

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

CLUTHA DISTRICT COUNCIL AND
MERIDIAN ENERGY LIMITED
NBZN: 9429037696863

Prepared by: Steve Woods

Date audit commenced: 1 July 2024

Date audit report completed: 15 August 2024

Audit report due date: 19 August 2024

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EXECUTIVE SUMMARY

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

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

The database is remotely hosted by thinkproject New Zealand Ltd. Network Electrical Servicing Ltd (NES) is the maintenance contractor. RAMM updates are conducted manually for replacements, and directly into RAMM from the field via Pocket RAMM for new lights. A monthly report from RAMM is provided to Meridian to calculate the kW value.

Meridian reconciles this DUML load using the DST profile. Submissions are based on the database information, with on and off times derived from data logger information.

I compared the database provided to the capacity information Meridian supplied to EMS for the month of June 2024 and I confirm the submission is accurate.

The field audit was undertaken of a statistical sample of 199 items of load. The field audit confirmed that the database accuracy cannot be confirmed to be within the allowable +/-5% threshold. There is potential under submission of 1,100 kWh per annum.

This audit found four non-compliances. The future risk rating of four indicates that the next audit be completed in 24 months. I agree with this recommendation.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	<p>The database cannot be confirmed as accurate to within +/- . 5% based on the field audit. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates.</p> <p>The data used for submission does not track changes at a daily basis and is provided as a snapshot.</p>	Strong	Low	1	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	Four additional items of load were found in the field of the 199 items of load sampled.	Strong	Low	1	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	The database cannot be confirmed as accurate to within +/- . 5% based on the field audit. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates.	Strong	Low	1	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database cannot be confirmed as accurate to within +/- 5% based on the field audit. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates. The data used for submission does not track changes at a daily basis and is provided as a snapshot.	Strong	Low	1	Identified
Future Risk Rating						4	

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

RECOMMENDATIONS

Subject	Section	Description	Recommendation
			Nil

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

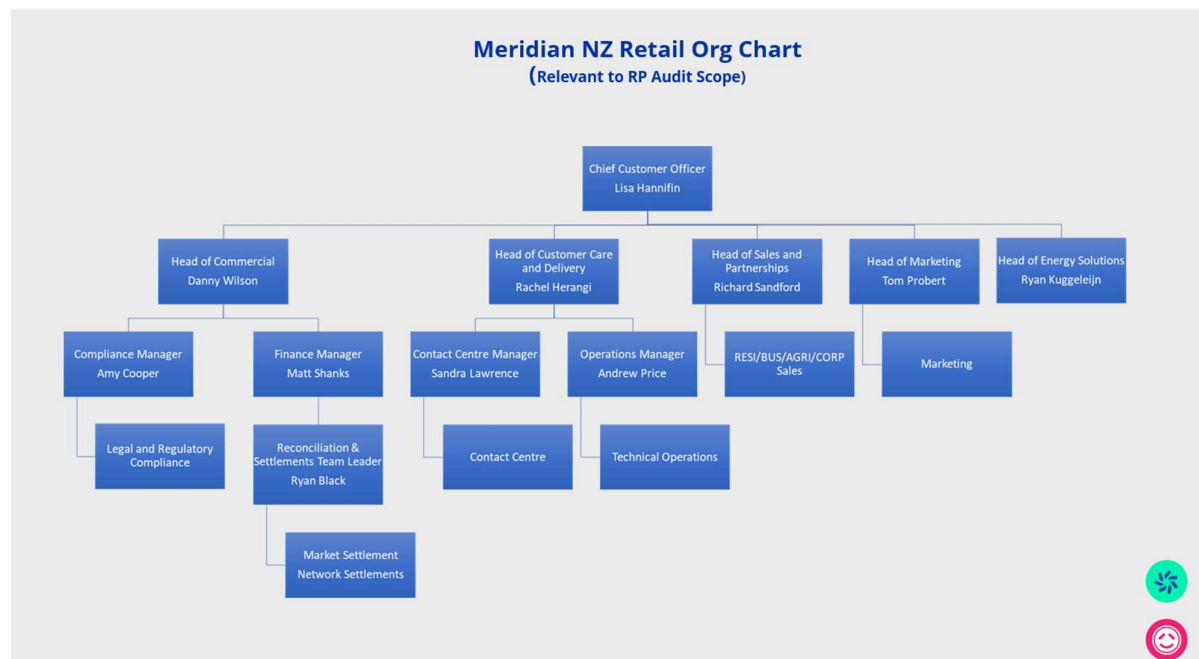
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

