

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

AUCKLAND INTERNATIONAL AIRPORT
LIMITED (AIAL)
NZBN: 9429039490162

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EXECUTIVE SUMMARY

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

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

AIAL's compliance is reliant on the compliance of TENCO, as the contractor. The level of compliance is high. The audit found five non-compliances and no recommendations are made.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The next audit frequency table indicates that the next audit be due in 18 months. I have considered this, and the material impact of the non-compliances found and recommend that the next audit is in 24 months' time.

The matters raised are detailed in the tables below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Timeliness of provision of ICP information to the registry manager	3.4	7(2) of schedule 11.1	One ICP was updated to "ready" status after initial electrical connection.	Strong	Low	1	Cleared
Timeliness of initial electrical connection date	3.5	7(2A) of schedule 11.1	Five ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.	Moderate	Low	2	Cleared
Connection of ICP that is not an NSP	3.6	11.17	One ICP with a late status update to "ready" did not have a responsible trader recorded on the registry on the initial electrical connection date.	Strong	Low	1	Cleared
Changes to registry information	4.1	8 of schedule 11.1	One late address update. Two late status updates to "decommissioned".	Strong	Low	1	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1)	One meter recertification not notified to the RM within 20 days of meter recertification.	Strong	Low	1	Cleared
Future Risk Rating						6	

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

RECOMMENDATIONS

Subject	Section	Recommendation
		Nil

ISSUES

Subject	Section	Issue	Remedial action
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

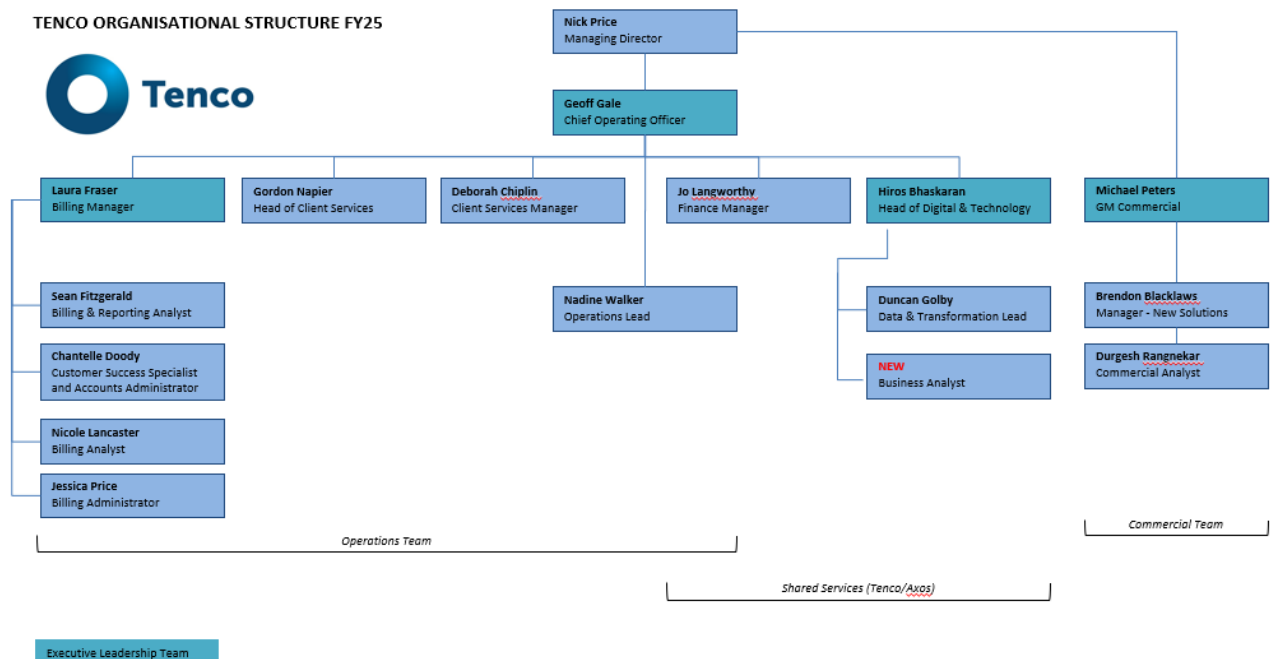
The Electricity Authority website was checked to determine whether AIAL has any Code exemptions in place.

