ELECTRICITY INDUSTRY PARTICIPATION CODE
RECONCILIATION PARTICIPANT AUDIT REPORT

Provera

For

FOROURGOOD LIMITED

NZBN: 9429046893093

Prepared by: Brett Piskulic

Date audit commenced: 27 June 2024

Date audit report completed: 19 August 2024

Audit report due date: 28 August 2024

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EXECUTIVE SUMMARY

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of **ForOurGood Ltd (FOGY),** to support their application for renewal of certification in accordance with clauses 5 and 7 of schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits version 7.2.

FOGY is a HHR trader for meter category 1 and 2 ICPs. There has been a large increase in "active" ICP numbers from 894 in 2021, to 4956 in 2022, and 9012 in 2024.

During the audit period FOGY has improved some of their status update and switching processes to increase automation and reduce errors. The files generated by FOGY's system use the same logic as the manual process, and because of this the improvements were not considered by FOGY to be a material change. The timeliness and accuracy of each type of registry update has been similar to, or better than previous audits. Despite the large increase in workload, there were small numbers of late and inaccurate registry and switching updates.

Submission continues to be highly accurate, and where accuracy issues were found, they were isolated and affected small numbers of ICPs and low volumes. In some cases, one minor low impact issue caused non-compliance in several report sections, such as two existing ICPs which had shared unmetered load added resulting in 17 kWh of unmetered load being omitted from submission before the ICPs switched out. Because FOGY is an HHR only trader, they were unable to submit the unmetered load.

The audit recorded 18 non compliances and a risk rating of 23, a small increase from 16 non-compliances and a risk rating of 21 during the previous audit. The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Based on the audit risk rating, the indicative next audit date is in 12 months. Given that despite an increase in workload compliance is similar to the previous audit and non-compliances were minor, I recommend that the next audit is completed in 16 months on 28 December 2025.

The matters raised are shown in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	11.2	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023. Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate. ICPs 0000042660UNFC5 and 0427243033LC200 have incorrect "inactive" status event dates. ICP 0000164722TR658 appears to have been reconnected by the gaining trader by 27 June 2023 and the ICP switched effective from 28 June 2023. The ICP incorrectly had "inactive" status recorded for at least 27 June 2023.	Moderate	Low	2	Investigating
Electrical Connection of Point of Connection	2.11	10.33A	One reconnection was not certified within five business days.	Strong	Low	1	Identified
Provision of information on dispute resolution scheme	2.19	11.30A	Some price change notifications did not contain information on Utilities Disputes.	Strong	Low	1	Cleared
Provision of information on electricity plan comparison site	2.20	11.30B	Some price change notifications did not contain information on Powerswitch.	Strong	Low	1	Cleared
Changes to registry information	3.3	10 of schedule 11.1	70 late updates to "active" status for reconnections. 18 late updates to "inactive" status for disconnections. 18 late trader updates.	Strong	Low	1	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			Six ANZSIC code updates were made more than 20 business days after FOGY began trading at the ICP.				
Management of "inactive" status	3.9	19 of schedule 11.1	ICPs 0000042660UNFC5 and 0427243033LC200 have incorrect "inactive" status event dates. ICP 0000164722TR658 appears to have been reconnected by the gaining trader by 27 June 2023 and the ICP switched effective from 28 June 2023. The ICP incorrectly had "inactive" status recorded for at least 27 June 2023.	Moderate	Low	2	Identified
Losing trader must provide final information - standard switch	4.3	5 of schedule 11.3	Ten CS breaches for switch moves.	Strong	Low	1	Identified
Retailers must use same reading - standard switch	4.4	(1) and 6A of schedule 11.3	One RR breach.	Strong	Low	1	Identified
Gaining trader informs registry of switch request - switch move	4.7	5 of schedule 11.3	Three switch move NT files were issued more than three business days after pre conditions were cleared.	Strong	Low	1	Identified
Losing trader provides information - switch move	4.8	10 of schedule 11.3	ICP 0000605524HBBF4 AN-8072264 24 October 2023 had the AA (acknowledge and accept) code manually applied when an AMI meter was installed. One E2 breach where the CS event date was before the gaining trader's requested event date.	Strong	Low	1	Identified
Gaining trader changes to switch meter reading - switch move	4.11	12 of schedule 11.3	One RR breach.	Strong	Low	1	Identified
Withdrawal of switch requests	4.15	17 and 18 of schedule 11.3	Two outgoing NWs had incorrect NW withdrawal advisory codes applied. 12 NA breaches. 7 SR breaches. Two AW breaches.	Moderate	Low	2	Identified
Electricity conveyed & notification by	6.1	10.13	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation	Strong	Low	1	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
embedded generators			commenced in December 2023, and the ICP has not been added to the gifting register. Energy is not metered and quantified according to the code where meters are bridged.				
Collection of information by certified reconciliation participant	6.5	2 of schedule 15.2	Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods.	Moderate	Low	2	Identified
Trading period duration	7.1	13 of schedule 15.2	Two clock synchronisation events over 1800 seconds resulted in trading period durations which were outside the ±0.1% threshold.	Moderate	Low	2	Identified
Creation of submission information	12.2	15.4	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023 for ICPs 0000241337WE97B and 0000242779WE6A4.	Strong	Low	1	Investigating
Accuracy of submission information	12.7	15.12	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023. Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.	Strong	Low	1	Investigating
Reconciliation participants to prepare information	12.9	2 of schedule 15.3	17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023.	Strong	Low	1	Identified
Future Risk Rating						**23**	

Future risk rating	0	1-3	4-14	16-40	41-55	55+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Recommendation
		Nil	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code (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

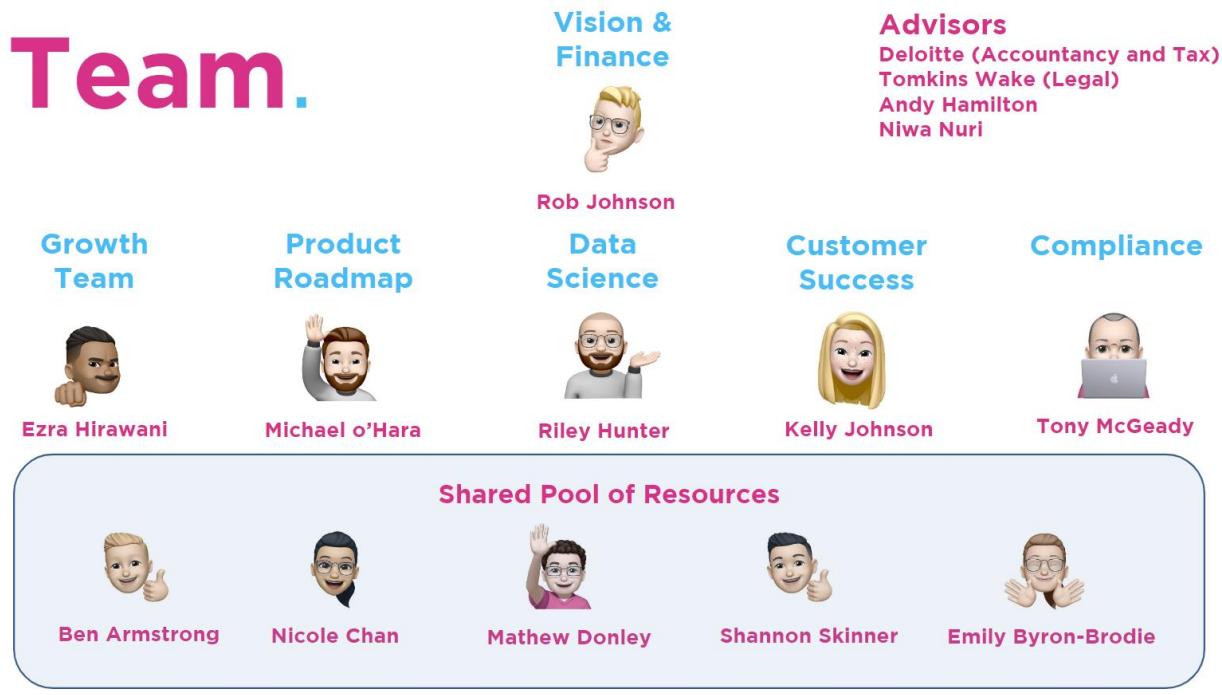
I checked the Authority's website to identify any relevant exemptions.

Audit commentary

FOGY does not have any exemptions in place.

1.2. Structure of Organisation

FOGY proivided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditors:

Name	Company	Role
Brett Piskulic	Provera	Lead Auditor
Tara Gannon	Provera	Supporting Auditor

Personnel assisting in this audit were:

Name	Title
Tony McGeady	Compliance
Nicole Chan	Software Developer and Customer Success
Matthew Donley	Shared Pool of Resources
Michael O'Hara	Product Roadmap

1.4. Use of Agents (Clause 15.34)

Code reference

Clause 15.34

Code related audit information

A reconciliation participant who uses an agent

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

Audit observation

I requested details of agents involved in any relevant processes.

Audit commentary

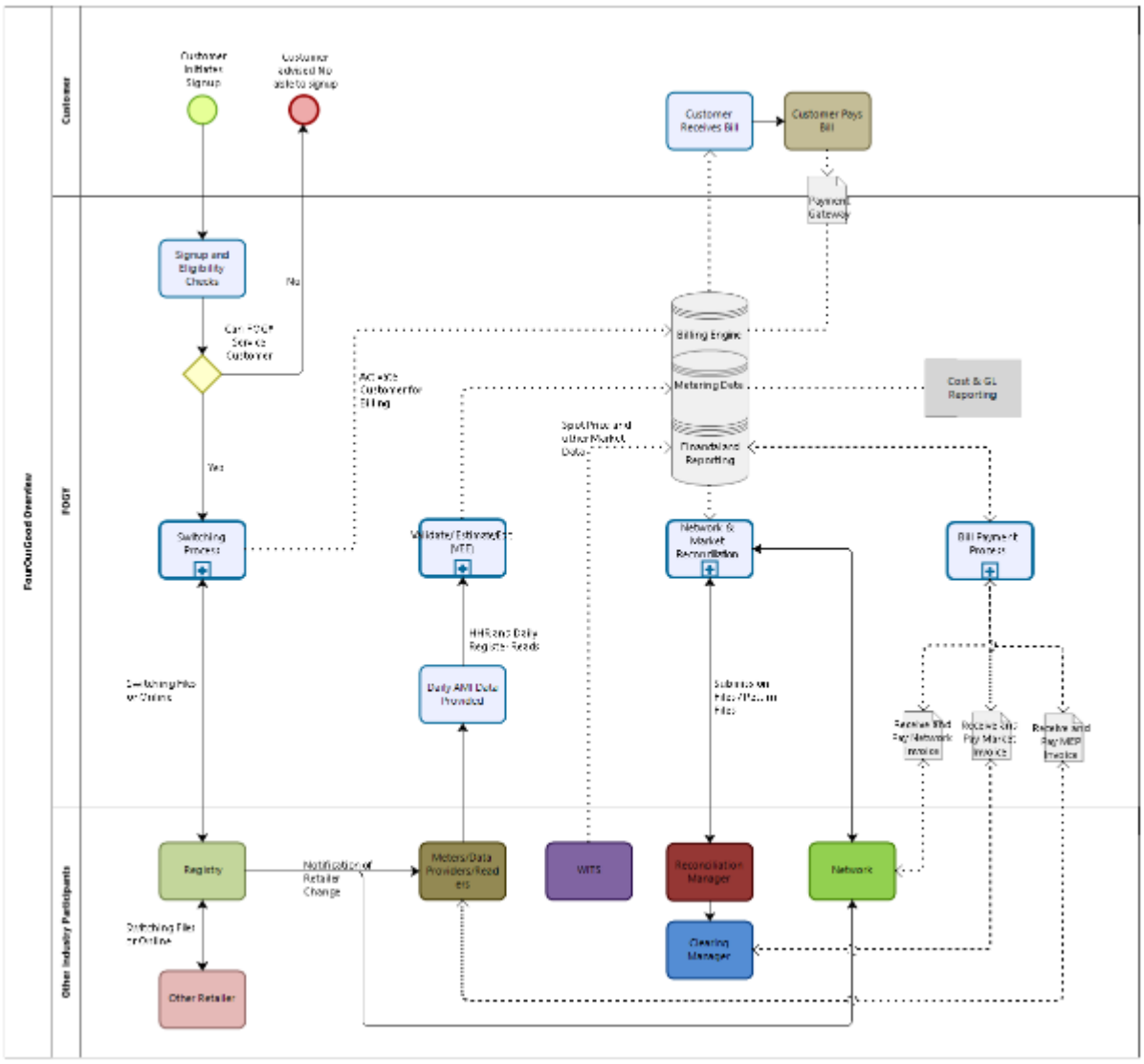
FOGY uses IntelliHUB Limited as an agent for supplying estimated HHR data. IntelliHUB Limited is an MEP providing AMI data, but the provision of estimates is undertaken as an agent to retailers, not as an MEP.

1.5. Hardware and Software

The diagram below shows the processes and systems at a high level. A bespoke system has been developed and its functionality was checked as part of this audit. The Sequel system is cloud based, hosted by Microsoft and password protection is in place to ensure data security.

Azure automatically backs up the production databases, and FOGY takes its own daily backups which are retained for a rolling fortnight.

There have been some incremental system and process changes during the audit period, including increased automation of some status update and switching processes. FOGY considered the changes to be enhancement of their manual process rather than a material change, and provided process documentation confirming that the automated processes were consistent with the previous manual processes.



1.6. Breaches or Breach Allegations

FOGY has not had any breach allegations recorded by the Electricity Authority during the audit period.

1.7. ICP Data

The quantity of ICPs by status is shown below:

Status	2024	2022	2021	2020
Active (2,0)	9,012	4,956	894	390
Inactive – new connection in progress (1,12)	-	-	-	-
Inactive – electrically disconnected vacant property (1,4)	90	16	1	1
Inactive – electrically disconnected remotely by AMI meter (1,7)	23	7	3	0
Inactive – electrically disconnected at pole fuse (1,8)	10	1	-	-
Inactive – electrically disconnected due to meter disconnected (1,9)	-	-	-	-
Inactive – electrically disconnected at meter box fuse (1,10)	-	-	-	-
Inactive – electrically disconnected at meter box switch (1,11)	6	5	1	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-	-	-	-
Inactive – reconciled elsewhere (1,5)	-	-	-	-
Decommissioned (3)	40	10	4	0

The “active” ICPs on the list file were summarised by meter category in the table below:

Metering Category	2024	2022	2021	2020
1	9,012	4,655	894	390
2	-	1	-	-
3	-	-	-	-
4	-	-	-	-
5	-	-	-	-
9	-	-	-	-
Blank	-	-	-	-

1.8. Authorisation Received

A letter of authorisation was received.

1.9. Scope of Audit

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of FOGY, to support their application for renewal of certification in accordance with clauses 5 and 7 of schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits V7.2 and was completed remotely.

Registry list, event detail and audit compliance report for 1 January 2023 to 7 June 2024, and a registry list snapshot for 7 June 2024 were reviewed.

FOGY deals with HHR AMI ICPs only. They do not conduct new connections and do not deal with unmetered load. The table below shows the tasks under clause 15.38 of part 15 for which FOGY requires certification.

