

# **ELECTRICITY INDUSTRY PARTICIPATION CODE RECONCILIATION PARTICIPANT AUDIT REPORT**

For

## **PLATINUM POWER (PLTM)**

Prepared by: Ewa Glowacka – TEG & Associates Ltd

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Audit report due date: 13-Jul-21

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## EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Platinum Power (PLTM) to support their application for certification, in accordance with clauses 2A of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.2 issued by the Electricity Authority.

At the time of this audit Platinum Power was trading 38 NHH ICPs. The company trades mainly category 1 metering installations (existing and new connections).

Switching is conducted by PLTM via web interface. The company does not use any specific software to perform tasks covered by this audit. The company uses JC Consulting's services to provide reconciliation services. The functions performed by JC Consulting were audited during this audit.

Overall, we noted 10 non-compliances and one recommendation. The level of compliance has not improved since the last audit. It has to be noted that PLTM gained more customers and the complexity of their operation increased.

The level of compliance has improved in the following areas:

- Switch Breach Report did not note any non-compliances
- All reconciliation files were submitted and all of them in time

The main issues identified during this audit are:

- New installations are electrically connected without accepting responsibility for ICP and not having approval from Northpower
- Reconciliation participant reads do not sufficiently meet the Code requirements
- PowerSwitch and Utilities Dispute information are not provided on customer invoices and other communications to the customer about electricity services and bills

At present the customer database is held by a billing team which is not synchronised with the registry. Our recommendation is to compare the billing database with the registry records on a weekly basis to avoid discrepancies. It was our recommendation during the last audit but to our knowledge this has not been implemented

Platinum Power engaged Momentous Consulting to assist with the required processes and acts as a consultant to support the company in the area of compliance.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 25 which results in an indicative audit frequency of 12 months. We agree with the result.

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

Registry files used to assess compliance covered the period 16/07/2020 to 31/05/2021.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	11.2	A small number of incomplete or incorrect information	Moderate	Low	2	Identified
Electrical Connection of Point of Connection	2.11	10.33A	New installations are electrically connected without accepting responsibility and not having approval from Northpower	Weak	Medium	6	Identified
Arrangements for metering equipment provision	2.13	10.36	No arrangements with CTCT to provide the MDEP services for two ICPs	Strong	Low	1	Identified
Provision of information on dispute resolution scheme	2.19	11.30A	No information about Utilities Dispute is provided on the Platinum Power customer invoice and communication to customer about electricity services and bills	Moderate	Low	2	Identified
Provision of information on electricity plan comparison site	2.20	11.30B	No information about Powerswitch is provided on the Platinum Power website, a customer invoice and communication to customer about electricity services and bills	Moderate	Low	2	Identified
Changed to registry information	3.3	10 of Schedule 11.1	Late updates to the registry for 4 ICPs	Moderate	Low	2	Identified
Provision of information to the registry manager	3.5	9 of Schedule 11.1	Late provision of information to the registry for ICP 0000572721NRA6A	Strong	Low	1	Identified
ANZSIC codes	3.6	9(1)(k) of Schedule 11.1	4 ICPs incorrect ANZSIC code assigned	Moderate	Low	2	Identified
Losing trader must provide final information - standard switch	4.3	5 of Schedule 11.1	Incorrect value of daily average consumption in the CS file for 0000500974NR0DF	Strong	Low	1	Identified

Derivation of meter readings	6.6	5(b)(c)(d)(e) of Schedule 15.2	The observations made by PLTM during manual reads are not recorded	Weak	Low	3	Identified
Future Risk Rating						25	
Next audit						12 Months	

Future risk rating	0-1	1-3	4-15	16-40	41-55	56+
Indicative audit frequency	36 months	24 months	18 months	12months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Description	Recommendation
Identification of readings	9.1	RM TOOL does not have a flag to identify RP reads	Flag PLTM reads in RM TOOL

## 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

Platinum Power does not have any exemptions granted to exempt them from compliance with all or any of the clauses.

#### Audit commentary

Platinum Power did not apply for any exemptions. We checked the Electricity Authority website and confirmed that there are no exemptions in place.

### 1.2. Structure of Organisation

The company consists of director Mano Warmington.

### 1.3. Persons involved in this audit

Name	Title	Company
Mano Warmington	Director	Platinum Power
John Brunton	Contractor	Platinum Power
John Candy	Director	JC Consulting
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates

### 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

Platinum Power uses JC Consulting to create and submit files to the reconciliation manager.

#### Audit commentary

As a part of this audit, we audited work performed by JC Consulting as Platinum Power's agent. Details are in the relevant parts of this audit.

Platinum Power understands their responsibilities in relation to this clause.

### 1.5. Hardware and Software

The main systems are as follows:

- Switching is conducted via web interface.
- Access Database (RM TOOL) provided and run by JC Consulting for NHH submissions

### 1.6. Breaches or Breach Allegations

There were no breaches lodged against Platinum Power in the period covered by this audit.

### 1.7. ICP Data

Metering Category	(14/06/2021)	(2020)	(date)
1	34	11	
2	4	0	
3	0	0	
4	0	0	
5	0	0	
9	0	0	

Status	Number of ICPs (14/06/2021)	Number of ICPs (2020)	Number of ICPs (date)
Active (2,0)	38	11	
Inactive – new connection in progress (1,12)	0	0	
Inactive – electrically disconnected vacant property (1,4)	0	0	
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	
Inactive – electrically disconnected at pole fuse (1,8)	0	0	
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	
Inactive – electrically disconnected at meter box switch (1,11)	0	0	

Inactive – electrically disconnected ready for decommissioning (1,6)	0	0	
Inactive – reconciled elsewhere (1,5)	0	0	
Decommissioned (3)	0	0	

#### 1.8. Authorisation Received

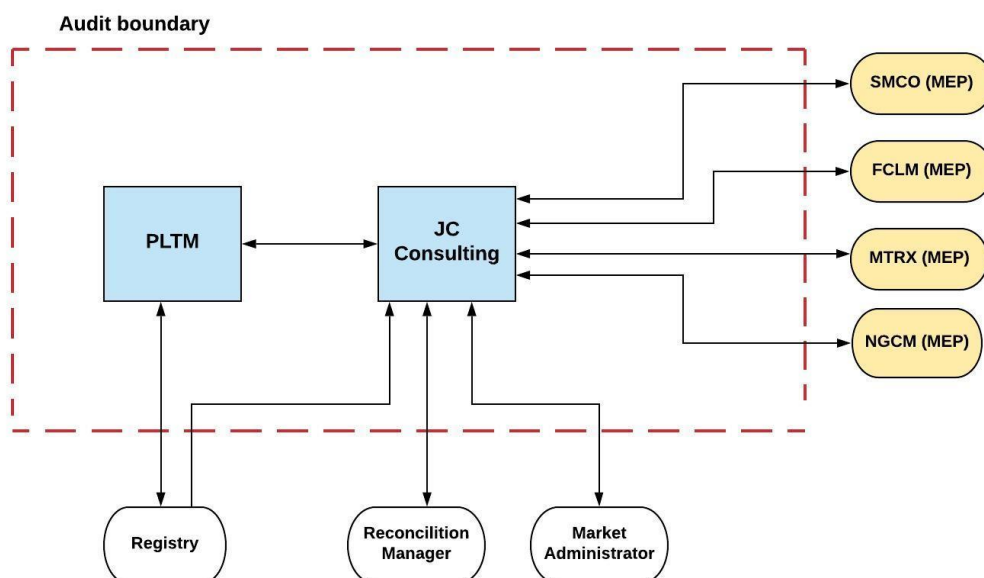
No authorisation letter was required.

