

ELECTRICITY INDUSTRY PARTICIPATION CODE  
RECONCILIATION PARTICIPANT AUDIT REPORT

For

BODY CORPORATE POWER (BCPL)

Prepared by: Ewa Glowacka – TEG & Associates

Date audit commenced: 9 March 2020

Date audit report completed: 30 March 2020

Audit report due date: 26-Mar-20

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## EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Body Corporate Power (BCPL) to support their application for certification, in accordance with clauses 4 of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.1 issued by the Electricity Authority.

At the time of the audit, Body Corporate Power was trading 100 ICPs. 96 ICPs were reconciled as NHH and 4 ICPs as HHR. Body Corporate Power uses JC Consulting's services to provide reconciliation services as described in the body in this document. Body Corporate Power conducts switching using the registry web interface. In some instances JC Consulting assists Body Corporate Power and updates the registry.

As part of this audit we audited John Candy Consulting and reviewed the Wells audit report dated 04/06/2019 and EDMl report dated 28/08/19. To assess compliance we reviewed a number of registry files such as LIS, EDA, PR-255, the Switch Breach Report, and the Audit Compliance report for the audit period.

The audit found 10 non-compliances. The level of compliance is not as good as last year.

The main issue identified during this audit was the incorrect allocation of status to 50 ICPs (Crest Maidstone Apartments). During the audit it was identified that meters were installed between 26/7/19 and 29/7/19. BTS was removed on 1/08/2019 and replaced by Retail and Common area ICPs with Common Area set up to act as a gate meter. On 27/12/19, Body Corporate Power requested that Vector create new ICPs for these installations. At the time of audit volumes were not submitted to the reconciliation manager.

To remedy the situation BCPL requested Vector to reset the ICP creation dates to 25/07/2019, then the status of "Inactive" Reason 12 "installation in progress" would be backdated and from 01/08/2019 assigned the status "Active" and volumes submitted to the reconciliation manager.

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 34 which results in an indicative audit frequency of 12 months. We agree with the result.

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

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	11.2	Incorrect information in small number of CS files and incorrect status for 50 ICPs	Moderate	Low	2	Identified
Provision for information	2.2	15.35	No volumes submitted for 50 ICPs since 1/8/2019	Weak	Medium	6	Identified
Electrical connection of point of connection	2.11	10.33A	50 ICPs were electrically connected with no certified metering installation in place	None	Medium	8	Identified
Changes to registry information	3.3	10 of Schedule 11.1	Backdated trader and status events in the registry	Moderate	Low	2	Identified
Provision of information to the registry manager	3.5	9 of Schedule 11.1	Incorrect profile recorded for 4 ICPs	Moderate	Low	2	Identified
Management of "inactive" status	3.9	19 of Schedule 11.1	"Inactive-new connection in progress" is assigned incorrectly to 50 ICPs located in the Crest	None	Medium	8	Identified
Losing trader to provide final information – standard switch	4.3	5 of Schedule 11.1	Incorrect last Read date in CS file for one ICP	Strong	Low	1	Identified
Losing traded must provide final information – switch move	4.8	10(1) of Schedule 11.3	AN files not sent for all NTMI (3 ICPs)	Moderate	Low	2	Identified

Losing trader to provide final information –switch move	4.10	11 of Schedule11.3	Incorrect last Read date in CS file for 3 ICPs	Moderate	Low	2	Identified
HHR aggregates information provision to the reconciliation manager	11.4	15.8	HHRAGGR files do not contain electricity supplied information	Strong	Low	1	Not required. The Code change required a line up with RN file specification. Breach risk rating excluded from total
Historical estimate reporting to RM	13.3	10 of Schedule 15.3	Historical estimates target not met for revision 3 for Aug'19 (WRD0331) and Nov'19 (ALB0331)	Strong	Low	1	Identified
Future Risk Rating						34	
Next audit date						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
			Nil

## ISSUES

Subject	Section	Description	Issue
			Nil

## 1. ADMINISTRATIVE

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

#### Code reference

*Section 11 of Electricity Industry Act 2010.*

#### Code related audit information

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

#### Audit observation

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

#### Audit commentary

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

### 1.2. Structure of Organisation

James Martin is the Managing Director of Body Corporate Power.

### 1.3. Persons involved in this audit

Name	Title	Company
James Martin	Managing Director	Body Corporate Power
John Candy	Director	JCC 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

Body Corporate Power uses three agents to meet their obligations; WELLS, a meter reading company, EDMI (reading one 3PH category 3 metering installation), and JC Consulting, to create and submit files to the reconciliation manager.