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Within Audit Scope	Agents involved in performance of tasks
(a) - Maintaining registry information and performing customer and embedded generator switching	✓	
(b) – Gathering and storing raw meter data	✓	
(c)(i) - Creation and management of HHR volume information	✓	IntelliHUB creates HHR estimates
(c)(ii) - Creation and management of NHH volume information	✗	
(c)(iii) - Creation and management of HHR & NHH volume information	✗	
(c)(iv) - Creation and management of dispatchable load information	✗	
(d) – Calculation of ICP days	✓	
(da) - delivery of electricity supplied information under clause 15.7	✓	
(db) delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	
(e) – Provision of submission information for reconciliation	✓	
(f) - provision of metering information to the grid owner in accordance with subpart 4 of Part 13.	✗	

IntelliHUB's audit report is expected to be submitted with this report, and MEPs are subject to a separate audit regime.

1.10. Summary of previous audit

The previous audit was conducted in January 2023 by Tara Gannon of Veritek Limited. The summary tables below show the statuses of the non-compliances and recommendations raised in the previous audit. Further comment is made in the relevant sections of this report.

Subject	Section	Clause	Non-compliance	Status
Relevant information	2.1	11.2	ICP 0438360974LC55A has an incorrect ANZSIC code recorded. ICP 0000063546TR2A9 has an incorrect "inactive" status event date recorded. ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.	Cleared Still existing Cleared Still existing
Electrical Connection of Point of Connection	2.11	10.33A	One reconnection was not certified within five business days.	Still existing
Changes to registry information	3.3	10 of schedule 11.1	Nine late updates to "active" status for reconnections. Four late updates to "inactive" status for disconnections. Four late trader updates. One ANZSIC code update was made more than 20 business days after FOGY began trading at the ICP.	Still existing
ANZSIC codes	3.6	9 (1(k) of schedule 11.1	ICP 0438360974LC55A had an incorrect ANZSIC code recorded. 000000 residential was applied but S955 Civic Professional and Other Interest Group Services was expected.	Cleared
Management of "inactive" status	3.9	19 of schedule 11.1	ICP 0000063546TR2A9 was disconnected on 12 July 2022 and was originally correctly entered on the registry as "inactive" from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an "inactive" record dated 20 June 2022.	Still existing
Losing trader response to switch request and event dates - standard switch	4.2	3 and 4 of schedule 11.3	One AN had an incorrect response code applied.	Still existing
Losing trader must provide final information - standard switch	4.3	5 of schedule 11.3	Six transfer CS files contained an incorrect last actual read date.	Still existing

Subject	Section	Clause	Non-compliance	Status
Losing trader provides information - switch move	4.8	10 of schedule 11.3	One E2 breach where the CS event date was before the gaining trader's requested event date.	Still existing
Losing trader must provide final information - switch move	4.10	11 of schedule 11.3	Three switch move CS file contained incorrect switch event read types. Three switch move CS files contained an incorrect last actual read date. One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.	Cleared
Gaining trader changes to switch meter reading - switch move	4.11	12 of schedule 11.3	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.	Still existing
Withdrawal of switch requests	4.15	17 and 18 of schedule 11.3	Two outgoing NWs had incorrect NW withdrawal advisory codes applied. One outgoing NW was issued in error and was rejected by the other trader. Three NA breaches. One incoming NW file was rejected in error.	Still existing
Metering information	4.16	21 of schedule 11.3	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.	Cleared
Electricity conveyed & notification by embedded generators	6.1	10.13	Energy is not metered and quantified according to the code where meters are bridged.	Still existing
Identification of readings	9.1	3(3) of schedule 15.2	Three switch move CS files had incorrectly recorded switch event read types.	Cleared
Creation of submission information	12.2	15.4	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.	Cleared, but new non-compliance exists
Accuracy of submission information	12.7	15.12	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.	Cleared Still existing

Subject	Section	Clause	Recommendation	Status
Relevant information	2.1	Replacement reading data from IntelliHUB	Arrange for IntelliHUB to provide replacement data if it is obtained within 100 days of the reading date.	In progress. FOGY is working with IntelliHUB to resolve this issue.
Electrical Connection of Point of Connection	2.11	Check meter certification when arranging meter reconnections	If a meter requiring reconnection does not have current meter certification, attempt to arrange re-certification with the MEP.	Adopted
Management of "inactive" status	3.9	Inactive ICPs with consumption	Check ICPs 0000162652HBF16, 0000502587NR344, 0000670816TUCFC, 0000974411TU5C0, 0100578446LCBA3, 0395721083LCCAF, 0476945267LCD1E and 1001156046CK19F to confirm the correct "active" status periods and process registry updates as necessary.	Adopted
Management of "inactive" status	3.9	Review of ICPs with "inactive" consumption	Not all ICPs appear to be investigated and actioned during the weekly checks of "inactive" consumption, and I recommend that the weekly checks are more thorough, with status updates made where necessary.	Adopted
Losing trader must provide final information - standard switch	4.3	Processes for last actual read dates	Update processes to ensure that the last actual read date is consistently populated with the last date an actual reading was received for during the period of supply. Where a switch event reading is estimated, the last actual read date is expected to be before the last day of supply.	Adopted
Electricity conveyed & notification by embedded generators	6.1	Distributed generation for ICP 0000052255HBB9D	Confirm whether distributed generation is present for ICP 0000052255HBB9D, and if it is, arrange for compliant I flow metering to be installed.	Adopted

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

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

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

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

Audit observation

The processes to find and correct incorrect information were examined. The registry validation processes were examined in detail in relation to the achievement of this requirement.

The registry list and audit compliance report were examined to identify any registry discrepancies, and to confirm that information was correct and not misleading.

Audit commentary

Registry data synchronisation and validation

FOGY uses the registry as the database of record for ICP attributes. There is no validation between FOGY's records and the registry because the registry is the database of record. Registry information is downloaded as an input into:

- the reconciliation process to ensure that aggregation factors are correctly applied,
- the application process to determine whether an ICP can validly sign up,
- meter changes and removals, and
- other processes as needed.

Registry status updates are manually triggered from FOGY's database. The user selects the status, reason and event date and a file is generated and transferred to the registry. At the time of the previous audit, these changes were made manually using the registry user interface. FOGY considered the change as an enhancement of their manual process rather than a material change.

Trader updates including MEP nominations are completed manually using the registry user interface.

Registry notification files are not reviewed, and registry acknowledgement files are processed automatically. Any record with an acknowledgement code other than "000" (no error – update was successful) generates an email which is reviewed and actioned by FOGY.

I checked a sample of aggregation factor changes identified on the registry list with history and confirmed they were correctly included in submission data with correct aggregation factors.

Static data accuracy

Static data accuracy was reviewed by checking the audit compliance report, registry list and a sample of registry updates made by FOGY on the event detail report. The following data inaccuracies were identified which were not corrected as soon as practicable:

- ICPs 0000042660UNFC5 and 0427243033LC200 have incorrect "inactive" status event dates; ICP 0000042660UNFC5 was made "inactive" from 1 May 2024 but should have been "inactive" from 9 May 2024, and ICP 0427243033LC200 was made "inactive" from 1 June 2022 but should have been "inactive" from 1 June 2023,
- ICP 0000164722TR658 appears to have been reconnected by the gaining trader on or before 27 June 2023 and the ICP switched effective from 28 June 2023, the ICP incorrectly had "inactive" status recorded for at least 27 June 2023.

I rechecked previous audit exceptions and found they have not been resolved:

- ICP 0438360974LC55A which had an incorrect ANZSIC code has switched out, and
- ICP 0000063546TR2A9 was disconnected on 12 July 2022 but is still recorded as being "inactive" from 20 June 2022.

Read and volume data accuracy

Processes for validation of read and volume data are compliant. Review of a sample of data confirmed that errors and meter accuracy issues are being detected and appropriately corrected. The following submission accuracy issues were identified:

- I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register,
- 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023 for ICPs 0000241337WE97B and 0000242779WE6A4,
- two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods, and
- IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.

The previous audit found ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October 2022. I confirmed that permanent estimate I flow data was submitted from 3 August 2022 until 27 September 2023 when actual data was received from the MEP.

All ICPs are settled as HHR, and the correction process is discussed in **section 8.2**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11.2	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023. Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate. ICPs 0000042660UNFC5 and 0427243033LC200 have incorrect "inactive" status event dates.

From: 18-Dec-23 To: 23-Jul-24	ICP 0000164722TR658 appears to have been reconnected by the gaining trader by 27 June 2023 and the ICP switched effective from 28 June 2023. The ICP incorrectly had "inactive" status recorded for at least 27 June 2023. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are moderate overall, because there are processes to identify incomplete and inaccurate data and a small number of exceptions occurred. There is no process for reporting of unmetered load. The submission impact is low based on the number of ICPs affected and volumes. All consumption is reported for reconciliation regardless of status.

Actions taken to resolve the issue	Completion date	Remedial action status
Time variations were reviewed and Decision made due to flat profile and low load not to adjust each interval as variation between intervals was extremely small and rounding for Reconciliation made the adjustment irrelevant As with many of the Status related non-compliances these are due to other Participants reconnecting sites and then failing to Request the switch, and not restoring the connection to in-Active. Reporting continues to check for these and correct as soon as identified Unmetered Load of 17kwh over the period was identified once WAIK updated the Registry with the Shared unmetered values. This was reviewed and initiation of requesting those customers moved to another retailer was initiated. Volume was reviewed and modelled by creating a Interval dataset, but Reconciliation rounding meant each interval rounded to Zero IHUB Estimates are reviewed and catchup data requested (or re-estimated if no catchup data available at the time of calculation for each Market revision	31/10/2024	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	

IHUB Estimates > 15 days are indentified with the HHR to Read Checks during Each Revision and Any that have not had catchup data are requested, if no catchup data is available from MEP, the previous MEP Estimation will be replaced with a FOGY Estimate between available reads Follow-up process to be established where ICP moves from a load only to both Load and Generation to ensure EG register is in place. MEP request will be implemented and ICP will be added to Register until it has appropriate metering	31/10/2024	

2.2. Provision of information (Clause 15.35)

Code reference

Clause 15.35

Code related audit information

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

Audit observation

Processes to provide information were reviewed and observed throughout the audit.

Audit commentary

This area is discussed in several sections in this report and compliance is confirmed with regard to timeliness and format of information in accordance with Part 15.

Audit outcome

Compliant

2.3. Data transmission (Clause 20 Schedule 15.2)

Code reference

Clause 20 of schedule 15.2

Code related audit information

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

Audit observation

HHR data is provided via SFTP. I reviewed the method to receive meter reading information and traced a diverse sample of readings from the source files to FOGY's system and submission information.

Audit commentary

HHR data is provided by SFTP which ensures the security and integrity of data. It is imported into FOGY's database on receipt, and the raw files are zipped and archived. I confirmed the accuracy of data transfer by tracing:

- HHR data and readings from the MEP's source files to FOGY's database for ten ICPs, which confirmed the volumes and readings were recorded and labelled correctly, and
- one month of HHR data from FOGY's database to the HHR aggregates submission for ten ICPs, which confirmed that the submissions were consistent with the data in the database.

The sample of ICPs included all MEPs who provide data to FOGY.

Audit outcome

Compliant

2.4. Audit trails (Clause 21 Schedule 15.2)

Code reference

Clause 21 of schedule 15.2

Code related audit information

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

The audit trail must include details of information:

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

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

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

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

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

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

Audit observation

A complete audit trail was checked for all data gathering, validation and processing functions. I reviewed audit trails for a small sample of events.

Audit commentary

Compliant audit trails are recorded in FOGY's system. If an estimate is conducted and actual data is subsequently provided by the MEP, the original estimated row is labelled as "double" and is ignored for billing and submission. Estimates are identified at trading period and daily level.

Audit outcome

Compliant

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

Code reference

Clause 10.4

Code related audit information

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

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

Audit observation

I reviewed the current terms and conditions for all brands supplying ICPs under the FOGY participant code.

Audit commentary

All brands which supplied ICPs during the audit period have compliant terms and conditions.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

The trader must use its best endeavours to provide access:

- *in accordance with any agreements in place,*
- *in a manner and timeframe which is appropriate in the circumstances.*

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

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

Audit observation

I reviewed the current terms and conditions for all brands supplying ICPs under the FOGY participant code.

Audit commentary

All brands which supplied ICPs during the audit period have compliant terms and conditions.

FOGY supports other parties to obtain access to metering installations and will arrange disconnection of the ICP as a last resort if access is refused.

Audit outcome

Compliant

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

Code reference

Clause 10.35(1)&(2)

Code related audit information

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

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

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

Audit observation

Examination of the registry list confirmed all ICPs have meter category 1.

Audit commentary

FOGY is not responsible for any metering installations with loss compensation factors.

Audit outcome

Compliant

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

Code reference

Clause 11.15B

Code related audit information

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

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

- *the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d));* ***and***
- *the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).*

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

Audit observation

I reviewed the current terms and conditions for all brands supplying ICPs under the FOGY participant code.

Audit commentary

All brands which supplied ICPs during the audit period have compliant terms and conditions.

Audit outcome

Compliant

2.9. Connection of an ICP (Clause 10.32)

Code reference

Clause 10.32

Code related audit information

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

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

Audit commentary

No new connections have occurred; and all ICPs are metered, with an MEP recorded and metering category 1.

Audit outcome

Compliant

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

Code reference

Clause 10.33(1)

Code related audit information

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

- *for a point of connection to the grid – the grid owner has approved the connection,*

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

Audit commentary

No new connections have occurred.

Audit outcome

Compliant

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

Code reference

Clause 10.33A(1)

Code related audit information

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

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

Audit observation

The registry list, audit compliance report and FOGY operations documents were examined to determine compliance.

Audit commentary

Metering information for active ICPs

All “active” ICPs have an MEP recorded and metering installed.

New Connections

No new connections have occurred.

Reconnections

Quarterly, FOGY checks for ICPs with meter certifications which are close to expiring and advises the MEP. FOGY's operations documents state that meters need to be certified within five business days of reconnection and it is expected that staff will raise a job for meter recertification alongside the reconnection if necessary.

ICP 0005321166RN70D was not certified within five business days of its reconnection on 27 February 2024, and staff did not check the ICP was certified before reconnecting. The meter was recertified on 26 March 2024.

Bridged meters

17 meters were bridged during the audit period. One ICP switched out before being unbridged and the other 16 ICPs had their meters certified on unbridging.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.11 With: Clause 10.33A From: 27-Feb-24 To: 26-Mar-24	One reconnection was not certified within five business days. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are strong, because there is a process to ensure that ICPs are certified on reconnection, as well as a quarterly process to check all ICPs are certified. The audit risk is low because one ICP was affected by the non-compliance, and it was recertified 51 business days after reconnection.

Actions taken to resolve the issue	Completion date	Remedial action status
ICP have all had Service Requests raised with MEP to Recertify	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Check to ensure ICP is certified before reconnections has been implemented All Sites where bridging or other issues are identified will ensure certification is completed as part of Service Request to resolve	02/08/2024	

2.12. Arrangements for line function services (Clause 11.16)

Code reference

Clause 11.16

Code related audit information

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

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

Audit observation

I checked that use of system agreements or arrangements were in place with the relevant distributors.

Audit commentary

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs connected to networks or with MEPs where no trading arrangements are in place are declined.

FOGY has confirmed that arrangements are in place with all existing networks they trade on during past audits and did not begin trading on any new networks during the audit period.

Audit outcome

Compliant

2.13. Arrangements for metering equipment provision (Clause 10.36)

Code reference

Clause 10.36

Code related audit information

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

Audit observation

I checked that agreements or arrangements were in place with the relevant MEPs.

Audit commentary

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs connected with MEPs where no trading arrangements are in place are declined.