#### 1.9. Scope of Audit

This reconciliation participant audit was performed at the request of Platinum Power. Clause 2A of Schedule 15.1 puts the obligation on the reconciliation participant to obtain Authority approval before performing a function listed in clause 15.38(1) without certification. The audit was carried on 1 July 2021 at TEG & Associates' office in Auckland and by video conference with JC Consulting.

The table below shows the tasks under clause 15.38 of part 15 for which Platinum Power requires certification.

The diagram above shows the audit boundaries.



Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Relevant to audit	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)(ii) - Creation and management of NHH volume information	✓	JC Consulting
(d)(i) – Calculation and delivery of ICP days under clause 15.6	✓	JC Consulting
(d)(ii) - delivery of electricity supplied information under clause 15.7	✓	JC Consulting
(d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	JC Consulting
(e) – Provision of submission information for reconciliation	✓	JC Consulting

#### 1.10. Summary of previous audit

The previous audit was conducted in July 2021 by Ewa Glowacka of TEG & Associates. The following non-compliances were identified.

Subject	Section	Clause	Non Compliance	Comment
Relevant information	2.1	11.2	Small number of registry updates were late.	Still exists
Provision of information	2.2	15.35	Reconciliation files were not submitted for Mar'20 and April'20 ( day4 and 13)	Cleared
Changed to registry information	3.3	10 of Schedule 11.1	4 MEP nominations were late (57%)	Still exists
Losing trader must provide final information - standard switch	4.3	5 of Schedule 11.3	1 CS file was sent late	Cleared
Withdrawal of switch request	4.15	18 of Schedule 11.3	1 AW file was late by one day	Cleared
Electricity supplied information provision to reconciliation manager	11.3	15.7	AV-120 was not submitted for Mar'20 and April'20 ( day4 and 13)	Cleared
Creation of submission information	12.2	15.4	Submission files were not submitted for March and April'20 (day4 and 13)	Cleared

## 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

To assess compliance with these clauses we examined the process of validating information in the registry. The LIS file dated 08/06/2021 was examined to identify any inaccuracies. The Event Detail (EDA) file for the period of audit and the Audit Compliance report were examined to determine how quickly Platinum Power provide information to the registry, and correct information which is identified as inaccurate and confirm that all information is correct and not misleading.

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

#### Audit commentary

JC Consulting polls registry for changes weekly with standard registry reporting, key switching files are be retrieved and push notification sent to PLTM to advise occurrence, additionally weekly checks of outstanding activity will be performed by PLTM using the JCC switch breach reporting tool.

Registry data is synchronized with JC Consulting RM systems weekly and immediately prior to settlement runs to ensure alignment with the registry. All submissions (other than BILLED) are be based on registry attributes (including metering) and data received from meter data providers, and on occasion as necessary manual reads obtained by PLTM.

Incomplete registry information is listed below:

Section	Description
2.11	New connections process was not followed, which resulted in correcting/backdating information in the registry for 0000572721NRA6A and 0000573255NRA98
3.3	Late updates to the registry for 4 ICPs
3.5	Late provision of information to the registry for ICP 0000572721NRA6A
3.6	Incorrect ANZSIC code in the registry for some ICPs
3.3	<ul style="list-style-type: none"><li>Registry information updates were greater than 5 business days from the event date.</li></ul>
4.3	<ul style="list-style-type: none"><li>Incorrect value of daily average consumption in the CS file for 0000500974NR0DF</li></ul>

## Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 From: 16-Jul-20 To: 31-May-21	A small number of incomplete or incorrect information Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvements to update the registry in a timely manner. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrections have been made where needed.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Platinum will review processes and make amendments to ensure accurate and complete information is populated on the registry. We will discuss the average daily consumption figure that is supplied to us by our agent. In this particular case the instance was due to human error.		21/11/2021	

## 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 for providing information to the reconciliation manager were reviewed and assessed throughout this document. JC Consulting acts as the agent for Platinum Power to provide information in accordance with Part 15.

### Audit commentary

Compliance with this area is discussed in a number of relevant sections.

Last year's audit noted non-compliance because submission files were not provided to the reconciliation manager for March'20 and April'20.

We confirm that the company met their obligations to provide information in accordance with Part 15.

#### **Audit outcome**

Compliant

### **2.3. Data transmission (Clause 20 Schedule 15.2)**

#### **Code reference**

*Clause 20 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**

JC Consulting downloads data from MEPs on behalf of Platinum Power. PLTM is provided with a copy of metering data for billing purposes. PLTM provides reconciliation participant meter to JC Consulting via Dropbox.

#### **Audit commentary**

Once metering data is downloaded from the service providers' servers it is uploaded to the RM TOOL. JC Consulting uses only secure transmission functions, password protected, or SFTP for all data.

The data transfer process was reviewed during the MEPs audit and found compliant.

#### **Audit outcome**

Compliant

### **2.4. Audit trails (Clause 21 Schedule 15.2)**

#### **Code reference**

*Clause 21 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**

We checked the audit trail for all data gathering, validation, and correction for the audit period.

Switching will be conducted by PLTM using the registry web interface which has audit trails.

JC Consulting will retain an audit trail of downloading data via FileZilla. The audit trail of reconciliation files is recorded by the RM portal.

The audit trail of data validation, estimation and creation of reconciliation files will be recorded in the RM TOOL.

#### **Audit commentary**

As a part of this audit, we reviewed JC Consulting operation. The audit confirms that a complete audit trail was viewed for all data gathering, validation and processing functions. The log of these activities includes the activity identifier, date and time and operator identifier.

#### **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**

The Platinum Power Terms and Conditions were reviewed.

#### **Audit commentary**

The Terms and Conditions provide the relevant information for a customer to meet the requirements of this clause.

#### **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**

The Platinum Power Terms and Conditions were reviewed.

#### **Audit commentary**

A copy of the Terms and Conditions was sighted and contains the required information for access arrangements.

#### **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:*

- if practical in the circumstances, ensure that the metering installation is located at a point of connection; or*
- 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**

The LIS file dated 14/06/2021 was reviewed. All metering installations traded by Platinum Power are category 1 or 2. It was discussed with PLTM if any metering installation required the application of any loss compensation factors.

#### **Audit commentary**

PLTM stated that is not responsible for any metering installations with loss compensation factors. We checked for category 2 metering installations and confirm no loss compensation factors needs to be applied to metering data.

