

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT**

For

**WESTPOWER LIMITED (WPOW)  
(NZBM# 9429038917936)**

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Date audit report completed: 2 October 2024

Audit report due date: 07-Oct-24

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## EXECUTIVE SUMMARY

This distributor audit was performed at the request of Westpower Limited (WPOW) as required by clause 11.10 of Part 11 to assure compliance with the Electricity Industry Participation Code 2010. The relevant rules audited are as required by the Guidelines for Distributor Audits V 7.2 issued by the Electricity Authority

Westpower has good controls in place for most processes, and the processes are well documented. Robust processes and prompt and accurate information updates are treated as a priority. The company uses Maximo to manage new connections, and the process works well.

The area which requires more attention is distributed generation. Westpower requires their presence during the electrical connection of distributed generation, which is called "witnessing", but there is still an issue with getting paperwork from the field in time to update the registry within 3 business days.

Overall, the level of compliance is high. The audit found five non-compliances. A lack of resources causes some non-compliance related to late updates. A new person has recently been employed to address this, but it takes time to provide sufficient training.

The audit period was from 1/01/2023 to 15/08/2024.

The Electricity Authority determines the date of the next audit, which depends on the compliance level during this audit. Table 1 of the Guidelines for Distributor Audit provides some guidance. The Future Risk Rating score is 7, which results in an indicative audit frequency of 18 months. We agree with this result.

We thank the Westpower staff for their complete cooperation in this audit.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	For ICP 0000828321WP78F the input data for the "Ready" status was after the Initial Electrical Connection	Strong	Low	1	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	25 late Initial Electrical Connection Date (IECD) updates	Moderate	Low	2	Identified
Changes to registry information	4.1	8 of Schedule 11.1	Some updates to registry backdated more than three business days of the event	Moderate	Low	2	Identified
ICP address	4.4	2 of Schedule 11.1	ICP 0000615162WP2F7 did not have address allowing the ICP to be readily located	Strong	Low	1	Cleared
Distributor to provide ICP information to the registry manager	4.6	7(1) of Schedule 11.1	Three ICPs with incorrect distributed generation information	Moderate	Low	2	Identified
Future Risk Rating						7	

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

### RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

### ISSUES

Subject	Section	Issue	Description
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		Nil	
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## 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.

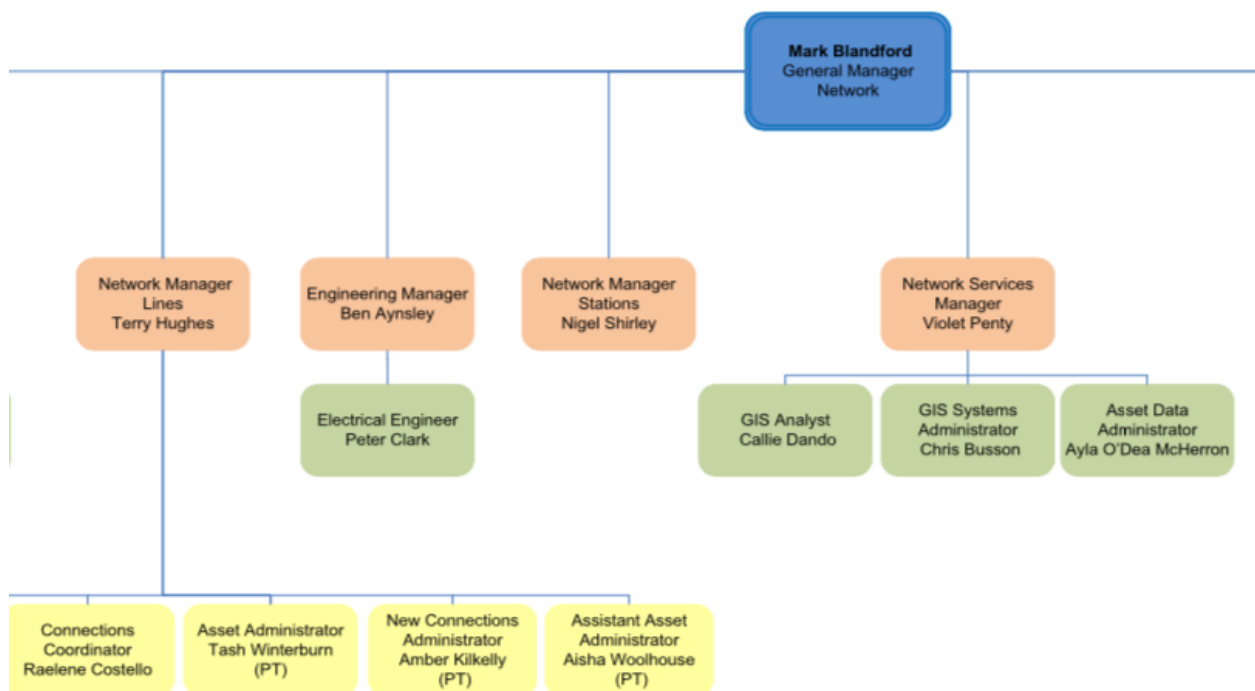
#### Audit observation

It was discussed with Westpower during this audit, and it was confirmed that Westpower does not have any exemptions granted from obligations to comply with the Code.

#### Audit commentary

A review of exemptions on the Electricity Authority website confirmed that no exemptions are relevant to this audit's scope.

### 1.2. Structure of Organisation



### 1.3. Persons involved in this audit

Name	Title	Company
Raelene Costello	Connections Coordinator	Westpower
Amber Kilkelly	New Connections Administrator	Westpower
Violet Penty	Network Services Manager	Westpower
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates Ltd

#### 1.4. Use of contractors (Clause 11.2A)

##### Code reference

Clause 11.2A

##### Code related audit information

*A participant who uses a contractor*

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

##### Audit observation

Westpower were asked to provide the details of any sub-contractors authorised to perform electrical connection activities on their networks.

##### Audit commentary

ElectroNet, part of the same company group, carries out all electrical connections on the Westpower network. No subcontractors are used.

#### 1.5. Supplier list

Gentrack is the supplier of Gentrack used for billing purposes and communication with the registry. Electronet carries out all electrical connections on the Westpower network. No sub-contractors are used.