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

#### Audit commentary



As a part of this audit we reviewed the WELLS audit report dated 04/06/2019 and EDMl audit dated 28/08/19.

We do acknowledge that the Wells audit is older than seven months, but we contacted the auditor of Wells, coming up a new audit in May'20, and she commented that there we no changes to WELLS's process which could negatively impact their compliance.

As a part of this audit we audited work done by JC Consulting as an agent of Body Corporate Power.

### 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 RM submissions

### 1.6. Breaches or Breach Allegations

There were no breaches or breach allegations lodged against Body Corporate Power in the period covered by this audit.

### 1.7. ICP Data

Metering Category	Number of ICPs (01/03/2020)	Number of ICPs (7/4/2019)	Number of ICPs (08/05/18)
1	109	69	46
2	2	1	2
3	2	2	0
4	0	0	0
5	0	0	0
9	2	0	0

Status	Number of ICPs (01/03/2020)	Number of ICPs (07/04/19)	Number of ICPs (08/05/18)
Active (2,0)	100	71	7
Inactive – new connection in progress (1,12)	53	5	4
Inactive – electrically disconnected vacant property (1,4)	0	0	0
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	0

Inactive – electrically disconnected at pole fuse (1,8)	0	0	0
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	0
Inactive – electrically disconnected at meter box fuse (1,10)	1	0	0
Inactive – electrically disconnected at meter box switch (1,11)	0	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	10	0	1
Inactive – reconciled elsewhere (1,5)	0	0	38
Decommissioned (3)	5	3	2

#### 1.8. Authorisation Received

Body Corporate Power provided a letter of authorisation to Ewa Glowacka of TEG & Associates permitting the collection of data from other parties for matters directly related to the audit.

#### 1.9. Scope of Audit

This reconciliation participant audit was performed at the request of Body Corporate Power (BCPL) as required by clause 16A.24(b) to support the application for recertification. The audit was carried out on the 9th of March 2020, at 19 Arrenway Drive, Auckland.

The audit covers the following processes under clause 15.38 of Part 15, performed by Body Corporate Power:

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	✓	JCC Consulting (some tasks)
(b) – Gathering and storing raw meter data	✓	WELLS – NHH meter readings (3 ICPs) EDMI – 1 ICP 1002059115UNEE9
(c)(i) - Creation and management of HHR volume information	✗	
(c)(ii) - Creation and management of NHH volume information	✗	
(c)(ii) - Creation and management of HHR and NHH volume information	✓	JCC Consulting
(c)(iv) - Creation and management of dispatchable load information	✗	
(d)(i) – Calculation and delivery of ICP days under clause 15.6	✓	JCC Consulting
(d)(ii) - delivery of electricity supplied information under clause 15.7	✓	JCC Consulting
(d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	JCC Consulting
(e) – Provision of submission information for reconciliation	✓	JCC Consulting
(f) - Provision of metering information to the grid owner in accordance with subpart 4 of part 13	✗	

#### 1.10. Summary of previous audit

The previous audit was conducted by Ewa Glowacka of TEG & Associates on May 2019. The findings are noted in the table below:

Subject	Section	Clause	Non-Compliance	Comment
Audit requirements	1.11	15.37A	Audit report complete late	Cleared
Relevant information	2.1	11.2	Incorrect profile for some ICPs	Still exists

Provision of information	2.2	15.35	Body Corporate Power failed to take all practicable steps to provide complete and accurate submission volumes for October 2018.	Still exists
Changes to registry information	3.3	10 of Schedule 11.1	Backdated trader and status events in the registry	Still exists
Management of “inactive” status	3.9	19 of Schedule 11.1	Incorrect status applied to one ICP	Still exists
Losing trader to provide final information – standard switch	4.3	5 of Schedule 11.1	The last read date for 1 ICP was incorrect	Still exists
Non-half hour switch event meter reading - standard switch	4.5	6(3)(b) of Schedule 11.3	The switch event read rejected for one ICP.	Cleared
Losing traded must provide final information – switch move	4.8	10(1) of Schedule 11.3	CS file for one ICP was sent late	Still exists
Losing trader determines a different date – switch move	4.9	10(2) of Schedule 11.3	For one ICP a different date was assigned (in the past) than requested by the gaining trader	Cleared
Gaining trader informs registry of switch request - gaining trader switch	4.12	14 of Schedule 11.3	Incorrect type of switch used for one ICP	Cleared
Withdrawal of switch requests	4.15	17 of Schedule 11.3	One NW file was sent late	Cleared
HHR aggregates information provision to the reconciliation manager	11.4	15.8	HHRAGGR files do not contain electricity supplied information	Still exists
Reconciliation participant to prepare information	12.9	15.4	Mismatch of submissions profile between the registry and submitted files for four ICPs; switch event meter reading not used for one ICP	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

Processes to provide information to the reconciliation manager were reviewed and assessed throughout this document. JC Consulting acts as the agent to Body Corporate Power to provide information in accordance with Part 15.

