hardware or software relevant to this audit. A spreadsheet exists of all ICPs, but this does not interface to the registry.

Registry information is maintained by Alpine Energy using their Mountain Power ICP database. It is a Microsoft Access database and VB application. Access to the database is restricted through network access permissions, and access to the network is restricted using logins and passwords.

The database is fully backed up every night, with incremental backups every 15 minutes.

1.7. Breaches or Breach Allegations

The Electricity Authority confirmed that there have been no alleged breaches for Mountain Power.

1.8. ICP and NSP Data

Mountain Power has responsibility for the NSPs in the table below, and “active” ICP numbers are as of 7 June 2024. No NSPs were created, decommissioned, or transferred to or from other networks during the audit period.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
MOPO	MMP0111	MACKENZIE PARK	ALPE	TWZ0331	MMP0111MOPOE	EN	1 May 2008	157
MOPO	MMT0111	MANUKA TERRACE	ALPE	TWZ0331	MMT0111MOPOE	EN	1 May 2008	212

Mountain Power’s ICPs are summarised by status below:

Status	ICPs Jun 2024	ICPs Nov 2022	ICPs Oct 2021	ICPs Jan 2020
New (999,0)	-	-	-	-
Ready (0,0)	3	5	8	6

Status	ICPs Jun 2024	ICPs Nov 2022	ICPs Oct 2021	ICPs Jan 2020
Active (2,0)	369	331	300	284
Distributor (888,0)	-	-	-	-
Inactive – new connection in progress (1,12)	1	2	2	1
Inactive – electrically disconnected vacant property (1,4)	2	2	1	1
Inactive – electrically disconnected remotely by AMI meter (1,7)	1	1	1	1
Inactive – electrically disconnected at pole fuse (1,8)	-	-	-	-
Inactive – electrically disconnected due to meter disconnected (1,9)	-	-	-	-
Inactive – electrically disconnected at meter box fuse (1,10)	-	-	-	-
Inactive – electrically disconnected at meter box switch (1,11)	-	-	-	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-	-	-	-
Inactive – reconciled elsewhere (1,5)	-	-	-	-
Decommissioned (3)	9	7	2	2

1.9. Authorisation Received

A letter of authorisation was provided.

1.10. Scope of Audit

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

Mountain Power has two embedded networks situated in Twizel. The parent network (Alpine Energy) creates ICPs and performs registry maintenance as Mountain Power’s agent.

The audit analysis was completed on registry list, event detail, and audit compliance reports for 1 February 2023 to 7 June 2024, and registry list and meter installation details reports for 7 June 2024.

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

Functions Requiring Audit Under Clause 11.10(4) of Part 11	Contractors Involved in Performance of Tasks
The creation of ICP identifiers for ICPs.	Alpine Energy
The provision of ICP information to the registry and the maintenance of that information.	Alpine Energy
The creation and maintenance of loss factors.	Alpine Energy

Alpine Energy's processes for Mountain Power were reviewed as part of their October 2023 distributor audit. Mountain Power confirmed that their processes for Alpine Energy have not changed since their distributor audit.

1.11. Summary of previous audit

Mountain Power provided a copy of their previous audit conducted in December 2022 by Steve Woods of Veritek Limited. The audit recorded five non-compliances and made four recommendations. The current status of the non-compliances and recommendations is listed below.

Table of non-compliances

Subject	Section	Clause	Non-compliance	Status
Timeliness of Provision of ICP Information to the registry manager	3.4	Clause 7(2) of Schedule 11.1	Late update to the registry for one ICP electrically connected during the audit period.	Still existing
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late initial electrical connection date updates for 15 ICPs	Still existing.
Notice of NSP for each ICP	4.2	7(1), 7(4) and 7(5) Schedule 11.1	One ICP with the incorrect NSP assigned.	Cleared.
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	Four ICP's with the incorrect initial electrical connection date recorded.	Still existing.
Creation of loss factors	8.1	11.2	Loss factors are not accurate as indicated by the reconciliation losses. Loss factors have not been reviewed annually.	Cleared. The loss factors have been updated to be consistent with the parent network and no parent network loss factor changes have occurred since.

Table of Recommendations

Subject	Section	Recommendation	Description	Status
Distributors to Provide ICP Information to the Registry manager	4.6	Dedicated NSP status	Change dedicated status to "Y" for remaining 13 ICPs set to "N".	Adopted. Further exceptions exist, so the recommendation has been re-raised.
Distributors to Provide ICP Information to the Registry manager	4.6	Initial Electrically Connected Date	Correct the IECD in the registry.	Adopted. Some new exceptions were identified which are recorded as non-compliance.
Distributors to Provide ICP Information to the Registry manager	4.6	Distributor unmetered load details	Liaise with the trader to confirm load details and then update the unmetered load details for 0000022015MOBE0.	Not adopted. Re-raised.
Creation of loss factors	8.1	Loss factor review	Complete annual review of loss factors to ensure any changes made by Alpine Energy are reflected in Mountain Power loss factors.	Adopted. The loss factors have been updated to be consistent with the parent network and no parent network loss factor changes have occurred since.