#### 1.6. Hardware and Software

Westpower uses four systems to create and maintain ICP information in the registry:

- Maximo—this is an Asset Management System that includes workflow functionality. It enables Electronet to assign and track the tasks associated with ICP creation and maintenance.
- GIS – this records the location of each connection to the network. A map is attached to each approval of a new connection.
- Gentrack –this is used to manage all ICPs on the Westpower network. All changes to the registry are made via Gentrack.
- SharePoint – document storage. All documents associated with a connection are scanned and attached to the relevant connection.
- Mind Manager – process documentation



## 1.7. Breaches or Breach Allegations

On 14 November 2023, Westpower lodged self-breach with the Authority.

*ICP 0000828321WP78F was energised by our contractor (ENS) on 09/11/23 without a trader being listed in the registry, without retailer acceptance.*

### Resolution to this event

A retailer was assigned on 13/11/23.

### Steps taken to prevent recurring

An internal incident has been raised with the contractor to investigate and identify mitigations. A new process has been implemented to prevent such an event.

## 1.8. ICP and NSP Data

Westpower provided a list of all ICPs as of 15/08/2024.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
WPOW	ATU1101	ATARAU			WCOTHERWPOWG	G	1/05/08	46
WPOW	DOB0331	DOBSON			WCOTHERWPOWG	G	1/05/08	3,219
WPOW	GYM661	GREYMOUTH			WCOTHERWPOWG	G	1/05/08	4,722
WPOW	HKK0661	HOKITIKA			WCOTHERWPOWG	G	1/05/08	5,043
WPOW	KUM0661	KUMARA			WCOTHERWPOWG	G	1/05/08	715
WPOW	RFN1101	REEFTON			WCOTHERWPOWG	G	1/05/08	891
WPOW	RFN1102	REEFTON			WCOTHERWPOWG	G	1/05/08	638
WPOW	OTI0111	OTIRA			WCOTIRAWPOWG	G	1/11/12	52

Status	Number of ICPs (15/08/2024)	Number of ICPs (2023)	Number of ICPs (2021)	Number of ICPs (2020)	Number of ICPs (2018)
New (999,0)	54	68	55	34	9
Ready (0,0)	4	3	3	2	0
Active (2,0)	14,431	14,218	13,943	13,823	13,582
Distributor (888,0)	0	0	0	0	0
Inactive – new connection in progress (1,12)	24	20	24	17	20
Inactive – electrically disconnected vacant property (1,4)	705	726	752	755	777
Inactive – electrically disconnected remotely by AMI meter (1,7)	36	33	19	13	14

Inactive – electrically disconnected at pole fuse (1,8)	14	9	8	6	10
Inactive – electrically disconnected due to meter disconnected (1,9)	4	4	7	6	3
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	1	1	0
Inactive – electrically disconnected at meter box switch (1,11)	1	1	1	1	1
Inactive – electrically disconnected ready for decommissioning (1,6)	7	7	10	8	8
Inactive – reconciled elsewhere (1,5)	0	0	0	0	0
Decommissioned (3)	1,573	1,454	1,365	1,355	1,257

### 1.9. Authorisation Received

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

### 1.10. Scope of Audit

The audit covers the following processes under clause 11.10 of Part 11, performed by Westpower, as listed below:

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

The audit was conducted on the Westpower premises, 146 Tainui Street in Greymouth, on 18/19 October 2024. As of the report date, we had followed the Guidelines for Distributor Audits version 7.2 published by the Authority.

### 1.11. Summary of previous audit

We reviewed Steve Woods of Veritek’s previous audit, conducted in February 2023. The table below shows the current status of the findings from that audit.

Subject	Section	Clause	Non-Compliance	Comment
Timeliness of Provision of ICP Information to the registry	3.4	7(2) of Schedule 11.1	Late update to the registry for one ICP electrically connected during the audit period.	Cleared
Provision of the initial electrical connection date	3.5	7(2A) of Schedule 11.1	37 late initial electrical connection updates.	Still exists
Monitoring of “new” & “ready” statuses	3.14	15 Schedule 11.1	Two ICPs at status “new” not followed up with trader.	Cleared
Registry updates	4.1	8 Schedule 11.1	Some updates to registry backdated greater than three business days of the event.	Still exists

Notice of NSP for each ICP	4.4	2 Schedule 11.1	122 ICPs with insufficient details to be readily locatable.	Cleared
Registry accuracy	4.6	7(1) Schedule 11.1	One ICP with incorrect unmetered load details. ICED was updated late for one ICP.	Still exists
Maintenance of price category codes	4.12	23 Schedule 11.1	One new price category created; the required notification period was not provided.	Cleared

## 2. OPERATIONAL INFRASTRUCTURE

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

#### Code reference

*Clause 11.2(1) and 10.6(1)*

#### Code related audit information

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

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

#### Audit observation

Westpower information provided to the registry and other participants is based on documents and emails from customers, traders, electricians, line staff, etc. All documents and emails are stored within Gentrack as attachments to relevant ICPs. Tracing any request and update is easy and provides an excellent audit trail.

#### Audit commentary

Westpower has robust reporting and monitoring in place. Maximo (Asset Management System) manages new connections from the customer application to the Initial Electrical Connection. Business rules implemented in Maximo enforce compliance with the Code.

The Audit Compliance reports are checked frequently to identify and correct discrepancies. Registry notification files are checked daily.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 11.2(2) and 10.6(2)*

#### Code related audit information

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

#### Audit observation

The Audit Compliance Reports for the audit period and the LIS and EDA files were checked. It was discussed with Westpower staff what processes were in place to identify incorrect information in their systems and the registry and the process to correct that data as soon as practicable.

#### Audit commentary

Westpower has established comprehensive processes and procedures to guarantee accurate and reliable information delivery. Audit Compliance Reports are regularly reviewed to identify any non-compliance. Any discrepancies found are thoroughly investigated and rectified as needed. Non-compliances identified in the Audit Compliance reports are used to improve processes and for training purposes.

### Audit outcome

Compliant

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

### Code reference

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

### Code related audit information

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

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

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

### Audit observation

This was discussed during the audit. The PR-255 file was examined to determine if there were examples of load control switches on the Westpower network.

### Audit commentary

It is Westpower policy not to work on the customers' installation. If there is a problem with the meter, customers are advised to contact their retailer or electrician.

### Audit outcome

Compliant

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

### Code reference

*Clause 11.30A*

### Code related audit information

*A distributor must provide clear and prominent information about Utilities Disputes:*

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

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

### Audit observation

This was discussed during the audit.