Audit commentary

Review of exemptions on the Electricity Authority website confirmed that there are no exemptions in place for AIAL.

1.2. Structure of Organisation

TENCO provided an organisation chart:



1.3. Persons involved in this audit

Auditors:

Name	Role	Organisation
Brett Piskulic	Auditor	Provera

Personnel assisting in this audit were:

Name	Title	Organisation
Nick Price	Managing Director	TENCO
Nadine Walker	Operations Analyst	TENCO

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

- *remains responsible for the contractor's fulfilment of the participants Code obligations,*
- *cannot assert that it is not responsible or liable for the obligation due to the action of a contractor,*
- *must ensure that the contractor has at least the specified level of skill, expertise, experience, or qualification that the participant would be required to have if it were performing the obligation itself.*

Audit observation

TENCO performs all AIAL's responsibilities.

1.5. Supplier list

All activities covered by the scope of this audit are conducted by TENCO.

1.6. Hardware and Software

Hardware and software are discussed in the TENCO agent audit report.

1.7. Breaches or Breach Allegations

AIAL has not had any breach allegations relevant to this audit recorded by the Electricity Authority.

1.8. ICP and NSP Data

Review of the NSP table showed AIAL had the following NSP as of 7 June 2024:

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of active ICPs
AIAL	AKL0331	AUCKLAND AIRPORT	MNG0331	VECT	AKL0331AIALE	EN	1 October 2022	544

A list file was provided as of June 2024:

Status	Number of ICPs 2024	Number of ICPs 2022	Number of ICPs 2021	Number of ICPs 2018
New (999,0)	0	3	0	0
Ready (0,0)	123	3	4	10
Active (2,0)	544	545	538	547
Distributor (888,0)	0	0	0	0
Inactive – new connection in progress (1,12)	2	0	0	4
Inactive – electrically disconnected vacant property (1,4)	10	15	18	10
Inactive – electrically disconnected remotely by AMI meter (1,7)	2	1	3	0
Inactive – electrically disconnected at pole fuse (1,8)	0	0	0	0
Inactive – electrically disconnected due to meter disconnected (1,9)	8	8	8	5
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	0	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	0	0	0	1
Inactive – reconciled elsewhere (1,5)	0	0	0	0
Decommissioned (3)	391	361	356	299

1.9. Authorisation Received

An email of authorisation was provided.

1.10. Scope of Audit

This distributor audit was performed at the request of AIAL, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

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

The audit analysis was undertaken on:

- a registry list snapshot as of 10 June 2024,
- a registry list with history and event detail report for 1 September 2022 to 10 June 2024,
- audit compliance reports covering 1 September 2022 to 10 June 2024,
- a meter installation details report for 10 June 2024, and
- the NSP table, NSP mapping table, loss factor table, and price category table for 10 June 2024.

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

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

The audit report for TENCO will be submitted with this audit.

1.11. Summary of previous audit

AIAL's previous audit conducted in August 2022 by Rebecca Elliot of Veritek Limited was reviewed. The current status of the issues found in that audit are detailed below:

Subject	Section	Clause	Non-compliance	Status
Timeliness of initial electrical connection date	3.5	7(2A) of schedule 11.1	Three ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.	Still existing
Changes to registry information	4.1	8 of schedule 11.1	One pricing event was not updated within three days of the event.	Still existing
ICP location address	4.4	2 of schedule 11.1	Three active ICPs with addresses that are not readily locatable.	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1)	One meter recertification not notified to the RM within 20 days of meter recertification.	Still existing

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded for TENCO.

Audit outcome

Compliant

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

Processes to provide information were reviewed and observed throughout the audit, and as part of TENCO's agent audit.

Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause. Incorrect information is normally corrected daily, or as soon as possible upon discovery.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

Audit observation

The management of this process is discussed in the TENCO contractor report. The PR-255 file was examined to determine whether load control devices existed on the network.

Audit commentary

Compliance is recorded in the TENCO audit. Load control devices do exist on the network, but AIAL do not complete any work requiring a change of seal, the retailer will initiate any such work required with a contractor.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

The TENCO agent audit report discusses the management of this information. The Disputes Resolution information was examined to determine compliance.