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

I confirmed the process to ensure that registry information is complete, accurate, and not misleading or deceptive. The registry list and audit compliance reports were examined to identify incomplete and inaccurate information.

Audit commentary

Registry synchronisation

ICP information is maintained in Alpine Energy's Mountain Power ICP database. When data maintained by the distributor on the registry is updated in the ICP database, the update is automatically sent to the registry.

Acknowledgement files are imported into the Mountain Power ICP database, and reports are run to identify any failed updates each morning. Issues are investigated and corrected by Alpine Energy.

Registry validation

Alpine Energy have registry validations in place and errors are detected and corrected through this process. Mountain Power identifies trader or MEP information which is inconsistent with distributor information and checks paperwork received from the field to ensure they provide correct and accurate information.

Registry information accuracy

Three network updates adding distributed generation details had incorrect event dates. The updates replaced the previous trader event, instead of the correct event date being entered.

ICP	Network event date	Network event update date	Correct network event date	Comment
0000010125MO770	8 December 2016	19 December 2023	12 December 2023	Solar added from the date of the previous network update in error. Event attributes were correct, but the event date should have been 12 December 2023.
0000010326MO1B7	15 July 2021	5 May 2023	4 May 2023	Solar added from the date of the previous network update in error. Event attributes were correct, but the event date should have been 4 May 2023.

ICP	Network event date	Network event update date	Correct network event date	Comment
0000022145MOAEC	16 November 2010	29 June 2023	27 June 2023	Solar added from the date of the previous network update in error. Event attributes were correct, but the event date should have been 27 June 2023.

Five ICPs had incorrect initial electrical connection dates recorded.

ICP Identifier	Metering Installation Certification Date	Status Event Date	Correct initial electrical connection date	Initial Electrical Connection Date
0000010104MO660	27 September 2023	27 September 2023	27 September 2023	28 September 2023
0000027758MOE3C	3 October 2023	3 October 2023	3 October 2023	5 October 2023
0000010137MOD58	19 September 2023	19 September 2023	18 September 2023	26 September 2023
0000026872MOF57	15 May 2023	15 May 2023	15 May 2023	9 October 2023
0000010501MO72E	4 April 2023	4 April 2023	4 April 2023	5 May 2023

Six ICPs which are not decommissioned have the dedicated NSP flag set to N, but are expected to be Y. Mountain Power believes that all of the affected ICPs are currently “inactive”, including 0000010370MO830 where the trader has updated to “active” status on the registry, but Mountain Power has not received confirmation that the ICP is connected and 0000014100MO1EA which is expected to be decommissioned once a request is received from the trader.

ICP	Network (distributor)	Point of Connection	Dedicated NSP	ICP Status Code	ICP Status Reason
0000010214MOFCE	MOPO	MMT0111	N	0	0
0000011010MO563	MOPO	MMT0111	N	0	0
0000026472MO35B	MOPO	MMP0111	N	0	0
0000011824MO39C	MOPO	MMT0111	N	1	12
0000014100MO1EA	MOPO	MMT0111	N	1	7
0000010370MO830	MOPO	MMT0111	N	2	0

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1) From: 16-Nov-10 To: 1-Jul-24	Five ICPs have incorrect initial electrical connection dates recorded. Three ICPs have incorrect network event dates recorded. Six ICPs have incorrect dedicated NSP flags recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are moderate because most information is accurate, but some incorrect event dates and initial electrical connection dates were recorded. The audit risk rating is low because the initial electrical connection date and distributed generation fields do not have a direct impact on submission. The ICPs with incorrect dedicated NSP flags are believed to be "inactive".		
Actions taken to resolve the issue		Completion date	Remedial action status
ICP's with incorrect initial electrical connection dates have been corrected. ICP's with incorrect NSP flags have been corrected. ICP's with incorrect network event dates to be corrected in due course.		24 July 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All new ICP's to be coded with Y flag for dedicated NSP as new NCA is received. Better understanding of connection date timing to ensure correct dates are recorded.		Ongoing	

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

If the participant becomes aware that in providing information under this Part, the participant has not complied with that obligation, the participant must, as soon as practicable, provide such further information as is necessary to ensure that the participant does comply.