Westpower provided the following information which were :

- Westpower website link,

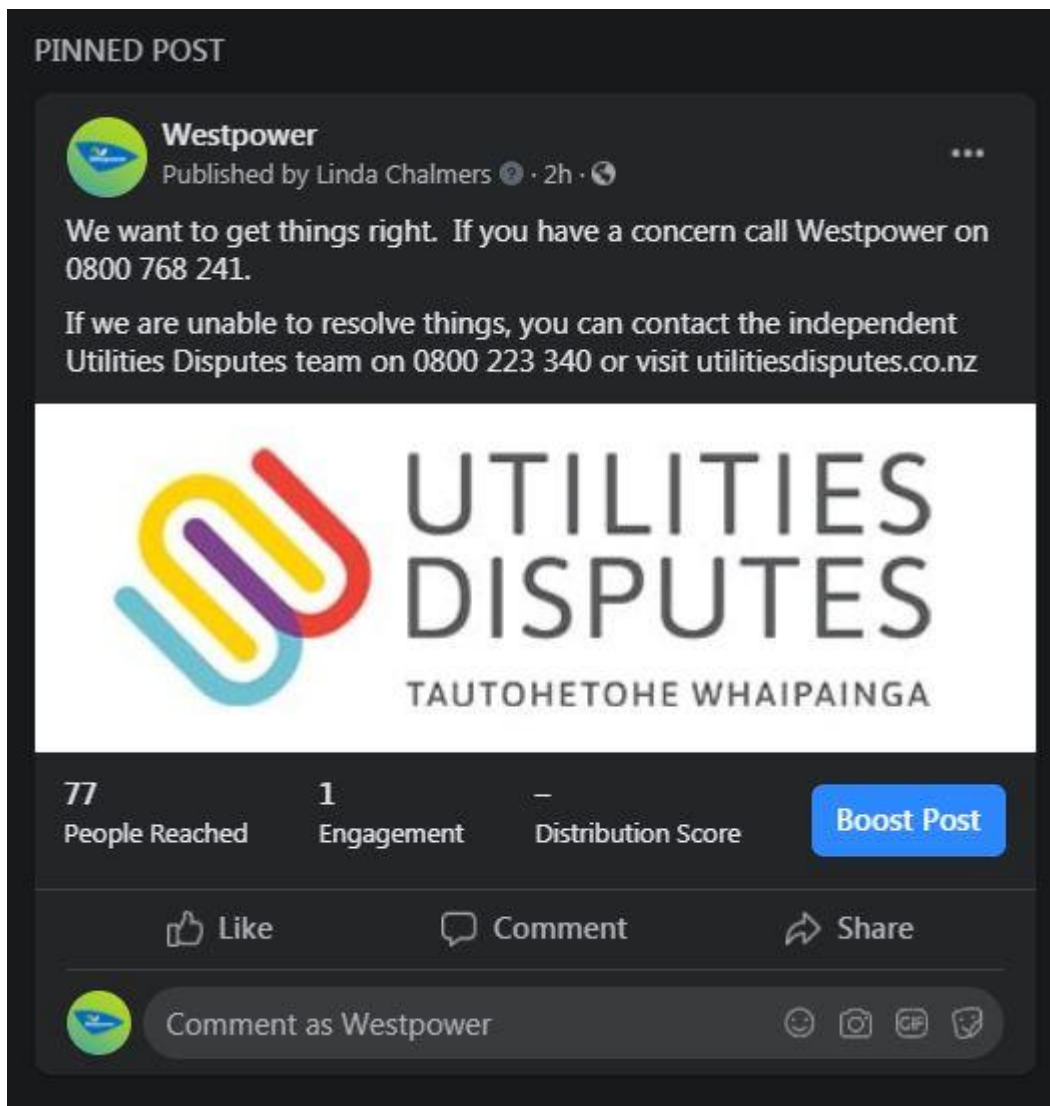
- X and Facebook account
- email signatures examples, and
- instruction provided to Call Care

#### Audit commentary

These provided clear and prominent information about Utilities Disputes for the consumer.

We examined the Westpower website and confirmed that information about Utilities Disputes is on the home page.

Call Care takes inbound calls from consumers for Westpower after hours. Westpower has instructed Call Care to provide information for the Utilities Disputes process when a complaint is received.





**Inbox** | Westpower | Available | Automated Responses

**Automated Responses**

- Greet People
- Instant Reply
- Away Message Off
- Share and Get Information
- Questions for Potential Customers
- Frequently Asked Questions
- Comment to Message
- Contact Information
- Location
- Hours
- Send Confirmations
- Job Application Received
- Follow Up
- Positive Feedback
- Negative Feedback**
- Appointment Reminders
- Page Recommended
- Page Not Recommended

**Edit Message: Negative Feedback** | Preview in Messenger | Cancel | Save

**Timing**  
 Sent 10 minutes after someone gives negative feedback

**Message**  
 Customize the message you send.

**Text** 222

Hi  we're sorry you had a less than ideal experience with Westpower. If you have a concern call us on 0800 768 241. If we are unable to resolve things, you can contact the independent Utilities Disputes team on 0800 223 340 or visit [utilitiesdisputes.co.nz](https://utilitiesdisputes.co.nz)

+ Add customer's name

**Attachment (Optional)**  
 + Add an attachment

**Button (Optional)**  
 + Add a button

**Mobile Preview:**

12:00 PM  
 Westpower  
 ACTIVE NOW

Hi Dean, we're sorry you had a less than ideal experience with Westpower. If you have a concern call us on 0800 768 241. If we are unable to resolve things, you can contact the independent Utilities Disputes team on 0800 223 340 or visit [utilitiesdisputes.co.nz](https://utilitiesdisputes.co.nz)

**Audit outcome**

Compliant



### 3. CREATION OF ICPS

#### 3.1. Distributors must create ICPs (Clause 11.4)

##### Code reference

*Clause 11.4*

##### Code related audit information

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

##### Audit observation

The Audit Compliance Reports and the LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff.

Westpower created 328 new ICPs during the audit period. A random sample of 20 new ICP connection records, proportioned by network, was also checked.

##### Audit commentary

An ICP for a new connection is created upon a customer's request or from his/her representative. The Request for Supply form is completed online or emailed to the Westpower office. Customers are asked to state installation details such as the number of phases, anticipated load, and planned livening date on the form. They are advised to contact their preferred retailer before being electrically connected.

There are three types of new connections to the network, "simple", "network extension" and "complex".

A new connection that does not require line or cable work is called "simple." A network engineer assesses it. After his approval, the ICP identifier is created, and the person requesting an ICP is issued a Network Connection Agreement, which shows the ICP identifier and the capacity of the connection. The agreement is issued for 6 months; after 6 months, the application needs to be re-evaluated.