Audit commentary

Compliance is recorded for TENCO.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded for TENCO.

Examination of the registry list found 142 ICPs were created during the audit period. ICPs were created in accordance with this clause for all new connections.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

The new connection process is discussed in the TENCO audit report. The registry list and audit compliance reports were examined to determine compliance.

A diverse characteristics sample of ten of the 142 new ICPs created during the audit period were checked to determine whether the ICPs had been created within three business days of a request by a trader.

Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause.

There were 142 new ICPs created during the audit period. This clause assumes that the ICP requests will be made by traders. A sample of ten ICPs were reviewed, they were all requested by the customer therefore this clause does not apply.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The new connection process is discussed in the TENCO report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Information was provided as required by this clause for all ICPs created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO audit report. The event detail report, registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded for TENCO.

23 ICPs had initial electrical connection dates populated during the audit period, indicating that they had been connected.

Information was provided as required by this clause for all ICPs created and initially electrically connected during the audit period, except for one ICP. ICP 0003133912AA19F was initially electrically connected on 19 September 2023 but was not moved to “ready” status until ten business days later on 3 October 2023 due to delays receiving details of the size of supply and trader from the customer.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 19-Sep-23 To: 03-Oct-23	One ICP was updated to “ready” status after initial electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, as the process is compliant and only one exception was identified. The impact is low, as the ICP was moved to “ready” status ten business days after initial electrical connection.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP in question was updated to Ready as soon as the information required to do so was received from the customer.		During audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
ICPs are no longer distributed unless their status has been updated to Ready.		Ongoing	

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

Code reference

Clause 7(2A) of schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO audit report. The event detail report, registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded for TENCO.

There were 23 initial electrical connection dates updated during the audit period. 18 of these were updated within the required timeframe. Five were updated late. These were all checked and it was found that three were due to late notification of the metering event, and two were due to delays confirming the active date with the trader.

The accuracy of the initial electrical connection date is discussed in **section 4.6**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of schedule 11.1 From: 09-Sep-22 To: 14-May-24	Five ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, as they are sufficient to prevent late updates most of the time. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
4 ICPs were late to have IEDs updated due to the time taken by the MEP or the trader to confirm the livening date. 1 ICP was late to be updated due to a previous process where the input date was used as the effective date.		During the audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The IED is updated as soon as all the information required to do so is available and the process of using the input date as the event date was replaced in 2022.		Ongoing	

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The management of this process is discussed in the TENCO agent report. The event detail report, registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent report.

Review of the registry list confirmed that a trader is currently recorded for all “active” ICPs, there are 123 “ready” ICPs and no “new” ICPs. The registry list does not record any shared unmetered load on AIAL’s network.

23 ICPs had initial electrical connection dates populated during the audit period, indicating that they had been connected. As recorded in **section 3.4** one ICP, 0003133912AA19F was not updated to “ready” status prior to the initial electrical connection date, and the trader was not recorded as having accepted responsibility for the ICP in the registry on the initial electrical connection date due to delays receiving details of the size of supply and trader from the customer.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.6 With: Clause 11.17 From: 19-Sep-23 To: 03-Oct-23	One ICP with a late status update to “ready” did not have a responsible trader recorded on the registry on the initial electrical connection date. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, as the process is compliant and only one exception was identified. The impact is low, as the ICP was moved to “ready” status ten business days after initial electrical connection.		
Actions taken to resolve the issue		Completion date	Remedial action status
Confirmation of the proposed trader was late to be received from our client. This was updated in the registry as soon as it was available.		During the audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
ICPs are no longer distributed unless the status is Ready		Ongoing	

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO agent report. The event detail report, registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent report. AIAL will not electrically connect an ICP without a reconciliation participant accepting responsibility.

As recorded in **sections 3.4** and **3.6**, one ICP was not updated to “ready” status prior to the initial electrical connection date. In this case the trader had accepted responsibility for the ICP prior to initial electrical connection, although AIAL had not updated the registry on time.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TENCO agent report. The registry list, event detail report, and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent report. All electrically connected ICPs had certified meters on their initial electrical connection date. No temporary electrical connections were identified.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No new NSPs have been connected during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

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

A distributor may only electrically connect an NSP if:

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No new NSPs have been connected during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1(1) of schedule 11.1

Code related audit information

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

yyyyyyyyyyxxccc where:

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

Audit observation

The management of this process is discussed in the TENCO agent report.

