

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

For

OURPOWER
(NZBN 9429032569827)

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Audit report due date: 31-Jul-24

TABLE OF CONTENTS

Executive summary	6
Audit summary	7
Non-compliances	7
Recommendations	8
Issues	8
1. Administrative.....	9
1.1. Exemptions from Obligations to Comply with Code (Section 11)	9
1.2. Structure of Organisation.....	9
1.3. Persons involved in this audit	10
1.4. Use of Agents (Clause 15.34).....	10
1.5. Hardware and Software	10
1.6. Breaches or Breach Allegations	11
1.7. ICP Data.....	12
1.8. Authorisation Received.....	12
1.9. Scope of Audit	13
1.10. Summary of previous audit	14
2. Operational Infrastructure	15
2.1. Relevant information (Clause 10.6, 11.2, 15.2)	15
Non-compliance.....	16
2.2. Provision of information (Clause 15.35).....	16
2.3. Data transmission (Clause 20 Schedule 15.2).....	17
2.4. Audit trails (Clause 21 Schedule 15.2).....	17
2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)	18
2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6)).....	18
2.7. Physical location of metering installations (Clause 10.35(1)&(2)).....	19
2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B).....	19
2.9. Connection of an ICP (Clause 10.32).....	20
2.10. Temporary Electrical Connection of an ICP (Clause 10.33).....	21
2.11. Electrical Connection of Point of Connection (Clause 10.33A)	21
2.12. Arrangements for line function services (Clause 11.16).....	22
2.13. Arrangements for metering equipment provision (Clause 10.36)	22
2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5))	23
2.15. Electrical disconnection of ICPs (Clause 10.33B)	23
2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7)	24
2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2.....	24
2.18. Use of ICP identifiers on invoices (Clause 11.30)	25
2.19. Provision of information on dispute resolution scheme (Clause 11.30A)	26
2.20. Provision of information on electricity plan comparison site (Clause 11.30B)	26
3. Maintaining registry information	27
3.1. Obtaining ICP identifiers (Clause 11.3).....	27
3.2. Providing registry information (Clause 11.7(2))	27
3.3. Changes to registry information (Clause 10 Schedule 11.1)	28

Non-compliance.....	28
3.4. Trader responsibility for an ICP (Clause 11.18).....	29
3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1).....	30
3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1).....	30
3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1).....	31
3.8. Management of “active” status (Clause 17 Schedule 11.1).....	31
3.9. Management of “inactive” status (Clause 19 Schedule 11.1).....	32
3.10. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1).....	32
4. Performing customer and embedded generator switching.....	34
4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3).....	34
4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3).....	34
4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3).....	35
4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3).....	35
4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3).....	36
4.6. Disputes - standard switch (Clause 7 Schedule 11.3).....	37
4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3).....	37
4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3).....	38
Non-compliance.....	39
4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3).....	40
4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3).....	40
4.11. Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3).....	41
4.12. Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3).....	42
4.13. Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3).....	43
4.14. Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3).....	43
4.15. Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3).....	44
Non-compliance.....	45
4.16. Metering information (Clause 21 Schedule 11.3).....	45
4.17. Switch protection (Clause 11.15AA to 11.15AB).....	46
5. Maintenance of unmetered load.....	47
5.1. Maintaining shared unmetered load (Clause 11.14).....	47
5.2. Unmetered threshold (Clause 10.14 (2)(b)).....	47
5.3. Unmetered threshold exceeded (Clause 10.14 (5)).....	48
5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B).....	48
6. Gathering raw meter data.....	50
6.1. Electricity conveyed & notification by embedded generators(Clause 10.13, Clause 10.24 and 15.13).....	50
6.2. Responsibility for metering at GIP(Clause 10.26 (6), (7) and (8)).....	50

6.3.	Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)	51
6.4.	Reporting of defective metering installations (Clause 10.43(2) and (3))	51
6.5.	Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)	52
6.6.	Derivation of meter readings (Clause 3(1), 3(2) and 5 Schedule 15.2)	53
6.7.	NHH meter reading application (Clause 6 Schedule 15.2)	53
6.8.	Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)	54
6.9.	NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)	54
6.10.	NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)	55
6.11.	NHH meter interrogation log (Clause 10 Schedule 15.2)	56
6.12.	HHR data collection (Clause 11(1) Schedule 15.2)	56
6.13.	HHR interrogation data requirement (Clause 11(2) Schedule 15.2)	57
6.14.	HHR interrogation log requirements (Clause 11(3) Schedule 15.2)	57
7.	Storing raw meter data	59
7.1.	Trading period duration (Clause 13 Schedule 15.2)	59
7.2.	Archiving and storage of raw meter data (Clause 18 Schedule 15.2)	59
7.3.	Non metering information collected / archived (Clause 21(5) Schedule 15.2)	60
8.	Creating and managing (including validating, estimating, storing, correcting and archiving) volume information	61
8.1.	Correction of NHH meter readings (Clause 19(1) Schedule 15.2)	61
8.2.	Correction of HHR metering information (Clause 19(2) Schedule 15.2)	61
8.3.	Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)	62
8.4.	Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)	62
9.	Estimating and validating volume information	64
9.1.	Identification of readings (Clause 3(3) Schedule 15.2)	64
9.2.	Derivation of volume information (Clause 3(4) Schedule 15.2)	64
9.3.	Meter data used to derive volume information (Clause 3(5) Schedule 15.2)	65
9.4.	Half hour estimates (Clause 15 Schedule 15.2)	65
9.5.	NHH metering information data validation (Clause 16 Schedule 15.2)	66
9.6.	Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)	66
10.	Provision of metering information to the GRID OWNER in accordance with subpart 4 of Part 13 (clause 15.38(1)(f))	68
10.1.	Generators to provide HHR metering information (Clause 13.136)	68
10.2.	Unoffered & intermittent generation provision of metering information (Clause 13.137)	68
10.3.	Loss adjustment of HHR metering information (Clause 13.138)	69
10.4.	Notification of the provision of HHR metering information (Clause 13.140)	69
11.	Provision of submission information for reconciliation	70
11.1.	Buying and selling notifications (Clause 15.3)	70
11.2.	Calculation of ICP days (Clause 15.6)	70
11.3.	Electricity supplied information provision to the reconciliation manager (Clause 15.7)	71
11.4.	HHR aggregates information provision to the reconciliation manager (Clause 15.8)	72
12.	Submission computation	74
12.1.	Daylight saving adjustment (Clause 15.36)	74

12.2. Creation of submission information (Clause 15.4).....	74
12.3. Allocation of submission information (Clause 15.5)	75
12.4. Grid owner volumes information (Clause 15.9).....	75
12.5. Provision of NSP submission information (Clause 15.10).....	76
12.6. Grid connected generation (Clause 15.11).....	76
12.7. Accuracy of submission information (Clause 15.12)	77
Non-compliance.....	77
12.8. Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)	78
12.9. Reconciliation participants to prepare information (Clause 2 Schedule 15.3)	79
12.10. Historical estimates and forward estimates (Clause 3 Schedule 15.3).....	80
12.11. Historical estimate process (Clause 4 and 5 Schedule 15.3)	80
12.12. Forward estimate process (Clause 6 Schedule 15.3).....	81
12.13. Compulsory meter reading after profile change (Clause 7 Schedule 15.3).....	82
13. Submission format and timing	83
13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3).....	83
13.2. Reporting resolution (Clause 9 Schedule 15.3)	84
13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)	84
Conclusion	86
Participant response	86

EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of NewPower Energy Limited to support their application for certification, in accordance with clauses 4 of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.1 issued by the Electricity Authority.

Until 31 May 2023 OurPower Limited traded using two codes OURP and OPHL, at which point the OURP ICPs were switched to another Trader. OurPower ceased trading as a retailer from 1 June 2023 with the OPHL code continuing to operate generation only as NewPower Energy Ltd. This audit report covers the OURP code for this audit period as a CRP audit has already been completed and submitted for OPHL code for this audit period.

The audit found five non-compliance issues. They were low volume, and discrepancies involved manual processes. Most of OurPower's high volume processes were automated. OurPower appears to have implemented the recommendations and suggestions made in previous audits.

OurPower (OURP) no longer trades.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 10 which results in an indicative audit frequency of 18 months. We agree with the result and would recommend the next audit be in 18 months.

We thank Steve Robertson NewPower Energy Ltd for his cooperation in this audit.

The audit period was 16/07/2022 to 31/05/2024.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	10.6, 11.2, 15.2	A small amount of information was inaccurate or submitted late.	Moderate	Low	2	Identified
Changes to the registry information	3.3	10 of Schedule 11.1	15 x Registry updates were later than five business days.	Moderate	Low	2	Identified
Losing trader provides information - switch move	4.8	10(1) Schedule 11.3	1 x switch CS file sent to the Registry greater than 3 business days after the NT file had been received.	Moderate	Low	2	Identified
Withdrawal of switch requests	4.15	Clauses 17 and 18 Schedule 11.3	1 x switch NW file was sent to the Registry over 3 months after the switch date.	Moderate	Low	2	Identified
Accuracy of submission information	12.7		1 x NHHVOLs file contained volume errors during the audit period.	Moderate	Low	2	Identified
Future Risk Rating						10	

Future risk rating	0-1	1-3	4-15	16-40	41-55	56+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Recommendation
Nil	Nil	Nil	Nil

ISSUES

Subject	Section	Description	Issue
Nil	Nil	Nil	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 (EA) website was checked, and this was discussed with NewPower Energy Ltd.

Audit commentary

NewPower Energy Ltd (OURP) stated it did not apply for any exemptions and does not have any exemptions granted to exempt them from compliance with all or any of the clauses relevant to the scope of this audit.

Checks of the Electricity Authority website confirmed this.

1.2. Structure of Organisation



1.3. Persons involved in this audit

Name	Title	Organisation
Steven Robertson	Trading Manager	NewPower Energy Ltd
Alister Haszard	Consultant	NewPower Energy Ltd
Allan Borcoski	Electricity authority Approved Auditor	Borcoski Energy Services Ltd

1.4. Use of Agents (Clause 15.34)

Code reference

Clause 15.34

Code related audit information

A reconciliation participant who uses an agent

- remains responsible for the contractor's fulfilment of the participant's Code obligations*
- cannot assert that it is not responsible or liable for the obligation due to something the agent has or has not done*

Audit observation

This was discussed with NewPower Energy Ltd (OURP).