## 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

The Platinum Power Terms and Conditions were reviewed.

#### Audit commentary

The Terms and Conditions contain the appropriate clause to achieve compliance with this clause.

## 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

The LIS, EDA file and the Audit Compliance report was reviewed. In the audit period PLTM gained three new installations. We reviewed the new connections process.

### Audit commentary

The new connection process is well documented.

The new connections gained by PLTM were 0000572075NRC6A, 0000572721NRA6A, and 0000572777NR3ED, all of them connected to the Northpower network. PLTM has an arrangement with MEP, Intellihub, to provide the MEP services. Intellihub is Platinum Power's preferred MEP.

### 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:*
  - o *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 2 business days of electrical connection*
  - o *if the ICP has metered load, 1 or more certified metering installations are in place*
  - o *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

### Audit observation

The EDA and LIS files were reviewed. It was discussed during the audit.

### Audit commentary

The company stated that they did not authorise Intellihub to temporarily electrically connect any point of supply.

### 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 2 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 electrical connection.*

#### **Audit observation**

The EDA and LIS files were reviewed. It was discussed during the audit.

The connection process was reviewed.

#### **Audit commentary**

PLTM are aware that they can only instruct the electrical connection of an ICP that is their responsibility on the registry. The new connection process instructs that once the ICP has been created, PLTM will accept that ICP as a “new connection in progress”. Once they are the retailer on the registry they will nominate a MEP and make arrangements with that MEP for the connection of the installation.

We walked through three new connections and noted that the documented new connection process is not followed which leads to the /correcting of entries in the registry.

Below we describe two new connections to present how the process was applied in practice

#### **0000573255NRA98**

ICP was created on 2/06/21. The approval and acceptance not sent to NPOW until 14/06/21. NPOW NEWICP price plan applied on 14/06/21, which resulted in changing the registry status to “Ready”. Later on, NPOW received email from PLTM stating that ICP was electrically connected on 4/06/21 and asking for the “Ready” status to be reversed to 3/06/21 to allow PLTM to make the ICP “active” from 04/06/21.

#### **0000572721NRA6A**

ICP was created on 26/02/21. The acceptance and approval was received on 11/03/21 so NPOW updated the ICP to “Ready” on this date. Then on 9/04/21 NPOW received only a photo of the meter from PLTM that had been installed but it took PLTM until 16/04/21 to provide any paperwork giving confirmation that the meter had been installed and livened on 9/03/21”From the trail of events, it appears that Platinum Power had the metering installed and the ICP livened without first:-

- a) Accepting responsibility for the ICP with Northpower
- b) Receiving the approval to liven the ICP from Northpower
- c) Nominating a MEP for the ICP
- d) Receiving acceptance of the nomination from the MEP

It should be noted that, while PLTM is authorised by Northpower to work on their network to electrically connect ICPs and hang meters, separate authority and approval for each new connection must be obtained to meet these clause requirements.”

Non-compliance	Description		
Audit Ref: 2.11 With: 10.33A From: 01-Feb-20 To: 31-May-21	<p>New installations are electrically connected without accepting responsibility and not having approval from Northpower</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are weak. The process is well documented but not followed. There is the possibility of having electrically connected ICPs not being recorded in the registry therefore volumes not being reconciled. Audit risk rating is medium because PLTM is planning to gain more new connections.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
In both instances Platinum worked with Northpower to resolve the issues at the time.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Platinum have discussed the process with Northpower and are fully aware that they need to follow due process. In future we will discuss new connections with all involved prior to installing metering. Platinum have documented processes, and these will be followed.			

#### Audit outcome

Non-compliant

### 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

The EDA file for the audit period was reviewed to identify which ICPs traded by PLTM are connected to which network.

#### **Audit commentary**

Platinum Power demonstrated the existence of a UoSA with NPOW and TOPE.

PLTM demonstrated that they have arrangements in place with MEP which provide services to them.

#### **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**

The company has arrangements with FCLM, AMS, and MTRX. We noted that 2 ICPs (0000165400TE9BD and 0000591850TE71A) have CTCT recorded as the MEP in the registry.

#### **Audit commentary**

There are no arrangements with CTCT to provide the MEP services for two ICPs. New MEPs were nominated, the nominations were accepted but customers refuse to give access.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 2.13 With: 10.36 From: 16-Sep-19 To: 31-May-21	No arrangements with CTCT to provide the MEP services for two ICPs 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. New MEP has already accepted nomination, but customers refuse the access to carry on work. Audit risk rating is low because the company is planning to replace meters in the near future		
Actions taken to resolve the issue		Completion date	Remedial action status
These meters have been an ongoing issue. The customer has not allowed access in both cases to have the meters changed.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Platinum are again in discussions with these customers and are making some progress to arrange for the meters to be replaced with IHUB/MTRX metering.			

#### 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

It was discussed during the audit.

##### Audit commentary

The company understands their obligations and will follow the Code requirements. No such situation occurred during the period covered by this audit. All gained ICPs had the status “active” in the registry.

##### 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

It was discussed during the audit.

### Audit commentary

The company understands their obligations. During this audit period the company did not request any disconnections or electrical disconnections.

### 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 unbridge 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

This clause came in to force on 01/02/2021. We discussed it during the audit.

### Audit commentary

Platinum Power stated that it is not their company policy to remove or break seals.

Platinum Power did not remove or break seals without authorisation from the MEPs. If such a situation occurs, PLTM will notify the MEP recorded in the registry.

### 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 1 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

This clause came in to force on 01/02/2021. We discussed it during the audit.

### Audit commentary

Platinum Power stated that it is not their company policy to bridge/bypass meters. It was not requested during this audit period, and they are not planning to do it in the future.

### 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

We asked the company to provide an example of their invoice to assess compliance with this clause.

#### **Audit commentary**

PLTM provided a sample of their invoice. We confirm that the relevant ICP identifiers are printed on every invoice.

#### **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**

This was covered during the audit. This clause came in to force on 01/02/2021.

#### **Audit commentary**

At the time of this audit neither the Platinum Power's invoice, or other communications to the customer about electricity services and bills, provided information about Utilities Dispute.

Information about Utilities Dispute is posted on the Platinum Power's website.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 2.19 With: 11.30A  From: 02-Feb-21 To: 31-May-21	No information about Utilities Dispute is provided on the Platinum Power customer invoice or communications to customers about electricity services and bills  Potential impact: None  Actual impact: None  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvements to update the registry in a timely manner. There was no impact on settlement outcomes. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an oversight on our behalf, and we accept the noncompliance.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are working with Utilimate our billing provider to update all invoices with required information. We have also noted the requirements under the guidelines as to when we are required to provide this information and made note to do so.		21/11/2021	

## 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

This was covered during the audit. This clause came in to force on 01/02/2021.

### Audit commentary

At the time of this audit neither the Platinum Power's website, or invoice, or other communications to the customer about electricity services and bills, provided information about Powerswitch.