#### Audit commentary

To assess compliance with these clauses we examined the process of validating information in the registry. The LIS file dated 01/03/20 was examined to identify any inaccuracies. The Event Detail (EDA) file for the period 01/03/19 to 29/02/20 was examined to determine how quickly Body Corporate Power provides information to the registry and corrects information which was identified as inaccurate.

The LIS and Metering Installation Information (PR-255) files were analysed, the results are shown below:

Issue	Quantity	Comments
ICP Status = 002, MEP = blank, UNM Flag = N	0	No evidence of this occurring
ICP Status = 002, Generation Capacity is not blank,	28	
Highest Metering Category >2 with residential ANZSIC code assigned (000000)	0	No evidence of this occurring
ANZSIC code = blank or T994, T994000, T99, T999, T999999, T995, T995000, T997, T997000, T998, T998000	0	No evidence of this occurring
ICP with B or G Inst Type, or non-null Fuel or Gen Capacity that do not have a corresponding Injection Register	0	No evidence of this occurring
Highest Metering Category greater than 2, Submission Type HHR = No	0	No evidence of this occurring
Highest Metering Category = 9, UNM Flag=N	0	No evidence of this occurring

All active ICPs with Initial Energisation Date populated during a defined period	0	
All Active ICPs (ICP Status = 2) with Shared ICP List not blank	0	No evidence of this occurring
All ICPs at ICP Status 001,12	53	
Submission Type HHR = Y, Profile does not contain HH	0	No evidence of this occurring
Submission Type HHR and Submission Type NHH both = Y	0	No evidence of this occurring
All active ICPs where Distributor has indicated UML (UML Load Details not NULL) but Retailer has none (UNM Flag = N)	0	No evidence of this occurring
All active ICPs with UNM Flag = Y	0	No evidence of this occurring
All active ICPs with load in excess of 6kWh (Daily Unmetered kWh greater than 16.4 daily)	0	No evidence of this occurring
All active ICPs with load between 3-6k kWh (Daily Unmetered kWh between 8.2-16.4 daily)	0	No evidence of this occurring
All active ICPs with Engineered profile (Daily Unmetered kWh = ENG)	0	No evidence of this occurring

As described in **section 3.9**, 50 ICPs have incorrect status in the registry. ICPs are electrically connected but no volumes have been submitted.

In **section 3.5** we identified 4 ICPs with incorrect profile assigned.

In **section 4.3** and **4.10** we identified incorrect information in CS files.

#### Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Incorrect information in 3 CS files and incorrect status for 50 ICPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate as they require some improvement. There was minor impact on settlement. Audit risk rating low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>FCLM provides daily read files these files are dated next day to reading. Adjust reading date to previous day. All readings were correct.</p> <p>At the time of the Audit BCPL used the status installation in progress as there were two Traders at an ICP and submetering in place. BCPL was in the process of updating ICPs to reflect the correct energisation date. We considered this as the correct status as at the time audit for the 50 ICPs at Crest. Post Audit Vector backdated ICP in Registry to 1/08/2019. We have now updated status to Active (Energised).</p> <p>(See note Crest in summary).</p>		1 <sup>st</sup> April	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Regarding the three CS files. The Switching document has been updated to reflect the Date on Files from FCLM (one day after) reading.</p> <p>Regarding the 50 ICPs, we will introduce a process to audit a meter installation and check that it is configured correctly. This will include checking with the Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document.</p>		1 <sup>st</sup> April	

## 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

We reviewed the processes for file submission performed by JC Consulting and found them compliant.

Alleged breaches during the period covered by this audit were reviewed.

##### Audit commentary

In section 3.9 we identified 50 ICPs electrically connected on 1/8/19 but no volumes have been submitted. It was discussed during the audit. According to Body Corporate Power “The issue we have is that when the network was lived by Ganellen (BTS to Perm) they wired the meter board behind the gate meter so all ICPs were live from day one. The company was aware that volumes were recorded by the meters as FCLM was providing readings. Body Corporate Power is working to resolve it.

Mismatch between profile used in submission files and the registry (4 ICPs).