Some new connections require additional line or cable work. They are called "network extensions". Once an application is lodged, it is assessed by a network engineer. The additional cabling or line work is priced, and a proposal is sent to a customer for approval. Once agreed upon, a deposit is approved and paid; an ICP identifier is created and uploaded to the registry. The registry assigns the status "New" as a proposed retailer is not recorded. Approval is sent to the electrician/customer, who is advised to contact the trader. Once the trader notifies Westpower that they accept the ICP, the proposed trader is uploaded to the registry, and its status is updated to "Ready."

Application statuses are monitored by Westpower staff on the Maximo dashboard.

Since the last audit, Westpower has created 328 ICPs for new connections, of which 246 were electrically connected.

##### Audit outcome

Compliant

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

##### Code reference

*Clause 11.5(3)*

##### Code related audit information

*The distributor, within 3 business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.*

**Audit observation**

An ICP identifier is created only upon a customer or electrician's request, not the participant's. When an ICP identifier is created, a customer or representative and the participant are advised.

**Audit commentary**

This clause does not apply to Westpower. Compliance was not assessed.

**Audit outcome**

Not applicable

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

**Code reference**

*Clause 11.7*

**Code related audit information**

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

**Audit observation**

The Audit Compliance Reports and the LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff.

A random sample of 20 new ICP connections was checked.

**Audit commentary**

We confirm that the required information was accurately entered as per the clause. Gentrack has built-in validation to ensure that mandatory fields are filled out. The ICP is created in Gentrack and uploaded to the registry in the morning. Since November 2023, all files created by Gentrack have been manually uploaded because the Gentrack version used by Westpower is incompatible with the new security measures implemented by Jade."

Registry response information is checked to ensure the data was successfully uploaded.

**Audit outcome**

Compliant

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

**Code reference**

*Clause 7(2) of Schedule 11.1*

**Code related audit information**

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

**Audit observation**

The Audit Compliance Reports and the LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff. A random sample of 20 new ICP connection records was checked.

**Audit commentary**

The Audit Compliance report identified ICP 0000828321WP78F, for which the “Ready” status input data was after the Initial Electrical Connection Date. As described in **section 1.7**, Westpower lodged the self-breach with the Authority.

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: 7(2) Schedule 11.1  From: 09-Nov-23 To: 15-Nov-23	For ICP 0000828321WP78F the input data for the “Ready” status was after the Initial Electrical Connection  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as strong. It was one-off event caused by a contractor livening the installation before a retailer was recorded in the registry. The process was reviewed and refined. Impact on settlement outcomes is minor; audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
An internal incident was raised with our contractor.		13/11/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A new process has been developed to prevent such an event happening again.		30/11/2023	

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

**Code reference**

*Clause 7(2A) of Schedule 11.1*

**Code related audit information**

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

**Audit observation**

The Audit Compliance Reports and the LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff. A random sample of 20 new ICP connection records was checked.

A sample of 14 randomly chosen late updates was examined.

#### **Audit commentary**

Only ElectroNet inspectors can electrically connect an installation. Before they go on-site, they contact the Westpower office to check if a trader requested a livening.

Maximo has two flags that help monitor a new connection. When an ICP is created, it has the flag "WAITRETAILER", which means it is awaiting acceptance from the trader. Once the ICP acceptance is received, the flag is changed to "RDYENERGISE." The new connection could be livened only when a trader accepts it.

Paperwork is returned from the field, and the Initial Electrical Connection Date is entered in Gentrack and downloaded to the registry.

There were 246 initial electrical connection date updates in the LIS report. The Audit Compliance report identified 25 late updates. The volume of late updates decreased from 37 in the last audit.

All ICPs with the status "Active" had IECD populated.

We have reviewed 14 late IEDC updates. Most of the delays were caused by a lack of resources. Once a new person was hired, it took time to provide sufficient training. The lack of IEDC was identified using the Audit Compliance reports, and the registry was updated. All late updates occurred in 2023, with the last late update being April 2024.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1  From: 01-Jan-23 To: 15-Aug-24	25 late Initial Electrical Connection Date (IECD) updates  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate. Westpower employed additional resources to assist in processing data coming from the field. The training was provided, last late update in 042024. Impact on settlement outcomes is minor; audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Extra training was developed for new staff.		31/08/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training is continually provided to ensure staff are aware of all regulatory requirements and timeframes.		On-going	

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

#### Code reference

Clause 11.17

#### Code related audit information

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

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

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

#### Audit observation

The Audit Compliance Reports and the LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff. A random sample of 20 new ICP connection records was checked.

#### Audit commentary

We sampled 20 randomly chosen new installations to assess compliance. The examples are shown in the table below:

ICP	ICP created	Retailer acceptance	Electrically connected
0000906135WP34E	30/11/2023	13/12/2023	11/01/2024
0000780379WP801	20/12/2023	15/01/2024	17/01/2024
0000878860WP915	22/04/2024	19/01/2024	01/02/2024
0000790361WP859	11/12/2023	13/12/2023	08/02/2024
0000758396WPC34	24/01/2024	31/01/2024	29/02/2024
0000606368WP060	21/05/2024	17/06/2024	08/07/2024
0000486407WP8B1	09/07/2024	15/07/2024	18/07/2024
0000606039WP72E	13/12/2022	19/06/2024	30/07/2024
0000790366WP593	20/05/2024	04/06/2024	05/08/2024
0000462745WP26F	15/07/2024	17/07/2024	19/08/2024
0000522215WP09B	19/2/2024	29/02/2024	19/03/2024
0000466337WPD36	04/03/2024	07/03/2024	28/03/2024
0000606105WPACC	26/06/2024	26/03/2024	02/04/2024
0000306117WPD37	01/11/2023	05/12/2023	18/04/2024
0000712560WPE7F	30/04/2024	01/05/2024	10/05/2024
0000790235WP85F	25/03/2024	16/04/2024	20/05/2024
0000445028WP06B	08/04/2024	21/05/2024	29/05/2024
0000710458WP1D7	27/02/2024	07/03/2024	06/06/2024
0000758717WP93A	29/04/2024	06/06/2024	26/08/2024
0000484414WPD9C	05/04/2024	01/05/2024	03/07/2024

A sampling of randomly chosen new installations confirmed that no installation was electrically connected without a trader recorded in the registry as accepting responsibility for the ICP.

The process adopted by Westpower was reviewed. It is robust and compliant.