Audit commentary

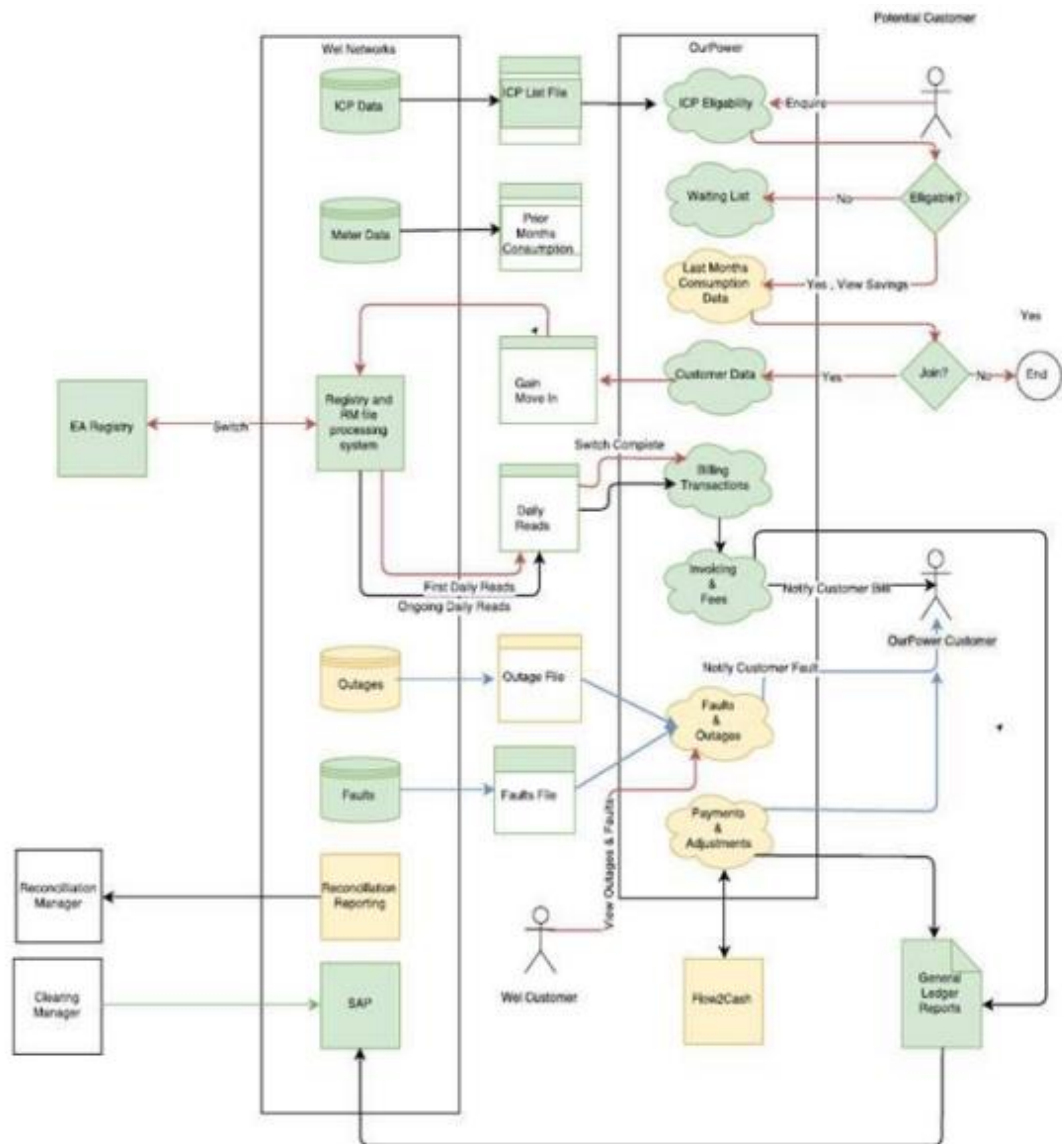
NewPower Energy Ltd (OURP) stated it did not use any agents for the fulfilment of the participant's Code obligations.

1.5. Hardware and Software

The Microsoft Azure cloud computing service is used, which creates backups to the cloud.

A bespoke reconciliation system was developed and used by OURP, though it did utilise WEL Networks' existing interface to the registry.

The high level diagram below outlines the processes and interfaces of the reconciliation system:



1.6. Breaches or Breach Allegations

NewPower Energy Ltd (OURP) there was a breach allegation against the OPHL code on 12 July 2022 (reference 2207OURP1) when OPHL was trading under Our Power Ltd.

The following self breaches were notified to the Electricity Authority:

Reference	Date	Clause	Breach
2207OURP1	12 July 2022	Part 15 Clause 14.4(1)	OPHL failed to submit the ICP Days (AV110) file on time
2209OURP1	27 September 2022	Part 15 Clause 15.2(1)(a)	NHHVols file 16 September contained a volume error
2210OURP1	14 October 2022	Part 15 Clause 15.2(1)(a)	OURP made incorrect NHH volume submissions for August 2022 R1

All the cases related to the breaches are now closed.

1.7. ICP Data

Metering Category	(25/06/24)	(Aug 2022)	(2021)
1	3187	2898	2781
2	0	0	0
3	0	0	0
4	0	0	0
5	0	0	0
9	0	0	0

Status	Number of ICPs (25/06/2024)	Number of ICPs (2022)	Number of ICPs (2021)
Active (2,0)	3155	2,898	2781
Inactive – new connection in progress (1,12)	0	0	0
Inactive – electrically disconnected vacant property (1,4)	1	0	1
Inactive – electrically disconnected remotely by AML meter (1,7)	20	26	14
Inactive – electrically disconnected at pole fuse (1,8)	0	0	0
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	0
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	0	0	0
Inactive – reconciled elsewhere (1,5)	0	0	0
Decommissioned (3)	11	9	5

1.8. Authorisation Received

NewPower Energy Ltd (OURP) provided authorisation to Borcoski Energy Services Ltd permitting the collection of data from other parties for matters related to the audit.

1.9. Scope of Audit

This reconciliation participant audit was performed at the request of NewPower Energy Limited to encompass the Authority's request for annual audits as required by clause 2 of Schedule 15.1 of the Code, to assure compliance with the Electricity Industry Participation Code 2010. The audit was carried out between 4 July 2024 and 30 July 2024 remotely by telecon and email.

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

1.10. Summary of previous audit

Subject	Section	Clause	Non Compliance	Comment
Relevant information	2.1	11.5	Small number of late updates and incorrect Switch Event Meter Read in 14 CS files	Still exists
Changes to the registry information	3.3	10 of Schedule 11.1	9 late registry updates	Still exists
Losing trader must provide final information - standard switch	4.3	5 of Schedule 11.3	Incorrect Switch Event Meter Read in one CS file	Not found in this audit
Losing trader provides information - switch move	4.8	10 (1) of Schedule 11.3	One late AN file and one AN file was not sent for one ICP	Still exists
Losing trader must provide final information - switch move	4.10	11 of Schedule 11.3	2 CS files late Incorrect Switch Event Meter Read in 13 CS files	Not found in this audit
Accuracy of submission information	12.7	15.12	One day volumes were over submitted for 14 ICPs (switches out)	Still exists

The previous audit was conducted in August 2022 by Ewa Glowacka of TEG & Associates.

2. OPERATIONAL INFRASTRUCTURE

2.1. Relevant information (Clause 10.6, 11.2, 15.2)

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

A participant must take all practicable steps to ensure that information that the participant is required to provide is:

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

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

Audit observation

The LIS and EDA files were checked for the audit period, along with the Registry and Audit Compliance Summary Report and Submission files for the audit period to assess compliance with code requirements.

Audit commentary

The following non-compliances were identified and are detailed in the appropriate sections of this report:

Section	Discrepancy
3.3	15 x Trader Information updates to the Registry were later than five business days.
4.8	1 x switch CS file sent to the Registry greater than 3 business days after the NT file had been received.
4.15	1 x switch NW file was sent to the Registry over 3 months after the switch date.
12.7	1 x NHHVOLs file contained volume errors during the audit period.

Audit outcome

Non-compliant

NON-COMPLIANCE

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 16-Jul-22 To: 31-May-24	A small amount of information was inaccurate or submitted late. Potential impact: Low Actual impact: Low Audit history: Several previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. Some improvements can be made to ensure information submitted as required is accurate and timely. There was minor impact on settlement outcomes due to the small number of ICPs involved. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Data was submitted.		At the time	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes were reviewed and better escalation process to manage future issues.		June 2023	

2.2. Provision of information (Clause 15.35)

Code reference

Clause 15.35

Code related audit information

If an obligation exists to provide information in accordance with Part 15, a participant must deliver that information to the required person within the timeframe specified in the Code, or, in the absence of any such timeframe, within any timeframe notified by the Authority. Such information must be delivered in the format determined from time to time by the Authority.

Audit observation

NewPower Energy Ltd (OURP) made available process documentation, data files and reports as requested to complete the audit.

Audit commentary

Compliance of obligations to provide information in accordance with part 15 were observed using the information provided and discussed in the relevant sections of this audit report.

Audit outcome

Compliant

2.3. Data transmission (Clause 20 Schedule 15.2)

Code reference

Clause 20 Schedule 15.2

Code related audit information

Transmissions and transfers of data related to metering information between reconciliation participants or their agents, for the purposes of the Code, must be carried out electronically using systems that ensure the security and integrity of the data transmitted and received.

Audit observation

This was discussed with OURP. Information delivery to the reconciliation manager was reviewed along with submission files for the audit period.

Audit commentary

HHR metering data was provided by WEL Networks (WASN), AMS and NHH metering data from NGCM MEPs, respectively. The OURP system used SFTP with appropriate password protection.

Reconciliation files are submitted via the RM portal.

Audit outcome

Compliant

2.4. Audit trails (Clause 21 Schedule 15.2)

Code reference

Clause 21 Schedule 15.2

Code related audit information

Each reconciliation participant must ensure that a complete audit trail exists for all data gathering, validation, and processing functions of the reconciliation participant.

The audit trail must include details of information:

- *provided to and received from the registry manager*
- *provided to and received from the reconciliation manager*
- *provided and received from other reconciliation participants and their agents.*

The audit trail must cover all archived data in accordance with clause 18.

The logs of communications and processing activities must form part of the audit trail, including if automated processes are in operation.

Logs must be printed and filed as hard copy or maintained as data files in a secure form, along with other archived information.

The logs must include (at a minimum) the following:

- *an activity identifier (clause 21(4)(a))*
- *the date and time of the activity (clause 21(4)(b))*
- *the operator identifier for the person who performed the activity (clause 21(4)(c)).*

Audit observation

This was discussed with OURP. Information delivery to the reconciliation manager was reviewed along with submission files for the audit period. Audit trails for data gathering, validation, and correction were reviewed. Relevant MEP audit reports were also reviewed.

Audit commentary

The OURP system includes audit trails for ICP and meter reading information. Checks confirmed HHR metering data was stored in the respective MEPs systems. Review of MEP audit reports confirmed appropriate audit trails were created appropriately.

The RM portal records the audit trail of reconciliation files submitted.

Audit outcome

Compliant

2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)

Code reference

Clause 10.4

Code related audit information

If a participant must obtain a consumer's consent, approval, or authorisation, the participant must ensure it:

- *extends to the full term of the arrangement*
- *covers any participants who may need to rely on that consent.*

Audit observation

Terms and Conditions of Supply provision to Customers of OURP was reviewed.

Audit commentary

Checks confirmed the Terms and Conditions of Supply to Customers provided the relevant information to meet this code requirement.

Audit outcome

Compliant

2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))

Code reference

Clause 10.7(2),(4),(5) and (6)

Code related audit information

The responsible reconciliation participant must, if requested, arrange access for the metering installation to the following parties:

- *the Authority*
- *an ATH*
- *an auditor*
- *an MEP*
- *a gaining metering equipment provider.*

The trader must use its best endeavours to provide access:

- *in accordance with any agreements in place*

- *in a manner and timeframe which is appropriate in the circumstances.*

If the trader has a consumer, the trader must obtain authorisation from the customer for access to the metering installation, otherwise it must arrange access to the metering installation.

The reconciliation participant must provide any necessary facilities, codes, keys or other means to enable the party to obtain access to the metering installation by the most practicable means.

Audit observation

Terms and Conditions of Supply provision to Customers of OURP was reviewed.

Audit commentary

Checks confirmed the Terms and Conditions of Supply to Customers provided the relevant information to meet this code requirement.

Audit outcome

Compliant

2.7. Physical location of metering installations (Clause 10.35(1)&(2))

Code reference

Clause 10.35(1)&(2)

Code related audit information

A reconciliation participant responsible for ensuring there is a category 1 metering installation or category 2 metering installation must ensure that the metering installation is located as physically close to a point of connection as practical in the circumstances.

A reconciliation participant responsible for ensuring there is a category 3 or higher metering installation must:

- a) if practical in the circumstances, ensure that the metering installation is located at a point of connection; or*
- b) if it is not practical in the circumstances to locate the metering installation at the point of connection, calculate the quantity of electricity conveyed through the point of connection using a loss compensation process approved by the certifying ATH.*

Audit observation

The LIS file for the audit period was reviewed. MEP audit reports were also reviewed.

