

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT**

For

**ELECTRA (ELEC)**  
(COMPANY #579974)

Prepared by: Allan Borcoski Borcoski Energy Services Ltd

Date audit commenced: 5 July 2024

Date audit report completed: 14 August 2024

Audit report due date: 25-Aug-24

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## EXECUTIVE SUMMARY

This distributor audit was performed at the request of Electra (ELEC) as required by clause 11.10 of Part 11, to assure compliance with the Electricity Industry Participation Code 2010. The relevant rules audited are as required by the Guidelines for Distributor Audits V7.2 issued by the Electricity Authority.

Electra had 47953 Active and Inactive ICPs at the time of this audit, with a net increase of 599 ICPs during this audit period.

Electra's level of compliance of historical Registry information has improved from the previous audit, for example this audit found 59 historical (pre this audit period) IECD not populated in the Registry compared to the 534 found at the previous audit. Significant efforts by Electra staff using new tools such as the Dashboard have enabled this improved compliance result.

This audit identified 6 non compliances, all with low audit risk.

The key issues identified during this audit were:

1. Timeliness of the population of Initial Electrical Connection Date
2. Timeliness of the population and missing information in the registry for distributed generation (to a lesser extent)

Both of these issues have been a constant challenge for a number of previous audits.

The new tools, including a mobile phone application to collect new connection information provided to field contractors, have not however improved the population of Registry information to consistently meet Code requirements. Despite the Dashboard providing visibility of key compliance information and the mobile data application in the field, Registry updates are being missed and then falling into the historical category for remedial action. Electra staff advised that late or non-supply of work completion information for new connections from approved warranted contractors and distributed generation installation contractors were the main issue

Electra staff are aware of the issues and are committed to resolving the issues and improving the situation.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter.

The Future Risk Rating score is 12 which results in an indicative audit frequency of 12 months. We concur with this result and recommend the next audit be in 12 months.

We thank Electra staff for their full and complete cooperation in this audit.

The audit period was 16 January 2023 to 30 June 2024.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1)	Inaccurate or missing information related to distributed generation, IECD, addresses recorded in the registry	Moderate	Low	2	Identified
Requirement to correct errors	2.2	11.2(2)	Incorrect or missing historical information in the registry across a number of areas.	Moderate	Low	2	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	17% of IECDs during the audit period were populated in the registry late.  59 ICPs connected historically still did not have IECD populated in the Registry.	Moderate	Low	2	Identified
Changes to registry information	4.1	8 of Schedule 11.1	A number of registry information updates were greater than 3 business days from the event date.	Moderate	Low	2	Identified
ICP location address	4.4	2 of Schedule 11.1	For 22 ICPs the address descriptions do not allow	Moderate	Low	2	Identified

			ICPs to be readily located				
Distributor to provide ICP information to the registry manager	4.6	7(1)(m)(o)(p) of Schedule 11.1	Incorrect or missing information in the registry for distributed generation, IECD, UML and NSP Status.	Moderate	Low	2	Identified
<b>Future Risk Rating</b>						<b>12</b>	

Future risk rating	1-2	3-6	7-9	10-19	20-24	25+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Recommendation	Description
Nil	Nil	Nil	Nil

## ISSUES

Subject	Section	Issue	Description
Nil	Nil	Nil	Nil

## 1. ADMINISTRATIVE

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

#### Code reference

Section 11 of Electricity Industry Act 2010.

#### Code related audit information

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

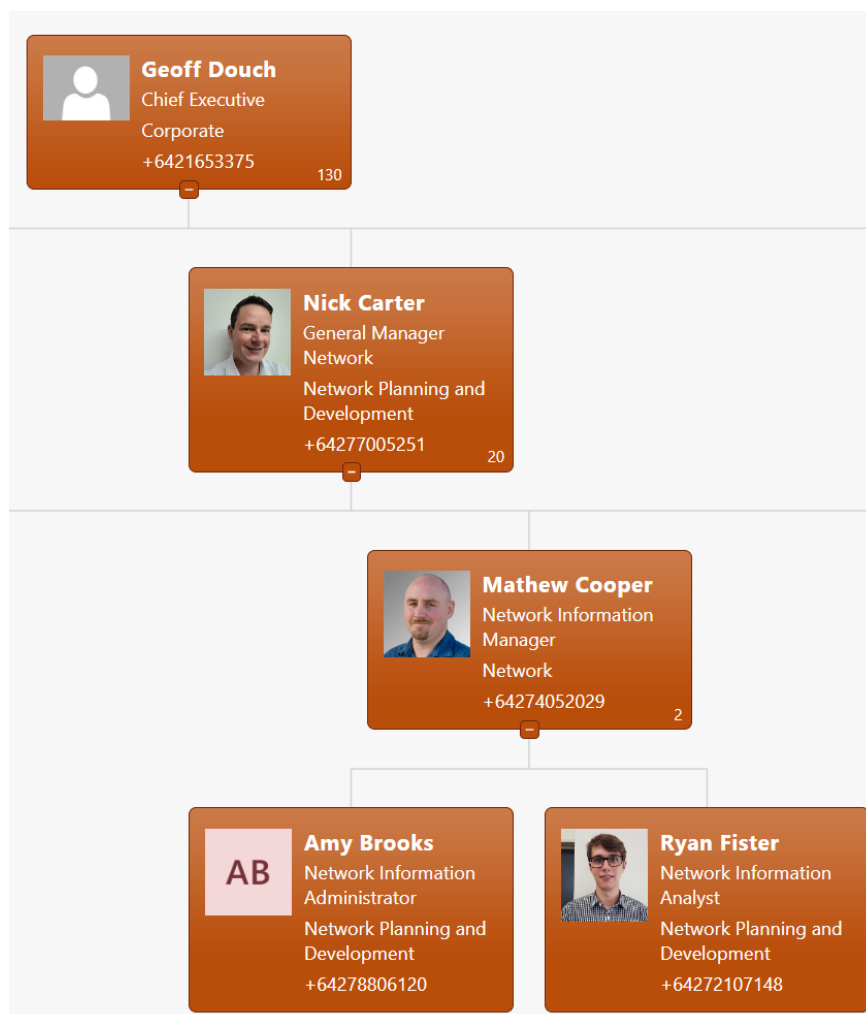
#### Audit observation

Electra confirms that there are no exemptions in place which are relevant to the scope of this audit.

#### Audit commentary

We checked the Electricity Authority website and confirmed that there are no exemptions in place.

### 1.2. Structure of Organisation





### 1.3. Persons involved in this audit

Name	Role	Company
Mathew Cooper	Network Information Manager	Electra
Ryan Fister	Network Information Analyst	Electra
Amy Brooks	Network Information Administrator	Electra
Allan Borcoski	Electricity Authority Approved Auditor	Borcoski Energy Services Ltd

### 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 contractors 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

There are no contractors who assist with, or are used in, the Electra operations that were audited.