ICPs are uploaded without a proposed trader; therefore, the registry assigns the status “New”. Once the trader’s acceptance is received, the trader’s name is uploaded to the registry. Most new customers (connections) chose Mercury Energy as a preferred trader. In some cases, Mercury Energy accepts a new connection before an ICP is issued. Mercury Energy accepts a new connection based on the address and installation number. It is a historic process, and it works well for both parties.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.31

#### Code related audit information

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

#### Audit observation

The Audit Compliance Reports, LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff.

A random sample of 20 new ICP connection records was checked.

#### Audit commentary

Westpower does not connect an ICP unless a trader requests it. It receives an email from a proposed trader accepting an ICP. 328 ICPs were created during the audit period.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.31A

#### Code related audit information

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

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

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

*advising all traders would impose a material cost on the distributor, and*

*in the distributor's reasonable opinion the advice would not result in any material benefit to any of the traders.*

#### Audit observation

It was discussed during the audit.

#### Audit commentary

Westpower stated that no MEP had made such a request.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.30

#### Code related audit information

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

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

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

#### Audit observation

The NSP table was reviewed.

#### Audit commentary

Westpower has not created any new NSP during the audit period.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.30A and 10.30B

#### Code related audit information

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

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

*A distributor may only electrically connect an NSP if:*

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

#### Audit observation

The NSP table was reviewed.

#### Audit commentary

Westpower has not created any new NSP during the audit period.

#### Audit outcome

Distributor audit report V16



Compliant

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

#### Code reference

*Clause 1(1) Schedule 11.1*

#### Code related audit information

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

*yyyyyyyyyyxxccc where:*

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

#### Audit observation

Within the Westpower area, a unique distributor code, "WP," ensures that the ICP is unique according to code requirements. Gentrack generates an ICP using an installation number, unique distributor code, and checksum. The checksum is generated based on the algorithm provided by the market administrator.

#### Audit commentary

We analysed the LIS file dated 15 August 2024 and confirmed that the "WP" distributor code is used. The ICP identifier is used in all communication with the registry and participants.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 6 Schedule 11.1*

#### Code related audit information

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

#### Audit observation

The LIS file was examined to confirm all "Active" ICPs have a single loss category code.

#### Audit commentary

Compliance is confirmed based on a review of the LIS file and the ICP creation process. An ICP's loss category code is assigned when it is first uploaded to the registry. The registry design does not allow assigning more than a single loss category code to an ICP.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 13 Schedule 11.1*

### Code related audit information

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

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

### Audit observation

The new connection process was analysed in conjunction with the EDA file for the period covered by this audit.

### Audit commentary

ICPs are uploaded without a proposed trader; therefore, the registry assigns the status “New”. Once the trader’s acceptance is received, the trader’s name is uploaded to the registry. As described in **section 3.6**, most new customers (connections) chose Mercury Energy as their preferred trader. In some cases, Mercury Energy accepts a new connection before an ICP is issued. Mercury Energy accepts a new connection based on address, not on ICP. It is a historic process that works well for both parties.

### Audit outcome

Compliant

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

### Code reference

Clause 15 Schedule 11.1

### Code related audit information

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

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

### Audit observation

We checked the list file for ICPs at “New” or “Ready” for longer than 24 months to confirm that traders had been notified.

### Audit commentary

Westpower closely monitors ICPs with the “New” and “Ready” statuses. After 12 months, a trader or a customer is approached and asked if the ICP is still required.

Two ICPs at “New” have been in the registry for over 24 months. An electrician confirmed that one of them is going ahead this year, but a customer has not confirmed the second one yet.

The Audit Compliance Report is used to monitor “New” and “Ready” statuses.

### Audit outcome

Compliant

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

### Code reference

Clause 7(6) Schedule 11.1

#### Code related audit information

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

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

#### Audit observation

The Westpower network includes several generating stations. The biggest, Amethyst Hydro Station, has a capacity of 7400kW.

#### Audit commentary

Examination of the list file confirmed that they do not have any embedded generation stations with a capacity of 10MW or more that require an individual loss category code.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 10.33A(4)*

#### Code related audit information

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

#### Audit observation

The Audit Compliance Reports, LIS, EDA reports and the registry were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff. A random sample of 20 new ICP connection records, proportioned by network, was also checked.

#### Audit commentary

Westpower will only connect a point of connection if requested by the trader responsible recorded in the registry. Westpower requires a Service Request providing authorisation to connect an ICP electrically.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 10.30C and 10.31C*

#### Code related audit information

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

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

#### **Audit observation**

Processes were examined for the disconnection and electrical disconnection of ICPs and NSPs.

#### **Audit commentary**

Westpower understands its responsibilities regarding this clause. Westpower only conducts electrical disconnection for safety and where ICPs are to be decommissioned.

#### **Audit outcome**

Compliant

### 3.18. Meter bridging (Clause 10.33C)

#### **Code reference**

*Clause 10.33C*

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

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

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

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

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

#### **Audit observation**

The Westpower process for bridging control devices was examined.

#### **Audit commentary**

Westpower does not bridge meters. Where a contractor is required to do this on the Westpower network, it would result from a Service Request sent by the MEP directly to the contractor.

#### **Audit outcome**

Compliant

## 4. MAINTENANCE OF REGISTRY INFORMATION

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

#### Code reference

Clause 8 Schedule 11.1

#### Code related audit information

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

*Notification must be given by the distributor within 3 business days after the change takes effect, unless the change is to the NSP identifier of the NSP to which the ICP is usually connected (other than a change that is the result of the commissioning or decommissioning of an NSP).*

*In those cases, notification must be given no later than 8 business days after the change takes effect.*

*If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 13<sup>th</sup> business day and be backdated to the date the change took effect.*

*In the case of decommissioning an ICP, notification must be given by the later of 3 business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or 3 business days after the distributor has decommissioned the ICP.*

#### Audit observation

The EDA files were analysed, and the Audit Compliance Reports for the audit period were checked. This was discussed with Westpower staff.

The management of registry updates and NSP changes was reviewed. The process was discussed with Westpower staff.

#### Audit commentary

The table below details the quantity and compliance of registry updates.