Audit commentary

The LIS report reveals all the ICPs (metering category 1 only) OURP were responsible for were metered and the MEPs recorded in the Registry. The arrangements with the MEPs ensure the ICPs have appropriate and approved metering designs installed. OURP was not responsible for any ICPs using loss compensation factors

Audit outcome

Compliant

2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)

Code reference

Clause 11.15B

Code related audit information

A trader must at all times ensure that the terms of each contract between a customer and a trader permit:

- the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and
- the terms of the assigned contract to be amended on such an assignment to—
- the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or
- such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and
- the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and
- the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and
- the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).

The terms specified in subclause (1) must be expressed to be for the benefit of the Authority for the purposes of the Contracts (Privacy) Act 1982, and not be able to be amended without the consent of the Authority (clause 11.15B(2)).

Audit observation

Terms and Conditions of Supply provision to Customers of OURP was reviewed.

Audit commentary

Checks confirmed the Terms and Conditions of Supply to Customers provided the relevant consent to access for authorised parties to meet this code requirement.

Audit outcome

Compliant

2.9. Connection of an ICP (Clause 10.32)

Code reference

Clause 10.32

Code related audit information

A reconciliation participant must only request the connection of a point of connection if they:

- accept responsibility for their obligations in Parts 10, 11 and 15 for the point of connection; and
- have an arrangement with an MEP to provide 1 or more metering installations for the point of connection.

Audit observation

This was discussed with OURP. The EDA and LIS files for the audit period and the Registry were checked.

Audit commentary

OURP did not accept new connections currently, and they did not have a new connection process in place.

Checks confirmed no new connections were completed during the audit period.

Audit outcome

Compliant

2.10. Temporary Electrical Connection of an ICP (Clause 10.33)

Code reference

Clause 10.33(1)

Code related audit information

A trader may temporarily electrically connect a point of connection, or authorise a MEP to temporarily electrically connect a point of connection, only if:

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
 - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*
 - o *if the ICP has metered load, 1 or more certified metering installations are in place*
 - o *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

Audit observation

This was discussed with OURP. The EDA and LIS files for the audit period and the Registry were checked.

Audit commentary

OURP did not accept new connections and they did not have a new connection process in place.

Checks confirmed no new connections were completed during the audit period.

Audit outcome

Compliant

2.11. Electrical Connection of Point of Connection (Clause 10.33A)

Code reference

Clause 10.33A(1)

Code related audit information

A reconciliation participant may electrically connect or authorise the electrical connection of a point of connection only if:

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
 - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*
 - o *if the ICP has metered load, 1 or more certified metering installations are in place*

- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the electrical connection.*

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

The EDA file identified 421 ICPs were disconnected remotely during the audit period and 419 were reconnected. The Audit Compliance report did not identify any of those ICPs to be uncertified at the time of reconnection.

OURP stated they did not accept new connections, and they did not bridge meters checks confirmed this.

Audit outcome

Compliant

2.12. Arrangements for line function services (Clause 11.16)

Code reference

Clause 11.16

Code related audit information

Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must ensure that it, or its customer, has made any necessary arrangements for the provision of line function services in relation to the relevant ICP

Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must have entered into an arrangement with an MEP for each metering installation at the ICP.

Audit observation

This was discussed with OURP. The LIS file and the Registry were checked. A copy of the Distributor agreement with WEL Networks was sighted.

Audit commentary

OURP traded only on the WEL Network, and a Distributor agreement was in place.

Checks of the LIS and Registry confirm MEP arrangements were in place for each ICP metering installation OURP was responsible for.

Audit outcome

Compliant

2.13. Arrangements for metering equipment provision (Clause 10.36)

Code reference

Clause 10.36

Code related audit information

A reconciliation participant must ensure it has an arrangement with the relevant MEP prior to accepting responsibility for an installation.

Audit observation

This was discussed with OURP. The LIS file and the Registry were checked. A copy of the MEP agreement with WEL Metering Services was sighted.

Audit commentary

OURP had MEPs assigned to all ICPs it was responsible for in the Registry. MEP arrangements were in place with WAS, AMS and NGCM.

Checks confirmed the code requirement was met.

Audit outcome

Compliant

2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5))

Code reference

Clause 10.33B

Code related audit information

If a trader connects an ICP it is in the process of switching and the switch does not proceed or is withdrawn the trader must:

- *restore the disconnection, including removing any bypass and disconnecting using the same method the losing trader used*
- *reimburse the losing trader for any direct costs incurred*

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

OURP received 121 NWs from losing traders during the audit period. All of them had the "active" status.

OURP was aware of their obligations with respect to this clause.

Checks of the EDA file and Registry confirmed code requirements were met.

Audit outcome

Compliant

2.15. Electrical disconnection of ICPs (Clause 10.33B)

Code reference

Clause 10.33B

Code related audit information

Unless the trader is recorded in the registry or is meeting its obligation under 10.33A(5) it must not disconnect or electrically disconnect the ICP or authorise the metering equipment provider to disconnect or electrically disconnect the ICP.

Audit observation

This was discussed with OURP. The EDA and LIS files for the audit period and the Registry were checked.

Audit commentary

The EDA file identified 421 ICPs were disconnected remotely during the audit period and 419 were reconnected.

The Registry confirmed OURP was the Trader recorded in the Registry at the time.

Audit outcome

Compliant

2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7)

Code reference

Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7

Code related audit information

A trader can remove or break a seal without authorisation from the MEP to:

- *reset a load control switch, bridge or unbridge a load control switch – if the load control switch does not control a tome block meter channel*
- *electrically connect load or generation, of the load or generation has been disconnected at the meter*
- *electrically disconnect load or generation, if the trader has exhausted all other appropriate methods of electrical disconnection*
- *bridge the meter*

A trader that removes or breaks a seal in this way must:

- *ensure 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*
- *update the registry (if the profile code has changed)*
- *notify the metering equipment provider*

Audit observation

This was discussed with OURP. The EDA and LIS files for the audit period and the Registry were checked.

Audit commentary

OURP did not carry out this activity. OURP stated no meters at ICPs it was responsible for during the audit period were bridged or unbridged. OURP requested the MEP of record to deal with any metering related issues.

Audit outcome

Compliant

2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2)

Code reference

Clause 10.33C and 2A of Schedule 15.2

Code related audit information

A trader, or a distributor or MEP which has been authorised by the trader, may only electrically connect an ICP in a way that bypasses a meter that is in place (“bridging”) if, despite best endeavours:

- *the MEP is unable to remotely electrically connect the ICP*
- *the MEP cannot repair a fault with the meter due to safety concerns*
- *the consumer will likely be without electricity for a period which would cause significant disadvantage to the consumer*

If the trader bridges a meter, the trader must:

- *determine the quantity of electricity conveyed through the ICP for the period of time the meter was bridged*
- *submit that estimated quantity of electricity to the reconciliation manager*
- *within 1 business day of being advised that the meter is bridged, notify the MEP that they are required to reinstate the meter so that all electricity flows through a certified metering installation.*

The trader must determine meter readings as follows:

- *by substituting data from an installed check meter or data storage device*
- *if a check meter or data storage device is not installed, by using half hour data from another period where the trader considers the pattern of consumption is materially similar to the period during which the meter was bridged*
- *if half hour data is not available, a non-half hour estimated reading that the trader considers is the best estimate during the bridging period must be used.*

Audit observation

This was discussed with OURP.

Audit commentary

OURP did not carry out this activity. OURP stated no meters at ICPs it was responsible for during the audit period were bridged or unbridged. OURP requested the MEP of record to deal with any metering related issues.

Audit outcome

Compliant

2.18. Use of ICP identifiers on invoices (Clause 11.30)

Code reference

Clause 11.30

Code related audit information

Each trader must ensure the relevant ICP identifier is printed on every invoice or document relating to the sale of electricity.

Audit observation

This was discussed with OURP. Invoice information was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. Invoice information, website snapshot and customer correspondence was reviewed.

Audit commentary

OURP does not currently have a company website however a historical snapshot observed contained the link to Utilities Disputes. It was also quoted in correspondence with customers.

Checks confirmed code requirements were met.

Audit outcome

Compliant

2.20. Provision of information on electricity plan comparison site (Clause 11.30B)

Code reference

Clause 11.30B

Code related audit information

A retailer that trades at an ICP recorded on the registry must provide clear and prominent information about Powerswitch:

- *on their website*
- *in outbound communications to residential consumers about price and service changes*
- *to residential consumers on an annual basis*
- *in directed outbound communications about the consumer's bill.*

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

Audit observation

This was discussed with OURP. Invoice information, website snapshot and customer correspondence was reviewed.

Audit commentary

OURP does not currently have a company website however a historical snapshot observed contained the link to Powwerswitch. It was also quoted in correspondence with customers.

Checks confirmed code requirements were met.

Audit outcome

Compliant

3. MAINTAINING REGISTRY INFORMATION

3.1. Obtaining ICP identifiers (Clause 11.3)

Code reference

Clause 11.3

Code related audit information

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

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

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

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

Audit observation

This was discussed with OURP. The EDA and LIS files for the audit period were checked.

Audit commentary

OURP stated they did not accept new connections. Checks confirmed this.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 11.7(2)

Code related audit information

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

Audit observation

This was discussed with OURP. The EDA and LIS files for the audit period and the Registry were checked.

Audit commentary

OURP stated they did not accept new connections. Checks confirmed this.

A check of the LIS file shows all required information about each ICP was provided to the Registry for each ICP OURP traded electricity.

Audit outcome

Compliant

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

Code reference

Clause 10 Schedule 11.1

Code related audit information

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

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

The following Registry update discrepancies were observed:

Discrepancy	Business Days	Comment
Change to Active (Reconnection)	7 to 34	12 x ICP
Change to Inactive (Disconnection)	7	1 x ICP
Change submission type HHR	7 to 8	2 x ICP

Audit outcome

Non-compliant

NON-COMPLIANCE

Non-compliance	Description
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 16-Jul-22 To: 31-May-24	15 x Trader Information updates to the Registry were later than five business days. Potential impact: Low Actual impact: Low Audit history: Several previously Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	The controls are rated as moderate. Some improvements can be made to ensure updates to the registry are completed in a timely manner. There was minor impact on settlement outcomes due to the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Registry updates were made.		At the time	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process improvements made to flag registry issues which require manual intervention.		June 2023	

3.4. Trader responsibility for an ICP (Clause 11.18)

Code reference

Clause 11.18

Code related audit information

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

A trader ceases to be responsible for an ICP if:

- *another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or*
- *the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).*
- *if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):*
 - o *arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and*
 - o *advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).*

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

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

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

OURP had MEPs assigned to all Active ICPs it was responsible for in the Registry. OURP did not trade UML.

OURP decommissioned 3 x ICPs during the audit period.

Checks confirmed code requirements were met.

Audit outcome

Compliant

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

Code reference

Clause 9 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

OURP stated they did not accept new connections. Checks confirmed this.

Audit outcome

Compliant

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

Code reference

Clause 9 (1)(k) of Schedule 11.1

Code related audit information

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

Audit observation

This was discussed with OURP. The LIS files and Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

Checks confirmed all ICPs OURP were responsible for had correct ANSIC codes recorded in the Registry.

Audit outcome

Compliant

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

Code reference

Clause 9(1)(f) of Schedule 11.1

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. The LIS files and Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

OURP did not trade UML. OURP had exception reporting in place to monitor incoming switched ICPs to identify UML. None was found during the audit period.

Checks confirmed code requirements were met.

Audit outcome

Compliant

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

Code reference

Clause 17 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked.

Audit commentary

The EDA file identified 421 ICPs were disconnected remotely during the audit period and 419 were reconnected. OURP had processes in place to ensure there was only one party per ICP, that all active ICPs had an MEP identified in the Registry and were quantified by a metering installation.

Checks confirmed code requirements were met.

Audit outcome

Compliant

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

Code reference

Clause 19 Schedule 11.1

Code related audit information

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

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

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period and the Registry were checked. 5 randomly selected disconnected ICP transactions were checked.

Audit commentary

The EDA file identified 421 ICPs were disconnected remotely during the audit period and 419 were reconnected.