FOGY has confirmed that arrangements are in place with all existing MEPs they use during past audits. Metrix unexpectedly installed two BOPE meters for FOGY ICPs during the audit period. ICP 0102668027LCD30 had a BOPE meter from 4 August 2023 to 13 November 2023, and ICP 0310259037LCD78 had a BOPE meter from 30 August 2023 to 14 November 2023. Upon receiving installation paperwork, FOGY arranged for the BOPE meters to be replaced with MTRX meters.

Compliance is recorded because there were arrangements in place with MTRX when the ICPs switched to FOGY, and the change of MEP was made in error by the installer and rectified.

Audit outcome

Compliant

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

Code reference

Clause 10.33B

Code related audit information

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

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

Audit observation

The process for reconnecting ICPs during switch in was examined. Traders are only able to update ICP status for event dates where they are responsible for the ICP on the registry.

Audit commentary

If an ICP was reconnected as part of the switching process and the switch was later withdrawn, FOGY would restore the disconnection and reimburse the losing trader for any direct costs incurred if requested.

Audit outcome

Compliant

2.15. Electrical disconnection of ICPs (Clause 10.33B)

Code reference

Clause 10.33B

Code related audit information

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

Audit observation

The disconnection process was examined. Traders are only able to update ICP status for event dates where they are responsible for the ICP on the registry.

Audit commentary

FOGY's policy is not to disconnect any ICP in the process of switching out. FOGY checks if ICPs are in the process of switching out before arranging a disconnection.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

- *ensure personal are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code,*
- *replace the seal with its own seal,*
- *have a process for tracing the new seal to the personnel,*
- *update the registry (if the profile code has changed),*
- *notify the metering equipment provider.*

Audit observation

Policies and processes for removal and breakage of seals were reviewed. I checked ICPs where work had been conducted which could have resulted in seals being removed or broken, to determine compliance.

Audit commentary

Most disconnections and reconnections are completed remotely by the MEP, and most work that requires meter seals to be removed or broken is also completed by the MEP. Manual disconnections and reconnections after hours may be completed by Wells.

FOGY receives work completion paperwork from the MEPs and Wells and uses this information to confirm the ICP attributes including the status and event date, before updating their system and the registry.

Where seals have been removed or broken by a party which is not the MEP (such as a distributor or electrician completing a safety disconnection) a job is raised for the MEP to check and reseal the meter. I checked two ICPs where work had been conducted by the network which could have resulted in seals being removed or broken and confirmed that the meters were checked and resealed by the MEP at FOGY's request.

Audit outcome

Compliant

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

Code reference

Clause 10.33C and 2A of Schedule 15.2

Code related audit information

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

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

If the trader bridges a meter, the trader must:

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

The trader must determine meter readings as follows:

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

Audit observation

Processes for bridged meters were reviewed, and events that could have resulted in meter bridging or been caused by meter bridging were reviewed.

Audit commentary

FOGY only supplies HHR meters, which are usually disconnected and reconnected remotely. FOGY does not normally allow meters to be bridged. Meters are only bridged under extreme circumstances, such as power restoration following flooding.

17 meters were bridged during the audit period. The meters were bridged due to faults and reconnections which could not be completed remotely where not bridging the meter would cause customer hardship.

One ICP switched out before being unbridged and the gaining trader was advised. The other 16 ICPs were unbridged by the MEP and recertified. Nine ICPs had corrections processed based on consumption before or after the period the meter was bridged, and the other eight ICPs only had bridged relays, so no correction was required.

Audit outcome

Compliant

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

Code reference

Clause 11.30

Code related audit information

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

Audit observation

The process to ensure that the ICP identifier is printed on every invoice or document relating to the sale of electricity was checked, including reviewing invoices for all brands supplying ICPs under the FOGY participant code.

Audit commentary

FOGY's billing run information is used to populate an invoice template, and the invoice details are stored against each ICP and customer so that invoices can be reproduced if needed. I viewed invoices for all brands which supplied ICPs during the audit period and confirmed that the ICP number is displayed.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

The process to ensure that information on Utilities Disputes is provided to customers was reviewed for all brands which supplied ICPs during the audit period.

Audit commentary

Information on Utilities Disputes is provided for each brand:

- on invoices and outbound communications relating to invoices,
- on their websites, and
- in their terms and conditions.

Each brand's terms and conditions state that they do not have a call centre and that email is the primary form of contact between the customer and retailer.

Email price change notifications were provided for Salaam and Nau Mai Rā brands, and neither contained information on Utilities Disputes. FOGY has updated their processes for all brands to ensure that Utilities Disputes information is consistently provided for price change notifications.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.19 With: Clause 11.30A From: 01-Jan-23 To: 23-Jul-24	Some price change notifications did not contain information on Utilities Disputes. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating
Low	Controls are strong because processes have been updated ensure that Utilities Disputes information will be consistently provided for future price change notifications. The impact is low because Utilities Disputes information is provided to all customers on invoices and is also available on each brand's website.

Actions taken to resolve the issue	Completion date	Remedial action status
FOGY has updated their processes for all brands to ensure that Utilities Disputes information is consistently provided for price change notifications	02/08/2024	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY has updated their processes for all brands to ensure that Utilities Disputes information is consistently provided for price change notifications	02/08/2024	

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

Code reference

Clause 11.30B

Code related audit information

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

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

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

Audit observation

The process to ensure that information on Powerswitch is provided to customers was reviewed for all brands which supplied ICPs during the audit period.

Audit commentary

Information on Powerswitch is provided for each brand:

- in outbound communications about customer billing,
- on their websites, and
- via email on 1 April of each year.

Email price change notifications were provided for Salaam and Nau Mai Rā brands, and neither contained information on Powerswitch. FOGY has updated their processes for all brands to ensure that Powerswitch information is consistently provided for price change notifications.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.20 With: Clause 11.30B From: 01-Jan-23 To: 23-Jul-24	Some price change notifications did not contain information on Powerswitch. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are strong because processes have been updated ensure that Powerswitch information will be consistently provided for future price change notifications. The impact is low because Powerswitch information is provided to all customers with invoices at least annually and is also available on each brand's website.

Actions taken to resolve the issue	Completion date	Remedial action status
FOGY has updated their processes for all brands to ensure that Powerswitch information is consistently provided for price change notifications.	02/08/2024	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY has updated their processes for all brands to ensure that Powerswitch information is consistently provided for price change notifications.	02/08/2024	

3. MAINTAINING REGISTRY INFORMATION

3.1. Obtaining ICP identifiers (Clause 11.3)

Code reference

Clause 11.3

Code related audit information

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

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

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

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

Audit commentary

No new connections have occurred.

Audit outcome

Compliant

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

Code reference

Clause 11.7(2)

Code related audit information

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

Audit observation

The registry update process was reviewed. The registry list and audit compliance report were examined to confirm process compliance.

Audit commentary

FOGY does not initiate or complete new connections. The timeliness and accuracy of registry updates is assessed in **sections 3.3, 3.8** and **3.9**.

Audit outcome

Compliant

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

Code reference

Clause 10 of schedule 11.1

Code related audit information

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

Audit observation

The process to manage status changes is discussed in detail in **sections 3.8** and **3.9** below. The process to manage MEP nominations and trader updates was reviewed.

The registry list and audit compliance report were examined and a sample of late status updates, trader updates and MEP nominations were checked as described in the audit commentary.

Audit commentary

Status updates

Registry status updates are manually triggered from FOGY's database. The user selects the status, reason and event date and a file is generated and transferred to the registry. At the time of the previous audit, these changes were made manually using the registry user interface. FOGY considered the change as an enhancement of their manual process rather than a material change.

The timeliness of "active" status updates is set out on the table below:

Event	Year	ICPs notified greater than five days	Average notification days	Percentage compliant
Reconnections	2020	2	23.33	33.3%
	2021	3	3.21	78.57%
	2022	9	1.87	92.91%
	2024	**70**	**3.70**	**88.39%**

39 late reconnections were within ten business days of the event date, 60 were within 30 business days of the event date and 68 were within 75 business days of the event date. The latest update was made 234 business days after the event date. I checked the ten latest updates, including all over 30 business days after the event date, and found they were caused by:

- backdated switches and withdrawals,
- late notice of reconnection from the service provider, customer, or previous retailer,

- a backdated status update by the previous retailer which changed the status for some days in FOGY's period of supply and required a correction, and
- for one ICP there was a delay in processing the reconnection paperwork.

The timeliness of "inactive" status updates is set out on the table below:

Event	Year	ICPs notified greater than five days	Average notification days	Percentage compliant
Disconnections	2020	1	8	0%
	2021	4	3.89	91.30%
	2022	5	1.99	98.05%
	2024	**20**	**1.87**	**98.15%**

Six late disconnections were within ten business days of the event date, 11 were within 30 business days of the event date and 16 were within 100 business days of the event date. The latest update was made 262 business days after the event date. I checked the three latest or all late updates to each status reason code. Two updates were not genuinely late, but appeared to be late because an incorrect event date was entered. The incorrect event dates are recorded as non-compliance in **sections 2.1** and **3.9**.

ICP	Status Event Date	Status Event input date	Correct status event date
0000042660UNFC5	1 May 2024	10 May 2024	9 May 2024
0427243033LC200	1 June 2022	1 June 2023	1 June 2024

The other ten late updates were caused by late notice of the disconnection including where paperwork was sent to an incorrect email address, or missed notifications of disconnection where safety disconnections were completed by the network.

The late disconnections and reconnections were processed with the correct event date and reason code apart from ICPs 0000042660UNFC5 and 0427243033LC200. I rechecked previous audit exceptions and found ICP 0000063546TR2A9 was disconnected on 12 July 2022 but is still recorded as being "inactive" from 20 June 2022. This is not re-raised as non-compliance.

Trader updates

Trader updates including MEP nominations are completed manually using the registry user interface. The timeliness of trader updates is set out on the table below.

Event	Year	ICPs notified greater than 5 days	Average notification days	Percentage compliant
Trader updates	2020	N/A	N/A	N/A
	2021	0	0.00	100.00%
	2022	4	5.76	76.47%
	2024	**18**	**8.48**	**75.00%**

Five late updates were within ten business days of the event date, 14 were within 30 business days of the event date, and 17 were within 100 business days of the event date. The latest update was made 108 business days after the event date.

16 of the 18 late updates were MEP nominations caused by:

- a late request for MEP nomination by the MEP,
- FOGY being unable to nominate the MEP until another MEP event was reversed or a switch was completed, or
- a delay in FOGY realising that an MEP nomination was required or processing a request for nomination due to an oversight.

The other two late updates were additions of unmetered load, where the network made a backdated unmetered load update.

The content of the 18 late trader updates was checked and confirmed to be accurate.

Six ANZSIC code updates were made more than 20 business days after FOGY began trading at the ICP, because the CS file was backdated.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.3 With: Clause 10 of schedule 11.1 From: 31-Mar-23 To: 17-May-24	70 late updates to "active" status for reconnections. 18 late updates to "inactive" status for disconnections. 18 late trader updates. Six ANZSIC code updates were made more than 20 business days after FOGY began trading at the ICP. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as strong because a small number and proportion of updates were late. In most cases the late updates were caused by late notice of the required change by another party. The audit risk rating is low because the impact on settlement and participants is minor, and updates were processed in time for revised submission information to be washed up.

Actions taken to resolve the issue	Completion date	Remedial action status
In most cases the late updates were caused by late notice of the required change by another party, and all were correct as soon as identified and validated	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Continue to correct as information is made available and validated. Many of these do rely on third parties to provide information to enable FOGY to make appropriate changes	02/08/2024	

3.4. Trader responsibility for an ICP (Clause 11.18)

Code reference

Clause 11.18

Code related audit information

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

A trader ceases to be responsible for an ICP if:

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

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

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

The MEP nomination and decommissioning processes were reviewed, and the registry list and audit compliance report were examined to confirm process compliance. MEP nominations and decommissioned ICPs were examined.

Audit commentary

Retailers' responsibility to nominate and record a MEP in the registry

All ICPs currently supplied by FOGY are metered and have an MEP recorded in the registry. No new connections were completed, and all 97 MEP nominations made during the audit period were accepted. MEP nomination rejections are rare and are handled manually.

Decommissioning

Final interrogations will occur for decommissioned ICPs because data is provided daily.

A sample of ten ICPs were examined, and I confirmed that an attempt to read the meter was made at the time of removal, and the MEP was notified. The meters for the ten ICPs were removed on an estimated or actual closing read. Where an actual decommissioning read was not available, a reasonable estimate which considered the last actual readings was applied.

Audit outcome

Compliant

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

Code reference

Clause 9 of schedule 11.1

Code related audit information

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

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

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

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

Audit commentary

No new connections have occurred. All ICPs currently supplied by FOGY are metered, with an MEP recorded and metering category 1. No data discrepancies relating to new connection information were present.

Audit outcome

Compliant

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

Code reference

Clause 9 (1(k) of Schedule 11.1

Code related audit information

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

Audit observation

The process to capture and manage ANZISC codes was examined. The registry list and AC020 reports were reviewed and ANZSIC codes were checked for a sample of ICPs to determine compliance.

Audit commentary

All FOGY ICPs have meter category 1, and a valid ANZSIC code recorded. Most ICPs are residential, and FOGY retains the previous trader's ANZSIC code when ICPs switch in.

I checked all ICPs with non-residential ANZSIC codes and a sample of ICPs with residential ANZSIC codes making up 30 ICPs in total. All ICPs checked had correct ANZSIC codes applied.

The previous audit found ICP 0438360974LC55A had an incorrect code recorded and it has now switched out.

Audit outcome

Compliant

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

Code reference

Clause 9(1)(f) of schedule 11.1

Code related audit information

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

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

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

Audit observation

Unmetered load processes were reviewed, and the registry list and audit compliance report were examined.

Audit commentary

Unmetered load processes

ICPs with unmetered load are not normally supplied.

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs with unmetered load are rejected.

Pre-submission checks identify ICPs where the distributor unmetered load details, shared ICP, daily unmetered kWh, or trader unmetered load details are not null, or the unmetered flag is yes. The checks are completed following import of registry list data used to determine aggregation factors for submission.

Following the unexpected addition of shared unmetered load for two existing FOGY ICPs during the audit period, FOGY updated their validation process to check for ICPs where the distributor has added unmetered load on the registry daily. An email notification is generated, and the FOGY team check the details with the distributor and arrange for the ICP to switch out.

Unmetered load ICPs

During the audit period, WEL Networks added shared unmetered load to two ICPs supplied by FOGY effective from 2 February 2023 on 3 February 2023. FOGY identified the new shared unmetered load and updated the trader UNM flag, unmetered daily kWh and unmetered load details effective from 2 February 2023 on 16 March 2023. The daily unmetered kWh applied was consistent with the distributor's information.

Because FOGY does not normally supply ICPs with unmetered load, they contacted the customers and arranged for the ICPs to switch out.

ICP	Distributor unmetered load details	Daily kWh	Switch out date	Days with unmetered load	Unmetered kWh
0000241337WE97B	0016:11.5:1 Light across 5 ICPs,0000054391WE7F2	0.184 kWh	4 April 2023	61 days	11.224 kWh
0000242779WE6A4	0016:11.5:1 Light across 5 ICPs,0000054391WE7F2	0.184 kWh	9 March 2023	35 days	6.44 kWh
Total					17.664 kWh

As a HHR only trader, FOGY does not have a process to settle unmetered volumes which are required to be settled as NHH. They investigated whether the volumes could be added to a separate meter register and included in their HHR submissions, but the volumes were too low and rounded to zero.