#### Audit commentary

During the audit, we did not identify any contractors who assist Electra to meet their obligations relevant to the scope of this audit.

### 1.5. Supplier list

WindMil software is provided by Milsoft Utility Solutions.

### 1.6. Hardware and Software

Milsoft WindMil is used to manage information about network configuration and the location of ICPs. FME Flow, which provides automated ESB (Enterprise Service Bus) functionality, is used to transfer data between Milsoft WindMil and the Electricity Registry according to a logic defined by the requirements of the code. FME is used across the business for to integrate numerous applications and data sources together over a bus-like infrastructure.

## 1.7. Breaches or Breach Allegations

Electra has stated it has no breaches of the Electricity Industry Participation Code related to this audit

A check of the Electricity Authority website found that no breaches, or alleged breaches, were recorded in the period covered by this audit.

## 1.8. ICP and NSP Data

This table shows the NSPs located on the Electra network and the number of active and inactive ICPs.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
ELEC	MHO0331	Mangahao			MHO0331ELECGN	GN	1/05/11	18623
ELEC	PRM0331	Paraparaumu			PRM0331ELECGN	GN	1/05/08	29447

Status	Number of ICPs (21/07/2024)	Number of ICPs (2023)	Number of ICPs (2021)
New (999,0)	0	0	0
Ready (0,0)	64	28	24
Active (2,0)	46937	46,473	45,493
Distributor (888,0)	11	5	4
Inactive – new connection in progress (1,12)	41	35	32
Inactive – electrically disconnected vacant property (1,4)	743	689	688
Inactive – electrically disconnected remotely by AMI meter (1,7)	209	146	130
Inactive – electrically disconnected at pole fuse (1,8)	36	20	14
Inactive – electrically disconnected due to meter disconnected (1,9)	23	20	18
Inactive – electrically disconnected at meter box fuse (1,10)	4	4	5
Inactive – electrically disconnected at meter box switch (1,11)	1	0	1
Inactive – electrically disconnected ready for decommissioning (1,6)	1	2	1
Inactive – reconciled elsewhere (1,5)	0	0	0
Decommissioned (3)	3137	2976	2870

## 1.9. Authorisation Received

Electra provided a letter of authorisation to the auditor permitting the collection of data from other parties for matters related to the audit.

## 1.10. Scope of Audit

This audit was performed at the request of Electra, as required by clause 11.10 of Schedule 11, to assure compliance with the Electricity Industry Participation Code 2010.

The audit covers the following processes, under clause 11.10(4) of Part 11, performed by Electra:

- a. The creation of ICP identifiers for ICPs
- b. The provision of ICP information to the registry and the maintenance of that information
- c. The creation and maintenance of loss factors

The audit was carried out on the Electra premises at 35 Tongariro Street in Paraparaumu 9 to 10 July 2024.

## 1.11. Summary of previous audit

The previous audit was carried out in February 2023 by Ewa Glowacka of TEG & Associates Ltd. The findings of the audit are shown below:

Subject	Section	Clause	Non Compliance	Comment
Requirement to provide complete and accurate information	2.1	11.2(1) & 10.6(1)	Inaccurate or missing information related to distributed generation, IECD, addresses recorded in the registry	Still Exists
Requirements to correct errors	2.2	11.2(2)	Incorrect or missing historical information in the registry across a number of areas.	Still Exists
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	81 ICPs (3.3%) electrically connected during the audit period did not have IECD populated in the registry; One ICP (historic, prior 2021) does not have IECD populated 622 ICPs, including historic ICPs, had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event	Still Exists
Changes to registry information	4.1	8(1)(b)&(4) of Schedule 11.1	Registry event (address, distributed generation, decommissioning) updates backdated more than three business days	Still Exists

ICP location address	4.4	2 of Schedule 11.1	For 24 ICPs the address descriptions do not allow ICPs to be readily located	Still Exists
Distributor to provide ICP information	4.6	7(1) of Schedule 11.1	<ul style="list-style-type: none"> <li>• 6 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 1 UML ICP information recorded by Electra, but retailers do not submit volumes to RM</li> <li>• Effective Date in the registry for DG installation (sample of 20 ICPs) is not representative of the date of CoC</li> <li>• Incorrect Dedicated flag for “5 LE” ICPs</li> <li>• Incorrect installation flag “L” for 3 ICPs</li> <li>• No IECD for 81 ICPs electrically connected during this audit period</li> <li>• No IECD one ICP (historical, prior 2021)</li> </ul>	Still Exists

## 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

A check of the Audit Compliance Summary Report for the audit period, the LIS, EDA and PR255 files for the audit period. Windmill and pertinent information systems were also reviewed and where relevant checked against registry records. We discussed with Electra staff what processes were in place to ensure accurate information was provided to the registry.

#### Audit commentary

The table below shows a summary of the findings:

Section	Discrepancy
2.2	<p>Inaccurate or missing information recorded in the registry.</p> <ul style="list-style-type: none"><li>• 43 ICPs with Active status in the Registry but no IECD.</li><li>• 28 ICPs with no Distributed Generation information in the Registry despite the Retailer recently updating the Reconciliation profile to PV1.</li></ul>
3.5	<ul style="list-style-type: none"><li>• 17% of IECDs during the audit period were populated in the registry more than 10 days after the event.</li><li>• 59 ICPs connected prior to this audit period still did not have IECD populated in the Registry.</li></ul>
4.1	<ul style="list-style-type: none"><li>• A number of registry information updates were greater than 3 business days from the event date.</li></ul>
4.4	<ul style="list-style-type: none"><li>• For 22 ICPs the address descriptions do not allow ICPs to be readily located</li></ul>
4.6	<ul style="list-style-type: none"><li>• Incorrect or missing information in the registry for distributed generation, Initial Electrical Connection Dates UML and NSP Status.</li></ul>

#### Audit outcome

Non-compliant

## NON-COMPLIANCE

Non-compliance	Description		
Audit Ref: 2.1 With: <i>Clause 11.2(1) and 10.6(1)</i>  From: 16-Jan-23 To: 30-Jun-24	Inaccurate or missing information related to distributed generation, IECD, addresses recorded in the registry  Potential impact: Low  Actual impact: Low  Audit history: Multiple Times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correcting historical discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue	Completion date	Remedial action status	
Engaged in ongoing correspondence with approved livening agents to reinforce awareness of requirements and timeframes.  The Network Information Team is actively addressing the list of non-compliant ICPs by collaborating with retailers and livening agents to accurately identify and record livening dates.  Initiated a comprehensive review of current processes to identify areas for improvement.	31/03/2025	Identified	

Preventative actions taken to ensure no further issues will occur	Completion date
<p>Electra will introduce a new digital connection form to ensure the capture of all relevant information before a request is processed.</p> <p>The form will include the nomination of an approved livening agent by the requester, allowing proactive follow-up on IECDs.</p> <p>This approach is effective if the nominated livening agent is used but presents challenges if a different agent is involved. The primary indicator will then be the ICP's Active status update, which could limit the timeframe for verifying and recording the IECD.</p>	31/03/2025

## 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

The Audit Compliance Summary Reports for the audit period, the LIS and EDA files for the audit period were checked. It was discussed with Electra Staff what processes were in place to identify incorrect information in their systems and the registry, discrepancies in their systems and the Registry, and the methods to correct that data as soon as practicable.