Audit observation

I confirmed the process to ensure that registry information is complete, accurate, and not misleading or deceptive.

Audit commentary

Alpine Energy have registry validations in place and errors are detected and corrected through this process. Mountain Power identifies trader or MEP information which is inconsistent with distributor information and checks paperwork received from the field to ensure they provide correct and accurate information.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

If the distributor removes or breaks a seal in this way, it must:

- *ensure personal are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code,*
- *replace the seal with its own seal,*
- *have a process for tracing the new seal to the personnel,*
- *notify the metering equipment provider and trader.*

Audit observation

The meter installation details report was examined to determine whether load control devices existed on the network. Processes for management of removal and breakage of seals were checked.

Audit commentary

Alpine may remove or break a seal to bridge load control switches after hours as a result of direct contact from a customer on the Mountain Power network. NETcon will then attend site to reseal the load control, the contractor provides a photo of the meter and the seal when the fault has been attended. Alpine Energy informs the MEP and the retailer of the reseal.

The seals are numbered, and Alpine Energy maintain a register that records who the seal is issued to and where the seal has been used on the Mountain Power network.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

A distributor must provide clear and prominent information about Utilities Disputes:

- *on their website,*

- *when responding to queries from consumers,*
- *in directed outbound communications to consumers about electricity services and bills.*

If there are a series of related communications between the distributor and consumer, the distributor needs to provide this information in at least one communication in that series.

Audit observation

Provision of Utilities Disputes information was examined.

Audit commentary

Mountain Power do not have a website and they do not communicate directly with consumers, except for some applications for supply or outage notifications. These communications are managed by email. An example of an outage notification was provided which showed that notice of Utilities Disputes was provided.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPS (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process was examined in detail and is described in **section 3.2** below.

Audit commentary

Alpine Energy creates ICPS for Mountain Power as required by clause 1 of schedule 11.1. All 31 new connections created during the audit period have ICP numbers.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

The new connection process was examined. A sample of ten new connections were checked to confirm compliance. ICP requests are usually made by the customer's agent or electrician. If the request is not made by a trader this rule does not apply.

Audit commentary

Applications for ICPS are usually received from the electrician by Mountain Power. Once all the required information is received, it is provided to Alpine Energy to create the ICP. Once Alpine Energy create the ICP it is added to the Mountain Power ICP database and moved to "ready" status once approval from the trader is received. The registry is updated from the ICP database.

The sample of ten new connections checked were requested by the customer's electrician, and this rule does not apply.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

Data populated on the registry was checked for all 31 new ICPs created during the audit period, using the event detail report, registry list, and audit compliance report.

Audit commentary

All 31 ICPs created during the audit period had “ready” status, network information, a proposed trader, an address and a price category recorded prior to initial electrical connection.

All 27 ICPs created and initially electrically connected during the audit period had an initial electrical connection date recorded.

The audit compliance report identified two ICPs without initial electrical connection dates which were created prior to the audit period. ICP 0000013371MO695 is “decommissioned”, and ICP 0000014100MO1EA has been “inactive” since 29 January 2019 and will be “decommissioned” once a request is received. Compliance is recorded because the ICPs are not “active”.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The new connection process was examined, and I checked whether information was provided on time for the 31 ICPs created during the audit period. The audit compliance report was reviewed.

Audit commentary

All 31 ICPs created during the audit period had “ready” status, network information, a proposed trader, an address and a price category recorded as soon as practicable and prior to initial electrical connection.

The audit compliance report recorded that ICP 0000010831MO5DE created in 2021 was not moved to “ready” status prior to its 5 December 2022 initial electrical connection date. Because the ICP was not connected by November 2022, Mountain Power investigated and determined that the connection was no longer required and decommissioned the ICP. In December 2022, the property owner requested the ICP be livened. Mountain Power reversed the decommission and moved the ICP to “new” and then “ready” status so that it could be claimed and moved to “active” status by the trader, but these updates did not occur until after initial electrical connection.

The timeliness of provision of initial electrical connection dates is discussed separately in **section 3.5**.

Audit outcome

Non-compliant

Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 05-Dec-22</p> <p>To: 14-Dec-23</p>	<p>ICP 0000010831MO5DE created in 2021 was not moved to “ready” status prior to the 5 December 2022 initial electrical connection date, due to confusion about whether the ICP was still required.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong, this was an isolated occurrence which occurred due to confusion about whether the ICP was still needed. The impact was low because the ICP was claimed and moved to “active” in time for revision three reconciliation submissions to be completed by the trader.	
Actions taken to resolve the issue	Completion date	Remedial action status
Issue fully resolved. Timing issue caused by delay with new house build led to this confusion.	24 July 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Will not occur again as any ICP with a similar situation in the future will not be amended before discussing needs with end client first.	Ongoing	

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

The distributor must provide the information specified in subclause (1)(p) to the registry manager no later than 10 business days after the date on which the ICP is initially electrically connected.