##### Audit outcome

Non-compliant



Non-compliance	Description		
Audit Ref: 2.2 With: 15.35 From: 01-Aug-19 To: 29-Feb-20	No volumes submitted for 50 ICPs since 1/8/2019. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak as volume were not submitted to the RM. BCPL was aware that meters were recording values. Audit risk rating medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
All Volumes will be submitted from Energisation date adjusted to 1 <sup>st</sup> August 2019		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document. (as identified in 2.1 above)		1 <sup>st</sup> April 2020	

### 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 Metrix, FCLM, AMS, and Wells servers on behalf of Body Corporate Power.

#### Audit commentary

Once metering data is downloaded from the service providers servers it is uploaded to the RM TOOL. JC Consulting copies metering data to a Dropbox shared with Body Corporate Power, the company uses this data for analysis and billing purposes.

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

We sampled six ICPs from MTRX, AMS and Wells and traced them from the original files to volume information created by JC Consulting, and uploading to the reconciliation managers system.

#### 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.

#### Audit commentary

JC Consulting retains an audit trail of downloaded 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 is recorded in the RM TOOL.

We confirmed during the JC Consulting audit that the audit trail for data gathering, validation and processing functions is archived. For any changes to data, logs are created showing the date and time of the activity, an activity identifier, and the 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

We reviewed the Terms and Conditions for Electricity Supply provided by Body Corporate Power.

### Audit commentary

The Terms and Conditions covers contractors or agents, the Line Companies, the meter owner, and meter reader and any of their employees, contractors or agents. The agreement covers the full term of the arrangement. There are no long-term contracts for residential customers.

### 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

We reviewed the Terms and Conditions for Electricity Supply provided by Body Corporate Power.

### Audit commentary

The section “Access to your premises”, of the Terms and Conditions, covers access to a customer’s property. Body Corporate Power will give at least 10 working days prior to entry.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 10.35(1)&(2)*

#### Code related audit information

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

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

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

#### Audit observation

The LIS file was reviewed to identify what categories of metering installations are traded by Body Corporate Power.

#### Audit commentary

Body Corporate Power installations are category 1, 2 , and 3 metering installations. None of the metering installations requires a compensation factor applied due to the location of the installation, as per MEP’s advice.

We checked the RM TOOL functionality and confirmed that multipliers are applied to submission information.

#### 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**

We reviewed the Terms and Conditions for Electricity Supply provided by Body Corporate Power.

#### **Audit commentary**

Section 21 of the Terms and Conditions says “If we commit an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.55 of the Code, we permit the Electricity Authority to assign the rights and obligations of BCPL to another Retailer”.

#### **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 new connection process and the registry files were examined.

#### **Audit commentary**

The process has not changed since the last audit

Body Corporate Power applies to the relevant network for an ICP identifier on behalf of their customer. Once the ICP is in the registry, the ICP is claimed by changing the status from “ready” to “inactive-new connection in progress” (1,12) and an MEP is nominated. Once metering is installed and the installation electrically connected, the status of the ICP is changed to “active”.

At the time of the audit, 53 ICPs had the status “inactive-new connection in progress” assigned.

#### **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 reconciliation participant may temporarily electrically connect a point of connection, or authorise a MEP to temporarily electrically connect a point of connection, only if:*

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
  - *the reconciliation participant is recorded in the registry as the trader responsible for the ICP*
  - *if the ICP has metered load, 1 or more certified metering installations are in place*
  - *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

### Audit observation

Body Corporate Power was not asked by any MEP to temporarily electrically connect a point of connection.

### Audit commentary

Compliance confirmed by Body Corporate Power during the audit.

### 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 reconciliation participant is recorded in the registry as the trader responsible for the ICP*
  - *if the ICP has metered load, 1 or more certified metering installations are in place*
  - *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

### Audit observation

The process for new connections and the connection/disconnection of existing installations was examined. The review registry files provided by Body Corporate Power.

### Audit commentary

The process for new connections is described in **section 2.9**. According to the EDA file only one ICP was disconnected during the audit period.

Analysis of the LIS file showed 50 ICPs with the status “inactive-new connection in progress”. It was identified during the audit that ICPs were electrically connected with no certified metering installation in place. No volumes were submitted to the RM.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.11 With: 10.33A  From: 01-Aug-19 To: 29-Feb-20	50 ICPs were electrically connected with no certified metering installation in place  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: None  Breach risk rating: 8		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak. BCPL was aware that meters were recording volumes. Audit risk rating medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Meters were originally installed by Vircom as sub-meters during standard process with Vircom installations. Meters were then re-labelled and re-certified as revenue metering.  Network Energisation date and MEP records updated in Registry  Submitting all volume from energised ICPs from 1 <sup>st</sup> August 2019		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document. (as identified in 2.1 above)		1 <sup>st</sup> April 2020	

## 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

Body Corporate Power has an arrangement with all relevant networks. Agreements are always in place before any ICP is switched in.