### Audit commentary

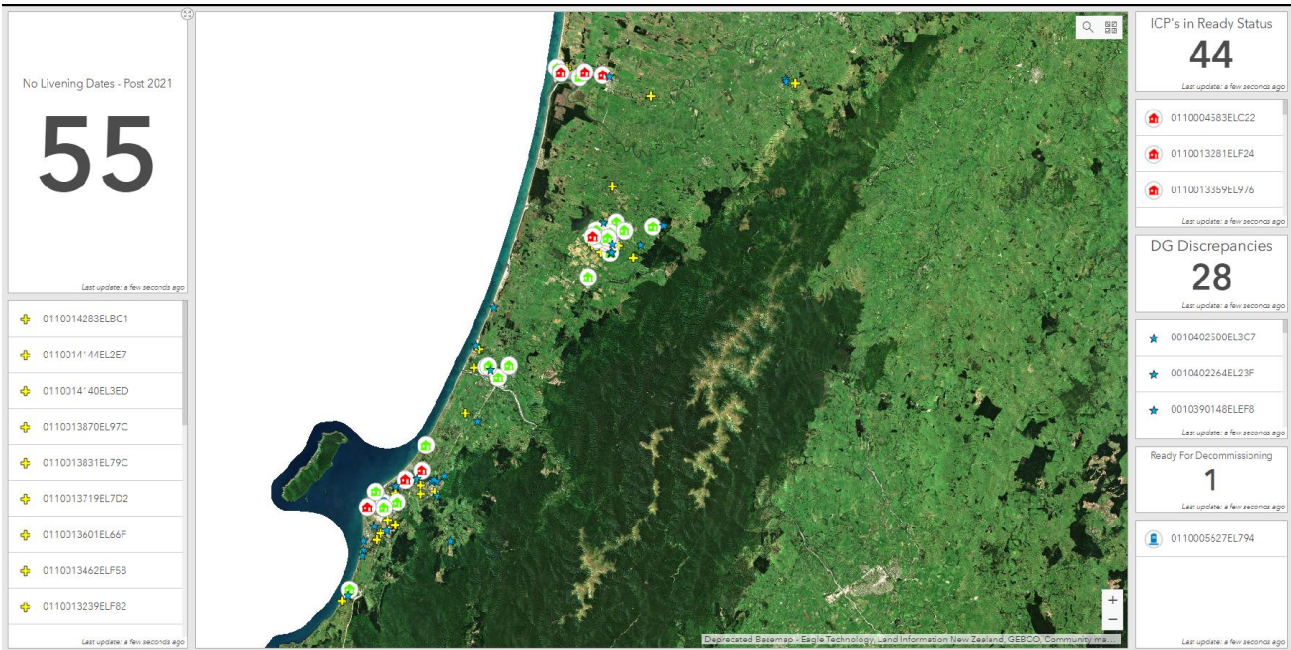
There was evidence of historical data discrepancies being corrected in the Registry demonstrated during the audit period, for example addresses, IECDs and decommissioned ICPs. Tools such as Service Desk and the work Dashboard (see a recent snapshot below) have been in place for some time and are used as part of daily processes and routines. The dashboard is focussed on livening dates, distributed generation, decommissioning's and ICP's that have been left in a ready status for too long.

For the information that is input to the Registry on time, initial population of information to the Registry appears fine due to error checking at the upload process. However missing Registry information is building daily as IECDs and distributed generation information for example not updated within required timeframes becomes non-compliant. This is tracked by the Dashboard and so is being monitored but this information then needs remedial action that takes considerable efforts to correct.

The level of non-compliance has reduced since the previous audit however, the root cause of the issues have not changed. Late of completion information received from field contractors is the main reason IECD and Distributed Generation information population to the Registry is late. It is suggested that further improvements to the Dashboard and more active management of the authorised livinging contractors should assist in resolving this issue and minimise the number of days of non-compliance.

Examples identified during this audit include:

- 43 ICPs with Active status in the Registry but no IECD.
- 28 ICPs with no Distributed Generation information in the Registry despite the Retailer recently updating the Reconciliation profile to PV1



**Audit outcome**

**Non-compliant**

Non-compliance	Description
<p>Audit Ref: 2.2</p> <p>With: <i>Clause 11.2(2) and 10.6(2)</i></p> <p>From: 16-Jan-23</p> <p>To: 30-Jun-24</p>	<p>Inaccurate or missing information recorded in the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple Times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>



<b>Low</b>	Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correcting historical discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p>Consistent with the response to 2.1, we have initiated a review of current processes and monitoring tools to enhance oversight.</p> <p>Distributed Generation remains a complex area; typically, DG connections do not require an Electra-approved contractor, making the registry Profile value the sole indicator of installation.</p> <p>Upon identifying an update to an ICP, efforts are made to locate the installer and obtain the necessary information for registry updates.</p> <p>Due to the involvement of multiple third parties, completing updates, apart from Installation Type, within the 3-day window poses a significant challenge.</p> <p>A completion date is difficult to set due to the ongoing nature of the issue and of factors outside our direct control.</p>	31/03/2025	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>We have commenced a review of current monitoring and processes with the objective of minimizing non-compliances.</p> <p>We will engage an industry expert to assist in the review of our monitoring and response processes.</p> <p>Due to our reliance on third parties for critical information, we recognize the challenges in meeting the 3-day compliance requirement</p>	31/03/2025	

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

#### Code reference

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

#### Code related audit information

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

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

- *ensure personnel 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**

This was discussed with Electra Staff.

#### **Audit commentary**

Electra Staff stated this is not an activity Electra carries out.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

## 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**

This was discussed with Electra Staff. The Electra website was checked, and a sample of a customer communication reviewed.

#### **Audit commentary**

The following is presented on the Electra website in the complaints section:

## COMPLAINTS PROCESS



[Home](#) > [Contact Us](#) > [Complaints process](#)

As a customer of Electra you have the right to expect quality service and support at all times. If you have a complaint or problem, including land issues, we want to know so that we can fix it. All our staff are committed to treating complaints seriously and reaching resolutions as quickly and fairly as possible.