Audit observation

The process to populate initial electrical connection dates was examined and the registry list and audit compliance reports were reviewed to determine compliance.

Audit commentary

All network and meter connections are usually completed on the same day by the same contractor.

Alpine Energy updates the initial electrical connection date to match the date work was completed, as detailed on the returned job for Mountain Power. As part of this process any information which has changed from the initial application (e.g. clarification of address) is updated.

26 of the 27 ICPs created and initially electrically connected during the audit period had initial electrical connection dates populated on time. ICP 0000010714MOACB had its initial electrical connection date populated 16 business days after the initial electrical connection date.

The audit compliance report identified recorded one ICP with a late initial electrical connection date which was created prior to the audit period. It was not a genuine late initial electrical connection date; the record replaced an earlier record with the same event date and initial electrical connection date.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 29-Jun-23 To: 30-Jul-23	ICP 0000010714MOACB had its initial electrical connection date populated 16 business days after the initial electrical connection date. 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 strong because most new ICPs had initial electrical connection dates updated on time. The audit impact is low because the update was six business days late.		
Actions taken to resolve the issue		Completion date	Remedial action status
Nothing required as registry has been updated, albeit 6 days after the due date.		24 July 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A one off situation whereby correct paperwork was received late leading to non compliance. MOPO has very good processes in place to prevent future late input.		Ongoing	

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The new connection process was examined in **section 3.2**. The registry list, event detail and audit compliance reports were examined to determine compliance.

Audit commentary

ICPs will not be electrically connected without the agreement from the trader. Trader acceptance is confirmed during the application process, and a blanket approval is in place with Contact Energy. All 27 ICPs created and connected during the audit period had responsibility accepted prior to being electrically connected.

All ICPs at “ready” have a proposed trader populated in the registry, and there is no shared unmetered load recorded against any ICP.

Audit outcome

Compliant

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The new connection process was examined in **section 3.2**. I checked all 27 ICPs created and initially electrically connected during the audit period and reviewed the registry list to identify any ICPs with shared unmetered load.

Audit commentary

As discussed in **section 3.2**, ICPs will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP. Trader acceptance is confirmed during the application process, and blanket approval is in place for Contact Energy. All 27 ICPs created and connected during the audit period had trader acceptance prior to being electrically connected.

No new connections for shared unmetered load were created.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

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

Audit observation

The new connection process was examined in **section 3.2**. The audit compliance report was reviewed to determine compliance.

Audit commentary

All network and meter connections are usually completed on the same day by the same contractor. No ICPs were temporarily electrically connected during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table was examined.

Audit commentary

No new NSPs were created by Mountain Power during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

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

A distributor may only electrically connect an NSP if:

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

Audit observation

The NSP table was examined.

Audit commentary

No new NSPs were created by Mountain Power during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

xxxxxxxxxxccc where:

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

Audit observation

The process for the creation of ICPs was examined.

Audit commentary

All ICPs are created in the correct format. A check of the new ICPs created during the audit period confirmed compliance.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The registry list was reviewed to confirm whether all ICPs have a single loss category and it was consistent with the NSP.

Audit commentary

The loss category code is known and assigned at the time of the ICP creation. Each “active” ICP has a single loss category, which clearly identifies the relevant loss factor. All “active” and “inactive” ICPs have the correct loss factor assigned for their NSP.

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

The new connection process was examined. The registry list, event detail report and audit compliance report were reviewed to determine compliance.

Audit commentary

The 31 ICPs created during the audit period were created at “new” status on the registry and updated to “ready” status within one second. There are no ICPs currently at the “new” status.

Monitoring of ICPs with the “new” and “ready” status is discussed in **section 3.14**.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

The management of ICPs at the “new” and “ready” status was examined. The audit compliance and registry list report were reviewed to determine compliance.

Audit commentary

There are no ICPs currently at “new” status, and three ICPs at “ready” status.

ICPs 0000011010MO563 and 0000026472MO35B have been at “ready” status since June and August 2023 respectively and have not been connected.

ICP 0000010214MOFCE was claimed by Meridian Energy at “inactive – new connection in progress” status on 13 February 2024. Meridian Energy reversed this record in May 2024 and the ICP has returned to “ready” status. Mountain Power believes that this is a new holiday home connection and is unlikely to be connected until spring 2024.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The registry list file was reviewed to determine compliance.