Compliance is recorded in this section because the unmetered load details were correctly populated on the registry. Non-compliance is recorded in **sections 2.1**, **12.2** and **12.7** because the unmetered load was omitted from submission.

Audit outcome

Compliant

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

Code reference

Clause 17 of schedule 11.1

Code related audit information

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

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

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

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

The timeliness of data for reconnections is assessed in **section 3.3**, and a sample of ten "active" status updates were checked for accuracy.

Audit commentary

All "active" ICPs have metering installed and only have one customer. Submission occurs for all ICPs regardless of status, to ensure all consumption information is captured.

Active status updates are processed once FOGY has received written confirmation of the reconnection from the MEP. Registry status updates are manually triggered from FOGY's database. The user selects the status, reason and event date and a file is generated and transferred to the registry. At the time of the previous audit, these changes were made manually using the registry user interface. FOGY considered the change as an enhancement of their manual process rather than a material change.

Registry acknowledgement files are processed automatically. Any record with an acknowledgement code other than "000" (no error – update was successful) generates an email which is reviewed and actioned by FOGY.

No new connections have occurred, and no data discrepancies relating to new connection information were present. I checked a sample of ten reconnections and confirmed that they were processed accurately.

Audit outcome

Compliant

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

Code reference

Clause 19 of schedule 11.1

Code related audit information

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

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

Audit observation

The disconnection process was examined using the audit compliance and event detail reports. The timeliness of data for disconnections is assessed in **section 3.3**, and a sample of updates were checked for accuracy.

Audit commentary

Inactive status updates

Inactive status updates are processed once FOGY has received written confirmation of the disconnection from the MEP. FOGY does not complete new connections and the "inactive - new connection in progress" status has not been used.

Registry status updates are manually triggered from FOGY's database. The user selects the status, reason and event date and a file is generated and transferred to the registry. At the time of the previous audit, these changes were made manually using the registry user interface. FOGY considered the change as an enhancement of their manual process rather than a material change.

Registry acknowledgement files are processed automatically. Any record with an acknowledgement code other than "000" (no error – update was successful) generates an email which is reviewed and actioned by FOGY.

The audit compliance report recorded five ICPs which were disconnected using reason code 1,7 "electrically disconnected remotely by AMI meter" but the AMI flag was set to no. The ICPs all had HHR metering, and the reason code was correctly applied.

I checked a sample of 15 "inactive" status updates including at least three (or all) "active" updates to each "inactive" status. The updates were processed with the correct status and event date apart from:

ICP	Status Event Date	Status Event input date	Correct status event date
0000042660UNFC5	1 May 2024	10 May 2024	9 May 2024
0427243033LC200	1 June 2022	1 June 2023	1 June 2024

I rechecked previous audit exceptions and found ICP 0000063546TR2A9 was disconnected on 12 July 2022 but is still recorded as being "inactive" from 20 June 2022. This is not re-raised as non-compliance.

Inactive ICPs with consumption

All consumption is reported for reconciliation regardless of the ICP's status. A weekly check of ICPs with "inactive: status and non-zero consumption is conducted, and it is intended that ICPs will be moved to "active" status as necessary.

FOGY provided a report of ICPs with consumption during periods with "inactive" status. The report included any ICPs with consumption during a reconciliation period where the ICP had "inactive" status for one or more days during that period. Because consumption is expected where an ICP has "active" status for one or more days during a reconciliation period, most of the ICPs on the report are expected not to have genuine "inactive" consumption. Due to the number of "false positives" to be checked on the report there are sometimes delays in identifying ICPs which genuinely have "inactive" consumption and require status correction. There are also sometimes delays in identifying potential "inactive" consumption where a meter is not communicating.

Where ICPs are reconnected by other traders during FOGY's period supply, FOGY requests the reconnecting retailer completes the switch from the reconnection date or restores the ICP to its disconnected state. If this cannot be achieved, the ICP will be moved to "active" status for the reconnected period.

I checked 15 ICPs with "inactive" consumption over 30 kWh and found 14 were "inactive" for part of a reconciliation period and the consumption fell on the days with "active" status. ICP 0000164722TR658 appears to have been reconnected by the gaining trader on or before 27 June 2023 and the ICP switched effective from 28 June 2023. The "inactive" consumption was reported by FOGY and accounted for in the switch event reading, and the ICP was moved to "active" status by the gaining trader on 28 June 2023. FOGY did not update the ICP's status to "active" before it switched out.

The previous audit found eight ICPs which appeared to have "inactive" consumption which required investigation. ICPs 0000162652HBF16, 0000502587NR344, 0000670816TUCFC, 0395721083LCCAF and 1001156046CK19F are likely to have been reconnected during FOGY's period of supply by other traders

as part of their switch gain process. The status dates were not corrected as the ICPs have switched out. The other ICPs appeared to have "inactive" consumption due to estimated reads provided by the MEP while the ICPs were disconnected.

Vacant ICPs with consumption

No examples of vacant ICPs with consumption were identified during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.9 With: Clause 19 of schedule 11.1 From: 01-Jun-22 To: 01-May-24	ICPs 0000042660UNFC5 and 0427243033LC200 have incorrect "inactive" status event dates. ICP 0000164722TR658 appears to have been reconnected by the gaining trader by 27 June 2023 and the ICP switched effective from 28 June 2023. The ICP incorrectly had "inactive" status recorded for at least 27 June 2023. Potential impact: None Actual impact: None Audit history: Three times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are moderate, because there are processes to identify and report "inactive" consumption and a small number of exceptions were identified. There is no impact on submission, because all consumption is reported regardless of status.

Actions taken to resolve the issue	Completion date	Remedial action status
Issues with other retailer connecting is always challenging, FOGY endeavours to ensure correct statuses at all times. Any issues with dates are corrected ASAP	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Retailers reconnecting sites prior to initiating a switch continue to create issues (and in a number of cases, reconnection occurs and no switch is initiated, leaving the site connected without FOGY's Knowledge). FOGY continues to monitor Vacant and disconnected sites for Volume and will follow up if any volume is detected. If a meter remains non-communicating for a period after reconnection by a third party, it may be some time before it can be identified	02/08/2024	

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

Code reference

Clause 15 of schedule 11.1

Code related audit information

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

Audit observation

FOGY does not initiate or complete new connections. The registry list, audit compliance report and event detail report were reviewed to confirm that no new connections occurred and assess compliance.

Audit commentary

No new connections have occurred, and no ICPs are currently at “new” or “ready” status with FOGY as the proposed trader.

The registry list recorded one ICP which temporarily had FOGY recorded as the proposed trader. The record was later updated to remove FOGY.

Audit outcome

Compliant

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

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

Code reference

Clause 2 of schedule 11.3

Code related audit information

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

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

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

Audit observation

The switch gain process was examined to determine when FOGY deem all conditions to be met. A typical sample of NTs were checked to confirm that these were notified to the registry within two business days, and that the correct switch type was selected.

Audit commentary

Customer applications are made online, and the application data is transferred directly to FOGY's system. The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs connected to networks or with MEPs where no trading arrangements are in place, with unmetered load or NHH metering are declined.

FOGY's processes are compliant with the requirements of Section 36M of the Fair Trading Act 1986. Transfer NT files are sent automatically as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

Transfer switch type is applied where a customer is transferring between retailers at an address. This information is collected as part of the customer application process, by asking whether the customer is "paying bills to another retailer for this property" or is "moving in and/or have not paid bills to another retailer for this property".

I checked the metering category for the 3,252 transfer switch ICPs where this information was available on the PR255 report and found none had metering categories of three or above. I checked the five most backdated NTs and found the NTs were issued on time, and the correct switch type was selected.

Audit outcome

Compliant

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

Code reference

Clauses 3 and 4 of schedule 11.3

Code related audit information

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

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

When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice from the registry manager under clause 22(a) the losing trader had been responsible for less than two months.

Audit observation

The event detail report was reviewed to:

- identify AN files issued by FOGY during the audit period,
- assess compliance with the requirement to meet the setting of event dates requirement, and
- a diverse sample ANs were checked to determine whether the codes had been correctly applied.

The switch breach history report was examined for the audit period.

Audit commentary

At the time of the previous audit, AN files were created manually using the registry user interface. Now, most AN files are automatically generated by FOGY's system using the same logic as the manual process. The AD (advanced metering) code is applied if the ICP has the AMI flag set to Y, and the AA (acknowledge and accept) code is applied if the AMI flag is set to N. FOGY considered the change as an enhancement of their manual process rather than a material change. AN timeliness is monitored using the switch breach report.

All 84 ANs had the AA (acknowledge and accept) or AD (advanced metering) code correctly applied, and all proposed event dates were within five business days of the NT arrival date.

The switch breach report did not record any AN breaches.

Audit outcome

Compliant

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

Code reference

Clause 5 of schedule 11.3

Code related audit information

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

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

Audit observation

The event detail report was reviewed to identify CS files issued by FOGY during the audit period. The accuracy of the content of CS files was confirmed by checking a sample of files. The content checked included:

- correct identification of meter readings and correct date of last meter reading,
- accuracy of meter readings, and
- accuracy of average daily consumption.

I checked for CS files with an average daily kWh that was negative, zero, or over 200 kWh.

The process to manage the sending of the CS file within five business days was examined, and the switch breach history report for the audit period was reviewed for CS breaches.

Audit commentary

At the time of the previous audit, CS files were created manually using the registry user interface. Now, most CS files are automatically generated by FOGY's system using the same logic as the manual process. FOGY considered the change as an enhancement of their manual process rather than a material change. Switch file content is determined from the read information in the system:

- the switch event reading and read type relate to the reading billed on FOGY's last day of supply,
- the last actual read date relates to the last actual read held by FOGY, and
- the average daily consumption is calculated from the last two actual reads during the period of supply; if less than two actual readings are available the incoming CS reading is applied.

CS timeliness

CS timeliness is monitored using the switch breach report. The switch breach history report recorded ten CS breaches where the CS arrival date was more than five business days after the event date. The CS files were delayed by backdated NTs, double withdrawals, or disputes with the other trader over the event date. The latest CS file was 63 days overdue.

CS content

Analysis of estimated daily kWh in the event detail report found no CS files had average daily kWh which was negative, zero or over 200 kWh.

I checked all 82 transfer CS files for consistency between event read types and last actual read dates and found no errors. I checked a random sample of a further five transfer CS files and found that all information was correct.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 of schedule 11.3 From: 03-Aug-23 To: 28-Dec-23	Ten CS breaches for switch moves. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as strong. Most CS files were on time and the late files were mostly delayed due to issues outside of FOGY's direct control. The impact on other participants is low. The late files were up to 63 days overdue, and the switches were completed in time for revised submission information to be washed up.

Actions taken to resolve the issue	Completion date	Remedial action status
FOGY continues to address these as they arise, the nature of the switching process means these happen and will continue to do so. FOGY works to correct any identified as soon as practical.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY's existing process covers this and will continue to be monitored and improved.	02/08/2024	

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

Code reference

Clause 6(1) and 6A of schedule 11.3

Code related audit information

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

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

If the gaining trader disputes a switch meter reading because the switch event meter reading provided by the losing trader differs by 200 kWh or more, the gaining trader must, within four calendar months of the registry manager giving the gaining trader written notice of having received information about the

switch completion, provide to the losing trader a changed switch event meter reading supported by two validated meter readings.

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

Audit observation

The process for the management of read change requests was examined.

The event detail report was analysed to identify all read change requests and acknowledgements during the audit period, and a sample of files were checked.

I also checked a sample of five estimated CS files provided by other traders where no RR was issued to determine whether the correct readings were recorded.

The switch breach report was reviewed to identify late RR and AC files.

Audit commentary

RR

ICPs requiring RRs are generally identified through the billing validation process or customer enquiries. Once two validated readings are obtained, the RR reading is calculated, and an RR file is generated from the system and a supporting email is sent to the other trader. The system is only able to automatically generate one RR per switching event, and if the initial RR is rejected any reissued files are created manually through the registry user interface. When the RR is raised, the proposed RR readings are entered into the system with flag excluding them from being used for billing and reconciliation. The status is changed to "valid" once an AC acceptance is received.

FOGY issued 628 RR files for transfer switches. 77 (12.2%) were rejected and 551 (87.8%) were accepted. A sample of five rejected files and five accepted files were checked. In all cases there was a genuine reason for FOGY's RR, the file content was accurate and supported by two actual reads obtained by FOGY, and the reads recorded in FOGY's system reflected the outcome of the RR process.

The switch breach history report recorded one late RR file for a transfer switch, which was caused by delays in obtaining validated actual readings from the MEP.

AC

All RR requests received are evaluated and validated against the ICP information. If the request is within validation requirements these are accepted. AC files are generated manually, and the timeliness of AC files is monitored using the switch breach history report. Readings are adjusted manually when the AC response is issued.

FOGY received one RR for a transfer switch, which was rejected, and the switch was later withdrawn. The switch breach history report did not record any late AC files.

CS files with estimated readings where no RR is issued

I reviewed five transfer CS files with estimated reads where no RR was issued and found the correct read values and read types were recorded.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 15-Dec-23 To: 19-Apr-24	One RR breach. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are strong because one file was late, and the file was delayed while actual readings were obtained to support the RR. The impact is low, because the RR was completed 127 days late, and in time for revision submissions to be provided.

Actions taken to resolve the issue	Completion date	Remedial action status
FOGY continues to work with other participants to ensure any RR is resolved. it should be noted that as FOGY is an HHR only retailer, RR files are requested for a large number of ICP's based on HHR data received where the Read provided by the Losing retailer is a non-Midnight read. Most that use Register Read for Billing and HHR data for reconciliation are very good about accepting the RR. There are still issues with some participants that Bill on Register Reads (sometimes Manual reads) but they reconcile on HHR data and refuse to accept the RR as the Actual is on the "Same Day" as the switch out date	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY continues to work with other participants to ensure any RR is resolved.	02/08/2024	

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

Code reference

Clause 6(2) and (3) of schedule 11.3

Code related audit information

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

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b):*

- *the gaining trader within five business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter; the losing trader must use that switch event meter reading.*

Audit observation

The process for the management of read requests was examined. The event detail report was analysed to identify read change requests issued and received under clause 6(2) and (3) schedule 11.3 and determine compliance.

Audit commentary

FOGY is a HHR only trader, and this clause does not apply where FOGY is the losing trader.

Audit outcome

Compliant

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

Code reference

Clause 7 of schedule 11.3

Code related audit information

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

Audit observation

I confirmed with FOGY whether any disputes have needed to be resolved in accordance with this clause.

Audit commentary

There were no examples of disputes that needed to be resolved under this clause.

Audit outcome

Compliant

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

Code reference

Clause 9 of schedule 11.3

Code related audit information

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

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

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

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

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

Audit observation

The switch gain process was examined to determine when FOGY deem all conditions to be met. A typical sample of NTs were checked to confirm that these were notified to the registry within two business days, and that the correct switch type was selected.

Audit commentary

Customer applications are made online, and the application data is transferred directly to FOGY's system. The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs connected to networks or with MEPs where no trading arrangements are in place, with unmetered load or NHH metering are declined.

FOGY's processes are compliant with the requirements of Section 36M of the Fair Trading Act 1986. Switch move NT files are automatically sent at 4am the day after all pre-conditions have been met, and the withdrawal process is used if the customer changes their mind.

Switch move is applied where a new customer is moving into an address. This information is collected as part of the customer application process, by asking whether the customer is "paying bills to another retailer for this property" or is "moving in and/or have not paid bills to another retailer for this property".