Checks confirmed code requirements were met.

Audit outcome

Compliant

3.10. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)

Code reference

Clause 15 Schedule 11.1

Code related audit information

If an ICP has had the status of “New” or “Ready” for 24 calendar months or more, the distributor must ask the trader whether it should continue to have that status and must decommission the ICP if the trader advises the ICP should not continue to have that status.

Audit observation

This was discussed with OURP. The EDA, LIS files, Audit Compliance report for the audit period were checked.

Audit commentary

OURP stated they did not accept new connections. Checks confirmed this.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

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

Code reference

Clause 2 Schedule 11.3

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA, Audit Compliance report and Registry were checked. A random sample of 5 NTTR files were checked.

Audit commentary

Customers joined OURP via their website. Once the acceptance criteria were met an NTTR file was automatically sent to the Registry within the 2 business day requirement. During the audit period OURP sent 537 NTTR files.

OURP was aware of the requirements of the Fair-Trading Act 1986

Audit outcome

Compliant

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

Code reference

Clauses 3 and 4 Schedule 11.3

Code related audit information

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

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

When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice

from the registry manager under clause 22(a) the losing trader had been responsible for less than 2 months.

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA, Audit Compliance report, Switch Breach report and Registry were checked. A random sample of 10 AN files were checked.

Audit commentary

OURP responded to NTTR notifications by sending the AN file the same day or following day.

The AN files sent by OURP during the audit period all used the AD response code and 99% of the proposed switch dates were within five business days.

Checks of the AN files confirmed compliance with the code requirements.

Audit outcome

Compliant

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

Code reference

Clause 5 Schedule 11.3

Code related audit information

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA, Audit Compliance report, Switch Breach report and Registry were checked. A random sample of 10 CS files were also checked.

Audit commentary

OURP sent CS files to the Registry within five business days, and they contained the correct event dates, switch meter readings and dates, and average daily consumptions were appropriate.

Checks of the CS files confirmed compliance with the code requirements.

Audit outcome

Compliant

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

Code reference

Clause 6(1) and 6A Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA, Audit Compliance report, Switch Breach report and Registry were checked. 3 x RR TR files and 5 x AC rejected files sent were also checked.

Audit commentary

OURP sent 3 RR TR files, all were accepted. The RR TR files were sent within four calendar months. 206 standard switch RR files were received during the audit period 189 were accepted by OURP. The RR files initially rejected by OURP were subsequently accepted. The initial rejection was generated due to OURP using the WASN meter reading in the CS file and the gaining trader wanting to use the other MEP's meter installed at the ICP. The issues were appropriately resolved.

Once the switches were completed OURP immediately nominated WASN as MEP and used readings from the WASN meter from the start of the OURP ICP responsibility. The WASN meter was already installed at the ICP and being read by WASN to retrieve data for use by WEL network.

Checks confirmed compliance with the code requirements.

Audit outcome

Compliant

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

Code reference

Clause 6(2) and (3) Schedule 11.3

Code related audit information

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA, LIS files, Switch Breach report and Registry were checked. 5 ICPs were also checked.

Audit commentary

No RR Files were sent or received by OURP during the audit period relating to this clause. OURP reconciled ICPs as HHR.

Checks confirmed compliance with the code requirements.

Audit outcome

Compliant

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

Code reference

Clause 7 Schedule 11.3

Code related audit information

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

Audit observation

This was discussed with OURP.

Audit commentary

OURP advised they did not have any disputes with any other Traders relating to this clause. OURP confirmed that they would not decline to accept another traders' validated meter reading or permanent estimate if they are reasonable and appropriate in the applicable circumstances. The company will also provide a reasonable explanation to the other participant where it does decline to accept their validated meter reading or permanent estimate.

Audit outcome

Compliant

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

Code reference

Clause 9 Schedule 11.3

Code related audit information

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

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

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

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked. 5 x NTMI files were checked.

Audit commentary

OURP is aware of the requirements of the Fair-Trading Act 1986.

Customers joined OURP via their website. Once the acceptance criteria were met an NTMI file was automatically sent to the Registry within the 2 business day requirement. During the audit period OURP sent 388 x NTMI files with 84 backdated. 5 x backdated NTMI files were checked, and customer issues were found to be the reason for the backdates.

Checks confirmed compliance with the code requirements.

Audit outcome

Compliant

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

Code reference

Clause 10(1) Schedule 11.3

Code related audit information

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

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

or
- *10(1)(c) request that the switch be withdrawn in accordance with clause 17.*

Audit observation

This was discussed with OURP. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked. A sample of 10 x NTMI and related AN and CS files were checked.

Audit commentary

OURP received 477 NTMI files. Checks confirmed the 10 sample AN files were sent automatically to the Registry within five business days and contained the correct information.

The switch breach report identified 1 x switch CS file sent to the Registry greater than 3 business days after the NT file had been received where an AN file had not been sent to the Registry prior.

Audit outcome

Non-compliant

NON-COMPLIANCE

Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 16-Jul-22 To: 31-May-24	1 x switch CS file sent to the Registry greater than 3 business days after the NT file had been received. Potential impact: Low Actual impact: Low Audit history: Several previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. Some improvements can be made to ensure updates to the registry are completed in a timely manner. There was minor impact on settlement outcomes due to the small number of ICPs. Audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Occurred due to exception in system process.	At the time	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process improvements made to flag registry issues which require manual intervention.	June 2023	

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

Code reference

Clause 10(2) Schedule 11.3

Code related audit information

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked. A sample of 10 x NTMI and related AN files were checked.

Audit commentary

OURP received 477 NTMI files. Checks confirmed the ten switch event dates proposed by gaining traders were accepted, the AN sent to the Registry were within the correct timeframes and contained the correct information.

Audit outcome

Compliant

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

Code reference

Clause 11 Schedule 11.3

Code related audit information

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked. A sample of 10 x CS files were checked in the Registry.

Audit commentary

CS files were sent to the Registry automatically. The switch breach report identified one late CS files sent to the Registry, this was dealt with in **section 4.8**. The average daily consumptions were reviewed using the EDA file and an additional 10 x ICPs with 0 kWh were checked. They were found to be due to the ICPs being disconnected vacant. The switch reads were all actual reads with the correct read dates.

Audit outcome

Compliant

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

Code reference

Clause 12 Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

This was discussed with OURP. The switch process was reviewed along with Switch Breach History report for the audit period. The EDA and Registry were also checked. The 4 x RR MI files sent were checked.

Audit commentary

No RR MI files were received during the audit period.

4 RR MI files were sent during the audit period. 3 of the RR files were accepted, 1 RR file was initially rejected but was eventually resolved.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.3

Code related audit information

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

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

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

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

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

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

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

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

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

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

Audit observation

This was discussed with OURP. The switch process was reviewed along with Switch Breach History report for the audit period. The EDA was also checked.

Audit commentary

OURP did not use this switch type during this audit period.

Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 15 Schedule 11.3

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. The switch process was reviewed along with Switch Breach History report for the audit period. The EDA was also checked.

Audit commentary

OURP was not involved in any switch's using this switch type during the audit period.

Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 16 Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

This was discussed with OURP. The switch process was reviewed along with Switch Breach History report for the audit period. The EDA was also checked.

Audit commentary

OURP was not involved in any switch's using this switch type during the audit period.

Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clauses 17 and 18 Schedule 11.3

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA file and Registry were checked. A sample of 10 NW files and 10 AW files were checked.

Audit commentary

OURP sent 64 NW notifications during the audit period:

- CX x 40
- CE x 14
- WP x 1
- DF x 9

Checks confirmed 63 NW notifications met code requirements, 8 were initially rejected and resolved appropriately. The remainder were accepted.

However, 1 NW file was sent late at more than 3 calendar months.

OURP sent 115 AW files to the registry 109 were acceptances with 6 rejections. Checks of the AW files confirmed compliance with the code requirements.

Audit outcome

Non-compliant

NON-COMPLIANCE

Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 & 18 Schedule 11.3 From: 16-Jul-22 To: 31-May-24	1 x switch NW file was sent to the Registry over 3 months after the switch date. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. Some improvements can be made to ensure updates to the registry are completed in a timely manner. There was minor impact on settlement outcomes due to the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Late NW files generally occurred when switch occurred in error (wrong site switched etc).		At the time	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
OURP has stopped switching customers.		June 2023	

4.16. Metering information (Clause 21 Schedule 11.3)

Code reference

Clause 21 Schedule 11.3

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. The Switch process and related meter reading was reviewed. The EDA, Switch Breach History files and Registry were checked. A sample of ten CS meter readings were checked.

Audit commentary

Meter reads are received from MEPs. Meter readings used in the switching process were validated meter readings or estimates (only 6 of the CS sent). The sample found all reads were actual and confirmed code requirements were met.

OURP are aware of the code requirements and understands the obligations with respect to costs.

Audit outcome

Compliant

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

Code reference

Clause 11.15AA to 11.15AC

Code related audit information

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

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

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

Audit observation

This was discussed with OURP.

Audit commentary

OURP states it does not undertake win back activities and is aware of code requirements.

Audit outcome

Compliant

5. MAINTENANCE OF UNMETERED LOAD

5.1. Maintaining shared unmetered load (Clause 11.14)

Code reference

Clause 11.14

Code related audit information

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

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

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

11.14(4) - A distributor who receives such a notification of changes from the trader under (3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared.

11.14(5) - If a distributor becomes aware of any change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change as soon as practicable after that change or decommissioning.

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

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

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

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

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it did not trade shared unmetered load (SUML) or UML of any kind during this audit period. Checks of the LIS file confirmed this.

Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 10.14 (2)(b)

Code related audit information

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

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it did not trade UML of any kind during this audit period. Checks of the LIS file confirmed this.

Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 10.14 (5)

Code related audit information

If the unmetered load limit is exceeded the retailer must:

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

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it did not trade UML of any kind during this audit period. Checks of the LIS file confirmed this.

Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 11 Schedule 15.3, Clause 15.37B

Code related audit information

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

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

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

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it did not trade UML of any kind during this audit period. Checks of the LIS file confirmed this.

Compliance was not assessed.

Audit outcome

Not applicable

6. GATHERING RAW METER DATA

6.1. Electricity conveyed & notification by embedded generators(Clause 10.13, Clause 10.24 and 15.13)

Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

Code related audit information

A participant must use the quantity of electricity measured by a metering installation as the raw meter data for the quantity of electricity conveyed through the point of connection.

This does not apply if data is estimated or gifted in the case of embedded generation under clause 15.13.

A trader must, for each electrically connected ICP that is not also an NSP, and for which it is recorded in the registry as being responsible, ensure that:

- *there is 1 or more metering installations*
- *all electricity conveyed is quantified in accordance with the Code*
- *it does not use subtraction to determine submission information for the purposes of Part 15.*

An embedded generator must give notification to the reconciliation manager for an embedded generating station, if the intention is that the embedded generator will not be receiving payment from the clearing manager or any other person through the point of connection to which the notification relates.

Audit observation

This was discussed with OURP. The LIS file, submission files and Registry were checked.

Audit commentary

OURP stated they did not accept new connections. Checks confirmed this.

All installations traded by OURP were metered. OURP did not use subtraction to determine volume information.

The LIS file identified 25 solar installations. Submission files were checked and confirmed that embedded generation (solar) volumes were submitted correctly.

Audit outcome

Compliant

6.2. Responsibility for metering at GIP(Clause 10.26 (6), (7) and (8))

Code reference

Clause 10.26 (6), (7) and (8)

Code related audit information

For each proposed metering installation or change to a metering installation that is a connection to the grid, the participant, must:

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least 3 months for the grid owner to review and comment on the design*
- *respond within 3 business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

The participant responsible for the metering installation must:

- *advise the reconciliation manager of the certification expiry date not later than 10 business days after certification of the metering installation*
- *become the MEP or contract with a person to be the MEP*
- *advise the reconciliation manager of the MEP identifier no later than 20 days after entering into a contract or assuming responsibility to be the MEP.*

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it does not have any connections to the grid. Checks confirm this.