### Audit commentary

During the audit, Body Corporate Power demonstrated the existence of either a UoSA or other trading arrangement for all networks to which their ICPs are connected.

### 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

FCLM is the preferred MEP for Body Corporate Power. For any new switches, Body Corporate Power accepts an existing MEP. If a NHH installation is changed to HHR, FCLM is always nominated as the MEP.

### Audit commentary

Body Corporate Power has an arrangement with all MEPs which provide metering services to them. The MEP is always nominated after acceptance of a new ICP or when a change of metering is requested.

### Audit outcome

Compliant



### 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 process for new connections was reviewed as per **section 2.9**.

##### Audit commentary

Since the last audit Body Corporate Power gained 50 new connections (Crest Maidstone Apartments).

##### 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 new connection process was described in **section 2.9**. The LIS and EDA files were examined to check the correctness of information and if the registry was notified in the timeframe specified by the relevant clause.

#### **Audit commentary**

The company checks the information in the registry for each ICP, before the ICP is accepted, to be sure of their accuracy. At the time of the audit, 53 ICPs had the “new connection in progress” status.

#### **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**

To assess compliance, we reviewed the EDA file for the period 01/03/2019 to 29/02/2020.

#### **Audit commentary**

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)	2018	3	1	2		33,3%
	2019	41	39	2		92.1%%
	<b>2020</b>	4	0	4	14	<b>0%</b>
Change to reconcile elsewhere (1,5)	2018	38	0	38		0%
	2019	40	0	40		0%
	<b>2020</b>	0				
Change to electrically disconnected ready for decommissioning (1,6)	2018	0				
	2019	0				
	<b>2020</b>	2	0	2	52	<b>0%</b>
Change to electrically disconnected at meter box fuse (1,10)	2018	0				
	2019	0				
	<b>2020</b>	1	1	0	1	<b>100%</b>
Change to new connection in progress (1,12)	2018	37	37	0		100%
	2019	78	3	75		
	<b>2020</b>	53	52	1	2.2	<b>98%</b>
Trader (NT updates and MEP nominations are excluded)	2018	No data recorded				
	2019	No data recorded				
	<b>2020</b>	10	8	2	6.6	<b>80%</b>
MEP nomination	2018	No data recorded				
	2019	No data recorded				

	2020	97	95	2	2.7	98%
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#### Status "Active"

All updates were later than 5BD.

Overall timeliness of registry updates has improved since the last audit.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Mar-19 To: 29-Feb-20	Backdated trader and status events in the registry  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. 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 added monitoring and peer review to the Switching process which is when most updates take place. Additional Checks now in place for metering setup, CS file submission ICP status and profile.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have updated process documents and added one new process document. New processes are in place for meter installations in multi dwellings. Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document. (as identified in 2.1 above)		1 <sup>st</sup> April 2020	

### 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 LIS file dated 01/02/2020 was analysed and we confirm that all ICPs have a MEP recorded in the registry.

### Audit commentary

Body Corporate Power fully understand 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.

Body Corporate Power is aware of their responsibility to notify the MEP where an ICP is decommissioned, and to obtain a final reading.

Since the last audit, the company has marked two ICPs as “ready for decommissioning”.

### 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

Registry files such as LIS, EDA and the Audit Compliance report were examined.

#### Audit commentary

Incorrect profile of RPS PV1 was assigned to 4 ICPs (0000669718UN6C2, 0000238799UN4A6, 0000946730TED1A, and 0030120043PC8D9), it should be RPS.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5  With: 9 of Schedule 11.1  From: 01-Mar-19  To: 29-Feb-20	Incorrect profile recorded for 4 ICPs  Potential impact: Low  Actual impact: Low  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 improvement. 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
Internal process corrected, Profile PV1 was applied incorrectly to sites with EG (Solar) based on Network Certification). The Profile PV1 Should only be applied to import-export capable metering.		1 <sup>st</sup> April 2020	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Correction on all 4 ICPs to RPS Profile and wait for meter upgrade to after installation of HHR or Import-Export Metering. We have amended our installation process for properties with new solar installations.	1 <sup>st</sup> April 2020	

### 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 dated 01/03/2020 was examined.

#### Audit commentary

The correctness of the ANZSIC code is checked when a switch is finalised or when a new connection is setup. We reviewed the LIS file and confirm that all ICPs have the correct ANZSIC code recorded.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 9(1)(f) of Schedule 11.1*

#### Code related audit information

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

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

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

#### Audit observation

The LIS file dated 01/03/2020 was examined.