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

1.2. Structure of Organisation

Meridian provided a copy of their organisational structure:



1.3. Persons involved in this audit

Auditor:

Name	Company	Role
Steve Woods	Veritek Limited	Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Melanie Mathews	Quality and Compliance Advisor	Meridian Energy
Pierre Kotzé	Road Asset Management Officer	Clutha DC
Trudy Stevenson		Network Electrical Servicing

1.4. Hardware and Software

The SQL database used for the management of DUML is remotely hosted by thinkproject New Zealand Limited. The database is commonly known as “RAMM” which stands for “Road Assessment and Maintenance Management”. The specific data used for DUML is held in the Streetlight tables. thinkproject New Zealand Limited backs up the database and assists with disaster recovery as part of their hosting service.

Database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

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

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000207893DE37B	Waipori Falls	10	240	10	240
0001982479TGE75	CDC Streetlights	1,717	90,478	1,604	89,205
0008801005TPE67	CDC Lights Urban	143	5,893	120	5,443
0008801015TP4CA	CDC Lights Rural	63	3,309	49	4,239
TOTAL				1,783	1,933

1.7. Authorisation Received

All information was provided directly by Meridian and CDC.

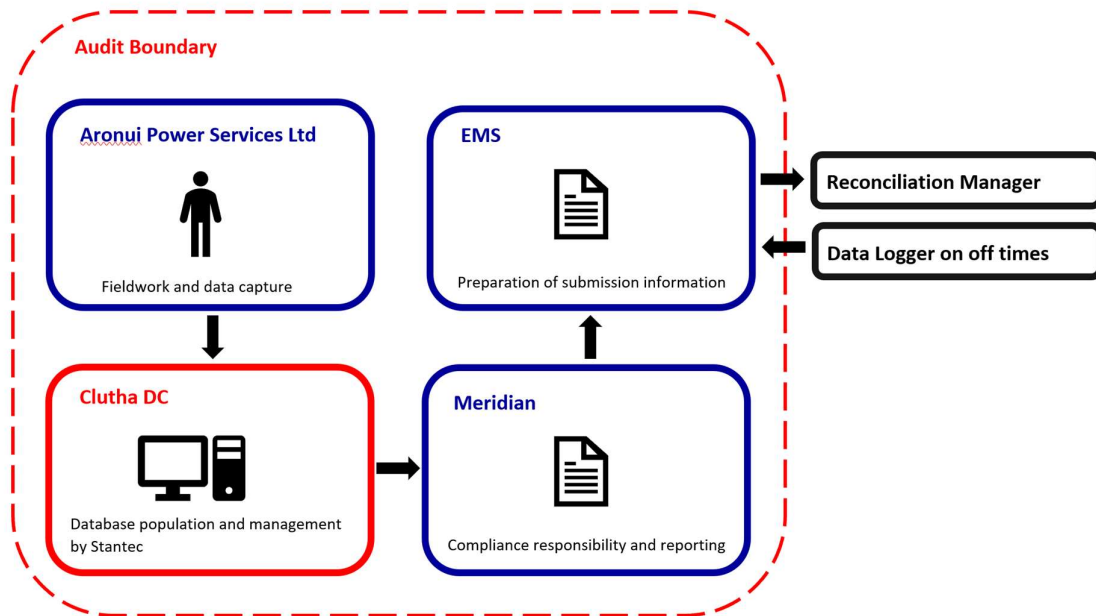
1.8. Scope of Audit

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

A RAMM database is held by CDC, who is Meridian’s customer. Network Electrical Servicing Ltd (NES) is the maintenance contractor. RAMM updates are conducted manually for replacements, and directly into RAMM from the field via Pocket RAMM for new lights.