Compliance was not assessed.

Audit outcome

Not applicable

6.3. Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)

Code reference

Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3

Code related audit information

The reconciliation participant must advise the metering equipment provider if a control device is used to control load or switch meter registers.

The reconciliation participant must ensure the control device is certified prior to using it for reconciliation purposes.

Audit observation

This was discussed with OURP. The LIS file was checked

Audit commentary

Checks confirm OURP submitted volumes to the Reconciliation Manager using the RPS, PV1 and HHR profiles. Control Devices are not required for Reconciliation purposes.

Audit outcome

Compliant

6.4. Reporting of defective metering installations (Clause 10.43(2) and (3))

Code reference

Clause 10.43(2) and (3)

Code related audit information

If a participant becomes aware of an event or circumstance that led it to believe a metering installation could be inaccurate, defective, or not fit for purpose they must:

- *advise the MEP*
- *include in the advice all relevant details.*

Audit observation

This was discussed with OURP.

Audit commentary

A defective metering installation would be identified by reviewing the AMI events, the HHR validation process, checks prior to reconciliation file creation or by the MEP. According to the process OURP would ask the relevant MEP to investigate and for appropriate action to be taken.

OURP did not identify any defective metering installations which would be not fit for purpose during this audit period.

Audit outcome

Compliant

6.5. Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)

Code reference

Clause 2 Schedule 15.2

Code related audit information

Only a certified reconciliation participant may collect raw meter data, unless only the MEP can interrogate the meter, or the MEP has an arrangement which prevents the reconciliation participant from electronically interrogating the meter:

2(2) - The reconciliation participant must collect raw meter data used to determine volume information from the services interface or the metering installation or from the MEP.

2(3) - The reconciliation participant must ensure the interrogation cycle is such that it does not exceed the maximum interrogation cycle in the registry .

2(4) - The reconciliation participant must interrogate the meter at least once every maximum interrogation cycle.

2(5) - When electronically interrogating the meter the participant must:

- a) ensure the system is to within +/- 5 seconds of NZST or NZDST*
- b) compare the meter time to the system time*
- c) determine the time error of the metering installation*
- d) if the error is less than the maximum permitted error, correct the meter's clock*
- e) if the time error is greater than the maximum permitted error then:
 - i) correct the metering installation's clock*
 - ii) compare the metering installation's time with the system time*
 - iii) correct any affected raw meter data.**
- f) download the event log.*

2(6) – The interrogation systems must record:

- the time*
- the date*
- the extent of any change made to the meter clock.*

Audit observation

This was discussed with OURP. The LIS file, MEP Audit Reports were checked.

Audit commentary

OURP has arrangements in place with WASN and NGCM. Raw metering data is collected by the MEPs. The MEPs manage the metering installation clock functions.

Checks of the MEP audit reports confirmed compliance with this code requirement.

Audit outcome

Compliant

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

Code reference

Clause 3(1), 3(2) and 5 Schedule 15.2

Code related audit information

All meter readings must in accordance with the participants certified processes and procedures and using its certified facilities be sourced directly from raw meter data and, if appropriate, be derived and calculated from financial records.

All validated meter readings must be derived from meter readings.

A meter reading provided by a consumer may be used as a validated meter reading only if another set of validated meter readings not provided by the consumer are used during the validation process.

During the manual interrogation of each NHH metering installation the reconciliation participant must:

- a) obtain the meter register*
- b) ensure seals are present and intact*
- c) check for phase failure (if supported by the meter)*
- d) check for signs of tampering and damage*
- e) check for electrically unsafe situations.*

If the relevant parts of the metering installation are visible and it is safe to do so.

Audit observation

This was discussed with OURP. The LIS file and MEP Audit Reports were checked. 5 x ICPs metering data was reviewed.

Audit commentary

OURP has arrangements in place with WASN and NGCM. Raw metering data is collected by the MEPs. Checks on the 5 ICPs metering data confirmed validated readings were derived from meter readings.

Audit outcome

Compliant

6.7. NHH meter reading application (Clause 6 Schedule 15.2)

Code reference

Clause 6 Schedule 15.2

Code related audit information

For NHH switch event meter reads, for the gaining trader the reading applies from 0000 hours on the day of the relevant event date and for the losing trader at 2400 hours at the end of the day before the relevant event date.

In all other cases, All NHH readings apply from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation.

Audit observation

This was discussed with OURP. The Switch process and related meter reading was reviewed. The EDA and Registry were checked. A random sample of 10 x CS meter readings were checked.

Audit commentary

The switch event read from the CS file is used as a start read for gained ICPs. Successive readings from MEPs were used from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation. The sample checks confirmed code compliance

Audit outcome

Compliant

6.8. Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)

Code reference

Clause 7(1) and (2) Schedule 15.2

Code related audit information

Each reconciliation participant must ensure that a validated meter reading is obtained in respect of every meter register for every non half hour metered ICP for which the participant is responsible, at least once during the period of supply to the ICP by the reconciliation participant and used to create volume information.

This may be a validated meter reading at the time the ICP is switched to, or from, the reconciliation participant.

If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 7(1).

Audit observation

This was discussed with OURP. The Switch process was reviewed. The EDA, Switch Breach History files and Registry were checked. A sample of 10 x switched ICP's meter readings were checked.

Audit commentary

Checks confirmed a validated meter reading was obtained at least once during the period of supply and all ICPs were switched on an actual reading.

Audit outcome

Compliant

6.9. NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)

Code reference

Clause 8(1) and (2) Schedule 15.2

Code related audit information

At least once every 12 months, each reconciliation participant must obtain a validated meter reading for every meter register for non-half hour metered ICPs, at which the reconciliation participant trades continuously for each 12 month period.

If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 8(1).

Audit observation

This was discussed with OURP. The EDA file and Registry were checked. A sample of 10 x switched ICP's were checked.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for one reconciliation period only (mostly only a proportion of the period). The Meter Frequency report unfortunately does not contain any meaningful information.

Checks of the EDA file and Registry confirmed there were no ICPs reconciled as NHH for 12 months. All ICPs switched to OURP became HHR immediately or soon after.

Audit outcome

Compliant

6.10. NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)

Code reference

Clause 9(1) and (2) Schedule 15.2

Code related audit information

In relation to each NSP, each reconciliation participant must ensure that for each NHH ICP at which the reconciliation participant trades continuously for each 4 months, for which consumption information is required to be reported into the reconciliation process. A validated meter reading is obtained at least once every 4 months for 90% of the non-half hour metered ICPs.

A report is to be sent to the Authority providing the percentage, in relation to each NSP, for which consumption information has been collected no later than 20 business days after the end of each month.

If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 9(1).

Audit observation

This was discussed with OURP. The EDA file and Registry were checked. A sample of 10 x switched ICP's were checked.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for one reconciliation period only (mostly only a proportion of the period). The Meter Frequency report unfortunately does not contain any meaningful information.

Checks of the EDA file and Registry confirmed there were no ICPs reconciled as NHH for 4 months. All ICPs switched to OURP became HHR immediately or soon after and all ICPs switched out did so on actual reads.

Audit outcome

Compliant

6.11. NHH meter interrogation log (Clause 10 Schedule 15.2)

Code reference

Clause 10 Schedule 15.2

Code related audit information

The following information must be logged as the result of each interrogation of the NHH metering:

10(a) - the means to establish the identity of the individual meter reader

10(b) - the ICP identifier of the ICP, and the meter and register identification

10(c) - the method being used for the interrogation and the device ID of equipment being used for interrogation of the meter.

10(d) - the date and time of the meter interrogation.

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports were checked.

Audit commentary

All raw meter reading information was collected by the MEPs.

ICPs were reconciled as HHR profile. OURP policy was to use WEL metering (WASN MEP) which was all HHR. In the later part of this audit period OURP made an agreement to use AMS meters and data. If NHH ICPs were switched in they had metering changed to HHR immediately, with the final readings used to calculate consumption.

Checks of the MEP audit reports confirmed compliance with this code requirement.

Audit outcome

Compliant

6.12. HHR data collection (Clause 11(1) Schedule 15.2)

Code reference

Clause 11(1) Schedule 15.2

Code related audit information

Raw meter data from all electronically interrogated metering installations must be obtained via the services access interface.

This may be carried out by a portable device or remotely.

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports were checked.

Audit commentary

ICPs were reconciled as HHR profile. OURP policy was to use WEL metering (WASN MEP) which was all HHR. In the later part of this audit period OURP made an agreement to use AMS meters and data.

All raw meter reading information was collected by the MEPs.

Checks of the MEP audit reports confirmed compliance with this code requirement.

Audit outcome

Compliant

6.13. HHR interrogation data requirement (Clause 11(2) Schedule 15.2)

Code reference

Clause 11(2) Schedule 15.2

Code related audit information

The following information is collected during each interrogation:

11(2)(a) - the unique identifier of the data storage device

11(2)(b) - the time from the data storage device at the commencement of the download unless the time is within specification and the interrogation log automatically records the time of interrogation

11(2)(c) - the metering information, which represents the quantity of electricity conveyed at the point of connection, including the date and time stamp or index marker for each half hour period. This may be limited to the metering information accumulated since the last interrogation

11(2)(d) - the event log, which may be limited to the events information accumulated since the last interrogation

11(2)(e) - an interrogation log generated by the interrogation software to record details of all interrogations.

The interrogation log must be examined by the reconciliation participant responsible for collecting the data and appropriate action must be taken if problems are apparent or an automated software function flags exceptions.

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports were checked.

Audit commentary

ICPs were reconciled as HHR profile. OURP policy was to use WEL metering (WASN MEP) which was all HHR. In the later part of this audit period OURP made an agreement to use AMS meters and data.

All raw meter reading information was collected by the MEPs.

Checks of the MEP audit reports confirmed compliance with this code requirement.

Audit outcome

Compliant

6.14. HHR interrogation log requirements (Clause 11(3) Schedule 15.2)

Code reference

Clause 11(3) Schedule 15.2

Code related audit information

The interrogation log forms part of the interrogation audit trail and, as a minimum, must contain the following information:

11(3)(a)- the date of interrogation

11(3)(b)- the time of commencement of interrogation

11(3)(c)- the operator identification (if available)

11(3)(d)- the unique identifier of the meter or data storage device

11(3)(e)- the clock errors outside the range specified in Table 1 of clause 2

11(3)(f)- the method of interrogation

11(3)(g)- the identifier of the reading device used for interrogation (if applicable).

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports were checked.

Audit commentary

ICPs were reconciled as HHR profile. OURP policy was to use WEL metering (WASN MEP) which was all HHR. In the later part of this audit period OURP made an agreement to use AMS meters and data.

All raw meter reading information was collected by the MEPs.

Checks of the MEP audit reports confirmed compliance with this code requirement.

Audit outcome

Compliant

7. STORING RAW METER DATA

7.1. Trading period duration (Clause 13 Schedule 15.2)

Code reference

Clause 13 Schedule 15.2

Code related audit information

The trading period duration, normally 30 minutes, must be within $\pm 0.1\%$ (± 2 seconds).

Audit observation

This was discussed with OURP. The MEP Audit reports were checked, and 5 x meter reading records were checked.

Audit commentary

ICPs were reconciled as HHR profile. OURP policy was to use WEL metering (WASN MEP) which was all HHR. In the later part of this audit period OURP made an agreement to use AMS meters and data.

All raw meter reading information was collected by the MEPs.

Checks of the MEP audit reports, and meter reading records confirmed compliance with this code requirement.

Audit outcome

Compliant

7.2. Archiving and storage of raw meter data (Clause 18 Schedule 15.2)

Code reference

Clause 18 Schedule 15.2

Code related audit information

A reconciliation participant who is responsible for interrogating a metering installation must archive all raw meter data and any changes to the raw meter data for at least 48 months, in accordance with clause 8(6) of Schedule 10.6.