Before the audit report was finalised The Platinum Power's website was updated and information about PowerSwitch is now available to customers.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.20 With: 11.30B  From: 02-Feb-21 To: 31-May-21	No information about Powerswitch is provided on the Platinum Power website, customer invoice or other communications to customers about electricity services and bills  Potential impact: None  Actual impact: None  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvements to update the registry in a timely manner. There was no impact on settlement outcomes. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an oversight on our behalf, and we accept the noncompliance.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As for 2.19 above.		21/11/2021	

### 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

The registry files and the Audit Compliance report was reviewed. The new connection process was discussed with the PLTM staff.

##### Audit commentary

The new connection process is well documented. New connections gained by PLTM were 0000572075NRC6A, 0000572721NRA6A, 0000573255NRA98 and 0000572777NR3ED, all of them connected to the Northpower network. To have ICP identifiers created for a new connection, Northpower requires a customer or its representative to fill in an application form. The process was followed and once ICP identifiers were uploaded to the registry, Platinum Power accepted ICPs, changed the status to "new connection in progress" and, after metering was installed, the status was changed to "active".

All information was provided to the registry. In **section 2.11** we recorded non-compliance because the process was not followed for 2 ICPs.

##### 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 LIS and EDA files were reviewed.

#### Audit commentary

We followed through the process for three new connections. All information was provided to the registry. The status update of 0000572721NRA6A to “active” was backdated. It was recorded as non-compliance in **section 3.3**.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10 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 5 business days after the change.

#### Audit observation

The EDA file and the Audit Compliance Report files for the audit period were analysed. The table below shows a summary of changes:

Status update	Year	Total number of updates	No of updates within 5BD	No of updates later than 5BD	Average notification days [BD]	Percentage compliant
Change to “Active” (2,0)	2020	0	0	0	0	
	2021	2	2	0	12	100%
Change to “New connection in progress” (1,12)	2020	0	0	0	0	
	2021	2	2	0	9	100%
Trader (NT updates and MEP nominations are excluded)	2020	0	0	0	0	
	2021	4	1	3	11	25%
MEP nomination	2020	7	3	4	13.8	42.8%
	2021	6	5	1	9	84%

#### Audit commentary

Trader updates – two late updates were related to a change of profile from HHR to RPS and type of reconciliation (0000510246NRC4D and 0000557595NRD38) and one late update of ANZSIC code (0000591850TE71A)

MEP nominations – one nomination was late by 48 business days.

0000556263NR202 –IHUG was nominated as the MEP on 05/05/21 backdated to 29/4/21. Then it was superseded by the entry on 17/05/21, backdating to 08/03/21. The meter was installed on 09/03/21.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 16-Jul-20 To: 31-May-21	Late updates to the registry for 4 ICPs Potential impact: None Actual impact: None Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvements to update the registry in a timely manner. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have had some issues with communication, in particular MEP nominations.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff are aware of the requirements and will take more care going forward. All profiles unless specified are now to be made RPS on switch in. We conduct a validation process for every switch that has evolved over time and should not see the same errors occurring going forward. We will be reviewing the MEP process.			

### 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)):*
  - o *arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and*
  - o *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**

The EDA file and the Audit Compliance Report files were analysed.

#### **Audit commentary**

All ICPs (38) have a MEP recorded in the registry. There were no ICPs marked as “ready for decommissioning”.

Platinum Power fully understands that as soon as they are recorded in the registry as accepting responsibility, the responsibility will cease only when an ICP switches out to another trader and its code is recorded in the registry.

Processes and business rules note the requirements of this clause. PLTM do not intend to accept ICPs with UML, however if they do JC Consulting will be able to ensure that these are processed compliantly. UML processes will be drafted when required. PLTM are aware of the different types of UML.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 9 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 5 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

The EDA file and the Audit Compliance Report files were analysed.

#### Audit commentary

The analyses of the EDA files showed that Platinum Power provided all required information to the registry.

0000572721NRA6A – trader information such as status, MEP nomination, and reconciliation information was backdated by 26 business days. It was due to a major communication breakdown between Northpower and PLTM. The ICP was created on 26/02/21, it was accepted by PLTM on 11/03/21, which is rather a long time. It has taken more than a month to update the status to “active”. Possible improvements were discussed with PLTM during the audit.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 9 of Schedule 11.1 From: 09-Mar-21 To: 16-Apr-21	Late provision of information to the registry for ICP 0000572721NRA6A Potential impact: None Actual impact: None Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, it was only one ICP out of three new connections. There was minor impact on settlement outcomes because of just one ICP. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Issue resolved at time the instance was advised.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Platinum have discussed the process with Northpower and are fully aware that they need to follow due process. In future we will discuss new connections with all involved prior to installing metering. Platinum have documented processes, and these will be followed.			

### 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 LIS file and the Audit Compliance report was analysed.

#### Audit commentary

0000572721NRA6A – ANZSIC code was populated after 26 BD, The Code requires it to be populated within 20 BD.

PLTM trades 38 ICPs. 22 ICPs have the ANZSIC code “0” (residential) assigned. We randomly checked 8 ICPs using Google Maps, we confirm the correct code was used.

16 ICPs had non-residential ANZSIC code assigned. We checked 10 ICPs using Google Maps and found that 4 of them (0000007999TE877, 0000548189NR90B, 0000548190NRDF7, 0000548191NR1B2) had incorrect ANZSIC code assigned. It was discussed with PLTM’s, and it will be corrected.

The company is planning to strengthen their evaluation process of ANZSIC codes after a switch is complete.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 16-Sep-20 To: 31-May-21	4 ICPs incorrect ANZSIC code assigned  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvements to assigning the correct ANZSIC codes, evaluation is needed after a switch is finalised. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
These ICPs will be corrected.		21/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have added a check using google maps where ICPs are switched to ensure we have the correct codes. We rely on the customer to provide information for new connections.			

### 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

The LIS file was analysed.

#### Audit commentary

According to the documentation provided by Platinum Power, it is not their intention to take on unmetered ICPs. If UML is found at a later date, the company will have a discussion with the customer regarding having metering put in place or switching to another retailer. If this is not possible they will have JC Consulting create consumption based on the daily kWh information either from the distributor or the customer. Platinum Power will update the registry with the required (or as much as we have at hand) UML information immediately on finding any UML.

#### Audit outcome

Compliant

### 3.8. Management of “active” status (Clause 17 Schedule 11.1)

#### Code reference

*Clause 17 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 1 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

The LIS file, EDA file, and the Audit Compliance report were examined. The process for status change was discussed during the audit.

#### Audit commentary

The processes for new connections and reconnections were reviewed. On gaining ICPs PLTM will initially check that the ICP is “active” as expected.

All ICPs traded by PLTM have an “active” status.

#### Audit outcome

Compliant

### 3.9. Management of “inactive” status (Clause 19 Schedule 11.1)

#### Code reference

*Clause 19 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 LIS file, EDA file, and the Audit Compliance report were examined. The process for status change was discussed during the audit.