Meridian submits the DUML load as NHH using the DST profile. The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian’s reconciliation participant audit and the EMS agent audit.

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



The field audit was undertaken of a statistical sample of 199 items of load in July 2024.

1.9. Summary of previous audit

The previous audit was conducted in August 2022 by Rebecca Elliot of Veritek. The summary table below shows the statuses of the non-compliances raised in the previous audit. Further comment is made in the relevant sections of this report.

Subject	Section	Clause	Non-Compliance	Status
Deriving submission information	2.1	11(1) of schedule 15.3	The database contains incorrect wattage and ballast wattage for eight items of load, resulting in under submission of 2,665 kWh per annum. The data used for submission does not track changes at a daily basis and is provided as a snapshot.	Cleared Still existing
ICP identifier and items of load	2.2	11(2)(a) and (aa) of schedule 15.3	One item of load with no ICP recorded.	Cleared
Description and capacity of load	2.4	11(2)(c) and (d) of schedule 15.3	Four items of load do not have lamp model, wattage or gear wattage recorded. Two items of load do not have lamp make or lamp model recorded. 13 items of load have the incorrect gear model recorded.	Cleared
All load recorded in database	2.5	11(2A) of schedule 15.3	Three additional items of load found in the field of the sample examined.	Cleared
Database accuracy	3.1	15.2 and 15.37B(b)	The database contains incorrect wattage and ballast wattage for eight items of load, resulting in under submission of 2,665 kWh per annum. 13 items of load with the incorrect gear model recorded.	Cleared
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database contains incorrect wattage and ballast wattage for eight items of load, resulting in under submission of 2,665 kWh per annum. The data used for submission does not track changes at a daily basis and is provided as a snapshot.	Cleared Still existing

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Meridian have requested Veritek to undertake this streetlight audit.

Audit commentary

This audit report demonstrates that the audit was conducted as required by this clause.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

The process for calculation of consumption was examined.

Audit commentary

This clause requires that the distributed unmetered load database must satisfy the requirements of schedule 15.5 regarding the methodology for deriving submission information.

A monthly report from the database is provided to Meridian and is used to calculate submissions. Meridian submits the DUML load as NHH using the DST profile. The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian's reconciliation participant audit and the EMS agent audit.

The capacities supplied to EMS for June 2024 were checked and confirmed to be accurate.

The field audit found that the database cannot be confirmed as accurate to within the allowable +/-5% threshold. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates.

On 18 June 2019, the Electricity Authority issued a memo confirming that the code requirement to calculate the correct monthly load must:

- take into account when each item of load was physically installed or removed, and
- wash up volumes must take into account where historical corrections have been made to the DUML load and volumes.

The current data used is a snapshot and this practice is non-compliant.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Jul-22 To: 25-Jul-24	The database cannot be confirmed as accurate to within +/- .5% based on the field audit. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUMML database indicates. The data used for submission does not track changes at a daily basis and is provided as a snapshot. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, the small number of exceptions indicated that controls are sufficient to ensure that all lamps are recorded accurately in the database most of the time. The impact is assessed to be low based on the estimated impact on kWh.		
Actions taken to resolve the issue		Completion date	Remedial action status
Clutha District Council has been advised of the inaccuracies. They are currently having field visits to confirm the information before the database is corrected.		15/11/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meridian will continue to follow up with Clutha District Council until corrections are complete. Processes are in place to account for historical database corrections that have a material impact on settlement volumes.		15/11/2024 Ongoing	

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

Code reference

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

Code related audit information

The DUMML database must contain:

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

Audit observation

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

Audit commentary

The analysis found that all items of load had an ICP number recorded.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The database contains street addresses, pole numbers and GPS coordinates.