Audit commentary

Compliance is recorded for TENCO agent report in relation to this clause.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 of schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO audit report. The registry list was examined to confirm all “active” ICPs have a single loss category code.

Audit commentary

Compliance is recorded in the TENCO agent audit report. Each “active” ICP only has a single loss category, which clearly identifies the relevant loss factor.

Audit outcome

Compliant

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

Code reference

Clause 13 of schedule 11.1

Code related audit information

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

- *the associated electrical installations are in the construction phase (clause 13(a) of schedule 11.1),*

- *the ICP is not ready for activation (clause 13(b) of schedule 11.1).*

Audit observation

The ICP creation process was reviewed as part of the TENCO agent audit. The registry list, event detail report, and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report in relation to this clause.

There are currently no ICPs with the “new” status. No ICPs have been at “new” status for over 24 months.

Audit outcome

Compliant

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

Code reference

Clause 15 of schedule 11.1

Code related audit information

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

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

Audit observation

Monitoring of “new” and “ready” status is discussed in the TENCO agent report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded for TENCO.

Examination of the list file found no ICPs at “new” status and 123 ICPs at “ready” status. Two ICPs have been at “ready” status for over 24 months, TENCO confirmed that they had contacted the trader and confirmed these were still required.

Audit outcome

Compliant

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

Code reference

Clause 7(6) of schedule 11.1

Code related audit information

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

- *the loss category code must be unique; and*
- *the distributor must provide the following to the reconciliation manager:*

- *the unique loss category code assigned to the ICP,*
- *the ICP identifier of the ICP,*
- *the NSP identifier of the NSP to which the ICP is connected,*
- *the plant name of the embedded generating station.*

Audit observation

The registry list was examined to determine compliance.

Audit commentary

Review of the registry list confirmed that no embedded generation is connected with a capacity of 10 MW or more.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

The new connection process of ICPs and NSPs is discussed in the TENCO report.

Audit commentary

AIAL do not undertake electrical connections of ICPs as this is a trader's responsibility. For all NSP electrical connections, AIAL has approved the trader to electrically connect the NSPs.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

Processes to manage this are discussed in the TENCO agent report.

Audit commentary

Compliance is confirmed for the process detailed in the TENCO agent report.

AIAL only conduct disconnection where ICPs are to be decommissioned and they obtain permission from the trader prior to decommissioning.

No NSPs were electrically disconnected and decommissioned during the audit period.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

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

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

If the distributor bridges a meter, the distributor must notify the responsible trader within 1 business day and include the date of bridging in its advice.

Audit observation

The management of this process was examined as part of the TENCO agent audit.

Audit commentary

Compliance is recorded in the TENCO agent audit report. TENCO do not bridge meters for AIAL, this is managed by the traders.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 of schedule 11.1

Code related audit information

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

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

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

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

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

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

Audit observation

The management of this process was examined as part of the TENCO agent audit. The audit compliance reports were examined to determine compliance.

Audit commentary

When information that is held by the registry changes, the distributor responsible for that ICP must provide notice to the registry of that change within three business days of that change taking effect. The event detail reports were examined to identify backdated event updates.

Address events

There were 32 address updates not relating to initial population of address data for new connections made during the audit period. The audit compliance reports identified one update which was backdated more than three business days for ICP 0003133459AA8E6. This was checked and found to be due to an address update being backdated to the previous event date in error.

Network Events

There were no late network updates during the audit period; all were updated within three business days.

NSP changes

There were no NSP changes made during the audit period.

Status Events

There were 23 “decommissioned” status updates made during the audit period. The audit compliance reports identified two ICPs where the updates were made more than three business days after the change to “ready for decommissioning” status. Both cases were checked and found:

- one was delayed because the MEP needed to reverse later records before decommissioning could be completed, and
- one was due to a delay confirming the decommissioning date.

Pricing Events

There were 227 pricing events during the audit period. The audit compliance reports identified 137 that were backdated more than three business days. I checked a sample of ten backdated updates and confirmed that all were updated within three business days of agreement being reached with the trader. Compliance is confirmed.