#### Audit commentary

The processes for disconnections were reviewed. In the audit period, PLTM did not disconnect any ICP.

#### Audit outcome

Compliant

### 3.10. ICPs at new or ready status for 24 months (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 "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

It is a distributor's obligation to monitor an ICP which has had the status of "New" or "Ready" for 24 calendar months or more. It is expected that a trader be able to respond to such queries from distributors.

#### Audit commentary

Platinum Power has not received such a query from any distributor.

#### 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 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 2 business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and 1 or more profile codes associated with that ICP.*

#### Audit observation

The Standard Switch process was examined and found compliant. The Event Listing file (EDA) and the Switch Breach History details report were examined for the period of this report. The process was discussed with PLTM's staff.

#### Audit commentary

Platinum Power sent 26 NTTR. The company uses the registry web interface to conduct switching.

PLTM is aware of the requirements of the Fair Trading Act 1986.

The last audit recorded a recommendation to update the Application form to include "agreed switch date" and type of switch. This was not implemented.

3 ICPs were backdated, this was at the customer's request.

#### 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 Schedule 11.3

#### Code related audit information

*Within 3 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 10 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 5 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 2 months.*

#### **Audit observation**

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the period of this audit. The process was discussed with PLTM's staff.

#### **Audit commentary**

PLTM received one NTTR, to which they responded by sending the AN file the following day. The valid switch response code was used.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 5 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 5 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**

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the period of this audit. The process was discussed with PLTM's staff.

The process to manage the sending of the CS file within five business days of the event date was examined.

The accuracy of the content of the CS files was confirmed by the checking of one record. 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.

#### **Audit commentary**

Platinum Power lost 1 ICP (0000500974NR0DF) in this audit period using the Standard Switch process. We assessed the CS file sent to the gaining trader. We noted that the average daily consumption was 713750 kWh. The company comment was that this was a human error, it was meant to be 7 kWh. The registry does not provide a mechanism to allow it to be corrected.



The Registry Functional Specification v22.21 states that average daily consumption within the CS file should be the average kWh per day for the last read period. PLTM receives daily readings, so the last read period is technically one day. Estimated daily consumption is calculated as the average daily consumption over the past billing period. While this is not technically consumption for the last read to read period, it provides a reasonable indication of the average daily consumption.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 16-Sep-20 To: 31-May-21	Incorrect value of daily average consumption in the CS file for 0000500974NR0DF  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, it was a human error. There was no impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted the ICP0000500974NR0DF was due to human error and a one off instance.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will discuss the average daily consumption with our agent.		21/11/2021	

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

##### Code reference

Clause 6(1) and 6A 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 4 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 2 validated meter readings.*

- *the losing trader can choose not to accept the reading, however, must advise the gaining trader no later than 5 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**

We analysed the Event Listing file (EDA) and checked reconciliation files.

#### **Audit commentary**

PLTM received one RR file which was rejected because the difference between the readings was 1 kWh. It is common that the difference between CS read, and the RR read was less than or equal to 1 kWh or because some retailers truncate and some round.

PLTM did not sent RR files for the standard switches. The switch event readings were used in the reconciliation process.

#### **Audit outcome**

Compliant

### **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) 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 5 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**

We analysed the Event Listing file (EDA) and checked reconciliation files.

#### **Audit commentary**

PLTM received RR file from ForOurGood (FOGY) for ICP 0000500974NR0DF. The ICP consumption is measured by a smart meter. The ICP was switching from a NHH reconciled to HHR reconciled. This clause states that if the gaining retailer provides the switch event meter reading within 5 BD, it must be accepted. PLTM rejected the RR because the difference was 1 kWh. There are examples where the difference between CS read, and the RR read was less than 1 kWh because some retailers truncate and some round.

The current Code does not specify that an AMI read used as a switch event meter reading must be taken at midnight, which could lead to discrepancies between reads provided by two traders.

#### **Audit outcome**

Compliant

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

##### Code reference

*Clause 7 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

There were no disputes with losing retailers. If such a situation were to occur in the future it would be resolved in accordance with this clause.

##### Audit commentary

Platinum Power confirmed that no disputes occurred in the period covered by this audit which would require a resolution. There were no switching activities. Platinum Power stated that they would not decline to accept another retailer's validated meter reading or permanent estimate if they are reasonable and appropriate in the applicable circumstances.

##### Audit outcome

Compliant

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

##### Code reference

*Clause 9 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 2 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 Move process was examined and found compliant. The Event Listing file (EDA) and the Switch Breach History details report were analysed for the time period of this audit. The process was discussed with PLTM's staff.

### Audit commentary

Platinum Power sent 3 NTMI. The company uses the registry web interface to conduct switching.

PLTM is aware of the requirements of the Fair Trading Act 1986.

Two ICPs were backdated at the customers' request.

### Audit outcome

Compliant

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

### Code reference

*Clause 10(1) Schedule 11.3*

### Code related audit information

*10(1) Within 5 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:*
  - o *confirmation of the switch event date; and*
  - o *a valid switch response code; and*
  - o *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—*
  - o *is not earlier than the gaining trader's proposed event date, and*
  - o *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

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the time period of this audit. The switch move process was examined and discussed with PLTM's staff.

### Audit commentary

PLTM lost two ICPs (0000543653NR63A and 0000501062NR354) using the Switch Move process. AN and CS files were sent the following day.

### Audit outcome

Compliant

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

### Code reference

*Clause 10(2) Schedule 11.3*

### Code related audit information

*If the losing trader determines a different date, then within 10 business days of receiving notice the losing trader must also complete the switch by providing to the registry manager as described in subclause (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

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the period of this audit.

### Audit commentary

We checked two Move IN switches and confirm that for both of them PLTM accepted the event date proposed by the losing trader.

### Audit outcome

Compliant

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

### Code reference

*Clause 11 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

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the period of this audit.

The accuracy of the content of the CS files was confirmed by checking a sample of two records. 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.

### Audit commentary

PLTM lost two ICPs using the Move In process. Both switches were completed in a compliant manner.

The accuracy of the content of the CS files was confirmed by checking a sample of two transfer CS files. The information recorded in the files was correct, apart from average daily consumption.

The Registry Functional Specification v22.21 states that average daily consumption within the CS file should be the average kWh per day for the last read period. PLTM receives daily readings, so the last read period is technically one day. Estimated daily consumption is calculated as the average daily consumption over the past billing period. While this is not technically consumption for the last read to read period, it provides a reasonable indication of the average daily consumption.

### Audit outcome

Compliant

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

##### Code reference

Clause 12 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 2 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 disputes 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 5 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

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the time period of this audit.

##### Audit commentary

PLTM sent one RR file for ICP 0000556263NR202, which was accepted by GEOL. The difference between reads was more than 200 kWh. PLTM sent the RR file within the time specified by this clause. Corrected readings were used for reconciliation.

##### Audit outcome

Compliant

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

##### Code reference

Clause 14 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 a non-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**

The EDA file for this audit period was analysed.