#### Audit commentary

At the time of this audit, Body Corporate Power was not trading any UML. As described in **section 2.1**, this is checked regularly as a validation process undertaken by JC Consulting.

#### 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

We analysed the LIS and EDA files for the audit period.

## Audit commentary

We confirm that each ICP has only 1 customer and the electricity consumed is qualified by a certified metering installation. 100 ICPs had the status “active” recorded by Body Corporate Power. In **section 12** it was confirmed that volumes are submitted to the RM for all of them.

## 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

We analysed the LIS and EDA files. The process of connection/disconnection was reviewed and found compliant.

## Audit commentary

In the registry there are 53 ICPs with the status “inactive – new connection in progress”. 50 ICPs are located in Crest Maidstone Apartments. Installations were livened on 1/08/19, but ICP identifiers were created by Vector on behalf of BCPL on 20/12/19. No volumes have been submitted for these ICPs at the time of this audit.

## Audit outcome



# Non-compliant

Non-compliance	Description		
Audit Ref: 3.9 With: 19 of Schedule 11.1  From: 01-Aug-19 To: 29-Feb-20	“Inactive-new connection in progress” is assigned in correctly to 50 ICPs located in the Crest  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: None  Breach risk rating: 8		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as none. BCPL was aware that meters were recoding volumes but no volumes were submitted. Audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Checks now in place for metering setup, ICP status and profile. Updated process documents and one new process document. At date of Audit there are two traders at 1 ICP. BCPL believes that it had used the correct status “Installation in Progress” in this scenario. Corrective action has been taken by BCPL to update registry and back date energisation date to 1 <sup>st</sup> August 2019. Status will be changed in Registry to “active” from that date and all volumes will be submitted from that date.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The Correct Status must apply to each ICP as per Status at that time. ICP Status will be backdated by Network to 1 <sup>st</sup> August and Active Status applied from 1 <sup>st</sup> August 2019 with all volumes submitted for all ICPs from that date.  As above a new process in place for meter installations in multi dwellings. Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties (as identified in 2.1 above). In this instance the Network was assumed to be a Customer Network with Nova Energy as Tier 1 Trader at Gate meter with BCPL trading as Tier Two.		7 <sup>th</sup> April 2020	

### 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 code obligation to monitor any 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

Body Corporate 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 to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### Audit commentary

During the audit period Body Corporate Power sent 48 NTTR. During the audit period all ICPs gained were metering installations category 1 and 2. The correct type of switch was used.

Body Corporate Power is aware of the requirements of the Fair Trading Act 1986.

#### 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**

The standard switch process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power received one NTTR from a gaining trader. The AN file was sent the following day.

#### **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**

The standard switch process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power lost one customer (0000905087TUCB0). The CS file was provided after two business days. The CS file contained incorrect information. Last Read Date was the same as Actual transfer Date.

Daily kWh consumption calculation was correct.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3  From: 01-Mar-19 To: 29-Feb-20	Incorrect last Read date in CS file for one ICP  Potential impact: None  Actual impact: None  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated strong. Switch event read was correct. No impact on settlement outcome. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
FLCM Submission files were labelled with the date following submission date. This was a simple human error. We now know that the date on the Submission files relate to the previous day.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Update process document “Switching Process”		1 <sup>st</sup> April 2020	

#### 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**

The standard switch process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power did not send any RR files. Body Corporate Power received one RR file, which was rejected. It was covered in the last audit. No other RR files were received in the audit period.

#### **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**

The standard switch process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power sent one RR for ICP 0000191474UN4B8, which was rejected. It was covered in the last audit. No other RR files were received. In the audit period.

#### **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 a losing trader. If such a situation were to occur in the future it would be resolved in accordance with this clause.

#### Audit commentary

Body Corporate Power confirmed that no disputes occurred in the period covered by this audit which would require a resolution. Body Corporate Power stated that they will not decline to accept another traders' 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 to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### Audit commentary

Body Corporate Power sent 3 NTMI files. All files were sent within 2 business days after the arrangement comes into effect.

The company is aware of the requirements of the Fair Trading Act 1986.

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

### Audit observation

The switch move process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

### Audit commentary

Body Corporate Power received 3 NTMI from gaining traders. No AN file was sent by Body Corporate Power which is non-compliance. No late files were recorded.