I checked the metering category for the 2,420 switch move ICPs where this information was available on the PR255 report and found none had metering categories of three or above. I checked the five most backdated NTs and found the following exceptions:

ICP	NT event audit number	Event date	Update date	Date preconditions were cleared	Business days
0000042127CPB3B	NT-8513867	16 March 2023	25 August 2023	25 July 2023	23
0000518940NR3CC	NT-9090445	3 November 2023	8 April 2024	25 March 2024	8
0002205197ENF04	NT-8936347	11 August 2023	6 December 2023	29 November 2023	5

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.7 With: Clause 9 of schedule 11.3 From: 06-Dec-23 To: 08-Apr-24	Three switch move NT files were issued more than three business days after pre conditions were cleared. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating
Low	The controls are strong because there are processes in place to ensure that NTs are normally issued as soon as pre-conditions are cleared. The delays were primarily caused by FOGY validating application data, which led to backdated move in dates being confirmed. The impact is low because the NT files were issued a maximum of 23 business days after pre-conditions were cleared.

Actions taken to resolve the issue	Completion date	Remedial action status
Existing processes endeavour to meet all switching timeframes, but this is not always possible in certain scenarios. FOGY continues to strive to meet the timeframes	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Existing processes are adequate, and any outliers are addressed as quickly as possible within the bounds of ensuring the correct information is available to resolve any issues	02/08/2024	

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

Code reference

Clause 10(1) of schedule 11.3

Code related audit information

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

- *10(1)(a) If the losing trader accepts the event date proposed by the gaining trader, the losing trader must complete the switch by providing to the registry manager:*
  - *confirmation of the switch event date; and*
  - *a valid switch response code; and*
  - *final information as required under clause 11; or*
- *10(1)(b) If the losing trader does not accept the event date proposed by the gaining trader, the losing trader must acknowledge the switch request to the registry manager and determine a different event date that—*
  - *is not earlier than the gaining trader's proposed event date, and*
  - *is no later than 10 business days after the date the losing trader receives notice, or*
- *10(1)(c) request that the switch be withdrawn in accordance with clause 17.*

Audit observation

The event detail report was reviewed to:

- identify AN files issued by FOGY during the audit period,
- assess compliance with the requirement to meet the setting of event dates requirement, and
- a diverse sample ANs were checked to determine whether the codes had been correctly applied.

The switch breach history report was examined for the audit period.

Audit commentary

AN

At the time of the previous audit, AN files were created manually using the registry user interface. Now, most AN files are automatically generated by FOGY's system using the same logic as the manual process.

The OC (occupied premises) code is applied if there is no move out date set or the proposed transfer date is before or on the move out date. If the proposed transfer date is after the move out date, the AD (advanced metering) code is applied if the ICP has the AMI flag set to Y, and the AA (acknowledge and accept) code is applied if the AMI flag is set to N. FOGY considered the change as an enhancement of their manual process rather than a material change. AN timeliness is monitored using the switch breach report.

The accuracy of AN response codes was checked:

- 130 ANs had the OC (occupied premises) code, and review of a sample of five confirmed that the OC code was correctly applied,
- 75 ANs had the AD (advanced metering) code correctly applied, and
- two ANs had the AA (acknowledge and accept) code; one was correct, and ICP 0000605524HBBF4 AN-8072264 24 October 2023 had the AA (acknowledge and accept) code manually applied when an AMI meter was installed.

The event detail report was reviewed to assess compliance with the setting of event dates requirements for all 207 switch move ANs. All ANs had proposed event dates which matched the gaining trader's proposed event date, and within ten business days of the NT arrival date.

The switch breach report did not record any AN breaches.

CS

At the time of the previous audit, CS files were created manually using the registry user interface. Now, most CS files are automatically generated by FOGY's system using the same logic as the manual process. FOGY considered the change as an enhancement of their manual process rather than a material change. CS timeliness is monitored using the switch breach history report.

The switch breach history report recorded one E2 breach where the CS event date was before the gaining trader's requested event date which is recorded as non-compliance in **section 4.8**. The error was a typo, the NT and AN proposed event date was 5 March 2024, but the switch was completed for 4 March 2024. No withdrawal was completed, and the other trader did not request a date change.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.8 With: Clause 10(1) of schedule 11.3 From: 04-Mar-24 To: 05-Mar-24	ICP 0000605524HBBF4 AN-8072264 24 October 2023 had the AA (acknowledge and accept) code manually applied when an AMI meter was installed. One E2 breach where the CS event date was before the gaining trader's requested event date. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating
Low	The controls are strong, the non-compliances were caused by manual data entry errors. FOGY is aware of the CS event date and AN response code requirement. The audit risk rating is low because: • the switch was completed one day before the requested date and the gaining trader did not dispute the date for the E2 breach, and • AMI meter information was recorded on the registry by the MEP for the ICP with an incorrect response code.

Actions taken to resolve the issue	Completion date	Remedial action status
Additional Checks added to manual process to ensure validation of correct codes before submitting	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Additional Checks added to manual process to ensure validation of correct codes before submitting	02/08/2024	

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

Code reference

Clause 10(2) of schedule 11.3

Code related audit information

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

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

Audit observation

The event detail report was reviewed to identify AN files issued by FOGY during the audit period, and assess compliance with the requirement to meet the setting of event dates requirement.

Audit commentary

All switch move AN files had proposed event dates consistent with the gaining trader's requested date, and a valid switch response code.

The switch breach history report recorded one E2 breach where the CS event date was before the gaining trader's requested event date which is recorded as non-compliance in **section 4.8**. The error was a typo, the NT and AN proposed event date was 5 March 2024, but the switch was completed for 4 March 2024. No withdrawal was completed, and the other trader did not request a date change.

Switches were completed as required by this clause.

Audit outcome

Compliant

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

Code reference

Clause 11 of schedule 11.3

Code related audit information

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

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

Audit observation

The event detail report was reviewed to identify CS files issued by FOGY during the audit period. The accuracy of the content of CS files was confirmed by checking a sample of files. The content checked included:

- correct identification of meter readings and correct date of last meter reading,
- accuracy of meter readings, and
- accuracy of average daily consumption.

CS files with an average daily kWh that was negative, zero, or over 200 kWh were identified, and exceptions were checked.

Audit commentary

At the time of the previous audit, CS files were created manually using the registry user interface. Now, most CS files are automatically generated by FOGY's system using the same logic as the manual process. FOGY considered the change as an enhancement of their manual process rather than a material change.

Switch file content is determined from the read information in the system:

- the switch event reading and read type relate to the reading billed on FOGY's last day of supply,
- the last actual read date relates to the last actual read held by FOGY, and
- the average daily consumption is calculated from the last two actual reads during the period of supply; if less than two actual readings are available the incoming CS reading is applied.

Analysis of estimated daily kWh in the event detail report found no CS files had average daily kWh which was negative or over 200 kWh. One CS file had a valid average daily kWh of zero.

I checked all 45 switch move CS files for consistency between event read types and last actual read dates, and found no errors. I checked a random sample of a further five transfer CS files and found all content was accurate.

Audit outcome

Compliant

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

Code reference

Clause 12 of schedule 11.3

Code related audit information

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

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

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

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

Audit observation

The process for the management of read change requests was examined.

The event detail report was analysed to identify all read change requests and acknowledgements during the audit period, and a sample of files were checked.

I also checked a sample of five estimated CS files provided by other traders where no RR was issued to determine whether the correct readings were recorded.

The switch breach report was reviewed to identify late RR and AC files.

Audit commentary

RR

ICPs requiring RRs are generally identified through the billing validation process or customer enquiries. Once two validated readings are obtained, the RR reading is calculated, and an RR file is generated from the system and a supporting email is sent to the other trader. The system is only able to automatically generate one RR per switching event, and if the initial RR is rejected any reissued files are created manually through the registry user interface. When the RR is raised, the proposed RR readings are entered into the system with flag excluding them from being used for billing and reconciliation. The status is changed to "valid" once an AC acceptance is received.

FOGY issued 645 RR files for switch moves. 93 (14.4%) were rejected and 552 (85.6%) were accepted. A sample of five rejected files and five accepted files were checked. In all cases there was a genuine

reason for FOGY's RR, the file content was accurate and supported by two actual reads obtained by FOGY, and the reads recorded in FOGY's system reflected the outcome of the RR process.

The switch breach history report recorded one late RR file for a switch move, which was caused by delays in obtaining validated actual readings from the MEP.

AC

All RR requests received are evaluated and validated against the ICP information. If the request is within validation requirements these are accepted. AC files are generated manually, and the timeliness of AC files is monitored using the switch breach history report. FOGY did not receive any RR files for switch moves and did not issue any AC files. The switch breach history report did not record any late AC files.

CS files with estimated readings where no RR is issued

I reviewed five switch move CS files with estimated reads where no RR was issued and found the correct read values and read types were recorded.

Agreed switch reading not applied for an outgoing CS file

The previous audit found ICP 0339943041LCEB7 did not have the correct switch event read recorded in FOGY's system for the switch event on 8 August 2022. The issue has been cleared and the correct read is now recorded.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.11 With: Clause 12 of schedule 11.3 From: 08-Aug-23 To: 13-Dec-23	One RR breach. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are strong because one file was late, and the file was delayed while actual readings were obtained to support the RR. The impact is low, because the RR was completed 126 days late, and in time for revision submissions to be provided.

Actions taken to resolve the issue	Completion date	Remedial action status
AS per Earlier non-compliance above. FOGY continues to work with other participants to ensure any RR is resolved. The identification of the RR is based on HHR reads arriving from the MEP and validating that against the Switch Read. This in	02/08/2024	Identified

itself can create delays if the ICP is flagged as Commnuicating on the Registry (as FOGY only takes on Communicating ICP's), and then no data is available for an extended period.		
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY continues to work with other participants to ensure any RR is resolved.	02/08/2024	

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

Code reference

Clause 14 of schedule 11.3

Code related audit information

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

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

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

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

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

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

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

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

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

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

Audit observation

FOGY does not deal with any HH switches.

Audit commentary

No HH NT files were issued. I checked the metering category for the transfer switch and switch move ICPs where this information was available on the PR255 report and found none had metering categories of three or above. All ICPs currently supplied have metering category 1.

Audit outcome

Compliant

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

Code reference

Clause 15 of schedule 11.3

Code related audit information

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

> *15(a) - provide to the registry manager a valid switch response code as approved by the Authority; or*
>
> *15(b) - provide a request for withdrawal of the switch in accordance with clause 17.*

Audit observation

FOGY does not deal with any HH switches.

Audit commentary

Review of the event detail report confirmed that no HH AN files were issued. All ICPs currently supplied have metering category 1.

Audit outcome

Compliant

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

Code reference

Clause 16 of schedule 11.3

Code related audit information

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

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

> *16(a)- give the losing trader or MEP for the ICP an opportunity to interrogate the metering installation immediately before the ICP is electrically disconnected or the metering equipment is removed; or*
>
> *16(b)- carry out an interrogation and, no later than five business days after the metering installation is electrically disconnected or removed, advise the losing trader of the results and metering component numbers for each data channel in the metering installation.*

Audit observation

FOGY does not deal with any HH switches.

Audit commentary

Review of the event detail report confirmed that no HH CS files were issued. All ICPs currently supplied have metering category 1.

Audit outcome

Compliant

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

Code reference

Clauses 17 and 18 of schedule 11.3

Code related audit information

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

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

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

Audit observation

The event detail report was reviewed to:

- identify all switch withdrawal requests issued by FOGY, and a sample were checked, and
- identify all switch withdrawal acknowledgements issued by FOGY, and a sample were checked.

The switch breach history report was checked for any late switch withdrawal requests or acknowledgements.

Audit commentary

At the time of the previous audit, NW and AW files were created manually using the registry user interface. Now, NW files are issued automatically from the system for “wrong switch type” and “customer cancellation” withdrawals and other NW files are created manually on the registry. AW files

are triggered to be sent from FOGY's system. FOGY considered the change as an enhancement of their manual process rather than a material change.

NW

457 NW files were issued by FOGY. 38 (8.3%) were rejected and 419 (91.7%) were accepted. I reviewed a diverse sample of two (or all) NWs per NW advisory code and found these two NWs had the DF (date failed) code applied where the NT proposed event date was not more than ten business days in the future. The proposed event date was incorrect, and the operator had manually selected the wrong code in error. The other NWs had the correct NW advisory codes.

ICP	Event audit no	Event date	Update date	NW advisory code
0000543423NR960	NW-1164827	27 February 2024	5 March 2024	DF (date failed)
0001035259PC06B	NW-1176899	20 May 2024	25 May 2024	DF (date failed)

There were 12 NA breaches for NW files issued more than two calendar months after switch completion, and seven SR breaches where the withdrawal process was not completed within ten business days of the first RR being issued. The files were delayed by double withdrawals, delays in the customer confirming the correct move in date, or while investigation occurred to confirm that the wrong property had been requested and/or a withdrawal was required.

AW

54 (15.6%) of the 339 AWs issued by FOGY were rejections. I reviewed a sample of two or all rejections per NW reason code and confirmed they were rejected based the information available at the time the response was issued.

There were two AW breaches where AW files were issued more than five business days of receipt of the NW. The files were issued one business day late due to an oversight.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.15 With: Clauses 17 and 18 of schedule 11.3 From: 03-Aug-23 To: 18-Apr-24	Two outgoing NWs had incorrect NW withdrawal advisory codes applied. 12 NA breaches. 7 SR breaches. Two AW breaches. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating
Low	The controls are rated as moderate. Most files were issued on time, and the late files were caused by double withdrawals or investigation to confirm whether a NW was required and the correct switch details. A small number of manually issued NWs contained incorrect advisory codes. The impact on other participants is low: • the NWs with incorrect response codes were accepted by the other trader, who understood that an incorrect date was originally requested, and • the late files were up to 126 days overdue, and the withdrawals were completed in time for revised submission information to be washed up.

Actions taken to resolve the issue	Completion date	Remedial action status
Existing processes enable the correction of these, but often these can be complex with Double withdrawals and backdating to correct issues with multiple parties and are prone to errors due to the manual and complex process to resolve. The FOGY team continue to update documentation for any of these more complex issues and best practice approaches to resolve	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY has and will continue to update documentation for any of these more complex issues and best practice approaches to resolve	02/08/2024	

4.16. Metering information (Clause 21 Schedule 11.3)

Code reference

Clause 21 of schedule 11.3

Code related audit information

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

> *21(a)- the trader who carries out the interrogation, switch event meter reading must ensure that the interrogation is as accurate as possible, or that the switch event meter reading is fair and reasonable.*
>
> *21(b) and (c) - the cost of every interrogation or switch event meter reading carried out in accordance with clauses 5(b) or 11(b) or (c) must be met by the losing trader. The costs in every other case must be met by the gaining trader.*

Audit observation

The meter reading process in relation to meter reads for switching purposes was examined.

Audit commentary

The meter readings used in the switching process are validated meter readings or permanent estimates. FOGY's policy regarding the management of meter reading expenses is compliant.

ICPs switch in and out as transfer switches or switch moves and the content of CS and RR files was examined in **section 4**. No incorrect switch event reads were identified.

The previous audit found ICP 0339943041LCEB7 did not have the correct switch event read recorded in FOGY's system for the switch event on 8 August 2022. The issue has been cleared and the correct read is now recorded.

Audit outcome

Compliant

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

Code reference

Clause 11.15AA to 11.15AC

Code related audit information

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

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

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

Audit observation

Winback and withdrawal processes were reviewed.