#### **Audit commentary**

Platinum Power did not use this type of switch to gain any customers in this audit period

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 15 Schedule 11.3*

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

*Within 3 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**

The EDA file for this audit period was analysed.

#### **Audit commentary**

Platinum Power was not notified of this type of switch in this audit period.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 16 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 5 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**

The EDA file for this audit period was analysed.

#### **Audit commentary**

Platinum Power did not use this type of switch to gain any customers in this audit period.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clauses 17 and 18 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 2 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 5 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 10 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 2 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**

We analysed the Event Listing file (EDA) and the Switch Breach History details report for the period of this audit.

#### **Audit commentary**

PLTM did not send any NW files. The company received two NW files, both of them NWS (wrong switch AW files were sent the following day accepting NWS).

#### **Audit outcome**

Compliant

### **4.16. Metering information (Clause 21 Schedule 11.3)**

#### **Code reference**

*Clause 21 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 the switching process was examined.

#### **Audit commentary**

PLTM is aware of their responsibilities for ensuring meter readings are managed and costs met, where relevant, by them.

#### **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 contact 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

This was discussed during the audit. The company has knowledge of their obligation.

##### Audit commentary

PLTM does not have binding terms or contracts with any consumers. The customers are not offered any good deals to encourage them not to switch. The EDA file was checked, PLTM did not send any NW files during the audit period.

##### 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

The LIS file and the Audit Compliance Report were analysed.

#### Audit commentary

Platinum Power has not traded SUML in the period covered by this audit.

There are no shared unmetered load ICPs traded by Platinum Power. JC Consulting checks weekly, to see if any of the networks have entered any historic SUML and, if any is found, it will be reconciled.

#### 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

The LIS file and the Audit Compliance Report were analysed.

#### Audit commentary

Platinum Power has not traded unmetered load in the period covered by this audit.

#### 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 10 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:*
  - o *the date the limit was calculated or estimated to have been exceeded*
  - o *the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.*

#### Audit observation

The LIS file and the Audit Compliance Report were analysed.

#### Audit commentary

Platinum Power has not traded unmetered load in the period covered by this audit.

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

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

#### Code reference

Clause 11 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**

The LIS file was analysed, and it was discussed during the audit.

**Audit commentary**

Platinum Power does not trade any distributed unmetered load and do not have such plans. This clause is not applicable. Compliance was not assessed.

**Audit outcome**

Not applicable

## 6. GATHERING RAW METER DATA

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

#### Code reference

*Clause 10.13, Clause 10.24 and Clause 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 1 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

The LIS file was analysed. All installations traded by Platinum Power are metered. No subtraction method is used to determine submission information provided to the reconciliation manager.

#### Audit commentary

Platinum Power does trades two ICPs (0000031140TEF85 and 0000555844NRA77) with embedded generation. We checked submission files and confirmed that embedded generation (solar) volumes are submitted.

The company is aware of bridged metering circumstances and do not intend on instructing these to occur.

#### Audit outcome

Compliant

### 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 3 months for the grid owner to review and comment on the design*
- *respond within 3 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**

Platinum Power is not responsible for any GIPs.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

*Clause 33 Schedule 10.7 and clause 2(2) 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 LIS file and reconciliation files provided by Platinum Power were examined.

#### **Audit commentary**

Platinum Power uses the RPS and PV1 profile. No control devices are needed therefore they have never approached a MEP asking for a control device to be certified.

#### **Audit outcome**

Compliant

### **6.4. Reporting of defective metering installations (Clause 10.43(2) and (3))**

#### **Code reference**

*Clause 10.43(2) and (3)*

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

*If a participant becomes aware of an event or circumstance that led 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**

The process related to defective installations was examined.

There is a standard reporting to highlight meters with zero consumption, as a trigger to detect bridged (or other faults) with metering. IN the unlikely event of a bridged meter occurrence, replacement volumes will be assessed and submit to the reconciliation manager.

Event logs provided by MEPs are monitored by JC Consulting.

#### Audit commentary

JC Consulting validates data provided by MEPs and runs reports to identify anomalies in meter readings which could indicate defective metering installations. Platinum Power has not identified any defective metering installations which could be not fit for purpose.

In a situation when a defective metering installation is identified, PLTM will be notified by JC Consulting. According to the process PLTM will approach the relevant MEP asking them to investigate and for appropriate action to be taken.

#### Audit outcome

Compliant

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

#### Code reference

Clause 2 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 it 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



Meter readings are collected by MEPs and downloaded by JC Consulting from their servers. PLTM also reads a few meters themselves.

#### Audit commentary

Compliance with this clause is assessed during the MEPs audit.

PLTM reads a small number of meters as described in **section 6.6**. They are ICPs which cannot be read remotely because of the type of meter installed.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 3(1), 3(2) and 5 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

PLTM does not accept customer reads.

There are 3 ICPs which cannot be read remotely therefore PLTM reads these themselves. PLTM' employees are certified to work on the Northpower network therefore they are more than qualified to read meters manually.

Each time a meter is read manually a meter photo is taken and provided to JC Consulting.

#### Audit commentary

The Code allows reconciliation participants to read meters manually. The participant needs to follow the process which is described in clause 5 of Schedule 15.2. It was discussed with PTLTM, who assured us that installations are sighted to check for missing or damaged seals, checked for tampering and unsafe situations. Their observations are not recorded therefore it is not sufficient to meet the requirements of clause 5 of Schedule 15.2.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.6 With: 5(b)(c)(d)(e) of Schedule 15.2 From: 16-Jul-20 To: 31-May-21	The observations made by PLTM during manual reads are not recorded  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as weak as the process used by PLTM to manually read meters is not sufficient to meet the Code requirements. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Platinum have always taken care to check meters when reading meters. We accept that we did not follow due Code requirements by documenting information for manual reads.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The process is already under review with an app in the development stages so that all required information associated with the read will be recorded.		21/11/2021	

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

##### Code reference

Clause 6 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 switch read from the CS file is used as a start read for NHH ICPs. Consecutive readings from MEPS apply from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation.

##### Audit commentary

Compliance confirmed based on scenarios provided to JC Consulting described in section 12.11.

## Audit outcome

Compliant

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

#### Code reference

*Clause 7(1) and (2) 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

The EDA file was examined to identify ICPs which have switched out since the last audit.

#### Audit commentary

Platinum Power lost three ICPs in the period covered by this audit. Meters were read during the period of being a customer of PLTM.

## Audit outcome

Compliant

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

#### Code reference

*Clause 8(1) and (2) 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

The LIS file and Meter Frequency reports were reviewed.

#### Audit commentary

JC Consulting provides monthly Meter frequency reports to the Authority on behalf of PLTM.

We reviewed the Meter Readings Frequency reports for the audit period to check if the company had 100% attainment of reads.

Compliance was achieved in the audit period.

## Audit outcome

Compliant

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

##### Code reference

*Clause 9(1) and (2) 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 4 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

The LIS file and Meter Frequency reports were reviewed.