All items of load have GPS co-ordinates recorded, and there is sufficient information recorded in the address field to be able to locate these lamps.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

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

Audit commentary

All relevant items of load have the lamp make, model and associated wattages populated.

Four items of load do not have the lamp make, lamp model, wattage or gear wattage recorded. Clutha DC advised that these lights are not in operation

All of the discrepancies identified in the last audit have been corrected.

Audit outcome

Compliant

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

Code reference

Clause 11(2A) of schedule 15.3

Code related audit information

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

Audit observation

The field audit was undertaken of a statistical sample of 199 items of load in July 2024.

Audit commentary

The following differences were identified during the field audit.

Discrepancy	Quantity
Incorrect wattage	24
In the field, not in the database	4
In the database but also in NZTA database	1

The field audit found four more lamps in the field from the 199 items of load sampled. This is recorded as non-compliance below. The issues identified during the last audit have been resolved.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Jul-22 To: 25-Jul-24	Four additional items of load were found in the field of the 199 items of load sampled. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status

Clutha District Council has been advised of the inaccuracies. They are currently having field visits to confirm the information before the database is corrected.	15/11/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Meridian will continue to follow up with Clutha District Council until corrections are complete.	15/11/2024	

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

Code reference

Clause 11(3) of schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The RAMM database functionality achieves compliance with the code.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

RAMM records audit trail information of changes made.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

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

Plan Item	Comments
Area of interest	Streetlights in the Clutha region
Strata	The database contains items of load located in the Clutha region owned by CDC. The management process is the same for all lights. The total population was divided into four strata: <ul style="list-style-type: none"> roads starting with A-E, roads starting with F–N, roads starting with O-Z, and NZTA.
Area units	I created a pivot table of the roads in the stratum, and I used a random number generator in a spreadsheet to select a total of 42 sub-units.
Total items of load	199 items of load were checked.

Wattages for all items of load were checked against the published standardised wattage tables produced by the Electricity Authority, and the manufacturer's specifications.

Audit commentary

Database accuracy based on the field audit

A field audit was conducted of a statistical sample of 199 items of load. The "database auditing tool" was used to analyse the results, which are shown in the table below.

Result	Percentage	Comments
The point estimate of R	100.3	Wattage from survey is higher than the database by 0.3%
R _L	90.6	With a 95% level of confidence, it can be concluded that the error could be between -9.4% and +9.7%
R _H	109.7	

These results were categorised in accordance with the "Distributed Unmetered Load Statistical Sampling Audit Guideline", effective from 1 February 2019. The table below shows that Scenario C (detailed below) applies. The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within +/- 5 %

In absolute terms the installed capacity is estimated to be the same as the database.

There is a 95% level of confidence that the installed capacity is between 9 kW lower to 10 kW higher than the database.

In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates.

There is a 95% level of confidence that the annual consumption is between 39,500 kWh p.a. lower to 40,600 kWh p.a. higher than the database indicates.

Scenario	Description
A - Good accuracy, good precision	<p>This scenario applies if:</p> <p>(a) R_H is less than 1.05; and</p> <p>(b) R_L is greater than 0.95</p> <p>The conclusion from this scenario is that:</p> <p>(a) the best available estimate indicates that the database is accurate within +/- 5 %; and</p> <p>(b) this is the best outcome.</p>
B - Poor accuracy, demonstrated with statistical significance	<p>This scenario applies if:</p> <p>(a) the point estimate of R is less than 0.95 or greater than 1.05</p> <p>(b) as a result, either R_L is less than 0.95 or R_H is greater than 1.05.</p> <p>There is evidence to support this finding. In statistical terms, the inaccuracy is statistically significant at the 95% level</p>
C - Poor precision	<p>This scenario applies if:</p> <p>(a) the point estimate of R is between 0.95 and 1.05</p> <p>(b) R_L is less than 0.95 and/or R_H is greater than 1.05</p> <p>The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within +/- 5 %</p>

Lamp description and capacity accuracy

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

All relevant items of load have the lamp make, model and associated wattages populated.