The event detail report recorded 70 NWs with the CX (customer cancellation) withdrawal code which were issued within 180 days of switch completion where FOGY was the losing trader. A sample was checked.

Audit commentary

FOGY sends an automated email to customers, prompting them to contact FOGY if they did not initiate the switch. No enticements or offers are made as part of this process.

70 ICPs had an NW issued with a CX withdrawal reason code within 180 days of switch completion where FOGY was the losing trader. 65 NWs were accepted and five were rejected. I checked a sample of ten NWs including the five rejected by the other trader and confirmed that no enticements were offered.

Audit outcome

Compliant

5. MAINTENANCE OF UNMETERED LOAD

5.1. Maintaining shared unmetered load (Clause 11.14)

Code reference

Clause 11.14

Code related audit information

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

> *11.14(2) - The distributor must give written notice to the traders responsible for the ICPs across which the unmetered load is shared, of the ICP identifiers of the ICPs.*
>
> *11.14(3) - A trader who receives such a notification from a distributor must give written notice to the distributor if it wishes to add or omit any ICP from the ICPs across which unmetered load is to be shared.*
>
> *11.14(4) - A distributor who receives such a notification of changes from the trader under (3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared.*
>
> *11.14(5) - If a distributor becomes aware of any change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change as soon as practicable after that change or decommissioning.*
>
> *11.14(6) - Each trader who receives such a notification must, as soon as practicable after receiving the notification, adjust the unmetered load information for each ICP in the list for which it is responsible to ensure that the entire shared unmetered load is shared equally across each ICP.*
>
> *11.14(7) - A trader must take responsibility for shared unmetered load assigned to an ICP for which the trader becomes responsible as a result of a switch in accordance with Part 11.*
>
> *11.14(8) - A trader must not relinquish responsibility for shared unmetered load assigned to an ICP if there would then be no ICPs left across which that load could be shared.*
>
> *11.14(9) - A trader can change the status of an ICP across which the unmetered load is shared to inactive status, as referred to in clause 19 of schedule 11.1. In that case, the trader is not required to give written notice to the distributor of the change. The amount of electricity attributable to that ICP becomes UFE.*

Audit observation

Unmetered load processes were reviewed, and the registry list and audit compliance report were examined.

Audit commentary

Unmetered load processes

ICPs with unmetered load are not normally supplied.

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs with unmetered load are rejected.

Pre-submission checks identify ICPs where the distributor unmetered load details, shared ICP, daily unmetered kWh, or trader unmetered load details are not null, or the unmetered flag is yes. The checks are completed following import of registry list data used to determine aggregation factors for submission.

Following the unexpected addition of shared unmetered load for two FOGY ICPs, FOGY updated their validation process to check for ICPs where the distributor has added unmetered load on the registry daily. An email notification is generated, and the FOGY team check the details with the distributor and arrange for the ICP to switch out.

Unmetered load ICPs

During the audit period, WEL Networks added shared unmetered load to two ICPs supplied by FOGY effective from 2 February 2023 on 3 February 2023. FOGY identified the new shared unmetered load and updated the trader UNM flag, unmetered daily kWh and unmetered load details effective from 2 February 2023 on 16 March 2023. The daily unmetered kWh applied was consistent with the distributor's information.

Because FOGY does not normally supply ICPs with unmetered load, they contacted the customers and arranged for the ICPs to switch out.

ICP	Distributor unmetered load details	Daily kWh	Switch out date	Days with unmetered load	Unmetered kWh
0000241337WE97B	0016:11.5:1 Light across 5 ICPs,0000054391WE7F2	0.184 kWh	4 April 2023	61 days	11.224 kWh
0000242779WE6A4	0016:11.5:1 Light across 5 ICPs,0000054391WE7F2	0.184 kWh	9 March 2023	35 days	6.44 kWh
Total					17.664 kWh

As a HHR only trader, FOGY does not have a process to settle unmetered volumes which are required to be settled as NHH. They investigated whether the volumes could be added to a separate meter register and included in their HHR submissions, but the volumes were too low and rounded to zero.

Compliance is recorded in this section because the unmetered load details were correctly populated on the registry. Non-compliance is recorded in **sections 2.1**, **12.2** and **12.7** because the unmetered load was omitted from submission.

Audit outcome

Compliant

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

Code reference

Clause 10.14 (2)(b)

Code related audit information

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

Audit observation

Review of the registry list with history and audit compliance report confirmed that no ICPs with standard unmetered load have been supplied.

Audit commentary

No ICPs with standard unmetered load have been supplied, and the two ICPs which were temporarily supplied with shared unmetered load were under the threshold.

Audit outcome

Compliant

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

Code reference

Clause 10.14 (5)

Code related audit information

If the unmetered load limit is exceeded the retailer must:

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

Audit observation

Review of the registry list with history and audit compliance report confirmed that no ICPs with standard unmetered load have been supplied.

Audit commentary

No ICPs with standard unmetered load have been supplied, and the two ICPs which were temporarily supplied with shared unmetered load were under the threshold.

Audit outcome

Compliant

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

Code reference

Clause 11 of schedule 15.3, clause 15.37B

Code related audit information

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

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

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

Audit observation

Review of the registry list with history and audit compliance report confirmed that no DUML ICPs have been supplied.

Audit commentary

FOGY does not supply any DUML ICPs.

Audit outcome

Compliant

6. GATHERING RAW METER DATA

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

Code reference

Clauses 10.13, 10.24 and 15.13

Code related audit information

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

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

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

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

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

Audit observation

Processes for metering, submission, and distributed generation were reviewed. The registry list and audit compliance report were examined to determine compliance.

Audit commentary

Metering installations installed

All "active" ICPs have an MEP recorded and metering installed. No submission information is determined by subtraction.

Distributed generation

171 ICPs have distributed generation recorded by the distributor and all have HHR profile.

167 have settled X and I flow meter registers installed and HHR profile, and I checked AV140 submission data for January and April 2024 and confirmed that all ICPs which were supplied and had I flow metering at the time of submission were correctly reported with I flows. Another two ICPs had settled I flow registers added after the report was run.

ICP 0010000767TEB1B is under investigation with the customer and network to determine whether generation is present before installation of I flow metering is arranged. There are no records indicating that generation is installed in the high-risk database.

ICP 0030326030PCC5C has I flow meter installation underway. According to the high-risk database a solar installation was certified on 18 December 2023, but meter installation was delayed because the MEP required a certificate of compliance to arrange meter installation and there was a delay in the customer providing this. The ICP has not been added to the gifting register.

No ICPs had distributed generation recorded by the trader and not the distributor. All ICPs have the HHR profile applied, therefore there were no profiles inconsistent with the generation fuel type.

Bridged meters

17 meters were bridged during the audit period. The meters were bridged due to faults and reconnections which could not be completed remotely where not bridging the meter would cause customer hardship.

One ICP switched out before being unbridged and the other 16 ICPs had their meters certified on unbridging. Nine ICPs had corrections processed based on consumption before or after the period the meter was bridged, and the other eight ICPs only had bridged relays, so no correction was required.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 6.1 With: Clause 10.13 From: 18-Dec-23 To: 23-Jul-24	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. Energy is not metered and quantified according to the code where meters are bridged. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are strong because meters are bridged rarely, and most ICPs with generation have I flow metering installed. The volume of ICPs with bridged meters is small and there are processes in place to ensure that an estimate of consumption is submitted to minimise the impact. The impact is low because I flow meter installation is in progress for ICP 0030326030PCC5C, and corrections are processed to record consumption during bridged periods.

Actions taken to resolve the issue	Completion date	Remedial action status
Issue was identified and in progress to resolve	31/10/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Existing controls identified this issue and FOGY will continue to monitor and correct as these arise	31/10/2024	

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

Code reference

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

Code related audit information

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

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

The participant responsible for the metering installation must:

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

Audit observation

FOGY does not have responsibility for any GIPs.

Audit commentary

FOGY does not have responsibility for any GIPs.

Audit outcome

Compliant

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

Code reference

Clause 33 of schedule 10.7 and clause 2(2) of schedule 15.3

Code related audit information

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

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

Audit observation

The registry list was reviewed to determine which profiles were used, and the audit compliance report was reviewed to identify exceptions.

Audit commentary

FOGY only uses the HHR profile, which does not require certification of control devices.

Audit outcome

Compliant

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

Code reference

Clauses 10.43(2) and (3)

Code related audit information

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

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

Audit observation

I checked the controls in place to identify defective metering.

Audit commentary

Defective meters are typically identified through the meter reading validation process, or from information provided by the meter reader, the network, the MEP, or the customer. Upon identifying a possible defective meter, FOGY raises a field services job to investigate.

Examples of potential faulty or stopped meters were identified during the audit period and I confirmed that the MEP was advised once the issue was identified.

Audit outcome

Compliant

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

Code reference

Clause 2 of schedule 15.2

Code related audit information

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

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

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

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

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

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

2(6) – The interrogation systems must record:

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

Audit observation

The data collection and clock synchronisation processes were examined.

MEPs are responsible for the collection of HHR and AMI data. Collection of data and clock synchronisation was reviewed as part of their MEP audits, and a sample of clock synchronisation events received by FOGY were reviewed.

Audit commentary

All information used to determine volume information is collected from the services interface or the metering installation by the MEP. MEPs monitor clock synchronisation, and this is covered as part of their audits. Clock synchronisation and meter event reports are received from the MEPs, saved on FOGY's file server and imported into their database for weekly review.

FOGY provided reports of clock synchronisation events outside the maximum permitted time errors for May and June 2024 which were corrected. I found that some time differences were over ±1800 seconds (one trading period). FOGY advised that the data was not spread between the trading periods when the correction was made, because the volume was very low.

MEP	ICP	Meter	Seconds	Correction date
IntelliHUB	1001141584UNB0C	214058719	-2543	4 June 2024
Bluecurrent	0000039902WE6A7	215509670	-3478	30 May 2024

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 6.5 With: Clause 2 of schedule 15.2 From: 30-May-24 To: 04-Jun-24	Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are moderate, because there are processes to identify and resolve clock synchronisation errors and determine whether they are material. The impact is low because two clock adjustments may have resulted in small volumes being recorded in an incorrect period.

Actions taken to resolve the issue	Completion date	Remedial action status
As highlighted in earlier Non compliance above – Clock Sync issues like this are evaluated and corrected where there is a measurable shift in volume between intervals as a result of the timesync issue. In both cases the volume shift would have resulted in < 1kwh variance per interval due to the flat load and extremely low volumes of these ICP.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY will continue to monitor Meter Events for these timesync errors and request the MEP's to correct where required. And to Estimate where volume shift has an measuable difference	02/08/2024	

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

Code reference

Clauses 3(1), 3(2) and 5 of schedule 15.2

Code related audit information

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

All validated meter readings must be derived from meter readings.

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

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

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

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

Audit observation

FOGY only deals with HHR data. No data is manually collected.

Audit commentary

FOGY only deals with HHR data. No data is manually collected.

Audit outcome

Compliant

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

Code reference

Clause 6 of schedule 15.2

Code related audit information

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

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

Audit observation

The process of the application of meter readings was examined. All ICPs are meter category 1 and are HHR settled, and no upgrades or downgrades occur.

Audit commentary

All AMI systems have a clock synchronisation function, which ensures correct time stamping.

NHH readings apply from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation except in the case of a switch event meter reading which applies to the end of the day prior to the event date for the losing trader and the start of the event date for the gaining trader as required by this clause.

The content of CS and RR files was examined in **section 4** and found to be accurate.

Audit outcome

Compliant

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

Code reference

Clause 7(1) and (2) of schedule 15.2

Code related audit information

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

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

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

Audit observation

FOGY only deals with HHR data.

Audit commentary

FOGY only deals with HHR data.

Audit outcome

Not applicable

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

Code reference

Clause 8(1) and (2) of schedule 15.2

Code related audit information

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

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

Audit observation

FOGY only deals with HHR data.

Audit commentary

FOGY only deals with HHR data.

Audit outcome

Not applicable

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

Code reference

Clause 9(1) and (2) of schedule 15.2

Code related audit information

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

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

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

Audit observation

FOGY only deals with HHR data.

Audit commentary

FOGY only deals with HHR data.

Audit outcome

Not applicable

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

Code reference

Clause 10 of schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

FOGY only deals with HHR data.

Audit commentary

FOGY only deals with HHR data.

Audit outcome

Not applicable

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

Code reference

Clause 11(1) of schedule 15.2

Code related audit information

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

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

Audit observation

HHR data is provided by the MEP and is obtained from the services access interface.

Audit commentary

Compliance with this clause has been demonstrated by the MEPs.

Audit outcome

Compliant

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

Code reference

Clause 11(2) of schedule 15.2

Code related audit information

The following information is collected during each interrogation:

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

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

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

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

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

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

Audit observation

HHR data is collected by the MEP.

Audit commentary

Compliance with this clause has been demonstrated by the MEPs.

Audit outcome

Compliant

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

Code reference

Clause 11(3) of schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

HHR data is collected by the MEP.

Audit commentary

Compliance with this clause has been demonstrated by the MEPs.

Audit outcome

Compliant

7. STORING RAW METER DATA

7.1. Trading period duration (Clause 13 Schedule 15.2)

Code reference

Clause 13 of schedule 15.2

Code related audit information

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

Audit observation

MEPs are responsible for trading period duration.

Audit commentary

Compliance with this clause has been demonstrated by the MEPs, and clock synchronisation is discussed further in **section 6.5**.

There were some clock differences of more than ±2 seconds which were corrected and then resulted in trading period durations which were not within ±0.1% of 30 minutes. I found that some time differences were over ±1800 seconds:

MEP	ICP	Meter	Seconds	Correction date
IntelliHUB	1001141584UNB0C	214058719	-2543	4 June 2024
Bluecurrent	0000039902WE6A7	215509670	-3478	30 May 2024

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 7.1 With: Clause 13 of schedule 15.2 From: 30-May-24 To: 04-Jun-24	Two clock synchronisation events over 1800 seconds resulted in trading period durations which were outside the ±0.1% threshold. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are moderate, because there are processes to identify and resolve clock synchronisation errors and determine whether they are material, but no corrections were processed. The impact is low because two clock adjustments may have resulted in small volumes being recorded in an incorrect period.

Actions taken to resolve the issue	Completion date	Remedial action status
Same ICP's and issue as above in 8.4 Clock Sync issues like this are evaluated and corrected where there is a measurable shift in volume between intervals as a result of the timesync issue. In both cases the volume shift would have resulted in < 1kwh variance per interval due to the flat load and extremely low volumes of these ICP.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY will continue to monitor Meter Events for these timesync errors and request the MEP's to correct where required. And to Estimate where volume shift has a measurable difference	02/08/2024	

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

Code reference

Clause 18 of schedule 15.2

Code related audit information

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

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

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

Audit observation

Processes to archive and store raw meter data were reviewed. Raw meter data from at least 48 months prior was reviewed to ensure that it is retained.

Audit commentary

Compliance with this clause has been demonstrated by MEPs as part of their audits. Access to FOGY's systems is restricted using logins and passwords.

FOGY stores all raw meter data files on its server after they are loaded into the database. Daily files which are more than two weeks old are zipped to save space on the network. I confirmed that raw meter reading data is retained for at least 48 months.

Readings cannot be modified without an audit trail being created, and the original data is retained. I viewed these audit trails, and they are discussed in further detail in **section 2.4**.