##### Audit commentary

JC Consulting provides monthly Meter frequency reports to the Authority on behalf of PLTM.

We reviewed the Meter Readings Frequency reports for the audit period to check if the company had 90% attainment of reads.

Compliance was achieved in the audit period.

##### Audit outcome

Compliant

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

##### Code reference

*Clause 10 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

Meter readings for remotely read meters are provided by MEPs.

##### Audit commentary

Assessment with this clause is part of the MEPs audit.

##### Audit outcome

Compliant

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

##### Code reference

*Clause 11(1) 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

Platinum Power does not trade HHR ICPs.

##### Audit commentary

This clause is not applicable. Compliance was not assessed.

##### Audit outcome

Not applicable

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

##### Code reference

*Clause 11(2) 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

Platinum Power does not trade HHR ICPs.

##### Audit commentary

This clause is not applicable. Compliance was not assessed.

##### Audit outcome

Not applicable

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

##### Code reference

*Clause 11(3) 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

Platinum Power does not trade HHR ICPs.

##### Audit commentary

This clause is not applicable. Compliance was not assessed.

##### Audit outcome

Not applicable

## 7. STORING RAW METER DATA

### 7.1. Trading period duration (Clause 13 Schedule 15.2)

#### Code reference

*Clause 13 Schedule 15.2*

#### Code related audit information

*The trading period duration, normally 30 minutes, must be within  $\pm 0.1\%$  ( $\pm 2$  seconds).*

#### Audit observation

Platinum Power does not trade HHR ICPs.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

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

#### Code reference

*Clause 18 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

NHH data is received from MEPs, which archives raw meter data. Some meters are read by PLTM themselves.

Platinum Power and JC Consulting keeps a copy of metering data. We reviewed the RM TOOL for compliance with this clause.

#### Audit commentary

We confirm the RM TOOL used by JC Consulting does not allow the modification of meter readings without an audit trail.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 21(5) 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**

This was discussed during the audit. Platinum Power do not use non-metering information to determine profile data.

**Audit commentary**

No non-metering information is collected by Platinum Power

**Audit outcome**

Compliant



## 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) 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

Correction of NHH readings, if necessary, is completed by JC Consulting as PLTM's agent.

#### Audit commentary

If correction of NHH readings is necessary it will be done in conjunction with Platinum Power. It will be done in the RM TOOL; any changes will have an audit trail. JC Consulting confirmed that there were no corrections of NHH data in the period covered by this audit.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 19(2) 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

Platinum Power does not trade HHR ICPs.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Compliant

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

### Code reference

*Clause 19(3) 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

It was discussed during the audit. PLTM trades category 1 and 2 metering installations.

### Audit commentary

The company stated no error or loss compensation needs to be applied to metering data.

### 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) 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

#### **Audit commentary**

The company stated that there were no instances of meter data which required correction/alteration.

#### **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) 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

We reviewed data in the RM TOOL and confirm all readings are clearly identified.

#### Audit commentary

The RM TOOL has the functionality to identify an estimated and actual reading.

Platinum Power has a number of ways in which meter readings are obtained. Meter readings are received from MEPs and manually read by PLTM's staff (reconciliation participant reads).

Our recommendation is to add additional flags to the RM TOOL to identify different types of readings. MEPs, WELLS, and reconciliation participant readings are deemed to be "actual".

#### Audit outcome

Compliant

Description	Recommendation	Audited party comment	Remedial action
Identification of readings provided by PLTM	Flag PLTM reads in RM TOOL		

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

#### Code reference

*Clause 3(4) 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

JC Consulting provided a submission summary of reconciliation files on behalf of PLTM. The summary allows us to evaluate what type of readings were used to calculate volumes submitted to the reconciliation manager.

#### Audit commentary

We reviewed the data provided by JC Consulting in **section 11** and **12** to confirm that volumes were based on readings as required, however, in **section 6.6** we identified that for some ICPs read manually by PLTM there is non-compliance.

## Audit outcome

Compliant

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

#### Code reference

*Clause 3(5) 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

Metering data is collected by MEPS

#### Audit commentary

Metering data is imported to the RM TOOL. Data is neither truncated nor rounded. We viewed readings in the RM TOOL and compliance is confirmed.

## Audit outcome

Compliant

### 9.4. Half hour estimates (Clause 15 Schedule 15.2)

#### Code reference

*Clause 15 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

Platinum Power does not trade HHR ICPs.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

## Audit outcome

Not applicable

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

#### Code reference

*Clause 16 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 0 values.*

#### **Audit observation**

NHH metering information data validation is conducted by JC Consulting. We reviewed the process and discussed a few scenarios with John Candy.

#### **Audit commentary**

JC Consulting adopted a validation process for NHH reads which consists of checking for high, low reads, consumption detected >10% of rollover amount, consumption on de energised sites, missing reads, negative consumption.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 17 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 0 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**

JC Consulting receives remotely read metering data from MEPs.

#### **Audit commentary**

When data is uploaded into the RM TOOL a validity check of meter readings is conducted and an exception report is created. MEPs are advised if there is an issue. There were no issues with metering data which were referred to MEPs. The event logs are reviewed.

#### **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

Platinum Power is not a generator.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### 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

Platinum Power is not a generator.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### 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

Platinum Power is not a generator.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### 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

Platinum Power is not a generator.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### 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 LIS file was used to identify which profiles are used by Platinum Power.

#### Audit commentary

For submissions Platinum Power use the RPS and PV1 profile. Trading notifications were 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 ICP days are reported to the reconciliation manager by JC Consulting as Platinum Power's agent. For audit purposes JC Consulting provided ICPDAYS and GR-100 for this audit period.

#### Audit commentary

Analysis of GR-100 showed that the number of days calculated by the registry and the RM TOOL was the same for all submissions. The exception were two months, where a small difference was recorded which was cleared in next revisions. It was caused by late switches.

#### 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*

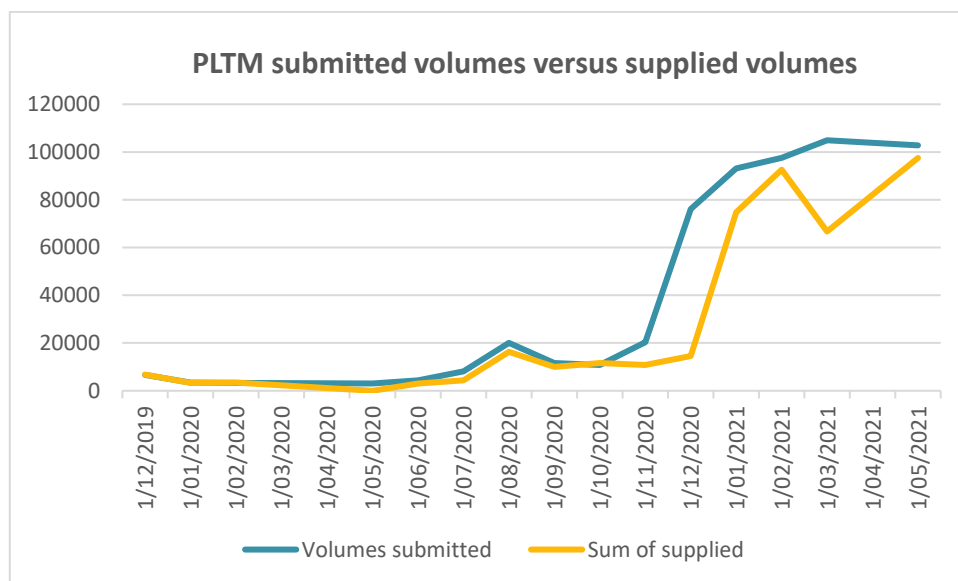
*15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

#### Audit observation

Electricity supplied information (BILLED) is submitted to the RM by JC Consulting. Volumes contained in the file are based on billing information provided by PLTM from their billing system.