Update	Date	Late	% Compliant	Average days
Address	2020	0	100%	-
	2021	0	100%	-
	2023	2	98.72	0.27
	2024	0	100%	
Price codes	2020	25	91.7%	
	2021	40	42.31%	
	2023	149	98.5%	60.44
	2024	103	92.62%	12.04
Status (decom)	2020	14	46.88%	5.9
	2021	15	42.31%	7.58
	2023	12	77.88%	5.00
	2024	17	79.6%	3.55
Network (excl. new connection & distributed generation)	2020	0	100%	
	2021	0	100%	
	2023	9	99%	
	2024	???	???	
Distributed	2020	11	22.22%	111.56

generation	2021	7	58.82%	34.41
	2023	3	60%	124
	2024	17	56.02%	6.89
NSP changes	2020	0	100%	
	2021	0	100%	
	2023	0	100%	
	2024	0	100%	

### Pricing events

A review of Audit Compliance Reports found 103 late updates, which is a decrease from the last audit. We discussed this with Westpower staff. The main reason for the delay is the lack of resources to process big files sent by some retailers. Each request is checked individually. Westpower strives to process them within 3 business days.

### Status events (decommissioning)

The decommissioning process is described in **section 4.11**.

The Audit Compliance Reports identified 17 late status updates, which is a slight increase from the last audit. We reviewed 10 ICPs decommissioned for which information was updated late. Out of these, 8 late updates resulted from Westpower requesting the MEP reverse their entry of meter removal to allow them to use the correct date of physical disconnection of installation.

### Distributed Generation events

The Audit Compliance Reports found 17 late updates, an increase since the last audit. We reviewed the late updates, which were all due to the installer's late paperwork provision.

### NSP changes

NSP changes are managed manually. Westpower had no NSP changes lasting more than ten business days during the audit period. Reviewing the Audit Compliance Report confirmed that no NSP changes were notified late.

### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref:4.1 Audit Ref: 4.1 With: 8 Schedule 11.1 From: 01-Jan-23 To: 15-Aug-24	Some updates to registry backdated more than three business days of the event  Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. The processes are well defined but there is lack of resource to update the registry. There is still a problem with getting information about distributed generation. Impact on settlement outcomes is minor; audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
Extra staff have been employed.		June 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes have been updated to ensure staff are aware of all regulatory timeframes.		On-going	

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

##### Code reference

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

##### Code related audit information

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

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

##### Audit observation

We reviewed the LIS file Audit Compliance reports and the process for creating ICP identifiers.

##### Audit commentary

Each ICP loaded into the registry has an assigned NSP identifier. This is a mandatory field in Gentrack. When an ICP identifier is created, Gentrack asks an operator to assign a transformer, which is “connected” to an NSP. A comparison is run regularly to check if the NSP assigned in the registry is the same as in Gentrack. Any discrepancies are corrected straight away.

The Audit Compliance report identified five ICPs with potentially the incorrect NSP assigned. After examination, it was found that they were all correctly mapped.

#### **Audit outcome**

Compliant

### 4.3. Customer queries about ICP (Clause 11.31)

#### **Code reference**

*Clause 11.31*

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

*The distributor must advise a customer (or any person authorised by the customer) or embedded generator of the customer or embedded generator's ICP identifier within 3 business days after receiving a request for that information.*

#### **Audit observation**

It was discussed with Westpower during the audit.

#### **Audit commentary**

Any customer request for advice on an ICP for an existing connection is actioned immediately, whether the customer is on the phone or at the office.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 2 Schedule 11.1*

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

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

#### **Audit observation**

The LIS files, EDA, and Audit Compliance reports were checked for the audit period. It was discussed with the Westpower staff.

#### **Audit commentary**

The Audit Compliance report identified ICP 0000615162WP2F7, whose address does not allow the ICP to be readily located.

We discussed it with Westpower staff. It was identified that the street number was incorrectly recorded in a building line in Gentrack. It was corrected during the audit.

#### **Audit outcome**

Non-compliant



Non-compliance	Description		
Audit Ref: 4.4 With: 2 Schedule 11.1  From: 01-Jan-23 To: 15-Aug-24	ICP 0000615162WP2F7 did not have address allowing the ICP to be readily located. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as strong. After last audit Westpower corrected all addresses to meet compliance. Impact on settlement outcomes is minor; audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Address format was corrected in Gentrack.		18/09/2024	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes and training in place to ensure correct formatting of addresses.		On-going	

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

##### Code reference

Clause 3 Schedule 11.1

##### Code related audit information

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

##### Audit observation

It was discussed with Westpower during the audit.

##### Audit commentary

There are no known situations where an ICP could not be electrically disconnected without electrically disconnecting another ICP.

##### Audit outcome

Compliant

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

##### Code reference

Clause 7(1) Schedule 11.1

##### Code related audit information

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

- the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)
- the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)
- the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)
- the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)
- the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)
- if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):
  - a) the unique loss category code assigned to the ICP
  - b) the ICP identifier of the ICP
  - c) the NSP identifier of the NSP to which the ICP is connected
  - d) the plant name of the embedded generating station
- the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)
- if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):
  - a) a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity
  - b) a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period
  - c) if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-
    - (i) no capacity value recorded in the registry field for the chargeable capacity; and
    - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded
  - d) if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-
    - (i) the annual capacity value recorded in the registry field for the chargeable capacity; and
    - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded
  - e) the actual chargeable capacity of the ICP in any other case
- the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is

unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1)

- the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)
- the status of the ICP (Clause 7(1)(k) of Schedule 11.1)
- designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)
- if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)
- if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)
- if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):
  - a) the nameplate capacity of the generator; and
  - b) the fuel type
- the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).

#### Audit observation

The Audit Compliance Reports, LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff. A random sample of 20 new ICP connection records was checked.

#### Audit commentary

##### Distributed Generation

Applications for distributed generation are sent via email. The application form requires details of the inverter and any installed batteries, if applicable. Engineers review all applications before approval. Westpower requires their presence during electrical connection, which is called "witnessing." ROI (Record of Inspection) is sent back to the Westpower office. The energisation date is recorded in Gentrack and then uploaded to the registry.

We sampled 10 ICPs for which distributed generation (solar) was installed). All information recorded in the registry is correct. We observed that Westpower records generation capacity as per application. In two instances, customers installed fewer solar panels than initially stated in the application.

Audit Compliance Reports identified 5 active ICPs where the trader's profile indicates distributed generation. It was discussed with Westpower staff; the comments are below

ICP	Profile	Comment
0000842380WPFC	PV1 GXP	Updated during the audit
0000812470WP3AC	RPS PV1	No solar
0000782667WP772	RPS PV1	Waiting for paperwork
0000850521WP630	RPS PV1	Updated during the audit

## Unmetered load

New unmetered load connections are allowed but must be approved by the General Manager.