Here are the ways you can go about letting us know:



### Talk to us

A quick chat with a staff member at Electra is often all that is required to resolve your concern. Call us on 0800 Electra (0800 353 2872) between 8am - 5pm weekdays and ask to speak with our General Manager - Lines Business. He will take personal responsibility for ensuring your complaint is thoroughly investigated and resolved as quickly and fairly as possible. We endeavour to resolve all formal complaints within a period of 20 days and we do not charge for this service.



### Utilities Disputes Limited

We sincerely hope that your complaint has been resolved by this stage. If not, you can contact Utilities Disputes on 0800 22 33 40 or go to [www.utilitiesdisputes.co.nz](http://www.utilitiesdisputes.co.nz). Utilities Disputes is a free and independent service for resolving complaints about utilities providers.

Electra is a member of the Utilities Disputes Scheme including land complaints.



The following message is included on customer communications:



Electra is a member of the Utilities Disputes Scheme.

Utilities Disputes is a free and independent service for resolving complaints about utilities providers, and can be contacted on 0800 22 33 40 or go to [www.utilitiesdisputes.co.nz](http://www.utilitiesdisputes.co.nz)



The Customer Service Centre also has a script they follow advising of the customers of the Utilities Dispute process.

### 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

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked. The new connection process documents were reviewed. A random sample of 15 new ICP connection records were also checked.

#### Audit commentary

Retailers apply for new ICP connections to the network via a free form email to Electra which are delivered into a ManageEngine Service Desk platform. This is monitored by the Network Information Team who manage the lifecycle of all requests according to agreed SLAs. Connection approvals and ICP creations are typically begun on the day of request assuming all required information is received.

The application is recorded in a spreadsheet called "New ICPs to issue" against the next valid ICP identifier along with ICP information such as customer, address, retailer and request date. New ICP identifiers are generated in batches of 100 and are loaded into the spreadsheet ready for allocation.

Electra reviews the proposed connection in the GIS system to confirm the physical location address and to check if network assets and capacity are available. If no work is required on the network to establish and connect the new ICP and the retailer has provided all information required, then the application will be approved.

The ICP will be created and loaded into WindMil along with the other information required to be uploaded to the registry. The retailer is notified with the ICP (by email). An Electra approved contractor is then engaged by the customer, or someone on their behalf, to make the physical connection to the network.

If work is required to establish a new connection, then the customer via the retailer will be asked to contact an Electra approved contractor to prepare a quote for the work to be completed. Once the customer agrees and pays a deposit for the work to go ahead, assuming that the work is approved in accordance with Electra's policies, the connection is approved and the ICP is created and issued as per the standard process.

#### 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 3 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

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked. The new connection process documents were reviewed. A random sample of 15 new ICP connection records were also checked.

#### Audit commentary

Retailers apply to Electra for new ICP connections to the network. The application is logged in a spreadsheet along with ICP information such as customer, address, retailer and request date. WindMil is also populated with the information required to be uploaded to the registry.

The retailer provides all the information Electra requires to establish a new ICP so once that information is processed by Electra, an ICP is created in the registry and assigned the status of ready. If ICPs cannot be created within 3 business days, the Retailer is notified.

15 ICPs were randomly selected from ICPs created during the audit period. There were no issues found and many ICP requests were responded to in the same day.

#### 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

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked. The new connection process documents were reviewed. A random sample of 15 new ICP connection records were also checked.

#### Audit commentary

Retailers apply to Electra for new ICP connections to the network. The application is logged in a spreadsheet along with ICP information such as customer, address, retailer and request date. WindMil is also populated with the information required to be uploaded to the registry.

The retailer provides all the information Electra requires to establish a new ICP so once that information is processed by Electra, an ICP is created in the registry and assigned the status of ready. A 7 pm daily file updates the registry with the new ICP information.

15 ICPs were randomly selected from ICPs created during the audit period There were no issues found and many ICP requests were responded to in the same day

### **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**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### **Audit commentary**

WindMil is populated with the information provided by the retailer and required to establish a new ICP. A 7 pm daily file from WindMil updates the registry with the new ICP static information to create the ICP record and assigned the status of ready.

15 new ICPs were randomly selected, and data checked no issues were found.

The Audit compliance report identified 2 ICPs where the Ready status was not input prior to the Active date. Further investigation revealed that for one ICP Electra changed dates briefly in the Registry to allow the Retailer to correct the Active date. The second issue was caused by a Registry file transfer failure, the issue was corrected at the earliest opportunity.

Checks confirmed compliance with this code requirement.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 7(2A) of Schedule 11.1*

### Code related audit information

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

### Audit observation

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### Audit commentary

ELEC advises their aim is to have accurate information populated in the Registry.

768 new ICP connections were created on the Electra Network during the Audit period.

<b>Total IECD Input to Registry later than 10 business days within the Audit Period</b>	<b>IECD Input to Registry later than 10 business days for IECD within the Audit Period</b>	<b>Historical IECD Input During Audit Period. (For IECD prior to this Audit Period)</b>
189	130 (17% of ICPs created) Range 11 to 243 days	59      Range 176 to 1811 days

The total number IECD Input to Registry later than 10 business days was significantly lower than the last audit due to persistent efforts to correct the historic IECDs not populated in the Registry. Additional staff have also been added to new connections team to assist with improvement of these statistics.

The proportion of IECDs within the audit period was at a similar level to last the audit. The physical connection process in the field is managed by Retailers using Electra approved and warranted contractors, however the Retailers do not provide livening information back to ELEC. A livening app has been provided to the livening contractors, but ELEC advise that they continue to suffer from inconsistent work completion reports from connection contractors. This is an area ELEC plan to work on.

The dashboard implemented during the previous audit period has also been helpful in improving the historical IECD performance however it has not been as effective at assisting with managing the current IECD issue. It was discussed with ELEC staff that a possible contributor to this issue was that the Input for the *No Livening date – 2021 onwards* field in the dashboard came from a daily run Audit Compliance report hence non-compliance had already occurred. It was suggested that using the date the connection was made to the network be used as a start point to count down the 10 business days allowed to populate the Registry with the IECD. It was identified during the audit that this date was known as the livening contractors were required to obtain an approval to work on the network from the network operations for the date, they were to make a connection to the network. ELEC staff were to investigate this as a method to actively track and follow up with livening contractors to provide livening information within the 10-business day requirement.

The Audit Compliance report identified 28 ICPs where the IECD was different to the metering installation date. 20 ICPs were checked and together with the ELEC processes confirmed the IECD recorded in the Registry by ELEC were correct. Most of the Active dates were the same

as the IECD (depending on the Retailer), with one retailer choosing to simply use the metering installation data as the Active date.