Procedures must be in place to ensure that raw meter data cannot be accessed by unauthorised personnel.

Meter readings cannot be modified without an audit trail being created.

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports were checked.

Audit commentary

Raw meter data is collected by the MEPs and that raw meter data is retained by the MEPs; compliance is assessed as part of their MEP audits.

Checks of the MEP audit reports confirmed compliance with this code requirement.

Audit outcome

Compliant

7.3. Non metering information collected / archived (Clause 21(5) Schedule 15.2)

Code reference

Clause 21(5) Schedule 15.2

Code related audit information

All relevant non-metering information, such as external control equipment operation logs, used in the determination of profile data must be collected, and archived in accordance with clause 18.

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports and Registry were checked.

Audit commentary

Checks confirm OURP submitted volumes to the Reconciliation Manager using the RPS, PV1 and HHR profiles. Control Devices are not required for Reconciliation purposes. Control Devices, operation logs or other profile determination were not used.

This clause is not applicable. Compliance was not assessed

Audit outcome

Not applicable

8. CREATING AND MANAGING (INCLUDING VALIDATING, ESTIMATING, STORING, CORRECTING AND ARCHIVING) VOLUME INFORMATION

8.1. Correction of NHH meter readings (Clause 19(1) Schedule 15.2)

Code reference

Clause 19(1) Schedule 15.2

Code related audit information

If a reconciliation participant detects errors while validating non-half hour meter readings, the reconciliation participant must:

19(1)(a) - confirm the original meter reading by carrying out another meter reading

19(1)(b) - replace the original meter reading the second meter reading (even if the second meter reading is at a different date)

19(1A) if a reconciliation participant detects errors while validating non half hour meter readings, but the reconciliation participant cannot confirm the original meter reading or replace it with a meter reading from another interrogation, the reconciliation participant must:

- *substitute the original meter reading with an estimated reading that is marked as an estimate; and*
- *subsequently replace the estimated reading in accordance with clause 4(2)*

Audit observation

This was discussed with OURP. 5 x ICP NHH estimates were checked, and the GR 170 reports were checked.

Audit commentary

All raw meter reading information was collected by NGCM MEP.

Data validation was in place to identify zero readings high and low consumption for example.

The OURP estimation process was reviewed for 5 ICPs and found to meet requirements.

Audit outcome

Compliant

8.2. Correction of HHR metering information (Clause 19(2) Schedule 15.2)

Code reference

Clause 19(2) Schedule 15.2

Code related audit information

If a reconciliation participant detects errors while validating half hour meter readings, the reconciliation participant must correct the meter readings as follows:

19(2)(a) - if the relevant metering installation has a check meter or data storage device, substitute the original meter reading with data from the check meter or data storage device; or

19(2)(b) - if the relevant metering installation does not have a check meter or data storage device, substitute the original meter reading with data from another period provided:

- (i) *The total of all substituted intervals matches the total consumption recorded on a meter, if available; and*

- (ii) *The reconciliation participant considers the pattern of consumption to be materially similar to the period in error*

Audit observation

This was discussed with OURP. 5 x ICP HHR estimates were checked and the GR 170 and HHRAGGR reports were checked.

Audit commentary

All raw meter reading information was collected by WASN or AMS MEPs.

Data validation was in place to identify zero readings for example.

The OURP estimation process was reviewed for 5 ICPs and found to meet code requirements. Checks of the 5 sample estimates calculated confirmed revision file information was submitted correctly.

Audit outcome

Compliant

8.3. Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)

Code reference

Clause 19(3) Schedule 15.2

Code related audit information

A reconciliation participant may use error compensation and loss compensation as part of the process of determining accurate data. Whichever methodology is used, the reconciliation participant must document the compensation process and comply with audit trail requirements set out in the Code.

Audit observation

This was discussed with OURP. The LIS, MEP Audit reports and Registry were checked.

Audit commentary

OURP has only supplied ICPs with category 1 metering installations.

OURP stated it did not trade any ICPs requiring error or loss compensation. Checks confirm this.

This clause is not applicable. Compliance was not assessed

Audit outcome

Not applicable

8.4. Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)

Code reference

Clause 19(4) and (5) Schedule 15.2

Code related audit information

In correcting a meter reading in accordance with clause 19, the raw meter data must not be overwritten. If the raw meter data and the meter readings are the same, an automatic secure backup of the affected data must be made and archived by the processing or data correction application.

If data is corrected or altered, a journal must be generated and archived with the raw meter data file. The journal must contain the following:

19(5)(a)- the date of the correction or alteration

19(5)(b)- the time of the correction or alteration

19(5)(c)- the operator identifier for the person within the reconciliation participant who made the correction or alteration

19(5)(d)- the half-hour metering data or the non-half hour metering data corrected or altered, and the total difference in volume of such corrected or altered data

19(5)(e)- the technique used to arrive at the corrected data

19(5)(f)- the reason for the correction or alteration.

Audit observation

This was discussed with OURP. The LIS and MEP Audit reports were checked. 5 x ICP HHR and NHH estimates were checked

Audit commentary

Raw meter data is collected by the MEPs and that raw meter data is retained by the MEPs. OURP also holds a copy of the raw meter reading data. Checks confirmed the copy of raw data is maintained unedited.

When estimates or corrections were generated in OURP's system, they were created and saved into the "reconciliation channel estimates table" where the date and time and details of the correction was recorded.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

9. ESTIMATING AND VALIDATING VOLUME INFORMATION

9.1. Identification of readings (Clause 3(3) Schedule 15.2)

Code reference

Clause 3(3) Schedule 15.2

Code related audit information

All estimated readings and permanent estimates must be clearly identified as an estimate at source and in any exchange of metering data or volume information between participants.

Audit observation

This was discussed with OURP. The Submission files, MEP Audit Reports, switching files and the Registry were checked. A sample of 5 x ICPs were checked.

Audit commentary

Meter reading information collected from MEPs was actual and was labelled as such. If Estimated Readings were required they were labelled appropriately as estimated in the OURP system. HHR estimates were clearly labelled as estimates.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

9.2. Derivation of volume information (Clause 3(4) Schedule 15.2)

Code reference

Clause 3(4) Schedule 15.2

Code related audit information

Volume information must be directly derived, in accordance with Schedule 15.2, from:

3(4)(a) - validated meter readings

3(4)(b) - estimated readings

3(4)(c) - permanent estimates.

Audit observation

This was discussed with OURP. The Submission files, MEP Audit Reports, switching files and the Registry were checked. A sample of 5 x ICPs were checked.

Audit commentary

Raw meter data is collected by the MEPs. Meter reading information collected from MEPs was actual and was labelled as such. OURP did not use any manual readings, accept customer, or photo readings. Volume information was derived from validated meter reading information provided by the MEPs. If Estimated Readings were required they were labelled appropriately as estimated in the OURP system. The OURP system had the functionality to use both validated and estimated readings to create reconciliation files.

Checks confirmed compliance with this code requirement.

Audit outcome

[Click here to choose outcome from the drop down list.](#)

9.3. Meter data used to derive volume information (Clause 3(5) Schedule 15.2)

Code reference

Clause 3(5) Schedule 15.2

Code related audit information

All meter data that is used to derive volume information must not be rounded or truncated from the stored data from the metering installation.

Audit observation

This was discussed with OURP. The Submission files, MEP Audit Reports, switching files and the Registry were checked. A sample of 5 x ICPs were checked.

Audit commentary

Raw meter data is collected by the MEPs and that raw meter data is retained by the MEPs. OURP also holds a copy of the raw meter reading data. Checks confirmed the copy of raw data is maintained unedited and was not rounded or truncated when imported into the OURP system.

Data was not rounded or truncated by OURP until the submission files were produced, rounding to two decimal places was applied.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

9.4. Half hour estimates (Clause 15 Schedule 15.2)

Code reference

Clause 15 Schedule 15.2

Code related audit information

If a reconciliation participant is unable to interrogate an electronically interrogated metering installation before the deadline for providing submission information, the submission to the reconciliation manager must be the reconciliation participant's best estimate of the quantity of electricity that was purchased or sold in each trading period during any applicable consumption period for that metering installation.

The reconciliation participant must use reasonable endeavours to ensure that estimated submission information is within the percentage specified by the Authority.

Audit observation

This was discussed with OURP. The Submission files, MEP Audit Reports, switching files and the Registry were checked. A sample of 5 x ICP HHR estimates were checked

Audit commentary

Where the validation process identified trading period data missing a manual process was used to create estimated data for those periods. The most appropriate estimation method was selected depending on how much data needed to be estimated. The estimates were based on adjacent data and profile.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

9.5. NHH metering information data validation (Clause 16 Schedule 15.2)

Code reference

Clause 16 Schedule 15.2

Code related audit information

Each validity check of non-half hour meter readings and estimated readings must include the following:

16(2)(a) - confirmation that the meter reading or estimated reading relates to the correct ICP, meter, and register

16(2)(b) - checks for invalid dates and times

16(2)(c) - confirmation that the meter reading or estimated reading lies within an acceptable range compared with the expected pattern, previous pattern, or trend

16(2)(d) - confirmation that there is no obvious corruption of the data, including unexpected 0 values.

Audit observation

This was discussed with OURP. The Submission files, MEP Audit Reports and the Registry were checked. A sample of 5 x ICPs were checked.

Audit commentary

Raw meter data is collected by the MEPs and that raw meter data is retained by the MEPs. OURP also holds a copy of the raw meter reading data. When data was imported into the OURP system ICP numbers, meter serial numbers, and number of registers, invalid dates and times were checked against OURP system data.

Data validation was in place to identify issues such as zero readings, high and low consumption and unexpected values. Data that failed validation settings were identified by colour codes and reviewed.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

9.6. Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)

Code reference

Clause 17 Schedule 15.2

Code related audit information

Each validity check of electronically interrogated meter readings and estimate readings must be at a frequency that will allow a further interrogation of the data storage device before the data is overwritten within the data storage device and before this data can be used for any purpose under the Code.

Each validity check of a meter reading obtained by electronic interrogation, or an estimated reading must include:

17(4)(a) - checks for missing data

17(4)(b) - checks for invalid dates and times

17(4)(c) - checks of unexpected 0 values

17(4)(d) - comparison with expected or previous flow patterns

17(4)(e) - comparisons of meter readings with data on any data storage device registers that are available

17(4)(f) - a review of the meter and data storage device event log for any event that could have affected the integrity of metering data

17(4)(g) – a review of the relevant metering data where there is an event that could have affected the integrity of the metering data

If there is an event that could affect the integrity of the metering data (including events reported by MEPs but excluding where the MEP is responsible for investigating and remediating the event) the reconciliation must investigate and remediate any events.

If the event may affect the integrity or operation of the metering installation the reconciliation participant must notify the metering equipment provider.

Audit observation

This was discussed with OURP. The Submission files, MEP Audit Reports and the Registry were checked. A sample of 5 x ICPs were checked.

Audit commentary

Raw meter data is collected electronically and remotely by the MEPs and that raw meter data is retained by the MEPs. OURP also holds a copy of the raw meter reading data. When data was imported into the OURP system ICP numbers, meter serial numbers, and number of registers, invalid dates and times were checked against OURP system data. Data would not import if this data could not be validated.

In addition, validation rules identified; missing data, unexpected zero values, unexpected consumption patterns (e.g. high, low, negative), variation between register and interval data.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

10. PROVISION OF METERING INFORMATION TO THE GRID OWNER IN ACCORDANCE WITH SUBPART 4 OF PART 13 (CLAUSE 15.38(1)(F))

10.1. Generators to provide HHR metering information (Clause 13.136)

Code reference

Clause 13.136

Code related audit information

The generator (and/or embedded generator) must provide to the grid owner connected to the local network in which the embedded generator is located, half hour metering information in accordance with clause 13.138 in relation to generating plant that is subject to a dispatch instruction:

- *that injects electricity directly into a local network; or*
- *if the meter configuration is such that the electricity flows into a local network without first passing through a grid injection point or grid exit point metering installation.*

Audit observation

This was discussed with OURP. The LIS, submission files and Registry were checked.