### Audit outcome

Non-compliant



Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3  From: 26-Nov-19 To: 27-Nov-19	AN files not sent for all NTMI (3 ICPs)  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 improvement. Incorrect process. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching process document was correct, this was an oversight from BCPL. Switching process to be monitored and pair reviewed by J Candy.		Immediate and ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Peer review and monitoring of Switching Process, familiarisation of existing systems and processes		ongoing	

#### 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

The switch move process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

##### Audit commentary

The requested event date by a gaining trader was accepted.

##### 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

The switch move process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

##### Audit commentary

Body Corporate Power lost 3 ICPs (0000905087TUCB). The CS files contained incorrect information. Last Read Date was the same as Actual transfer Date.

Daily kWh consumption calculation was correct.

##### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.10  With: 11 of Schedule 11.3  From: 26-Nov-19  To: 27-Nov-19	Incorrect Last Read date in CS file for 3 ICPs  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 improvement. Incorrect process. No impact on settlement outcomes because switch event reads were correct.. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
FLCM Submission files were labelled with the date following submission date. This was a simple human error. We now know that the date on the Submission files relate to the previous day.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Update process document “Switching Process”		1 <sup>st</sup> April 2020	

#### 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**

The switch move process was examined to assess compliance. The EDA files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

No RR files received or sent.

#### **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 files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power did not use this type of switch to gain any customers in the 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 files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power lost one ICP 1002060916UNFA8 to TODD. The AN file was sent the following day after receiving notification from the registry.

#### **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 files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power did not use this type of switch to gain any customers in the 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)):*
  - o *the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and*
  - o *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**

The EDA files and the Switch Breach Report for the audit period were reviewed.

#### **Audit commentary**

Body Corporate Power sent one NW file and received 4 NW files for 2 ICPs. We examined the NW files sent, the reason code used was correct.

The Switch Breach report did not record any late NW and AW files.

#### 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. All reads are received from MEPS or agents.

#### Audit commentary

The company understands that it would be their responsibility to obtain any additional read and pay for it.

#### Audit outcome

Compliant

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

#### Code reference

Clause 11.15AA to 11.15AB

#### Code related audit information

*A trader that buys electricity from the clearing manager may elect to have a switch saving protection by giving notice to the Authority in writing.*

*If a protected trader enters into an arrangement with a customer of another trader (the losing trader), or a trader enters into an arrangement with a customer of a protected trader, to commence trading electricity with the customer, the losing trader must not, by any means, initiate contact with the customer to attempt to persuade the customer to terminate the arrangement during the period from the receipt of the NT to the event date of the switch including by:*

*11.15AB(4)(a)- making a counter offer to the customer; or*

*11.15AB(4)(b)- offering an enticement to the customer.*

**Audit observation**

Body Corporate Power is not part of the Switch saving protection program.

**Audit commentary**

It was discussed during the audit. The company does not approach customers to offer a better deal after receiving NT file. No NWCX files were sent in 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 dated 01/03/2020 was analysed.

#### Audit commentary

There are no shared unmetered load ICPs traded by Body Corporate Power. JC Consulting checks weekly, to see if any of the networks have not entered an historic SUML which will be reconciled if such a situation occurs.

#### 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 dated 01/03/2020 was analysed.

#### Audit commentary

Body Corporate Power does not trade unmetered load ICPs.

#### 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 dated 01/03/2020 was analysed.

#### Audit commentary

Body Corporate Power does not trade unmetered load ICPs. 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 dated 01/03/2020 was analysed.

**Audit commentary**

BCPL does not trade a 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 dated 01/03/2020 was analysed. All installations traded by Body Corporate Power are metered. No subtraction method is used to determine submission information provided to the reconciliation manager

#### Audit commentary

Body Corporate Power trades 49 ICPs at which solar panels are installed. We reviewed NHHVOLS for Mar'19 to Jan'20 and confirm that for all these installations volumes were submitted. The review of the LIS showed that for 2 ICPs (0001259190UN9B0 and 0140833080LC939) Vector assigned the installation type as "B" but no E/I meters were installed.

In **section 3.5** we identified that for 4 installations profile RPS PV1 is recorded in the registry, but no solar panels are installed.

#### 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**

Body Corporate Power does not trade such installations.

#### **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 for the audit period were analysed.

#### **Audit commentary**

The files analysis showed that Body Corporate Power submits volumes to the reconciliation manager using RPS, PV1, and HHR profiles. No control devices are needed. The company has 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 lead 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 documentation to manage defective installations was examined.