Audit outcome

Compliant

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

Code reference

Clause 21(5) of schedule 15.2

Code related audit information

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

Audit observation

FOGY does not deal with any non-metering information.

Audit commentary

FOGY does not deal with any non-metering information.

Audit outcome

Not applicable

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

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

Code reference

Clause 19(1) of schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

FOGY only deals with HHR data.

Audit commentary

FOGY only deals with HHR data.

Audit outcome

Not applicable

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

Code reference

Clause 19(2) of schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

I checked the process for estimation and correction, and reviewed examples. The process is the same for estimation and correction.

Audit commentary

There are two estimation methodologies:

- if a midnight read is available on either side of the period to be estimated, the system will automatically calculate and apportion the correct kWh figure between reads evenly across the relevant intervals, and
- if register reads are not available, estimation is conducted manually based on similar historic consumption; linear estimation is processed automatically within the database.

If an estimate is conducted and actual data is subsequently provided by the MEP, the original estimated row is labelled as "double" and is ignored for billing and submission. A row labelled as "estimate" may have some or all of the intervals estimated. It can be determined which intervals are estimated because they are different to the row above. The source field displays the correction technique and reason at a daily level, and which intervals are estimated or corrected.

I reviewed examples of corrections to confirm the correction method:

Issue	Correction method
Bridged meter	Consumption during the bridged period is estimated based on the consumption for the same weekday after the meter is unbridged. I checked 16 examples of bridged meters. Nine had corrections processed based on consumption before or after the period the meter was bridged, and the other eight ICPs only had bridged relays, so no correction was required.
Communications issue	Data is estimated and replaced with actual data once the communication issue is resolved, or a permanent estimate if the data cannot be retrieved. I checked ten examples of communications faults and confirmed the process was followed.
No power	Where a meter has a no power meter event, FOGY will determine whether there has been a genuine outage. If the outage is genuine, zero will be reported, and if it is not genuine a permanent estimate will be created based on historic information before the outage. I checked two examples of no power faults and confirmed the process was followed.
Faulty meter	Where a meter is either 1) not recording consumption, or 2) has a fault preventing data from being recorded accurately, data will be permanently estimated based on the history before the fault occurred or after the meter is replaced. I reviewed five examples of faulty meters and confirmed that investigation occurred, and corrections were processed as necessary.
Meter changes	Where a meter change occurs, opening and closing meter change readings are entered. On the day of the change, zeros are recorded for trading periods after the meter removal on the old meter and for trading periods before the meter installation on the new meter. I reviewed three examples of meter changes and confirmed that the expected process was followed.

Audit outcome

Compliant

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

Code reference

Clause 19(3) of schedule 15.2

Code related audit information

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

Audit observation

FOGY does not have ICPs with error or loss compensation arrangements.

Audit commentary

FOGY does not have ICPs with error or loss compensation arrangements.

Audit outcome

Compliant

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

Code reference

Clause 19(4) and (5) of schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

I checked the processes for estimation and correction.

Audit commentary

Raw data is not edited during the estimation and correction processes, and compliant audit trails are created.

Audit outcome

Compliant

9. ESTIMATING AND VALIDATING VOLUME INFORMATION

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

Code reference

Clause 3(3) of schedule 15.2

Code related audit information

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

Audit observation

FOGY does not deal with any NHH data. Identification of actual and estimated HHR volumes was checked.

Audit commentary

Readings and volumes are identified as estimated or actual as required by this clause. I checked a sample of switch event readings, MEP actual readings and MEP estimated readings, and confirmed that they were correctly classified in FOGY's system.

Audit outcome

Compliant

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

Code reference

Clause 3(4) of schedule 15.2

Code related audit information

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

3(4)(a) - validated meter readings,

3(4)(b) - estimated readings,

3(4)(c) - permanent estimates.

Audit observation

A sample of submission data was reviewed in **section 12**, to confirm that volume was based on readings as required.

Audit commentary

Volume information is directly derived from validated meter readings, estimated readings, or permanent estimates.

Audit outcome

Compliant

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

Code reference

Clause 3(5) of schedule 15.2

Code related audit information

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

Audit observation

A sample of submission data was reviewed in **sections 11** and **12**, to confirm that volume was based on readings as required.

Audit commentary

Data is not rounded or truncated until the submission files are produced and then rounding occurs to two decimal places.

Audit outcome

Compliant

9.4. Half hour estimates (Clause 15 Schedule 15.2)

Code reference

Clause 15 of schedule 15.2

Code related audit information

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

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

Audit observation

I checked the process for estimation and correction. The process is the same whether it is an estimation or a correction.

Audit commentary

There are two estimation methodologies.

- if a midnight read is available on either side of the period to be estimated, the system will automatically calculate and apportion the correct kWh figure between reads evenly across the relevant intervals, and
- if register reads are not available, estimation is conducted manually based on similar historic consumption; linear estimation is processed automatically within the database.

If an estimate is conducted and actual data is subsequently provided by the MEP, the original row (estimated data) is labelled as “double” and is ignored for billing and submission. A row labelled as “estimate” may have some or all of the intervals estimated. It can be determined which intervals are estimated because they are different to the row above. The source field displays the correction technique and reason at a daily level, and which intervals are estimated or corrected.

I checked a sample of ten estimates, including two temporary estimates and eight permanent estimates. FOGY met the requirement to use reasonable endeavours to produce accurate estimates. I also checked ten estimates where actual data became available at a later date and confirmed that the estimates were replaced with actual data.

FOGY's services agreement for Metrix, Counties Power and IntelliHUB meters states that "an estimated value may be provided when an actual read is unavailable; and replacement/catch-up data will be provided if/when available." IntelliHUB provides estimates to FOGY where actual data is not available. The IntelliHUB Limited audit report records compliance for the estimation technique and audit trail, but records non-compliance for the provision of complete and accurate information, because replacement data is only provided for a 15-day period. This is recorded as non-compliance in **section 2.1**. FOGY is still working with IntelliHUB to resolve this issue.

Audit outcome

Compliant

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

Code reference

Clause 16 of schedule 15.2

Code related audit information

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

> *16(2)(a) - confirmation that the meter reading or estimated reading relates to the correct ICP, meter, and register,*
>
> *16(2)(b) - checks for invalid dates and times,*
>
> *16(2)(c) - confirmation that the meter reading or estimated reading lies within an acceptable range compared with the expected pattern, previous pattern, or trend,*
>
> *16(2)(d) - confirmation that there is no obvious corruption of the data, including unexpected zero values.*

Audit observation

FOGY does not deal with any NHH data.

Audit commentary

FOGY does not deal with any NHH data.

Audit outcome

Not applicable

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

Code reference

Clause 17 of schedule 15.2

Code related audit information

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

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

- *17(4)(a) - checks for missing data,*
- *17(4)(b) - checks for invalid dates and times,*
- *17(4)(c) - checks of unexpected zero values,*
- *17(4)(d) - comparison with expected or previous flow patterns,*
- *17(4)(e) - comparisons of meter readings with data on any data storage device registers that are available,*
- *17(4)(f) - a review of the meter and data storage device event log for any event that could have affected the integrity of metering data,*
- *17(4)(g) – a review of the relevant metering data where there is an event that could have affected the integrity of the metering data.*

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

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

Audit observation

I checked the validation processes to confirm compliance.

Audit commentary

HHR validation checks include:

- **HHR_Register_Variation_Check** which includes a sum-check validation between the sum of the intervals and the difference between midnight reads with a threshold of ±0.01 kWh, which detects sum check failures and meter rollovers,
- **Missing_Data_Report** which checks the number of trading periods which have data for each day for each ICP meter register combination and identifies missing data and meter changes; any ICPs with less than the expected number of intervals for a day are checked,
- **VolumeSubmissionsMEPEstimates** shows estimates provided by MEPs, and any replacement actual data, and
- **Reconciliation_Checklist** compares the ICP level submission data to previous revisions to identify any large differences which require investigation.

All volumes are reported regardless of ICP status. A weekly check of ICPs with “inactive” status and non-zero consumption is conducted, and it is intended that ICPs will be moved to “active” status as necessary.

All information used to determine volume information is collected by the MEP. Meter event reports are received from the MEPs via SFTP and saved on FOGY’s file server. They are reviewed weekly to identify any issues that could affect meter accuracy, which are checked and followed up with the MEP if they appear to be persistent rather than isolated.

FOGY provided examples of meter events requiring action to date, which were mostly power up, power down and clock synchronisation events. I saw evidence of meter issues being identified through review and meter events and actioned.

Audit outcome

Compliant

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

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

Code reference

Clause 13.136

Code related audit information

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

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

Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit outcome

Not applicable

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

Code reference

Clause 13.137

Code related audit information

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

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

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

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

Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit outcome

Not applicable

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

Code reference

Clause 13.138

Code related audit information

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

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

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

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

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

Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit outcome

Not applicable

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

Code reference

Clause 13.140

Code related audit information

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

Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

Audit outcome

Not applicable

11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

11.1. Buying and selling notifications (Clause 15.3)

Code reference

Clause 15.3

Code related audit information

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

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

Audit observation

The registry list was reviewed to determine which profiles were used.

Audit commentary

FOGY only uses the HHR profile, and trading notifications are not required.

Audit outcome

Compliant

11.2. Calculation of ICP days (Clause 15.6)

Code reference

Clause 15.6

Code related audit information

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

> *15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period.*
>
> *15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

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

Audit observation

The process for the calculation of ICP days was examined by checking NSPs with a small number of ICPs to confirm the AV110 ICP days calculation was correct and reviewing GR100 ICP days comparison variances. Alleged breaches were reviewed to determine whether any submissions were made late.

Audit commentary

AV110 ICP days submission

ICP days submissions are generated from the database and checked against previous submissions for the same month. Differences are checked to confirm whether the recorded days are correct.

The process for the calculation of ICP days was examined by checking ICP days submitted for May 2024 initial submission for 25 NSPs with a small number of ICPs against the "active" ICP days on the registry list with history. The totals matched the expected values.

Breach information provided by the Electricity Authority did not identify any late ICP days submissions.

GR090 ICP missing

The GR090 ICPMISS reports are loaded into the database and reviewed on receipt and at the time of the next revision for that month. Any discrepancies are investigated and resolved.

I reviewed the 50 ICPs missing from the most submissions between November 2022 and April 2024 and confirmed that they were missing because an "inactive" status was recorded on the registry, or a backdated withdrawal had been completed. I checked a sample of submission data and confirmed that the ICPs with "inactive" status did not have volumes reported during "inactive" periods.

GR100 ICP days comparison

The GR100 ICPCOMP reports are loaded into the database and reviewed quarterly to investigate and resolve discrepancies. I reviewed the GR100 reports for August 2023 to April 2024 and found the differences are small and reasonable. The negative percentage figures in the table below indicate that the FOGY ICP days are higher than those on the registry.

The differences were reviewed and found to relate to small numbers of ICPs days which washed out with later revisions and were caused by timing differences relating to status changes and switches.

Month	Ri	R1	R3	R7	R14
Aug-2023	-	-0.02%	0.01%	0.00%	-
Sep-2023	0.00%	-0.01%	0.00%	0.00%	-
Oct-2023	0.02%	0.01%	0.00%	0.00%	-
Nov-2023	0.01%	0.00%	-0.01%	-	-
Dec-2023	-0.03%	0.00%	0.00%	-	-
Jan-2024	0.02%	-0.01%	0.00%	-	-
Feb-2024	0.01%	0.02%	0.00%	-	-
Mar-2024	0.05%	0.00%	-	-	-
Apr-2024	0.00%	-	-	-	-

Audit outcome

Compliant

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

Code reference

Clause 15.7

Code related audit information

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

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

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

Audit observation

The process for the calculation of "as billed" volumes was examined by checking five NSPs with a small number of ICPs for each code to confirm the AV120 calculation was correct, and reviewing GR130 reports to evaluate differences between billed and submission data.

Alleged breaches were reviewed to determine whether any submissions were made late.

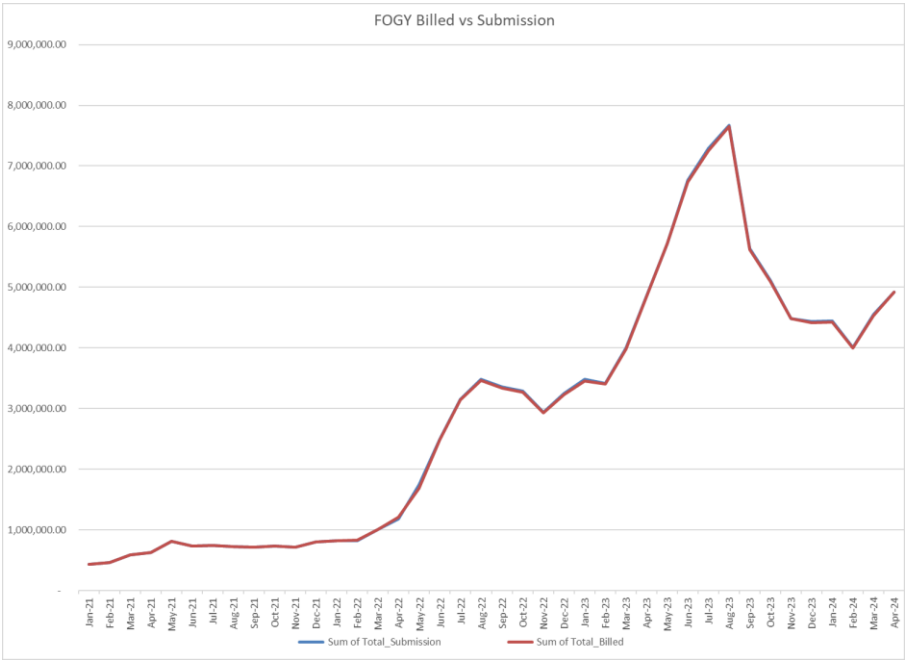
Audit commentary

No alleged breaches were recorded for late provision of submission information.

ICPs are billed daily based on midnight readings, and the values are stored in the billing consumption table. The billing and submission data are synchronised, as both are based on daily consumption.

The process for the calculation of as billed volumes was examined by checking five NSPs against daily billing information. The AV120 billed consumption calculation was confirmed to be correct for the NSPs checked.

I checked the difference between submission and electricity supplied information for the period January 2021 to April 2024, and the results are shown in the chart below. The total difference is 0.3% for the year ending April 2024 and 0.4 for the two years ending April 2024 (billed lower than submission).



Audit outcome

Compliant

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

Code reference

Clause 15.8

Code related audit information

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

> *15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period,*
>
> *15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

Audit observation

I confirmed that the process for the calculation and aggregation of HHR data is correct by matching HHR aggregates information with the HHR volumes data for a sample of submissions and tracing a sample of data from the source files received from the MEP to the submission files.

The GR090 ICP Missing files were examined, and an extreme case sample of ICPs missing were checked.

Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

Audit commentary

The Authority did not record any alleged breaches made for late submission information.

Report aggregation was checked by:

- tracing HHR data and readings from the MEP's source files to FOGY's database for ten ICPs, which confirmed the volumes and readings were recorded and labelled correctly,
- tracing one month of HHR data from FOGY's database to the HHR aggregates submission for ten ICPs, which confirmed that the submissions were consistent with the data in the database, and
- matching the HHR volumes and aggregates files for nine revisions during the audit period, which found that the volumes and aggregates files matched within ±0.00 kWh.