Audit commentary

OURP stated it did not ~~not~~ operate any generation. Checks confirmed this.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

10.2. Unoffered & intermittent generation provision of metering information (Clause 13.137)

Code reference

Clause 13.137

Code related audit information

Each generator must provide the relevant grid owner half-hour metering information for:

- *any unoffered generation from a generating station with a point of connection to the grid 13.137(1)(a)*
- *any electricity supplied from an intermittent generating station with a point of connection to the grid. 13.137(1)(b)*

The generator must provide the relevant grid owner with the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of that generator's volume information. (clause 13.137(2))

If such half-hour metering information is not available, the generator must provide the pricing manager and the relevant grid owner a reasonable estimate of such data. (clause 13.137(3))

Audit observation

This was discussed with OURP. The LIS, submission files and Registry were checked.

Audit commentary

OURP stated it did not operate any generation. Checks confirmed this.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

10.3. Loss adjustment of HHR metering information (Clause 13.138)

Code reference

Clause 13.138

Code related audit information

The generator must provide the information required by clauses 13.136 and 13.137,

13.138(1)(a)- adjusted for losses (if any) relative to the grid injection point or, for embedded generators the grid exit point, at which it offered the electricity

13.138(1)(b)- in the manner and form that the pricing manager stipulates

13.138(1)(c)- by 0500 hours on a trading day for each trading period of the previous trading day.

The generator must provide the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of the generator's volume information.

Audit observation

This was discussed with OURP. The LIS, submission files and Registry were checked.

Audit commentary

OURP stated it did not operate any generation. Checks confirmed this.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

10.4. Notification of the provision of HHR metering information (Clause 13.140)

Code reference

Clause 13.140

Code related audit information

If the generator provides half-hourly metering information to a grid owner under clauses 13.136 to 13.138, or 13.138A, it must also, by 0500 hours of that day, advise the relevant grid owner.

Audit observation

This was discussed with OURP. The LIS, submission files and Registry were checked.

Audit commentary

OURP stated it did not operate any generation. Checks confirmed this.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

11.1. Buying and selling notifications (Clause 15.3)

Code reference

Clause 15.3

Code related audit information

Unless an embedded generator has given a notification in respect of the point of connection under clause 15.3, a trader must give notice to the reconciliation manager if it is to commence or cease trading electricity at a point of connection using a profile with a profile code other than HHR, RPS, UML, EG1, or PV1 at least five business days before commencing or ceasing trader.

The notification must comply with any procedures or requirements specified by the reconciliation manager.

Audit observation

This was discussed with OURP. The LIS, submission files and Registry were checked.

Audit commentary

Checks confirm OURP submitted volumes to the Reconciliation Manager using the RPS, PV1 and HHR profiles.

OURP did not give Notice to the Reconciliation Manager for this clause as it was not required for these profiles.

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

11.2. Calculation of ICP days (Clause 15.6)

Code reference

Clause 15.6

Code related audit information

Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of:

15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

The ICP days information must be calculated using the data contained in the retailer or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.

Audit observation

This was discussed with OURP. The ICPDAYS (AV-110) files and ICPCOMP (GR- 100) files for the audit period were checked.

Audit commentary

The table below shows the minor variances between The OURP system, and the Registry calculated ICPDAYS:

Month	R0	R1	R3	R7	R14
Jul 22	-0.03	-0.01	0.00	0.00	0.00
Aug 22	-0.03	-0.02	0.02	0.00	0.00
Sept 22	-0.03	-0.05	0.00	0.00	0.00
Oct 22	0.06	0.03	0.00	0.00	0.00
Nov 22	0.02	0.01	0.00	0.00	0.00
Dec 22	0.02	0.00	0.00	0.00	0.00
Jan 23	0.00	0.00	0.00	0.00	0.00
Feb 23	0.00	0.05	0.00	0.00	0.00
Mar 23	0.00	0.00	0.00	0.00	0.00
Apr 23	0.03	0.00	0.00	0.00	0.00
May 23	0.00	0.00	0.00	0.00	0.00

OURP advise the main reason for the minor variances is because OURP did not submit data for Inactive ICPs as volume was 0 kWh.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

11.3. Electricity supplied information provision to the reconciliation manager (Clause 15.7)

Code reference

Clause 15.7

Code related audit information

A retailer must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each NSP, aggregated by invoice month, for which it has provided submission information to the reconciliation manager, including revised submission information for that period as non-loss adjusted values in respect of:

15.7(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

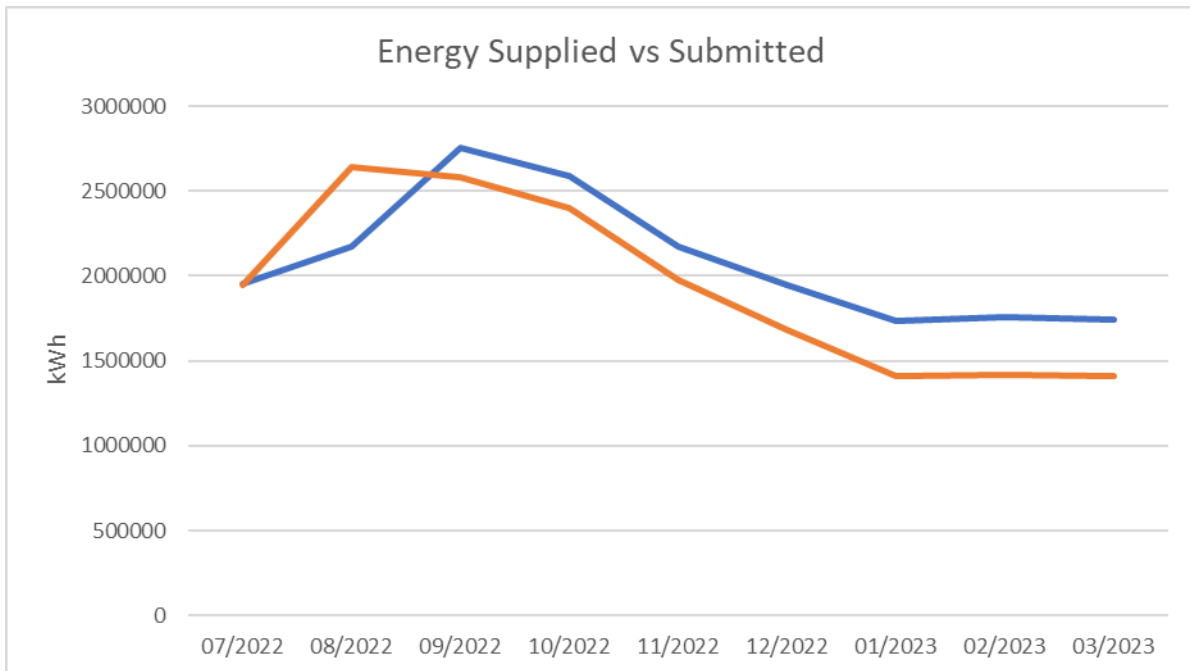
15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

Audit observation

This was discussed with OURP. BILLED files and reconciliation submission files between for the audit period were reviewed.

Audit commentary

The chart below identifies supplied against submissions between July 2022 and March 2023.



OURP invoiced customers daily and produced statements weekly. An AV-120 file was produced each day as a running total from the start of the month with the month end report submitted.

Audit outcome

Compliant

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

Code reference

Clause 15.8

Code related audit information

A retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each half hourly metered ICP for which it has provided submission information to the reconciliation manager, including:

15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

Audit observation

This was discussed with OURP. 5 x submissions of HHRAGGR and HHRVOLS files were compared, and 2 x ICPs HHR data checked end to end. The GR-90 ICP missing files for the audit period and the Registry were checked.

Audit commentary

The HHRAGGR and HHRVOLS file were examined between July and November 2022 to identify any discrepancies, there were only very minor differences between the data.

Month	HHRAGGR	HHRVOLS	% Diff	Missing ICPs
Jul-22	2451977	2454137	-0.09	24
Aug-22	2338713	2339881	-0.05	22
Sep-22	2113740	2113680	0.00	22
Oct-22	1861746	1860270	0.08	20
Nov-22	1603968	1601685	0.14	38

Further checks on the missing ICPs found they were caused by late switches or disconnected ICPs.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

12. SUBMISSION COMPUTATION

12.1. Daylight saving adjustment (Clause 15.36)

Code reference

Clause 15.36

Code related audit information

The reconciliation participant must provide submission information to the reconciliation manager that is adjusted for NZDT using 1 of the techniques set out in clause 15.36(3) specified by the Authority.

Audit observation

This was discussed with OURP. The MEP Audit Reports were checked.

Audit commentary

OURP has arrangements in place with WASN and NGCM. Raw metering data is collected by the MEPs.

The MEPs provide HHR data that is adjusted for NZDT. The “trading period run on” technique was used for daylight saving adjustment.

A review of the MEP audit reports confirmed that daylight savings adjustment techniques meet code requirements.

Audit outcome

Compliant

12.2. Creation of submission information (Clause 15.4)

Code reference

Clause 15.4

Code related audit information

By 1600 hours on the 4th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all NSPs for which the reconciliation participant is recorded in the registry as having traded electricity during the consumption period immediately before that reconciliation period (in accordance with Schedule 15.3).

By 1600 hours on the 13th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all points of connection for which the reconciliation participant is recorded in the registry as having traded electricity during any consumption period being reconciled in accordance with clauses 15.27 and 15.28, and in respect of which it has obtained revised submission information (in accordance with Schedule 15.3).

Audit observation

This was discussed with OURP. Submission files were checked. Checks for late file breaches were also made.

Audit commentary

No breaches or alleged breaches were identified during this audit period.

Checks confirmed that all submission files including revisions were submitted as required by the code.

Audit outcome

Compliant

12.3. Allocation of submission information (Clause 15.5)

Code reference

Clause 15.5

Code related audit information

In preparing and submitting submission information, the reconciliation participant must allocate volume information for each ICP to the NSP indicated by the data held in the registry for the relevant consumption period at the time the reconciliation participant assembles the submission information. Volume information must be derived in accordance with Schedule 15.2.

However, if, in relation to a point of connection at which the reconciliation participant trades electricity, a notification given by an embedded generator under clause 15.13 for an embedded generating station is in force, the reconciliation participant is not required to comply with the above in relation to electricity generated by the embedded generating station.

Audit observation

This was discussed with OURP. Submission files were checked along with GR-100,GR-090 and GR-170 files.

Audit commentary

A check of the monthly Submission Summary Reports confirmed ICPs, and consumption volume was allocated to the correct NSPs. Volume submissions compared to GR-170 files confirmed NSP allocations were matched, and NSPs with no ICPs appropriately identified zero volume.

Audit outcome

Compliant

12.4. Grid owner volumes information (Clause 15.9)

Code reference

Clause 15.9

Code related audit information

The participant (if a grid owner) must deliver to the reconciliation manager for each point of connection for all of its GXPs, the following:

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.9(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.9(b))*

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it is not a grid owner.

This clause is not applicable. Compliance was not assessed

Audit outcome

Compliant

12.5. Provision of NSP submission information (Clause 15.10)

Code reference

Clause 15.10

Code related audit information

The participant (if a local or embedded network owner) must provide to the reconciliation manager for each NSP for which the participant has given a notification under clause 25(1) Schedule 11.1 (which relates to the creation, decommissioning, and transfer of NSPs) the following:

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.10(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.10(b))*

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it was not an Embedded Network owner.

This clause is not applicable. Compliance was not assessed

Audit outcome

Not applicable

12.6. Grid connected generation (Clause 15.11)

Code reference

Clause 15.11

Code related audit information

The participant (if a grid connected generator) must deliver to the reconciliation manager for each of its points of connection, the following:

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.11(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.11(b))*

Audit observation

This was discussed with OURP. The LIS file was checked.