The late updating of the registry is recorded as non-compliance below.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of schedule 11.1 From: 01-Sep-22 To: 10-June-24	One late address update. Two late status updates to “decommissioned”. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as risk is mitigated to an acceptable level as TENCO have good reporting in place to manage registry updates. The audit risk rating is low as only three ICPs were affected, therefore the impact on settlement will be low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The address update was backdated due to a manual data entry error, whereby the event date was not updated from the previous event.		During the audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The implementation of Axos Registry Manager will prevent these manual data errors in future.		01/10/2024	

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

Code reference

Clauses 7(1), 7(4) and 7(5) of schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO report. This is an unlikely event given that AIAL has only one NSP. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report in relation to this clause. The audit compliance reporting showed that all ICPs were correctly mapped.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of this process was examined as part of the TENCO agent audit.

Audit commentary

Compliance is recorded in the TENCO agent audit report. ICP numbers are provided immediately when they have verified the requestor's identity and provided address details.

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 of schedule 11.1

Code related audit information

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

Audit observation

The management of this process was examined as part of the TENCO agent audit. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report. Review of the registry list and audit compliance reports found that all “active” and “inactive” ICPs have sufficient address information to allow the ICPs to be readily located.

Audit outcome

Compliant

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

Code reference

Clause 3 of schedule 11.1

Code related audit information

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

Audit observation

The management of this process was examined as part of the TENCO agent audit.

Audit commentary

Compliance is recorded for TENCO.

Audit outcome

Compliant

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

Code reference

Clause 7(1) of schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (clause 7(1)(a) of schedule 11.1),*
- *the NSP identifier of the NSP to which the ICP is usually connected (clause 7(1)(b) of schedule 11.1),*
- *the installation type code assigned to the ICP (clause 7(1)(c) of schedule 11.1),*
- *the reconciliation type code assigned to the ICP (clause 7(1)(d) of schedule 11.1),*
- *the loss category code and loss factors for each loss category code assigned to the ICP (clause 7(1)(e) of schedule 11.1),*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (clause 7(1)(f) of schedule 11.1):*
 - a) *the unique loss category code assigned to the ICP,*
 - b) *the ICP identifier of the ICP,*
 - c) *the NSP identifier of the NSP to which the ICP is connected,*

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report. Examination of the registry list and the audit compliance reports confirmed that ICP information had been populated correctly.

Audit outcome

Compliant

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

Code reference

Clause 7(3) of schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The audit compliance reporting and the registry list were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report in relation to this clause.

Pricing information was updated on the registry before trading of electricity commenced for all ICPs connected during the audit period, examination of the audit compliance report confirmed this.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) of schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

Co-ordinates are populated for one ICP and this meets the required standard. AIAL do not populate GPS co-ordinates for most ICPs.

Audit outcome

Compliant

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

Code reference

Clause 14 of schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

The list file contained 123 ICPs at “ready” status. All had a nominated trader and price category recorded.

Audit outcome

Compliant

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

Code reference

Clause 16 of schedule 11.1

Code related audit information

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

Audit observation

It is unlikely that AIAL will deal with any ICPs with a “distributor” status because they do not deal with shared unmetered load, and there are no embedded networks connected to existing embedded networks.

The registry list file for was examined in relation to the use of the “distributor” status.

Audit commentary

The “distributor” status was not used at all during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 20 of schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The registry list, event detail report, and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

23 ICPs were “decommissioned” during the audit period, and the registry was updated in accordance with this clause. The timeliness of updates to “decommissioned” status are discussed in **section 4.1**.

No ICPs are currently at the “inactive - ready for decommissioning” status.

Audit outcome

Compliant

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

Code reference

Clause 23 of schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

The management of this process is discussed in the TENCO agent audit report. The price category table was examined to determine compliance.

Audit commentary

AIAL has not created any new price category codes during the audit period.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 of schedule 11.1

Code related audit information

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

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

A loss category code takes effect on the specified date.

Audit observation

The loss category code table on the registry was examined.

Audit commentary

AIAL has not created any new loss category codes during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 of schedule 11.1

Code related audit information

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

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

Audit observation

The loss category code table on the registry was examined.