Audit commentary

Review of the registry list confirmed there are no embedded generators with a capacity greater than 10MW that require specific loss category codes.

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

Processes were examined for the connection of ICPs and NSPs.

Audit commentary

Alpine Energy will only connect a point of connection if requested by the trader responsible in the registry. Alpine Energy require a service request providing authorisation to electrically connect an ICP.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

Processes were examined for the disconnection and electrical disconnection of ICPs and NSPs.

Audit commentary

Alpine Energy understands their responsibilities in relation to this clause and completes disconnections on Mountain Power's behalf where required for safety reasons or decommissioning.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

The distributor can then only proceed with bridging the meter if, despite best endeavours:

- *the MEP is unable to remotely electrically connect the ICP,*

- *the MEP cannot repair a fault with the meter due to safety concerns,*
- *the consumer will likely be without electricity for a period which would cause significant disadvantage to the consumer.*

If the distributor bridges a meter, the distributor must notify the responsible trader within one business day and include the date of bridging in its advice.

Audit observation

Processes for bridging meters were examined.

Audit commentary

Alpine Energy may receive a call from a customer after hours, to investigate “no power” faults on behalf of Mountain Power. Alpine Energy will attend the site and may bridge the meter if required. Alpine Energy informs the trader that the meter has been bridged and requests a Service Request to unbridge the meter. Alpine Energy monitor these ICPs to ensure the meter is unbridged.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 13th business day and be backdated to the date the change took effect.

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

In the case of a change to price category codes, where the change is backdated, no later than 3 business days after the distributor and the trader responsible for the ICP agree on the change.

Audit observation

The management of registry updates was reviewed. The registry list and audit compliance reports were reviewed to determine compliance, and a sample of backdated updates were checked.

Audit commentary

The table below details the quantity and compliance of registry updates.

Address updates

All address updates were on time.

Update	Date	Late	% Compliant	Average Days
Address	2019	43	5.60%	-
	2020	Nil	100%	-
	2021	Nil	100%	-
	2022	Nil	100%	-
	2024	Nil	100%	-

Network updates

The audit compliance report recorded 28 late updates to network information, made between five and 3,150 business days of the event date.

Update	Date	Late	% Compliant	Average Days
Network (excl New Connection & Distributed Generation)	2019	17	5.60%	-
	2020	Nil	100%	-
	2021	Nil	100%	-
	2022	Nil	100%	-
	2024	28	6.67%	273.83

23 late updates were corrections from dedicated NSP flag N to Y and were backdated to the correct event date, five to 184 business days before the update date.

The other five late updates were additions, removals or changes to generation details made from the date of the previous network update:

- ICP 0000010004MOF64 and 0000013365MOD32's generation details were updated late because there was a change of the ICP which the solar installation was connected to, and the correct event date and attributes were applied; and
- ICP 0000010125MO770, 0000010326MO1B7 and 0000022145MOAEC's late updates replaced the previous network event instead of the correct event date being entered, which made the updates appear very late although they were within one week of the correct event date; the updates for 0000010326MO1B7 and 0000022145MOAEC were made within two business days of the correct event date so compliance is recorded in this section, but non-compliance is recorded in **sections 2.1** and **4.6** for applying incorrect event dates and the update for 0000010125MO770 was late relative to the correct event date.

Distributed Generation

The audit compliance report recorded three late additions of generation details which were also counted in the late updates to network information above for ICPs 0000010125MO770 and 0000010326MO1B7 which had incorrect event dates and 0000010004MOF64 which had distributed generation transferred from another ICP.

Update	Date	Late	% Compliant	Average Days
Distributed Generation	2020	3	0%	-
	2021	Nil	100%	-
	2022	Nil	100%	-
	2024	3	0%	750.33

NSP changes

There was one late NSP change recorded on the audit compliance report, but it was not genuine as it was caused by replacement of a previous network record with the same NSP.

Update	Date	Late	% Compliant	Average Days
NSP changes	2020	Nil	100%	-
	2024	Nil	100%	-

Price code updates

All pricing updates were on time.

Update	Date	Late	% Compliant	Average Days
Price Codes	2019	8	60%	-
	2020	4	77.78%	92
	2021	20	30%	30.4
	2022	Nil	100%	-
	2024	Nil	100%	-

Status updates

All decommissioned status updates were on time.