**Audit outcome**

Non-compliant

**NON-COMPLIANCE**

Non-compliance	Description		
<p>Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1  From: 16-Jan-23 To: 30-Jun-24</p>	<p>17% of IECDs during the audit period were populated in the registry more than 10 days after the event. 59 ICPs connected prior to this audit period still did not have IECD populated in the Registry. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Choose an item.</p>	<p>Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correcting historical discrepancies Registry in this area. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Aligned with the responses to Audit Ref: 2.1 and 2.2, we are conducting a thorough review of our monitoring processes to enhance our ability to identify and address non-compliances.  Guidance has been sought from the EA on determining an IECD for historical ICPs where previous efforts to ascertain the date have been unsuccessful.</p>		<p>31/03/2025</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Preventative actions will be in alignment with those for Audit Ref: 2.1 and 2.2, focusing on improved monitoring and communication processes.</p>		<p>31/03/2025</p>	



### 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**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

#### **Audit commentary**

Retailers apply to Electra for new connections and ICPs. This ensures the proposed retailer is recorded in the registry at the time of the initial upload of an ICP to the registry in the 7 pm daily file update from WindMil.

Checks confirmed the code requirements were met.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.31*

#### **Code related audit information**

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

#### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

#### **Audit commentary**

Retailers apply to Electra for new connections and ICPs. This ensures the proposed retailer is recorded in the registry at the time of the initial upload of an ICP to the registry in the 7 pm daily file update from WindMil.

This request inherently provides Electra with the request to connect the ICP to the network. Once the connection to the network is approved by Electra it issues the ICP to the retailer permitting the retailer to engage one of Electra's approved and authorised contractors to connect and live the ICP onto the network.

Electra's policy is to not accept shared unmetered load.

Checks confirmed the code requirements were met.

### **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**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### **Audit commentary**

Electra Staff state there have not been any requests to temporarily electrically connect any installation during this audit period. Electra Staff are aware of the code requirements in this area. Electra authorise approved contractors to carry out connection work on its network. Retailers issue the job requests to the Electra authorised contractor to connect and live ICPs onto the network.

### **Audit outcome**

Compliant

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

#### Code reference

Clause 10.30

#### Code related audit information

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

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

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

#### Audit observation

This was discussed with Electra Staff. The Registry NSP table was reviewed along with the LIS file.

#### Audit commentary

A check of the NSP table in the Registry showed that ELEC does not have any NSP on its network that is not a point of connection to the grid.

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 3.10. 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**

This was discussed with Electra Staff. The Registry NSP table was reviewed along with the LIS file.

### **Audit commentary**

Electra Staff state there have not been any requests to temporarily electrically connect any NSP that is not a point of connection to the grid during this audit period. Electra Staff are aware of the code requirements in this area.

### **Audit outcome**

Not applicable

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

### **Code reference**

*Clause 1(1) Schedule 11.1*

### **Code related audit information**

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

*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**

This was discussed with Electra Staff. The LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### **Audit commentary**

An MS Access database tool is used to create a unique sequential number combined with the distributor code “EL” to create each ICP Identifier on the Electra network. It was verified that the tool creates ICPs with the correct format. Batches of 100 ICPs are created and are copied to the spreadsheet called “New ICPs to issue”, the tool where traders requests for new ICPs are recorded.

Checks confirmed the code requirements were met.

### **Audit outcome**

Compliant

### 3.12. Loss category (Clause 6 Schedule 11.1)

#### Code reference

*Clause 6 Schedule 11.1*

#### Code related audit information

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

#### Audit observation

This was discussed with Electra Staff. The LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

#### Audit commentary

The loss category code is assigned to an ICP when it is first generated in WindMil along with the information required to be uploaded to the registry. A 7 pm daily file updates the registry with the new ICP information, creates the ICP which is assigned the status of READY. 20 new ICPs were randomly selected, and data checked both in WindMil and the registry.

Checks confirmed the code requirements were met.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 13 Schedule 11.1*

#### Code related audit information

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

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

#### Audit observation

This was discussed with Electra Staff. The LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

#### Audit commentary

Retailers apply to Electra for new ICP connections to the network. The retailer provides all the information Electra requires so once that information is processed by Electra an ICP is created

in the registry and assigned the status of READY. Electra does not use the NEW status in the registry.

Checks confirmed the code requirements were met.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 15 Schedule 11.1*

#### **Code related audit information**

*If an ICP has had the status of “New” or has had the status of “Ready” for 24 months or more:*

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

#### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed.

#### **Audit commentary**

There were no ICPs identified that remained in the “Ready” status for more than 24 months during this audit period.

Checks confirmed the code requirements were met.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 7(6) Schedule 11.1*

#### **Code related audit information**

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

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

### **Audit observation**

This was discussed with Electra Staff. LIS and the Registry were checked.

### **Audit commentary**

Electra has an embedded generation station of 37 MW capacity on its network. ICP 0110007806EL3CF Mangahao Power Station. It has the unique loss category code assigned (MHO1).

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 10.33A(4)*

### **Code related audit information**

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

### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### **Audit commentary**

Once provided with the ICP by Electra, retailers arrange the physical connection of ICPs to the network using approved Electra contractors that are authorised by Electra to carry out connection work on the network. The contractors are inherently authorised by the retailer and Electra to connect to the network.

Checks confirmed the code requirements were met.

### **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**

This was discussed with Electra Staff.

#### **Audit commentary**

Electra approved contractors are authorised to access the network to carry out disconnection/reconnection and work at the request of Retailers. The approved contractors are engaged and managed by the Retailers to carry out disconnection/reconnection work. Electra does not directly control the approved contractors, the Retailers do. Electra only provides approval and authorisation to work on the network.

#### **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**

This was discussed with Electra Staff.

#### **Audit commentary**

Electra advises they do not “bridge” or “unbridge” metering as a normal part of their network operations.

Electra would only bridge metering if the safety or welfare of customers or animals were at risk or if authorised and requested to do so by the retailer responsible for the ICP. This has not occurred during this audit period.

Electra staff are aware of the code requirements.

#### **Audit outcome**

Compliant





## 4. MAINTENANCE OF REGISTRY INFORMATION

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

#### Code reference

Clause 8 Schedule 11.1

#### Code related audit information

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

*Notification must be given by the distributor within 3 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 8 business days after the change takes effect.*

*If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 13<sup>th</sup> 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 3 business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or 3 business days after the distributor has decommissioned the ICP.*

#### Audit observation

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### Audit commentary

Changes to ICP information are first updated in Windmil except for status changes prior to decommissioning which are completed directly in the Registry. The 7 pm daily file updates the registry with the changed ICP information.