Audit commentary

OURP stated it was not a grid connected generator owner or operator.

This clause is not applicable. Compliance was not assessed

Audit outcome

Not applicable

12.7. Accuracy of submission information (Clause 15.12)

Code reference

Clause 15.12

Code related audit information

If the reconciliation participant has submitted information and then subsequently obtained more accurate information, the participant must provide the most accurate information available to the reconciliation manager or participant, as the case may be, at the next available opportunity for submission (in accordance with clauses 15.20A, 15.27, and 15.28).

Audit observation

This was discussed with OURP. Checks for late or inaccurate file breaches were also made.

Audit commentary

The following accuracy breaches were actually only one breach, and it was initially self-reported and addressed during the audit period. A second breach was raised by the RM for the same issue:

Reference	Date	Clause	Breach
2209OURP1	27 September 2022	Part 15 Clause 15.2(1)(a)	NHHVols file 16 September contained a volume error (August 2022 R1)
2210OURP1	14 October 2022	Part 15 Clause 15.2(1)(a)	OURP made incorrect NHH volume submissions for August 2022 R1

OPURP began accepting metering data from NGCM around this time, rather than displacing their meters. Unfortunately, when the ICPs were changed to HHR profile for R1 the OURP system did not remove the volume from the NHH files which was then submitted as well as the HHR volume.

The issue was subsequently corrected for future submissions.

Audit outcome

Non-compliant

NON-COMPLIANCE

Non-compliance	Description
Audit Ref: 12.7 With: Clause 15.12 From: 16-Jul-22 To: 31-May-24	1 x NHHVOLs file contained volume errors during the audit period. Potential impact: Low Actual impact: Low Audit history: once previously Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	The controls are rated as moderate because they mitigated risk most of the time. However, system improvements had to be made to ensure submissions to the RM were accurate going forward. There was minor impact on settlement outcomes due to the small number of ICPs and volume involved. Audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Both breachers relate to August 2022 R1 file – so only 1 error, not 2. Error was caused by a one-off circumstance when an issue reading automated meter read file into system caused them to be submitted NHH in R0 file, then corrected in R1 file to HHR. NHH R1 file was not correctly updated to remove data.	Sept 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Checks on subsequent Meter read files and correction to database to ensure future submissions did not duplicate meter reads for these meters.	On going until June 2023	

12.8. Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)

Code reference

Clause 4 Schedule 15.2

Code related audit information

Only volume information created using validated meter readings, or if such values are unavailable, permanent estimates, has permanence within the reconciliation processes (unless subsequently found to be in error).

The relevant reconciliation participant must, at the earliest opportunity, and no later than the month 14 revision cycle, replace volume information created using estimated readings with volume information created using validated meter readings.

If, despite having used reasonable endeavours for at least 12 months, a reconciliation participant has been unable to obtain a validated meter reading, the reconciliation participant must replace volume information created using an estimated reading with volume information created using a permanent estimate in place of a validated meter reading.

Audit observation

This was discussed with OURP. The EDA file and Registry were checked.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR.

Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for less than one reconciliation period only.

Checks of the EDA file and Registry confirmed there were no ICPs reconciled as NHH for 4 months. All ICPs switched to OURP became HHR immediately or soon after and all ICPs switched out did so on actual reads.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

12.9. Reconciliation participants to prepare information (Clause 2 Schedule 15.3)

Code reference

Clause 2 Schedule 15.3

Code related audit information

If a reconciliation participant prepares submission information for each NSP for the relevant consumption periods in accordance with the Code, such submission information for each ICP must comprise the following:

- *half hour volume information for the total metered quantity of electricity for each ICP notified in accordance with clause 11.7(2) for which there is a category 3 or higher metering installation (clause 2(1)(a)) for each ICP about which information is provided under clause 11.7(2) for which there is a category 1 or category 2 metering installation (clause 2(1)(ac) to 2(1)(ae)):*
 - a) *any half hour volume information for the ICP; or*
 - b) *any non-half hour volumes information calculated under clauses 4 to 6 (as applicable).*
 - c) *unmetered load quantities for each ICP that has unmetered load associated with it derived from the quantity recorded in the registry against the relevant ICP and the number of days in the period, the distributed unmetered load database, or other sources of relevant information. (clause 2(1)(c))*
- *to create non half hour submission information a reconciliation participant must only use information that is dependent on a control device if (clause 2(2)):*
 - a) *the certification of the control device is recorded in the registry; or*
 - b) *the metering installation in which the control device is location has interim certification.*
- *to create submission information for a point of connection the reconciliation participant must use volume information (clause 2(3))*
- *to calculate volume information the reconciliation participant must apply raw meter data :*
 - a) *for each ICP, the compensation factor that is recorded in the registry (clause 2(4)(a))*
 - b) *for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(4)(b))*

Audit observation

This was discussed with OURP. Submission files were checked along with the LIS file.

Audit commentary

Checks confirm OURP submitted volume submissions to the Reconciliation Manager using the RPS, PV1 and HHR Profiles. Control Devices, operation logs or other profile determination were not used to create volumes. Loss or compensation arrangements were not required.

OURP stated they did not trade any Shared UML or UML during this this audit period, checks confirmed this

Checks using the above information confirmed all ICP consumption volume was submitted that OURP was responsible for during the audit period.

Audit outcome

Compliant

12.10. Historical estimates and forward estimates (Clause 3 Schedule 15.3)

Code reference

Clause 3 Schedule 15.3

Code related audit information

For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the following techniques to create historical estimates and forward estimates. (clause 3(1))

Each estimate that is a forward estimate or a historical estimate must clearly be identified as such. (clause 3(2))

If validated meter readings are not available for the purpose of clauses 4 and 5, permanent estimates may be used in place of validated meter readings. (clause 3(3))

Audit observation

This was discussed with OURP. Submission files including revisions were checked along with the LIS file. 5 x ICP estimates were checked.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for less than one reconciliation period only. The NHH consumption was calculated by subtracting the switch event meter reading (CS file) from the NHH meter removal reading. This process ceased in August 2022 as AMS meter reading data was accepted.

Where meter reading data was not available estimates were made.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

12.11. Historical estimate process (Clause 4 and 5 Schedule 15.3)

Code reference

Clause 4 and 5 Schedule 15.3

Code related audit information

The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historic estimates of volume information for each ICP when the relevant seasonal adjustment shape is available.

If a seasonal adjustment shape is not available, the methodology for preparing an historical estimate of volume information for each ICP must be the same as in clause 4, except that the relevant quantities kWh_{Px} must be prorated as determined by the reconciliation participant using its own methodology or on a flat shape basis using the relevant number of days that are within the consumption period and within the period covered by kWh_{Px}.

Audit observation

This was discussed with OURP. Submission files including revisions were checked along with the LIS file. 5 x ICP estimates were checked.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for less than one reconciliation period only. The NHH consumption was calculated by subtracting the switch event meter reading (CS file) from the NHH meter removal reading. This process ceased in August 2022 as AMS meter reading data was accepted.

Checks confirmed historical estimates were calculated automatically based on a flat profile.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

12.12. Forward estimate process (Clause 6 Schedule 15.3)

Code reference

Clause 6 Schedule 15.3

Code related audit information

Forward estimates may be used only in respect of any period for which an historical estimate cannot be calculated.

The methodology used for calculating a forward estimate may be determined by the reconciliation participant, only if it ensures that the accuracy is within the percentage of error specified by the Authority.

Audit observation

This was discussed with OURP. Submission files including revisions were checked along with the LIS file. 5 x ICP estimates were checked.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for less than one reconciliation period only. The NHH consumption was calculated by subtracting the switch event meter reading (CS file) from the NHH meter removal reading. This process ceased in August 2022 as AMS meter reading data was accepted.

Forward estimates were based on the average daily consumption from the CS files after they were assessed for reasonableness. If the CS file data was not suitable a default value was used.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

12.13. Compulsory meter reading after profile change (Clause 7 Schedule 15.3)

Code reference

Clause 7 Schedule 15.3

Code related audit information

If the reconciliation participant changes the profile associated with a meter, it must, when determining the volume information for that meter and its respective ICP, use a validated meter reading or permanent estimate on the day on which the profile change is to take effect.

The reconciliation participant must use the volume information from that validated meter reading or permanent estimate in calculating the relevant historical estimates of each profile for that meter.

Audit observation

This was discussed with OURP. Submission files, the EDA and LIS files along with the Registry were checked for the audit period.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for less than one reconciliation period only. The NHH consumption was calculated by subtracting the switch event meter reading (CS file) from the NHH meter removal reading. This process ceased in August 2022 as AMS meter reading data was accepted.

When a meter was changed, and the profile was changed from RPS to HHR the meter removal reading was used.

Checks confirmed compliance with this code requirement.

Audit outcome

Compliant

13. SUBMISSION FORMAT AND TIMING

13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3)

Code reference

Clause 8 Schedule 15.3

Code related audit information

For each category 3 of higher metering installation, a reconciliation participant must provide half hour submission information to the reconciliation manager.

For each category 1 or category 2 metering installation, a reconciliation participant must provide to the reconciliation manager:

- *Half hour submission information; or*
- *Non half hour submission information; or*
- *A combination of half hour submission information and non-half hour submission information*

However, a reconciliation participant may instead use a profile if:

- *The reconciliation participant is using a profile approved in accordance with clause Schedule 15.5; and*
- *The approved profile allows the reconciliation participant to provide half hour submission information from a non-half hour metering installation; and*
- *The reconciliation participant provides submission information that complies with the requirements set out in the approved profile.*

Half hour submission information provided to the reconciliation manager must be aggregated to the following levels:

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

The non-half hour submission information that a reconciliation participant submits must be aggregated to the following levels:

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

Audit observation

This was discussed with OURP. Submission files including revisions were checked along with the LIS file.

Audit commentary

NHHVOLS submission files were checked, and it was verified that the format of submission files was compliant. Submission information was provided to the reconciliation manager in the appropriate format and aggregated correctly by:

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

HHRVOLS submission files were checked, and it was verified that the format of submission files was compliant.

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

OURP stated they did not trade any Shared UML or UML during this this audit period, checks confirm this.

Checks using the above information confirmed all ICP consumption volume was submitted that OURP was responsible for during the audit period.

Audit outcome

Compliant

13.2. Reporting resolution (Clause 9 Schedule 15.3)

Code reference

Clause 9 Schedule 15.3

Code related audit information

When reporting submission information, the number of decimal places must be rounded to not more than 2 decimal places.

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

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

Audit observation

This was discussed with OURP. Submission files including revisions were checked along with the EDA and LIS files.

Audit commentary

Data was not rounded or truncated by OURP until the submission files were produced. rounding to two decimal places was applied.

Checks of the submission information confirmed it was appropriately rounded to no more than two decimal places using the method prescribed by the code.

Audit outcome

Compliant

13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)

Code reference

Clause 10 Schedule 15.3

Code related audit information

By 1600 hours on the 13th business day of each reconciliation period the reconciliation participant must report to the reconciliation manager the proportion of historical estimates per NSP contained within its non-half hour submission information.

The proportion of submission information per NSP that is comprised of historical estimates must (unless exceptional circumstances exist) be:

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*
- *100% for revised data provided at the month 14 revision. (clause 10(3)(c))*

Audit observation

This was discussed with OURP. Submission files including revisions were checked along with the GR-170 NHH files for the audit period.

Audit commentary

ICPs were reconciled as HHR profile. When ICPs are switched in they either already have HHR data available and could be reconciled as HHR immediately or they had metering changed to HHR. Meter changes typically took less than a month so an ICP would typically be reconciled as NHH for less than one reconciliation period only.

Checks confirm revision submissions met code requirement.

Audit outcome

Compliant

CONCLUSION

See Executive Summary

PARTICIPANT RESPONSE