Update	Date	Late	% Compliant	Average Days
Status	2019	Nil	100%	-
	2020	Nil	100%	-
	2021	Nil	Has not occurred	-
	2022	Nil	Has not occurred	-
	2024	Nil	100%	-

Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 05-May-23 To: 19-Dec-23	23 late updates to correct the dedicated NSP flag. Three late additions, removals or changes to generation details for ICPs 0000010004MOF64, 0000013365MOD32 and 0000010125MO770. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate. All address, pricing and status updates were on time, and most of the late updates were corrections. The impact is low. 23/28 late updates were corrections to the dedicated NSP flag and were made in time for revised submission information to be washed up. The late distributed generation updates do not have a direct impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Nothing new to add here, all issues have been resolved on time.	24 July 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing maintenance of the MOPO database will ensure future compliance meets expectations.	24 July 2024	

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

Code reference

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

Code related audit information

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

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

Audit observation

The registry list, audit compliance report and NSP table were compared to determine compliance.

Audit commentary

Alpine Energy populates the registry with the NSP details provided by Mountain Power.

One street, Ostler Road, had ICP 0000022750MOB08 connected to MMP0111 and all other ICPs connected to MMT0111. The street is adjacent to Mackenzie Park and the correct NSPs are recorded.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was examined.

Audit commentary

Mountain Power and Alpine Energy may receive a direct request for ICP identifiers. ICP identifiers can be provided immediately on request once the address has been confirmed.

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The process to determine correct and unique addresses was examined, and address completeness and accuracy was checked using the audit compliance report.

Audit commentary

Addresses are confirmed as part of the application process. Review of the audit compliance reporting found all ICPs had complete and accurate addresses.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

This was examined as part of the new connection process.

Audit commentary

For new connections, this clause is well understood. All new applications are checked to ensure the electrical disconnection clauses are met, and each ICP has a separate connection.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

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

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

Audit observation

The management of registry information was reviewed. The registry list, audit compliance report and event detail report were reviewed to determine compliance.

Audit commentary

Registry data validation processes are discussed in **section 2.1**. All ICP information was checked and confirmed compliant unless discussed below.

Dedicated NSP

The previous audits recommended that the dedicated status should be set to Y. There are six ICPs which are not decommissioned which have the dedicated NSP flag set to N, and I recommend these are corrected. Mountain Power believes that all of the affected ICPs are currently "inactive", including 0000010370MO830 where the trader has updated to "active" status on the registry, but Mountain

Power has not received confirmation that the ICP is connected and 0000014100MO1EA which is expected to be decommissioned once a request is received from the trader.

ICP	Network (distributor)	Point of Connection	Dedicated NSP	ICP Status Code	ICP Status Reason
0000010214MOFCE	MOPO	MMT0111	N	0	0
0000011010MO563	MOPO	MMT0111	N	0	0
0000026472MO35B	MOPO	MMP0111	N	0	0
0000011824MO39C	MOPO	MMT0111	N	1	12
0000014100MO1EA	MOPO	MMT0111	N	1	7
c	MOPO	MMT0111	N	2	0

Recommendation	Description	Audited party comment	Remedial action
Dedicated NSP status	Change dedicated status to Y for remaining six ICPs set to N.	Updated and resolved. In future all new NCA's will see the NSP flag status amended to Y on their receipt. In the past this was only completed once initial connection date was confirmed.	Adopted. All the affected ICPs have their dedicated NSP flag updated to Y.

Initial electrical connection dates

Alpine Energy receives new connection information directly from the contractor and uses this to update the initial electrical connection date in the Mountain Power ICP database and on the registry. Connections on Mountain Power's network are normally completed by one contractor who connects both the network and meter, and the initial electrical connection date is provided on their paperwork.

The audit compliance reporting identified six ICPs with date inconsistencies between the initial electrical connection date, the "active" date and the meter certification date. Mountain Power provided connection paperwork which confirmed that one ICP had a correct initial electrical connection date recorded, and the other five ICPs did not:

ICP Identifier	Metering Installation Certification Date	Status Event Date	Correct initial electrical connection date	Initial Electrical Connection Date
0000010104MO660	27 September 2023	27 September 2023	27 September 2023	28 September 2023
0000027758MOE3C	3 October 2023	3 October 2023	3 October 2023	5 October 2023
0000010137MOD58	19 September 2023	19 September 2023	18 September 2023	26 September 2023
0000026872MOF57	15 May 2023	15 May 2023	15 May 2023	9 October 2023

ICP Identifier	Metering Installation Certification Date	Status Event Date	Correct initial electrical connection date	Initial Electrical Connection Date
0000010501MO72E	4 April 2023	4 April 2023	4 April 2023	5 May 2023

The audit compliance report identified two ICPs without initial electrical connection dates which were created prior to the audit period. ICP 0000013371MO695 is “decommissioned”, and ICP 0000014100MO1EA has been “inactive” since 29 January 2019 and will be decommissioned once a request is received. Compliance is recorded because the ICPs are not “active”.