The Audit Compliance Summary Report and the EDA file for the audit period identified the following:

Activity	Total Updates for the Audit Period	No of Updates Greater than 3 Days	Range in Days
Address (not new Connection)	6318	3630 (58%)	4 – 20 (5 x outliers 64 -1191)
Distributed Generation	504	6 (1.2%)	5 - 10
Pricing	3714	0	0

<b>Decommission Status</b> <b>3,2</b>	131	48 (37%)	6 - 2416
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The table above includes both current updates within the audit period and corrections of historical data.

A check of the address changes in the Registry indicates most of these are updates to GPS information not due to Retailer requests. However, there were 4 ICPs with late updates that ranged from 64 to 1191 days that were not due to GPS updates.

Pricing changes are backdated to the 1<sup>st</sup> of the month by agreement with Retailers. 15 retailer requests were checked and confirmed they were actioned the same day or the next meeting code requirements.

Distributed Generation compliance appears to have significantly improved from last audit. ELEC staff outlined increased efforts put into follow up contractors to return completion information. This is an industry wide issue. Despite these efforts 28 ICPs indicate Retailers had updated the profile in the Registry to a PV profile but no PV details were populated by ELEC, there were 83 ICPs last audit. A random sample was checked in the Registry, and it was found they all were changed to the PV profile during the audit period. There were 7 additional ICPs found that had the PV profile changed to a non PV profile, ELEC staff advised they had the PV installations removed.

Decommission compliance was an improvement on previous audit (58% late). The key issue is still late job completion information from approved contractors. ELEC advise they intend to improve this issue by adding decommissions to the field app contractors are currently using to record new connections.

### Audit outcome

Non-compliant

### NON-COMPLIANCE

Non-compliance	Description
Audit Ref: 4.1 With: <i>Clause 8</i> <i>Schedule 11.1</i>  From: 16-Jan-23 To: 30-Jun-24	A number of registry information updates(Address, Distributed Generation, Decommissioning) were greater than 3 business days from the event date.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>

Choose an item.	Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correction of historical Registry discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Aligned with the responses to Audit Ref: 2.1 and 2.2, we are conducting a thorough review of our monitoring processes to enhance our ability to identify and address non-compliances.		31/03/2025	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
<p>Aligned with the responses to Audit Ref: 2.1 and 2.2, we are conducting a thorough review of our monitoring processes to enhance our ability to identify and address non-compliances.</p> <p>We will engage an industry expert to assist in the review of our monitoring and response processes.</p>		31/03/2025	

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

##### Code reference

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

##### Code related audit information

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

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

##### Audit observation

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

##### Audit commentary

Electra has two NSPs on its network, PRM0331 and MHO0331. The NSP identifier is uploaded into the Registry when ICPs are initially loaded into the Registry as READY.

Checks confirmed the code requirements were met.

#### **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 3 business days after receiving a request for that information.*

#### **Audit observation**

This was discussed with Electra Staff.

#### **Audit commentary**

Queries are received typically by phone or retailer email service request. Emails are usually responded to on the same day. Phone queries about ICPs are usually dealt with immediately

Retailers manage the new connection process, so customers rarely contact Electra directly. Queries from electricians or retailers seeking ICP information or clarification are handled by the call centre initially and more difficult issues are dealt with by the GIS operators who manage the ICPs within Electra.

#### **Audit outcome**

Compliant

### 4.4. ICP location address (Clause 2 Schedule 11.1)

#### **Code reference**

*Clause 2 Schedule 11.1*

#### **Code related audit information**

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

#### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

#### **Audit commentary**

The retailer provides an installation address with the application for a new ICP connection. Electra check the proposed new ICP connections in the GIS system to confirm the physical location address prior to creating the ICP.

The Audit Compliance report identified 22 ICPs with difficult to locate addresses as they contain no street number (or duplicates), unit number, property name, or the same GPS coordinates. Evidence suggests correcting historic address information has been occurring during the audit period including populating large numbers of GPS co-ordinates. Checks confirmed all new ICPs have correct information.

**Audit outcome**

Non-compliant

**NON-COMPLIANCE**

Non-compliance	Description		
Audit Ref: 4.4 With: <i>Clause 2</i> <i>Schedule 11.1</i>  From: 16-Jan-23 To: 30-Jun-24	For 22 ICPs the address descriptions do not allow ICPs to be readily located.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correction of historical Registry discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra’s process requires compliant address descriptions at the point of ICP creation.  A review of not readily locatable ICPs is underway.		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electra’s process requires compliant address descriptions at the point of ICP creation.		31/03/2025	

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

## Code reference

Clause 3 Schedule 11.1

## Code related audit information

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

## Audit observation

This was discussed with Electra Staff.

## Audit commentary

The network connection application process is robust and well documented. The network connection process requires every proposed connection to the network (ICP) to be verified against the GIS to ensure it has a discrete disconnect point and connection to the network prior to an ICP being created.

Electra Staff state there are no known ICPs that could not be electrically disconnected without electrically disconnecting another ICP.

## Audit outcome

Compliant

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

### Code reference

Clause 7(1) Schedule 11.1

### Code related audit information

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

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

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



- if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):
  - a) the nameplate capacity of the generator; and
  - b) the fuel type
- the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).

**Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

**Audit commentary**

WindMil is populated with the information provided by the retailer and required to establish a new ICP. A 7 pm daily file from WindMil updates the registry with the new ICP static information to create the ICP record and assigned the status of ready. 15 new ICPs were randomly selected, and data checked no issues were found with the static information.

Further checks identified the following discrepancies:

No IECD in registry But Active	Distributed Generation Discrepancies	UML ICPs with no information in Registry
<ul style="list-style-type: none"> <li>• 17 ICPs in Audit Period</li> <li>• 26 historical</li> </ul>	<ul style="list-style-type: none"> <li>• 28 ICPs with no DG information but Retailer has populated PV profile</li> </ul>	<ul style="list-style-type: none"> <li>• 1 ICP</li> <li>• (identified at last audit)</li> </ul>

487 ICPs connected during the audit period.

5 of the 28 ICPs with no DG information were checked in the Registry to confirm the Retailer set the PV profile during the audit period. 7 additional ICPs were checked in the Registry and confirmed that PV details had been deliberately removed from the Registry

The LIS file identified the 11 LE ICPs (see below) that have an incorrect “Dedicated NSP” status of N. The 5 highlighted ICPs were identified in the previous audit. The additional 6 ICPs were created during this audit period.

- 0110011663ELA5A
- 0110012507EL543
- 0110012508ELA9D
- 0110012509EL6D8
- 0110013275ELE39
- 0110013710EL983
- 0110013711EL5C6
- 0110013820EL174
- 0110013895ELE89
- 0110014093ELB6B
- 0110014094EL6A1

ICP 0011261010ELB09 was identified at last audit as having no Distributor information in the Registry, this has not been corrected although 5 ICPs have been corrected.