The GR090 ICPMISS reports are loaded into the database and reviewed on receipt and at the time of the next revision for that month. I reviewed the 50 ICPs missing from the most submissions between November 2022 and April 2024 and confirmed that they were missing because an "inactive" status was recorded on the registry, or a backdated withdrawal had been completed. I checked a sample of submission data and confirmed that the ICPs with "inactive" status did not have volumes reported during "inactive" periods.

Audit outcome

Compliant

12. SUBMISSION COMPUTATION

12.1. Daylight saving adjustment (Clause 15.36)

Code reference

Clause 15.36

Code related audit information

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

Audit observation

Daylight savings processes for MEPs were reviewed as part of their audits.

Audit commentary

Compliance has been demonstrated by FOGY's MEPs and agents as part of their MEP audits. I checked a sample of raw data and submission data at the beginning and end of daylight savings and confirmed that the correct number of trading periods were recorded.

Audit outcome

Compliant

12.2. Creation of submission information (Clause 15.4)

Code reference

Clause 15.4

Code related audit information

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

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

Audit observation

Processes to ensure that submissions are accurate were reviewed. Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

Audit commentary

HHR submission and correction processes were reviewed in **sections 11.4** and **8.2** and found to be compliant, and no alleged breaches were recorded for late provision of submission data. HHR volumes are reviewed prior to submission, and these checks are discussed in **section 12.3**.

Delivery of submission data for all ICPs that FOGY is responsible for

Submission accuracy issues are discussed in detail in **section 12.7**. There were some instances were submissions made by FOGY were incomplete:

- I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register, and
- 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023 for ICPs 0000241337WE97B and 0000242779WE6A4.

Previous audit issues

The previous audit found ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October 2022. I confirmed that permanent estimate I flow data was submitted from 3 August 2022 until 27 September 2023 when actual data was received from the MEP.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 12.2 With: Clause 15.4 From: 18-Dec-23 To: 23-Jul-24	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023 for ICPs 0000241337WE97B and 0000242779WE6A4. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as strong because most submission information was accurate. The impact is low based on the number of ICPs affected, and volumes.

Actions taken to resolve the issue	Completion date	Remedial action status
I flow volumes will be estimated until such time as the meter is reconfigured and included in revisions	30/09/2024	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Process will be added to ensure any ICP flagged as B where no EG register is available yet will be Estimated and included in revisions until such time as the metering can be resolved. Expectations are still that Metering will be updated based on connection of Solar being approved by the Network and appropriate paperwork completed	30/09/2024	

12.3. Allocation of submission information (Clause 15.5)

Code reference

Clause 15.5

Code related audit information

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

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

Audit observation

Processes to ensure that information used to aggregate the reconciliation reports is consistent with the registry were reviewed in **section 2.1**. Processes to ensure that submissions are accurate were reviewed.

Audit commentary

As discussed in **section 9.6**, FOGY's HHR data validation processes are compliant with the requirements of clause 17 of schedule 15.2. FOGY completes pre submission reviews to ensure data is accurate, including comparisons to previous periods at ICP level.

Audit outcome

Compliant

12.4. Grid owner volumes information (Clause 15.9)

Code reference

Clause 15.9

Code related audit information

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

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

Audit observation

FOGY is not a grid owner.

Audit commentary

FOGY is not a grid owner.

Audit outcome

Not applicable

12.5. Provision of NSP submission information (Clause 15.10)

Code reference

Clause 15.10

Code related audit information

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

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

Audit observation

FOGY is not an embedded network owner.

Audit commentary

FOGY is not an embedded network owner.

Audit outcome

Not applicable

12.6. Grid connected generation (Clause 15.11)

Code reference

Clause 15.11

Code related audit information

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

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

Audit observation

FOGY does not have any grid connected generation.

Audit commentary

FOGY does not have any grid connected generation.

Audit outcome

Not applicable

12.7. Accuracy of submission information (Clause 15.12)

Code reference

Clause 15.12

Code related audit information

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

Audit observation

The revision process was checked during the audit to confirm compliance.

Audit commentary

All estimates are replaced with actual data where it is available, and revision files are provided whether data has changed or not. No alleged breaches were recorded for late provision of submission information.

The following submission accuracy issues were identified:

Unreported distributed generation

ICP 0030326030PCC5C has I flow meter installation underway. According to the high-risk database a solar installation was certified on 18 December 2023, but meter installation was delayed because the MEP required a certificate of compliance to arrange meter installation and there was a delay in the customer providing this. No notification of gifting was provided to the reconciliation manager.

Estimation for clock synchronisation events affecting more than one trading period

Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods.

MEP	ICP	Meter	Seconds	Correction date
IntelliHUB	1001141584UNB0C	214058719	-2543	4 June 2024
Bluecurrent	0000039902WE6A7	215509670	-3478	30 May 2024

Unreported unmetered load

During the audit period, WEL Networks added shared unmetered load to two ICPs supplied by FOGY effective from 2 February 2023 on 3 February 2023. FOGY identified the new shared unmetered load and updated the trader UNM flag, unmetered daily kWh and unmetered load details effective from 2 February 2023 on 16 March 2023. The daily unmetered kWh applied was consistent with the distributor's information. Because FOGY does not normally supply ICPs with unmetered load, they contacted the customers and arranged for the ICPs to switch out.

ICP	Distributor unmetered load details	Daily kWh	Switch out date	Days with unmetered load	Unmetered kWh
0000241337WE97B	0016:11.5:1 Light across 5 ICPs,0000054391WE7F2	0.184 kWh	4 April 2023	61 days	11.224 kWh

ICP	Distributor unmetered load details	Daily kWh	Switch out date	Days with unmetered load	Unmetered kWh
0000242779WE6A4	0016:11.5:1 Light across 5 ICPs,0000054391WE7F2	0.184 kWh	9 March 2023	35 days	6.44 kWh
Total					17.664 kWh

As a HHR only trader, FOGY does not have a process to settle unmetered volumes which are required to be settled as NHH. They investigated whether the volumes could be added to a separate meter register and included in their HHR submissions, but the volumes were too low and rounded to zero.

Replacement of MEP data

FOGY's services agreement for Metrix, Counties Power and IntelliHUB meters states that "an estimated value may be provided when an actual read is unavailable, and replacement/catch-up data will be provided if/when available"; IntelliHUB provides estimates to FOGY where actual data is not available and the IntelliHUB Limited audit report records compliance for the estimation technique and audit trail, but records non-compliance for the provision of complete and accurate information, because IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date which is non-compliance because more accurate information is available but is not used. FOGY is still working with IntelliHUB to resolve this issue.

Previous audit issues

The previous audit found ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October 2022. I confirmed that permanent estimate I flow data was submitted from 3 August 2022 until 27 September 2023 when actual data was received from the MEP.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 12.7 With: Clause 15.12 From: 18-Dec-23 To: 23-Jul-24	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023. Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate. Potential impact: None Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong because most submission information was accurate. The impact is low based on the number of ICPs affected, and volumes.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**
See comments in per previous sections with these same ICP's and Issues		02/08/2024	Investigating
Preventative actions taken to ensure no further issues will occur		**Completion date**	
See comments in per previous sections with these same ICP's and Issues		02/08/2024	

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

Code reference

Clause 4 of schedule 15.2

Code related audit information

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

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

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

Audit observation

FOGY does not deal with NHH data. The presence of HHR estimates at revision 14 was checked.

Audit commentary

Where actual data cannot be obtained, FOGY contacts the MEP to request the missing data and if necessary, raises a field services order to resolve the issue preventing the data from being obtained. If the issues cannot be resolved in the long term, FOGY works with the customers to arrange for them to switch to another trader.

FOGY provided a list of six ICPs where no actual readings were obtained in time for the May 2023 revision 14, and I confirmed that permanent estimate readings were entered.

Audit outcome

Compliant

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

Code reference

Clause 2 of schedule 15.3

Code related audit information

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

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

Audit observation

Aggregation and content of reconciliation submissions was reviewed, and the registry list and audit compliance report were reviewed.

Audit commentary

Aggregation of the HHR volumes and aggregates files was checked and found to be compliant in **section 11.4**. All ICPs have meter category 1 and HHR submission type. No loss or compensation arrangements are required and no profiles requiring certification of load control devices are used.

FOGY does not normally supply unmetered load and was unable to produce compliant NHH unmetered load submission data when shared unmetered load was added to two existing ICPs. 17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023 for ICPs 0000241337WE97B and 0000242779WE6A4.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 12.9 With: Clause 2 of schedule 15.3 From: 18-Dec-23 To: 23-Jul-24	17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as strong because most submission information was complete, accurate and correctly aggregated. The isolated exception occurred due to the network unexpectedly adding shared unmetered load to FOGY ICPs. The impact is low based on the number of ICPs affected, and the unreported volume.

Actions taken to resolve the issue	Completion date	Remedial action status
As mentioned in previous sections, volume for the 2 months it took to offboard the 2 ICP's would have been within the daily rounding for HHR settlement.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
FOGY does not accept ICP's with Unmetered load, and the addition of this shared unmetered load after the ICP's were with FOGY triggered the need to have these customers switch out to a retailer that does NHH reconciliation. FOGY will continue to monitor for this type of rare event and account for volume where this is possible	02/08/2024	

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

Code reference

Clause 3 of schedule 15.3

Code related audit information

For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the techniques described in clauses 4 to 7 to create historical estimates and forward estimates.

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

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

Audit observation

FOGY does not deal with NHH data.

Audit commentary

FOGY does not deal with NHH data.

Audit outcome

Not applicable

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

Code reference

Clauses 4 and 5 of schedule 15.3

Code related audit information

The methodology outlined in clause 4 of schedule 15.3 must be used when preparing historical estimates of volume information for each ICP when the relevant seasonal adjustment shape is available, and the reconciliation participant is not using an approved profile in accordance with clause 4A.

If the Authority has approved a profile for the purpose of apportioning volume information (in kWh) to part or full consumption periods, a reconciliation participant may use the profile despite the relevant seasonal adjustment shape being available; and if it uses the profile, must otherwise prepare the historical estimate in accordance with the methodology in clause 4.

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

Audit observation

FOGY does not deal with NHH data.

Audit commentary

FOGY does not deal with NHH data.

Audit outcome

Not applicable

12.12. Forward estimate process (Clause 6 Schedule 15.3)

Code reference

Clause 6 of schedule 15.3

Code related audit information

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

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

Audit observation

FOGY does not deal with NHH data.

Audit commentary

FOGY does not deal with NHH data.

Audit outcome

Not applicable

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

Code reference

Clause 7 of schedule 15.3

Code related audit information

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

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

Audit observation

The registry list and event detail report were reviewed to determine which profiles were used.

Audit commentary

FOGY only uses the HHR profile, and no profile changes occurred during the audit period.

Audit outcome

Compliant

13. SUBMISSION FORMAT AND TIMING

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

Code reference

Clause 8 of schedule 15.3

Code related audit information

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

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

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

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

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

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

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

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

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

Audit observation

I checked processes to ensure the correct aggregation of submission information.

Audit commentary

Aggregation factors are determined directly from registry information. There were no examples of incorrect aggregation identified.

Audit outcome

Compliant

13.2. Reporting resolution (Clause 9 Schedule 15.3)

Code reference

Clause 9 of schedule 15.3

Code related audit information

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

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

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

Audit observation

I reviewed the rounding of data on the AV090 and AV140 reports as part of the aggregation checks.

Audit commentary

Data is rounded to two decimal places.

Audit outcome

Compliant

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

Code reference

Clause 10 of schedule 15.3

Code related audit information

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

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

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

Audit observation

FOGY does not deal with any NHH data.

Audit commentary

FOGY does not deal with any NHH data.

Audit outcome

Not applicable

14. GLOSSARY OF TERMS

AW breach	AW arrival date is more than five business days after receipt of the NW.
CS breach for transfer switch	CS arrival date is more than five business days after the CS Actual Transfer Date and no NW has been provided. Note: To provide countdown visibility a CS timer must be created on arrival of the AN based on the AN Expected Transfer Date. The breach must be re-evaluated against the CS Actual Transfer Date on arrival of the CS.
E2 breach for switch move	NT Proposed Transfer Date and CS Actual Transfer date do not match; AND CS Actual Transfer Date is a) earlier than the NT Proposed Transfer Date; OR b) more than ten business days after receipt of the NT.
NA breach	NW arrival date is more than two calendar months after the CS Actual Transfer Date.
RR breach	RR arrival date is more than four calendar months from the CS Actual Transfer Date.
SR breach	NW arrival date is more than ten business days after the initial NW for the same trader requesting the withdrawal. Note: it is possible to breach on these multiple times for the same ICP and event date, if a trader continues to re-request a switch withdrawal for the same ICP and event date more than ten business days after their original request. The trader sending the corresponding AW (either accepting or rejecting the withdrawal) only receives a breach on the AW if it is sent more than five days after the latest NW as in the original rule.

CONCLUSION

During the audit period FOGY has improved some of their status update and switching processes to increase automation and reduce errors. The files generated by FOGY's system use the same logic as the manual process, and because of this the improvements were not considered by FOGY to be a material change. The timeliness and accuracy of each type of registry update has been similar to, or better than previous audits. Despite the large increase in workload, there were small numbers of late and inaccurate registry and switching updates.

Submission continues to be highly accurate, and where accuracy issues were found, they were isolated and affected small numbers of ICPs and low volumes. In some cases, one minor low impact issue caused non-compliance in several report sections, such as two existing ICPs which had shared unmetered load added resulting in 17 kWh of unmetered load being omitted from submission before the ICPs switched out. Because FOGY is an HHR only trader, they were unable to submit the unmetered load.

The audit recorded 18 non compliances and a risk rating of 23, a small increase from 16 non-compliances and a risk rating of 21 during the previous audit. The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Based on the audit risk rating, the indicative next audit date is in 12 months. Given that despite an increase in workload compliance is similar to the previous audit and non-compliances were minor, I recommend that the next audit is completed in 16 months on 28 December 2025.

PARTICIPANT RESPONSE

FOGY wishes it noted that the majority of the non Compliances are the result of third party actions, which resulted in the team needing to then resolve and as with any issue FOGY always endeavours to understand the issue and correct it as quickly as is practical.

Several common themes causing non-compliances as a result of third party action continue to arise each Audit, these are primarily:

- Other Retailers re-connecting a disconnected FOGY ICP without notification and then failing to move forward with a switch and not restoring the ICP back to its disconnected state
- MEP's remotely reconnecting a FOGY ICP at the request of a potential new retailer taking the site (but switch then not going ahead)
- MEP compliance programmes happening and changes to metering using another of that MEP companies participant codes, and requesting that FOGY nominate for the change post meter change (with associated paperwork delays meaning our nomination is then late.)
- Retailers refusing RR requests when Switch read is obviously not a Midnight read (often a manual read on day of switch which is used for Billing, even though that Retailer uses valid actual HHR data to Reconcile to the end of that day)

FOGY will continue to endeavour to identify and resolve each of these issues as identified and try to mitigate them happening in the first place where-ever possible.

FOGY will also be submitting a request to the EA to review some of the rules that allow other Retailers and MEP to reconnect properties, and the requirements that should be met before doing so, as well as restoring the property to the original disconnected state (at their cost) should the requested switch be withdrawn

- For any Reconnection performed by FOGY where it is not yet the Retailer, we ensure that the NT switch request is initiated before requesting the Reconnection of another Retailers ICP, this should be a mandatory Requirement in our view. And remote reconnection by MEP's should only be completed for the current responsible retailer or the gaining retailer as indicated by a switch in progress

In conclusion FOGY will be implementing a number of additional checks and balances that have been identified as part of this Audit to continue to improve the processes FOGY uses to meet or exceed our compliance obligations