Unmetered load

Part 11 states the distributors must provide unmetered load type and capacity of the unmetered load to the registry “if known”.

Three ICPs have unmetered load recorded by Mountain Power, but Mountain Power has not adopted the Authority’s recommended unmetered load format which is set out in their Guidelines on Unmetered Load Management:

45. The **Authority’s** recommended methodology for populating the **unmetered load** details field is set out below:

- (a) A standard method of populating this field is suggested by the **Authority** so that computer systems can extract crucial information. The first part of the string is delimited, and should contain the connected capacity and the hours of operation, and the remainder is available as free-form text.

The field definitions are:

Information	Format
Connected load	Watts, 4 digits, zero decimal places. Eg 1565
Semi colon separator	;
Running hours per day	Hours to 2 digits, and decimal hours to 1 decimal place Eg 02.5 (ie two and one half hours)
Semi colon separator	;
Other text	Free form as required

Example strings:

- 0110;10.5; Street light corner Rons Rd and Beatty St
This is a 110 watt connected capacity street light that runs for 10.5 hours per day.
- 1525;01.0; Sewage pump outside 76 Guthries Rd
This is a 1525 watt connected capacity sewage pump that runs for 1 hour per day.

Currently only the name of the load type is recorded:

ICP	Unmetered load details - Distributor	UN M Flag	Daily Unmetered kWh	Unmetered Load Details -retailer
0000010005MO321	Streetlighting	Y	3.7	0.306;12 18x17w LED S/lighting MMT0111
0000020005MO20D	Streetlighting	Y	22.2	1849;12.0 1849w 41x 35w SOX MP-DUML MMP0111
0000022015MOBE0	Telecom Cabinet	Y	5.5	0230;24.0;Telecom cabinet

I have repeated the recommendation that the Electricity Authority's recommended format be adopted so the load value can be confirmed correct. This is important as the trader's use these details to confirm unmetered loads when they switch traders. The current trader is likely to be able to confirm this.

Recommendation	Description	Audited party comment	Remedial action
Distributor unmetered load details	Liaise with the trader to confirm load details and then update the unmetered load details for 0000022015MOBE0.	Work in progress. To be completed within the next few weeks as Trader has yet to respond to MOPO's request for load information.	Adopted.

Event dates

Three network updates adding distributed generation details had incorrect event dates because the network update replaced the previous network event instead of the event date being updated.

ICP	Network event date	Network event update date	Correct network event date	Comment
0000010125MO770	8 December 2016	19 December 2023	12 December 2023	Solar added from the date of the previous network update in error. Event attributes were correct, but the event date should have been 12 December 2023.
0000010326MO1B7	15 July 2021	5 May 2023	4 May 2023	Solar added from the date of the previous network update in error. Event attributes were correct, but the event date should have been 4 May 2023.
0000022145MOAEC	16 November 2010	29 June 2023	27 June 2023	Solar added from the date of the previous network update in error. Event attributes were correct, but the event date should have been 27 June 2023.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1 From: 5-Apr-17 To: 1-Jul-24	Five ICPs have incorrect initial electrical connection dates recorded. Three ICPs have incorrect network event dates recorded. Six ICPs have incorrect dedicated NSP flags recorded. 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 moderate because most information is accurate, but some incorrect event dates and initial electrical connection dates were recorded. The audit risk rating is low because the initial electrical connection date and distributed generation fields do not have a direct impact on submission. The ICPs with incorrect dedicated NSP flags are believed to be "inactive".		
Actions taken to resolve the issue		Completion date	Remedial action status
All issues resolved as of todays date apart from the above ongoing issue.		24 July 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As previously discussed increased diligence will ensure future non compliance issues will be limited.		Ongoing	

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

The new connection process was examined in detail. The audit compliance reporting and the registry list were reviewed to determine compliance.

Audit commentary

Alpine Energy provides information as Mountain Power's agent. The audit compliance report confirmed that all pricing updates for new connections were made within the required timeframe.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The registry list was examined to confirm compliance.

Audit commentary

No ICPs have GPS coordinates recorded.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

Processes to manage ICPs at "ready" status were reviewed. The registry list, event detail report and audit compliance reports were reviewed to determine compliance.

Audit commentary

The new connection process ensures that a trader has taken responsibility for ICPs before the status is changed to ready.

The Mountain Power ICP database will only allow one price category, and the requirement to ensure that an ICP has a single price category will always be met. All three ICPs at “ready” status had a single price category assigned and proposed trader identified.