**Audit outcome**

Non-compliant

**NON-COMPLIANCE**

Non-compliance	Description		
Audit Ref: 4.6 With: <i>Clause 7(1)</i> <i>Schedule 11.1</i>  From: 16-Jan-23 To: 30-Jun-24	Incorrect or missing information in the registry for distributed generation, Initial Electrical Connection Dates UML and NSP Status.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Choose an item.	Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correction of historical Registry discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>A targeted data clean-up initiative is underway to correct historical inaccuracies in the registry, focusing on distributed generation and related fields.</p> <p>Strengthened collaboration with retailers and contractors to ensure timely and accurate submission of required information for distributed generation and IECDs.</p>	31/03/2025	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p>Automated data entry and validation tools are being developed to minimize errors and ensure all required fields are completed accurately before registry submission.</p> <p>Periodic internal audits have been scheduled to review registry data for compliance and identify areas for improvement.</p> <p>Feedback loops with stakeholders have been established to address challenges and ensure ongoing accuracy in registry submissions.</p> <p>We will engage an industry expert to assist in the review of our monitoring and response processes.</p>	31/03/2025	

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

**Code reference**

*Clause 7(3) Schedule 11.1*

**Code related audit information**

*The distributor must provide the following information to the registry manager no later than 10 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**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### **Audit commentary**

Electra assigns the actual price category code to the ICP at the time an ICP identifier is created and uploaded to the registry. Electra's network charges are not based on chargeable capacity.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 7(8) and (9) Schedule 11.1*

### **Code related audit information**

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

### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Report, LIS and EDA files were checked.

### **Audit commentary**

Electra began uploading GPS coordinates to the registry in 2021. It is an on-going project, and the updates are evident in the audit compliance report.

The format used by ELEC meets the NZTM2000 standard.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 14 Schedule 11.1*

### **Code related audit information**

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

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

*Before an ICP is given the "Ready" status in accordance with Clause 14(1) of Schedule 11.1, the distributor must:*

- identify the trader that has taken responsibility for the ICP (Clause 14(2)(a) of Schedule 11.1)
- ensure the ICP has a single price category (Clause 14(2)(b) of Schedule 11.1).

### Audit observation

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection process was reviewed. A random sample of 15 new ICP connection records were also checked.

### Audit commentary

Once a new ICP connection application from a Retailer has been approved the new ICP will be created in WindMil along with the other information required to be uploaded to the registry via a 7 pm daily file. The Retailer is confirmed as taking responsibility for the ICP as they made the application.

The ICP is created in the registry with the status of ready and a single Price Category Code.

Checks confirmed code requirements were met.

### Audit outcome

Compliant

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

### Code reference

Clause 16 Schedule 11.1

### Code related audit information

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

### Audit observation

This was discussed with Electra Staff. The LIS file for the audit period was checked along with the Registry.

### Audit commentary

Electra’s policy is to not accept shared unmetered load.

Electra has 11 Distributor status ICPs. 6 ICPs were created during this audit period with 2 ICPs connected to date.

Distributor ICP Created	Date Connected	POC
0110013710EL983	No	PRM0331
0110013711EL5C6	No	PRM0331
0110013820EL174	No	PRM0331

0110013895ELE89	No	PRM0331
0110014093ELB6B	08/03/2024	PRM0331
0110014094EL6A1	08/03/2024	PRM0331

### Audit outcome

Compliant

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

### Code reference

Clause 20 Schedule 11.1

### Code related audit information

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

*Decommissioning only occurs when:*

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

### Audit observation

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry. The new connection/decommission process was reviewed. A random sample of 15 new ICP disconnection records were also checked.

### Audit commentary

Customers and contractors request ICP decommission (permanent disconnections from the network) via their retailer. Retailers arrange the physical decommission of ICPs using approved ELEC contractors that are authorised by ELEC to carry out decommission work on the network. Retailers notify ELEC with the completion date and other information about the decommission work completed and request the ICP status in the registry be changed to decommissioned. However, this notification has not always been timely or complete. The sample checked showed the Retailers were often late with the population of the *Inactive – electrically disconnected ready for decommissioning (1,6)* status in the Registry which automatically made it difficult for ELEC to meet its registry update obligations.

ELEC Staff follow up with Retailers by email to obtain decommission completion information.

Checks confirmed code requirements were met.

### Audit outcome

Compliant

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

##### Code reference

Clause 23 Schedule 11.1

##### Code related audit information

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

*Each entry must specify the date on which each price category code takes effect, which must not be earlier than 2 months after the date the code is entered in the table.*

*A price category code takes effect on the specified date.*

##### Audit observation

This was discussed with Electra Staff. The Price Category Codes table in the registry was checked.

##### Audit commentary

During the audit period ELEC introduced 1 new price category into the Registry Price Category Code tables:

Code	Description	Start Date	Registry table Updated
IND	Individual Charge	1/04/2023	16/01/2023

##### Audit outcome

Compliant

## 5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

#### Code reference

*Clause 21 Schedule 11.1*

#### Code related audit information

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

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

*A loss category code takes effect on the specified date.*

#### Audit observation

This was discussed with Electra Staff. The Loss Factor table in the Registry was checked.

#### Audit commentary

ELEC reviewed the loss factors and loss factor 1 was updated with a start date of 1 May 2023. The Loss factor table was updated on 8 February 2023.

#### Audit outcome

Compliant

### 5.2. Updating loss factors (Clause 22 Schedule 11.1)

#### Code reference

*Clause 22 Schedule 11.1*

#### Code related audit information

*Each loss category code must have a maximum of 2 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

This was discussed with Electra Staff. The Loss Factor table in the Registry was checked.

#### Audit commentary

Loss factors have a single value for all trading periods for a year. There are no seasonal loss factor codes for summer or winter.

ELEC reviewed the loss factors and loss factor 1 was updated with a start date of 1 May 2023. The Loss factor table was updated on 8 February 2023.

#### Audit outcome

Compliant



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

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

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

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

*If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between 2 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

This was discussed with Electra staff. The NSP table in the Registry was checked.

#### Audit commentary

ELEC Staff confirm that Electra do not own any embedded networks and did not establish any embedded network that they are responsible for during this audit period. No NSP was decommissioned during this audit period

This clause is not applicable. Compliance was not assessed

#### Audit outcome

Not applicable

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

#### Code reference

Clause 26(1) and (2) Schedule 11.1

#### **Code related audit information**

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

*The request must be made at least 10 business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between 2 local networks. In all other cases, the request must be made at least 1 month before the NSP is electrically connected or the ICP is transferred.*

#### **Audit observation**

This was discussed with Electra staff. The NSP table in the Registry was checked.