Four items of load do not have the lamp make, lamp model, wattage or gear wattage recorded. Clutha DC advised that these lights are not in operation

All of the discrepancies identified in the last audit have been corrected.

NZTA lighting

NZTA lighting is included in the database and was checked as part of the field audit.

Change management process findings

Network Electrical Servicing Ltd (NES) is the maintenance contractor. RAMM updates are conducted manually for replacements, and directly into RAMM from the field via Pocket RAMM for new lights.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Jul-22 To: 25-Jul-24	The database cannot be confirmed as accurate to within +/- . 5% based on the field audit. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, the small number of exceptions indicated that controls are sufficient to ensure that all lamps are recorded accurately in the database most of the time. The impact is assessed to be low based on the estimated impact on kWh.		
Actions taken to resolve the issue		Completion date	Remedial action status
Clutha District Council has been advised of the inaccuracies. They are currently having field visits to confirm the information before the database is corrected.		15/11/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meridian will continue to follow up with Clutha District Council until corrections are complete.		15/11/2024	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

Submission data was checked for accuracy, including:

- checking the registry to confirm that all ICPs have the correct profile and submission flag, and

- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

The process for calculation of consumption was examined.

Audit commentary

This clause requires that the distributed un-metered load database must satisfy the requirements of schedule 15.5 regarding the methodology for deriving submission information.

A monthly report from the database is provided to Meridian and is used to calculate submissions. Meridian submits the DUML load as NHH using the DST profile. The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian’s reconciliation participant audit and the EMS agent audit.

The capacities supplied to EMS for June 2024 were checked and confirmed to be accurate.

The field audit found that the database cannot be confirmed as accurate to within the allowable +/-5% threshold. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates.

On 18 June 2019, the Electricity Authority issued a memo confirming that the code requirement to calculate the correct monthly load must:

- take into account when each item of load was physically installed or removed, and
- wash up volumes must take into account where historical corrections have been made to the DUML load and volumes.

The current data used is a snapshot and this practice is non-compliant.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Jul-22 To: 25-Jul-24	The database cannot be confirmed as accurate to within +/- 5% based on the field audit. In absolute terms, total annual consumption is estimated to be 1,100 kWh higher than the DUML database indicates. The data used for submission does not track changes at a daily basis and is provided as a snapshot. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>Controls are rated as strong, the small number of exceptions indicated that controls are sufficient to ensure that all lamps are recorded accurately in the database most of the time.</p> <p>The impact is assessed to be low based on the estimated impact on kWh.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Clutha District Council has been advised of the inaccuracies. They are currently having field visits to confirm the information before the database is corrected.	15/11/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Meridian will continue to follow up with Clutha District Council until corrections are complete.</p> <p>Processes are in place to account for historical database corrections that have a material impact on settlement volumes.</p>	<p>15/11/2024</p> <p>Ongoing</p>	

CONCLUSION

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

The database is remotely hosted by thinkproject New Zealand Ltd. Network Electrical Servicing Ltd (NES) is the maintenance contractor. RAMM updates are conducted manually for replacements, and directly into RAMM from the field via Pocket RAMM for new lights. A monthly report from RAMM is provided to Meridian to calculate the kW value.

Meridian reconciles this DUML load using the DST profile. Submissions are based on the database information, with on and off times derived from data logger information.

I compared the database provided to the capacity information Meridian supplied to EMS for the month of June 2024 and I confirm the submission is accurate.

The field audit was undertaken of a statistical sample of 199 items of load. The field audit confirmed that the database accuracy cannot be confirmed to be within the allowable +/-5% threshold. There is potential under submission of 1,100 kWh per annum.

This audit found four non-compliances. The future risk rating of four indicates that the next audit be completed in 24 months. I agree with this recommendation.

PARTICIPANT RESPONSE