Westpower populates the registry using the description as stated in the Code. There are 120 “Active” ICPs where Westpower has a standard unmetered load recorded.

### Audit outcome

Non-compliant

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 4.6 With: 7(1) Schedule 11.1 From: 01-Jan-23 To: 15-Aug-24	Three ICPs with incorrect distributed generation information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are recorded as strong. Good process but it relies on information provided by electricians. Impact on settlement outcomes is minor; audit risk rating is low.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Training has been provided to ensure staff are aware of all regulatory timeframes.		On-going	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Processes have been updated to ensure we receive accurate information in a timely manner.		On-going	

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

### Code reference

Clause 7(3) Schedule 11.1

### Code related audit information

The distributor must provide the following information to the registry manager no later than 10 business days after the trading of electricity at the ICP commences:

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

### **Audit observation**

The Audit Compliance Reports, LIS and EDA reports were checked for the audit period. The new connection process documents were reviewed and discussed with Westpower staff. A random sample of 20 new ICP connection records was checked.

### **Audit commentary**

We confirm that Westpower provides the actual price code for each ICP when it is first uploaded to the registry.

### **Audit outcome**

Compliant

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

### **Code reference**

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

### **Code related audit information**

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

### **Audit observation**

The LIS file dated 15 August 2024 was reviewed.

### **Audit commentary**

GPS coordinates are not recorded.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 14 Schedule 11.1*

### **Code related audit information**

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

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

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

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

### **Audit observation**

The new connection process was analysed in conjunction with the EDA file for the period covered by this audit.

### **Audit commentary**

According to the process, a new ICP is uploaded to the registry without a proposed trader. Once the trader accepts the ICP, the proposed trader's name is uploaded. The registry changes the ICP status to "Ready."

Each ICP has a single price category.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 16 Schedule 11.1*

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

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

#### **Audit observation**

The Audit Compliance Reports, LIS, EDA files and the registry were checked for the audit period. It was discussed with Westpower staff.

#### **Audit commentary**

There are no ICPs with the status of "distributor".

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 20 Schedule 11.1*

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

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

*Decommissioning only occurs when:*

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

#### **Audit observation**

The Audit Compliance Reports, EDA files, and registry were checked for the audit period. The decommission process documents were reviewed and discussed with Westpower staff. A random sample of 10 decommissioned ICP records was also checked.

#### **Audit commentary**

Decommissioning is carried out upon customer request. A work order is created, and once the service request is received back from the field, the ICP is updated to "decommissioned" in Gentrack. This action creates a file that is manually uploaded to the registry.

We checked the accuracy of the decommissioning date for a sample of 10 ICPs and found that an incorrect date was recorded for 2 ICPs; it was a human error.

In some cases, Westpower cannot use the correct decommissioning date in the registry due to the MEP entry (meter removal). Westpower has occasionally requested the MEP reverse their entry, which has resulted in backdated status entries.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 23 Schedule 11.1*

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

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

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

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

#### **Audit observation**

The price category code table on the registry was examined to determine compliance.

#### **Audit commentary**

Since the last audit, no new price categories have been recorded in the registry.

#### **Audit outcome**

Compliant

## 5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

#### Code reference

*Clause 21 Schedule 11.1*

#### Code related audit information

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

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

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

#### Audit observation

We checked the registry's Loss Factor table and confirmed that no new loss factor codes have been uploaded to it since the last audit.

#### Audit commentary

No new loss factor codes were uploaded to the registry.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 22 Schedule 11.1*

#### Code related audit information

*Each loss category code must have a maximum of 2 loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.*

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

#### Audit observation

We checked the registry's Loss Factor table and confirmed no updates to loss factor codes have been uploaded to the registry since the last audit.

#### Audit commentary

No updates to loss factor codes were uploaded to the registry.

#### Audit outcome

Compliant



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

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

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

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

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

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

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

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

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

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

#### Audit observation

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed. This was also discussed with Westpower staff.

#### Audit commentary

No new NSPs were created during the audit period.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 26(1) and (2) Schedule 11.1*

#### Code related audit information

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

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

#### **Audit observation**

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed. This was also discussed with Westpower staff.

#### **Audit commentary**

No NSPs were created or transferred during the audit period.

#### **Audit outcome**

Compliant

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

#### **Code reference**

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

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

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

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

#### **Audit observation**

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed. This was also discussed with Westpower staff.

#### **Audit commentary**

The NSP table on the registry was examined. No new balancing areas were created during the audit period.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 26(4) Schedule 11.1*

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

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

- *the network on which the NSP will be located after the creation or transfer (Clause 26(4)(a))*
- *the ICP identifier for the ICP that connects the network and the embedded network (Clause 26(4)(b))*

- the date on which the creation or transfer will take effect (Clause 26(4)(c)).

#### **Audit observation**

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed. This was also discussed with Westpower staff.

#### **Audit commentary**

Westpower has not established any new embedded network during the audit period.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 24(2) and (3) Schedule 11.1*

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

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

#### **Audit observation**

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed.

#### **Audit commentary**

No balancing areas were changed during the audit period.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 27 Schedule 11.1*

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

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

#### **Audit observation**

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed.

#### **Audit commentary**

No existing ICP became an NSP during the audit period.

#### **Audit outcome**

Compliant

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

##### **Code reference**

*Clause 1 to 4 Schedule 11.2*

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

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

##### **Audit observation**

The NSP mapping table in the registry, the Network Supply Points table, and relevant notifications were reviewed.

##### **Audit commentary**

Westpower has not initiated the transfer of any ICPs during the audit period.

##### **Audit outcome**

Compliant

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

##### **Code reference**

*Clause 10.25(1) and 10.25(3)*

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

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

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

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

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

##### **Audit observation**

The NSP supply point table was examined.

##### **Audit commentary**

Westpower does not have an NSP which is not connected to the grid.

##### **Audit outcome**

Compliant

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

### Code reference

Clause 10.25(2)

### Code related audit information

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

- assume responsibility for being the metering equipment provider (Clause 10.25(2)(a)(i)); or
- contract with a metering equipment provider to be the MEP (Clause 10.25(2)(a)(ii)); and
- no later than 20 business days after identifying the MEP advise the reconciliation manager in the prescribed form of the reconciliation participant for the NSP (Clause 10.25(2)(b)); and
- no later than 5 business days after the date of certification of each metering installation, advise the reconciliation manager of
  - a) the MEP for the NSP (Clause 10.25(2)(c)(i)); and
  - b) the NSP of the certification expiry date (Clause 10.25(2)(c)(ii)).