#### **Audit commentary**

ELEC did not create any new NSPs during the audit period, therefore the Reconciliation Manager was not asked to create any unique NSP identifiers.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

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

#### **Code related audit information**

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

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

#### **Audit observation**

This was discussed with Electra staff. The NSP table in the Registry was checked.

#### **Audit commentary**

ELEC Staff confirm that Electra do not own any embedded networks and did not establish any embedded network that they are responsible for during this audit period.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

##### Code reference

Clause 26(4) Schedule 11.1

##### Code related audit information

*If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must give notice to the reconciliation manager at least 1 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

This was discussed with Electra staff. The NSP table in the Registry was checked.

##### Audit commentary

ELEC Staff confirm that Electra do not own any embedded networks and did not establish any embedded network that they are responsible for during this audit period.

This clause is not applicable. Compliance was not assessed.

##### Audit outcome

Not applicable

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

##### Code reference

Clause 24(2) and (3) Schedule 11.1

##### Code related audit information

*The distributor must give written notice to the reconciliation manager of any change to balancing areas associated with an NSP supplying the distributor's network. The notification must specify the date and trading period from which the change takes effect, and be given no later than 3 business days after the change takes effect.*

##### Audit observation

This was discussed with Electra staff. The NSP table in the Registry was checked.

##### Audit commentary

Electra has two balancing areas, MHO0331ELECGN and PRM0331ELECGN. There were no changes to balancing areas during this audit period.

##### Audit outcome

Compliant

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

### Code reference

Clause 27 Schedule 11.1

### Code related audit information

*If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least 1 month before the transfer.*

### Audit observation

This was discussed with Electra staff. The NSP table in the Registry was checked.

### Audit commentary

ELEC Staff confirmed that Electra did not transfer an ICP which resulted in an ICP becoming an NSP, at which an embedded network connected to a network or an ICP became an NSP that is an interconnection point during this audit period.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

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

### Code reference

Clause 1 to 4 Schedule 11.2

### Code related audit information

*If the distributor wishes to transfer an ICP, the distributor must give written notice to the Authority in the prescribed form, no later than 3 business days before the transfer takes effect.*

### Audit observation

This was discussed with Electra staff. The NSP table in the Registry was checked.

### Audit commentary

ELEC Staff confirmed that during this audit period ELEC did not transfer any ICPs during the audit period.

ELEC Staff advise they are aware of the code requirements.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 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 1 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

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

### Audit commentary

ELEC Staff confirm that ELEC do not have any NSPs which they are responsible for that are not connections to the grid.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 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 5 business days after the date of certification of each metering installation, advise the reconciliation manager of
  - a) the MEP for the NSP (Clause 10.25(2)(c)(i)); and

b) *the NSP of the certification expiry date(Clause 10.25(2)(c)(ii)).*

#### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### **Audit commentary**

ELEC Staff confirm that ELEC do not have any NSPs which they are responsible for that are not connections to the grid.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

*Clause 29 Schedule 11.1*

#### **Code related audit information**

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

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

*At least 1 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**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### **Audit commentary**

ELEC Staff confirm that ELEC did not acquire all or part of a new network during this audit period.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### 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**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### **Audit commentary**

ELEC Staff confirm that ELEC do not own any embedded networks and did not establish any embedded network during this audit period.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

*Clauses 5 and 8 Schedule 11.2*

#### **Code related audit information**

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

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

*The notification must include any information requested by the Authority (Clause 8 of Schedule 11.2).*

#### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### **Audit commentary**

ELEC Staff confirm that ELEC do not own any embedded networks and did not establish any embedded network during this audit period.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

### **Code reference**

*Clause 6 Schedule 11.2*

### **Code related audit information**

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

### **Audit observation**

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

### **Audit commentary**

ELEC Staff confirm that ELEC do not own any embedded networks and did not establish any embedded network during this audit period.

This clause is not applicable. Compliance was not assessed.

### **Audit outcome**

Not applicable



## 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

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### Audit commentary

ELEC has no shared unmetered load on its network. The company policy is not to allow the installation of shared unmetered load.

#### 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

This was discussed with Electra Staff. The Audit Compliance Summary Reports, LIS and EDA files for the audit period were checked along with the Registry.

#### Audit commentary

ELEC has no shared unmetered load on its network. The company policy is not to allow the installation of shared unmetered load.

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

## 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

This was discussed with Electra Staff. The Asset management Plans, Information Disclosure documents and Loss Factor information on the Electra website was reviewed.

#### Audit commentary

Electra's loss factor calculation methodology is based on the requirements as set out in the Electricity Authority's Guidelines on the Calculation and use of Loss Factors for Reconciliation Purposes. An outline on how the loss Factors are calculated is published in the *Electra Network Loss Methodology* document found on the Electra website. Electra's losses are reviewed annually, and the current network losses (effective from 1 April 2024) are published as 6.60% with a loss factor of 1.071, a change from the previous 7.11% and 1.076, respectively. It was confirmed that Electra published the loss factor and network losses on their website.

#### Audit outcome

Compliant

## CONCLUSION

See Executive Summary

## PARTICIPANT RESPONSE

Since the last audit, Electra has made substantial improvements in our compliance. Key initiatives have been implemented to address previous audit findings and enhance the accuracy and timeliness of our data submissions.

### Improvements and Achievements:

- **Process Enhancements:** We're introducing a new digital connections form to ensure all necessary information is supplied before requests are processed, reducing the risk of missing or inaccurate data entries.
- **Data Clean-Up:** A targeted initiative has been launched to correct historical inaccuracies in the registry, particularly in distributed generation and IECDs, significantly improving our data quality.
- **Increased Collaboration:** We're strengthening collaboration with retailers and contractors, improving communication and efficiency in data collection where external input is crucial.

### Challenges and External Dependencies:

Despite our progress, we face challenges where our ability to improve is limited by reliance on third parties. The timeliness of IECD submissions and registry updates often depends on the promptness and accuracy of information from contractors and retailers. While we've reinforced the importance of timely data submission, delays sometimes occur beyond our control.

The complexity of distributed generation processes, involving multiple third parties, also presents challenges in capturing and updating required information within regulatory timeframes. We continue to work closely with these partners to mitigate these issues but recognize that complete control over these processes isn't always possible.

### Commitment to Continuous Improvement:

Electra remains committed to continuous improvement in compliance. We'll keep refining our processes, investing in team development, and leveraging technology to enhance data management. Our focus on proactive stakeholder engagement ensures that external dependencies are effectively managed.

In conclusion, while challenges remain, our progress since the previous audit demonstrates our team's commitment to excellence. We are confident that with continued focus and collaboration, Electra will further strengthen its compliance performance in future audits.