Audit outcome

Compliant

4.10. Management of “distributor” status (Clause 16 Schedule 11.1)

Code reference

Clause 16 Schedule 11.1

Code related audit information

The ICP status of “distributor” must be managed by the distributor and indicates that the ICP record represents a shared unmetered load installation or the point of connection between an embedded network and its parent network.

Audit observation

The registry list and event detail report were reviewed to determine compliance.

Audit commentary

The “distributor” status was not used at all during the audit period and is unlikely to be used as Mountain Power does not supply shared unmetered load and is unlikely to become a parent network.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The registry list, audit compliance report and event detail report were reviewed to determine compliance.

Audit commentary

Alpine Energy decommissions ICPs as Mountain Power's agent. ICPs are only decommissioned once an application for decommissioning is received, the trader has moved the ICP to "ready for decommissioning" status, and confirmation that the ICP has been decommissioned is received. It is very rare for an ICP to be decommissioned on the Mountain Power network.

One ICP was compliantly decommissioned during the audit period. There are no ICPs at "inactive - ready for decommissioning" status.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

The price category code table on the registry was examined.

Audit commentary

No new price category codes have been created or changed during the audit period.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 Schedule 11.1

Code related audit information

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

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

A loss category code takes effect on the specified date.

Audit observation

The loss category code table on the registry was examined.

Audit commentary

No new loss category codes were created during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

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

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

Audit observation

The loss category code table on the registry was examined.

Audit commentary

The loss factor for both loss factor codes was updated from 1.0191 to 1.0294 effective from 1 April 2023. Notification was provided on time on 25 January 2023, and only one loss factor code applied per month.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

If the distributor is creating or decommissioning an NSP that is an interconnection point between 2 local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.

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

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

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

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

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

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

Audit observation

The NSP table was examined.

Audit commentary

No NSPs were created or decommissioned during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

The request must be made at least 10 business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between two local networks. In all other cases, the request must be made at least one month before the NSP is electrically connected or the ICP is transferred.

Audit observation

The NSP table was examined.

Audit commentary

No NSPs were created or decommissioned during the audit period.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

The NSP table was examined.

Audit commentary

No new balancing areas were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was examined.

Audit commentary

No new NSPs were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was examined.

Audit commentary

No balancing areas were changed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was examined.

Audit commentary

The NSP table was examined. No ICPs have changed to become an NSP during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table was examined.

Audit commentary

Mountain Power has not acquired any networks during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

Processes to ensure that meters are present and certified were reviewed. The NSP table was examined.

Audit commentary

The NSP supply point table was reviewed:

Distributor	NSP POC	Description	MEP	Certification Expiry
MOPO	MMP0111	MACKENZIE PARK	AMCI	30 November 2026
MOPO	MMT0111	MANUKA TERRACE	AMCI	25 May 2026

Both NSPs have current meter certification, and no updates occurred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

Audit observation

The NSP table was examined.

Audit commentary

No NSPs were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The NSP table was examined.

Audit commentary

Mountain Power has not acquired any networks during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The NSP table was examined.

Audit commentary

There were no MEP changes during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The NSP table was examined.

Audit commentary

There were no ICP transfers during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table was examined.

Audit commentary

There were no ICP transfers during the audit period.

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit

The registry list registry list was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list registry list was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The “Guidelines on the calculation and the use of loss factors for reconciliation purposes” was published on 26 June 2018. I checked Mountain Power’s process against the guideline.

Audit commentary

The guideline requires the embedded network loss factor to be calculated using the following formula:

$$\text{RLF} = \frac{\text{Comparable point of connection on local network RLF}}{\text{Gateway NSPRLF}}$$

The comparable point of connection loss factor is 1.049 and the gateway NSP loss factor is 1.019. Mountain Power’s loss factor has been correctly recorded as 1.0294 since 1 April 2023.

The loss factors are calculated in accordance with the guideline, and Alpine Energy’s loss factors have not changed since the last loss factor review.

Audit outcome

Compliant

CONCLUSION

The audit found five non-compliances and repeats two recommendations. The non-compliance relates to a small number of late updates, mostly due to corrections, and some incorrect event dates, initial electrical connection dates and NSP flags. The previous audit non-compliance relating to loss factors has been resolved.

The audit risk rating of eight indicates that the next audit be due in 18 months. Many of the non-compliances relate to only a small number of ICPs. I have considered this in conjunction with Mountain Power's responses, the size of the network and recommend that the next audit be in at least 18 months' time on 28 January 2026.

PARTICIPANT RESPONSE

Overall a few simple issues have been found as a result of this Audit. Simple fixes from MOPO's perspective which will see any future instances limited.