Audit commentary

AIAL made four updates to loss factor codes during the audit period. All four updates were notified within the required period. There was only one loss factor per category code per month.

Loss factor	Start date	Updated
LF1	1 April 2023	31 January 2023
LF2	1 April 2023	31 January 2023
LF1	1 April 2024	31 January 2024
LF2	1 April 2024	31 January 2024

Audit outcome

Compliant

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

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

Code reference

Clauses 11.8 and 25 of schedule 11.1

Code related audit information

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

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

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

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

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

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

No NSPs were created, decommissioned, or transferred from other networks during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) of schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

No new NSPs were created or transferred to AIAL during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 24(1) and 26(3) of schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

There were no new NSPs created, and no balancing area changes during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) of schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP mapping table, NSP table, registry list and relevant notifications were examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

No NSPs were created or changed during the audit period. No ICPs had a change of NSP during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) of schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table was examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

No balancing areas were changed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 of schedule 11.1

Code related audit information

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No ICPs became NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 1 to 4 of schedule 11.2

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO report. The NSP table, registry and relevant notifications were examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

No ICPs were transferred from other networks during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TENCO report. The NSP table was examined.

Audit commentary

The process followed by TENCO is compliant. The NSP table was reviewed:

Distributor	NSP POC	Description	MEP	Previous Certification Expiry	New Certification expiry
AIAL	AKL0331	AUCKLAND AIRPORT	AMCI	24 December 2022	13 December 2025

The NSP has been recertified during the audit period and was checked with the Reconciliation Manager. I confirmed that AKL0331 was recertified on 13 December 2022 and notified to the Reconciliation Manager after 24 business days on 25 January 2023 due to a delay receiving the certification details. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 6.8 With: Clause 10.25(1) From: 16-Jan-23 To: 25-Jan-23	One meter recertification not notified to the RM within 20 days of meter recertification. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, as they are sufficient to prevent late updates most of the time.</p> <p>The audit risk rating is deemed to be low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Meter certification details were updated to the RM portal as soon as they were received from the MEP.		During audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We continue to work with MEPs to request copies of certifications as they fall due.		Ongoing	

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report.

No NSPs were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 29 of schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table was examined.

Audit commentary

AIAL has not acquired any networks.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO agent audit report . The NSP table was examined to determine whether there have been any MEP changes during the audit period.

Audit commentary

Compliance is recorded in the TENCO agent audit report. There have been no MEP changes during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 of schedule 11.2

Code related audit information

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

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

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

Audit observation

The management of this process is discussed in the TENCO agent audit report. The NSP table on the registry was examined.

Audit commentary

Compliance is recorded in the TENCO agent audit report. AIAL has not acquired any networks.

Audit outcome

Compliant

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

Code reference

Clause 6 of schedule 11.2

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO report. The NSP table was examined to determine compliance.

Audit commentary

Compliance is recorded in the TENCO agent audit report. AIAL has not acquired any networks.

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit observation

The registry list was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO report. Loss factor information was reviewed.

Audit commentary

Compliance is recorded for TENCO.

TENCO derives loss factors for loss category codes from the published parent network loss factors for similar installations. It is expected that ICPs on embedded networks will have the same loss factor as a similar type of connection on the parent network.

To do this, TENCO determines the gateway loss factor from the LE ICP's loss factor, then determines the local network loss factor which would be likely to apply to the embedded network ICPs if they were connected to the local network. TENCO then calculates the overall loss factor and multiplies this by the local network loss factor to determine the value for each embedded network loss factor code.

I stepped through the process and confirmed that the loss factors were calculated and assigned as expected.

TENCO maintains the internal loss factors in the registry, and within their pricing schedules which are issued to retailers.

Audit commentary

Compliant

CONCLUSION

AIAL's compliance is reliant on the compliance of TENCO, as the contractor. The level of compliance is high. The audit found five non-compliances and no recommendations are made.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The next audit frequency table indicates that the next audit be due in 18 months. I have considered this, and the material impact of the non-compliances found and recommend that the next audit is in 24 months' time.

PARTICIPANT RESPONSE

Tenco on behalf of AIAL have reviewed the above audit report on the 14th August 2024 and are in agreement with the findings contained within it.