### Audit observation

Westpower has not created an NSP since the last audit.

### Audit commentary

Westpower is aware of the process, and it will follow it accordingly

### Audit outcome

Compliant

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

### Code reference

Clause 29 Schedule 11.1

### Code related audit information

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

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

At least 1 month notification is required before the acquisition (Clause 29(2) of Schedule 11.1).

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

### Audit observation

Westpower has not acquired any new networks since the last audit.

### Audit commentary

Westpower is aware of the process, and it will follow it accordingly

### Audit outcome

Compliant

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

##### Code reference

Clause 10.22(1)(b)

##### Code related audit information

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

##### Audit observation

The NSP supply point table was examined.

##### Audit commentary

Westpower is not responsible for any NSP metering.

##### Audit outcome

Compliant

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

##### Code reference

Clauses 5 and 8 Schedule 11.2

##### Code related audit information

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

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

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

##### Audit observation

The NSP supply point table was examined.

##### Audit commentary

Westpower has not initiated the transfer of any ICPs during the audit period.

##### Audit outcome

Compliant

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

##### Code reference

Clause 6 Schedule 11.2

##### Code related audit information

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

**Audit observation**

The NSP supply point table was examined.

**Audit commentary**

Westpower has not initiated the transfer of any ICPs during the audit period.

**Audit outcome**

Compliant

## 7. MAINTENANCE OF SHARED UNMETERED LOAD

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

#### Code reference

*Clause 11.14(2) and (4)*

#### Code related audit information

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

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

#### Audit observation

We checked the LIS file dated 15 August 2024 and confirmed no shared unmetered load on the Westpower network.

#### Audit commentary

There is no shared unmetered load on the Westpower network.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 11.14(5)*

#### Code related audit information

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

#### Audit observation

We checked the LIS file dated 15 August 2024 and confirmed no shared unmetered load on the Westpower network.

#### Audit commentary

There is no shared unmetered load on the Westpower network.

#### Audit outcome

Compliant



## 8. CALCULATION OF LOSS FACTORS

### 8.1. Creation of loss factors (Clause 11.2)

#### Code reference

*Clause 11.2*

#### Code related audit information

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

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

#### Audit observation

There are three different categories of loss factors on the Westpower network: mass market (LF08 and LF05), large customers (individual loss factor calculated), and embedded generators (10). ETAP's load flow program calculates loss factors for large customers and embedded generators.

The Loss Factors for the connection at 11kV and 400V are published on the Westpower website as a part of the Distribution and Transmission Prices table. The published loss factor is the total loss factor consisting of technical and non-technical losses.

#### Audit commentary

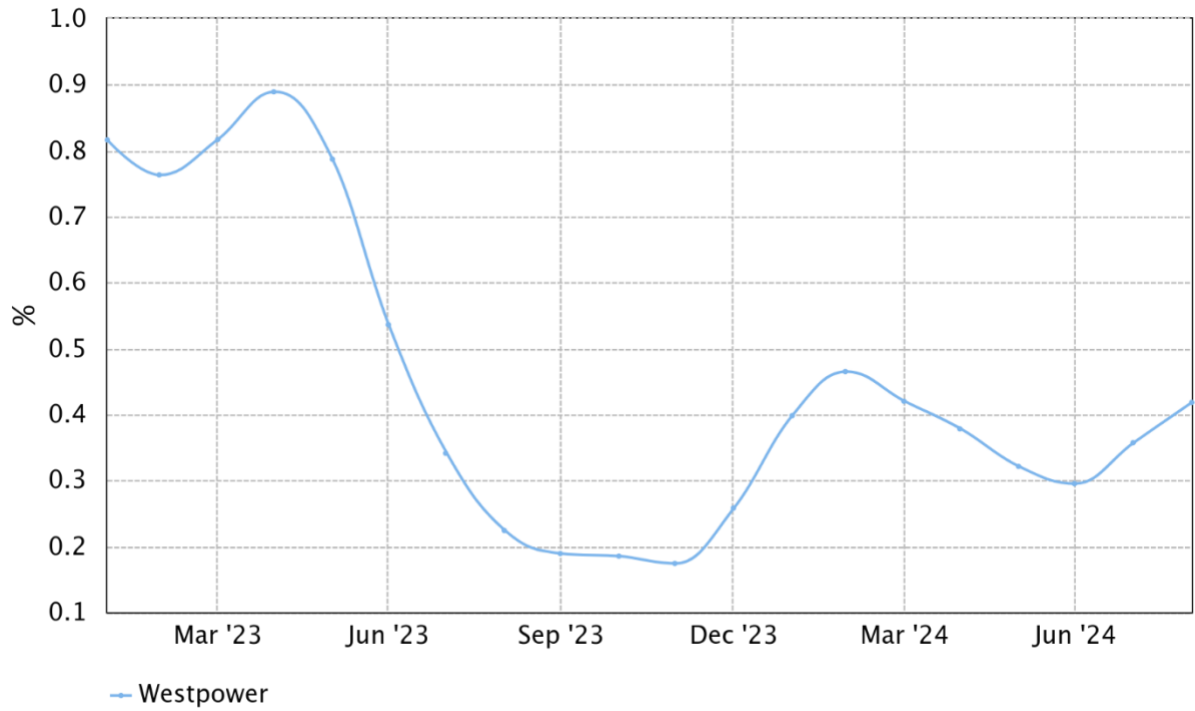
During the audit, Westpower provided the following statement:

*Westpower uses a high level approach to loss calculation on its network upon empirical data and historical trends.*

*For some time, the assessed loss factor of 1.08 on its low-voltage network and 1.05 on high voltage has correlated closely with actual network losses calculated each year by comparing the sum of generated and transmitted energy against offtake energy.*

*We carry out regular reconciliations of system losses due to the need to deal with seasonal effects and ensure revenue completeness when relying upon retailer information to generate monthly line charge invoices.*

The Electricity Authority provided the UFE graph below:



emi.ea.govt.nz/r/p5ddo

The UFE graph supplied by the Electricity Authority indicates that the 12-month UFE is tracking below the accepted +/-1% threshold.

**Audit outcome**

Compliant

## CONCLUSION

### PARTICIPANT RESPONSE

Westpower agrees with all the findings and recommendations in this report and looks forward to further strengthening its processes and controls to achieve continual improvement in its compliance with the Code requirements.