#### Audit commentary

The graph below shows a comparison between volumes submitted (rev1).



BILLED file was submitted for all months during the audit period.

#### 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**

*A retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity supplied 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**

Platinum Power trade NHH ICPs only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

## 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 1 of the techniques set out in clause 15.36(3) specified by the Authority.*

#### Audit observation

Platinum Power trade NHH ICPs only.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 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

JC consulting calculates and provides reconciliation files on behalf of Platinum Power. Reconciliation files from month Jan2021 to May 2021.

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

#### Audit commentary

The last audit noted non-compliance because reconciliation files were not submitted for Mar 2020 and April 2020.

In this audit period all reconciliation files were submitted in time.

#### Audit outcome

Compliant

### 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

PLTM provided copies of reconciliation files submitted during the audit period. Files are submitted by JC Consulting.

We examined the process for aggregating the NHHVOLS files.

#### Audit commentary

JC Consulting thoroughly validates and checks volume data before submission files are sent to the reconciliation manager. We compared consecutive submissions for Jan 2021 to Mar 2021 and found them to contain the same NSPs.

#### 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

Platinum Power is not a grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### 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) 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

Platinum Power is not an embedded network owner.

## Audit commentary

This clause is not applicable. Compliance was not assessed.

## 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

Platinum Power is not a generator.

## Audit commentary

This clause is not applicable. Compliance was not assessed.

## 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**

PLTM provided copies of all reconciliation files submitted during the audit period. The files were reviewed.

#### **Audit commentary**

Each month, on day 13 JC Consulting submits revision files to the reconciliation manager. JC Consulting has a compliant process in place, which replaces previously submitted volumes with more accurate information when it is obtained.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 4 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**

JC Consulting calculates volumes and submits to the reconciliation manager. NHH volumes are submitted in NHHVOLS files. The company PLTM, started trading in September 2019, which means revision 14 volumes were submitted for Sept 2019 to Feb2020.

#### **Audit commentary**

We checked GR170 NHH and confirm that volumes for the month 14 revision cycle for above months had volume information created using estimated readings replaced with volume information created using validated meter readings.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 2 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**

Reconciliation files are submitted by JC Consulting on behalf of PLTM.

#### **Audit commentary**

Platinum Power trades NHH ICPs, only using the RPS and PV1 profile, no certified control devices were used to create volumes.

No ICPs with unmetered load are supplied.

No certified control devices were used to create volumes.

We crosschecked the registry file and reconciliation files for four months and confirm that volumes were submitted for all ICPs.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 3 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 following techniques to create historical estimates and forward estimates. (clause 3(1))*

*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**

We reviewed AV-080 for Jan 2021 to May 2021.

#### **Audit commentary**

Historical and forward estimates were included and identified correctly.

#### **Audit outcome**

Compliant

### **12.11. Historical estimate process (Clause 4 and 5 Schedule 15.3)**

#### **Code reference**

*Clause 4 and 5 Schedule 15.3*

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

*The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historic estimates of volume information for each ICP when the relevant seasonal adjustment shape is available.*

*If a seasonal adjustment shape is not available, 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**

Historical estimates are calculated by JC Consulting as a part of volume calculations for submissions.

#### **Audit commentary**

JC Consulting submits NHHVOLS on behalf of PLTM. All meters are read remotely except a few. We asked JC Consulting to provide the calculation for a small number of scenarios.

- ICP gained
- ICP lost
- Reads span a month

The calculations were correct.

#### **Audit outcome**

Compliant

### **12.12. Forward estimate process (Clause 6 Schedule 15.3)**

#### **Code reference**

*Clause 6 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**

Forward estimates are calculated by JC Consulting if required.

#### **Audit commentary**

Platinum Powers' forward estimates are based on a daily average consumption specified in the CS file or daily average consumption from the previous read to read.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 7 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 EDA file for the audit period was reviewed. We reviewed the meter changes process and followed through 4 examples.

#### **Audit commentary**

There were no profile changes after meter changes. Platinum Power only uses the RPS and PV1 (1 ICP) profile.

#### **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 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

JC Consulting provided submission files for Jan 2021 to May 2021.

#### Audit commentary

Every month PLTM submits NHHVOLS (cat 1 & 2)

We reviewed files and confirmed that the format for submission files is compliant.

Submission information was provided to the reconciliation manager in the appropriate format and was aggregated to the following level:

- NSP code
- reconciliation type
- profile
- loss category code
- flow direction
- dedicated NSP
- consumption period

#### **Audit outcome**

Compliant

### **13.2. Reporting resolution (Clause 9 Schedule 15.3)**

#### **Code reference**

*Clause 9 Schedule 15.3*

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

*When reporting submission information, the number of decimal places must be rounded to not more than 2 decimal places.*

*If the unrounded digit to the right of the second decimal place is greater than or equal to 5, the second digit is rounded up, and*

*If the digit to the right of the second decimal place is less than 5, the second digit is unchanged.*

#### **Audit observation**

We reviewed submission files for Jan 2021 to May 2021.

#### **Audit commentary**

Submission information for NHH is rounded to two decimal places. It was discussed during the audit as to how submission information was calculated and JC Consulting confirm that submission volumes are rounded, using a method prescribed by this clause, at the end of calculations.

#### **Audit outcome**

Compliant

### **13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)**

#### **Code reference**

*Clause 10 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**

JC Consulting creates and submits reconciliation files. We reviewed NHHVOLS and GR-170 NHH created by the reconciliation manager for the audit period.

#### **Audit commentary**

After a review of the reconciliation files, we can confirm that PLTM met requirements of this clause. In most cases it reached 100% of HE by revision 3.

#### **Audit outcome**

Compliant

## CONCLUSION

### PARTICIPANT RESPONSE

Platinum thank Ewa Glowacka for her time and patience in conducting this audit. We had key staff member terminate her employment just prior to the audit which delayed getting some information together. We accept the noncompliance noted and will take on board advice from Ewa and our consultant to review and upgrade our processes. Platinum are committed to achieving a high level of compliance.