#### Audit commentary

Any defective installations are identified through the meter reading validation process conducted by JC Consulting or they notify MEPs or its agents. If such an issue arises, Body Corporate Power raises a SR asking for an investigation and replacement of a meter if necessary.

JC Consulting confirmed that no defective meters have been identified during the period covered by this audit.

#### 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:*

- ensure the system is to within +/- 5 seconds of NZST or NZDST*
- compare the meter time to the system time*
- determine the time error of the metering installation*
- if the error is less than the maximum permitted error, correct the meter's clock*
- if the time error is greater than the maximum permitted error then:*
  - correct the metering installation's clock*
  - compare the metering installation's time with the system time*
  - correct any affected raw meter data.*
- 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

Body Corporate Power trades 4 HHR ICPs. Data is collected by EDMl and FCLM and provided to JC Consulting.

#### Audit commentary

Compliance with this clause is validated during MEP and EDMl audits. We reviewed the EDMl audit report and confirm compliance.

#### 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

The data collection process was examined.

WELLS provides daily NHH reads. WELLS also provides a file listing any broken or missing seals or if any meter tampering was noted. The file is reviewed and acted on. There were no customer reads or participant reads.

#### Audit commentary

Metering data is collected remotely by AMS, MRTX and FCLM. Reads are collected manually by Wells. On rare occasions Body Corporate Power reads meters themselves. We reviewed the process documentation and the company provided a spreadsheet where all information related to the reads is recorded.

#### Audit outcome

Compliant

### 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 WELLS and 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 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 process for missing reads used by JC Consulting was examined. It is a very robust process.

#### Audit commentary

During the audit period all meters were interrogated at least once during the period of supply.

#### 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**

Every month JC Consulting on behalf of Body Corporate Power provides the Authority with a Meter Reading Frequency report. We reviewed the Meter Reading Frequency reports for Mar'19 to Jan'20 to check if the company had 100% attainment of reads.

#### **Audit commentary**

A review of Meter Frequency Reports confirmed that Body Corporate Power met the read attainment requirements for all months.

#### **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**

Every month JC Consulting on behalf of Body Corporate Power provides the Authority with a Meter Reading Frequency report. We reviewed the Meter Reading Frequency reports for Mar'19 to Jan'20 to check if the company had 100% attainment of reads.

#### **Audit commentary**

A review of Meter Frequency Reports confirmed that Body Corporate Power did not meet the read attainment requirements for all months. The exception was Dec'19 and Jan'20, one ICP was not read (1001123349LCEB2). The ICP was marked "ready for decommissioning" on 11/10/19 backdated to 01/08/19 therefore it should not be included the Dec'19 and Jan'20 report.

#### **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

NHH metering data is collected by Wells, FCLM, NGCM and Metrix.

##### Audit commentary

Compliance with this clause was assessed during the Wells and Metrix audits. We reviewed the Wells audit dated 04/06/19.

##### 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

HHR data is collected by FCLM and EDM I on behalf of Body Corporate Power and passed to JC Consulting. Body Corporate Power trades 4 HHR ICPs.

##### Audit commentary

FCLM and EDM I are responsible for HHR collection. Compliance with this clause was examined during the FCLM audit. We reviewed the EDM I audit report and confirm compliance.

##### Audit outcome

Compliant

#### 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**

HHR data is collected by FCLM and EDM I on behalf of Body Corporate Power and passed to JC Consulting. Body Corporate Power trades 4 HHR ICPs.

#### **Audit commentary**

FCLM and EDM I are responsible for HHR collection. Compliance with this clause was examined during the FCLM audit. We reviewed the EDM I audit report and confirm compliance.

#### **Audit outcome**

Compliant

### **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**

HHR data is collected by FCLM and EDM I on behalf of Body Corporate Power and passed to JC Consulting. Body Corporate Power trades 4 HHR ICPs.

#### **Audit commentary**

FCLM and EDMl are responsible for HHR collection. Compliance with this clause was examined during the FCLM audit. We reviewed the EDMl audit report and confirm compliance.

#### **Audit outcome**

Compliant

## 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

At the time of audit Body Corporate Power was trading 4 HHR ICPs. The trading period duration was reviewed as part of the FCLM and EDM I agent audits.

#### Audit commentary

We reviewed data provided by all parties and confirm the trading period is 30 minutes.

#### Audit outcome

Compliant

### 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

Meters are interrogated by MEPs, EDM I and Wells who archive raw meter data.

#### Audit commentary

We reviewed EDM I and Wells audit reports which confirmed that data is stored indefinitely.

#### 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**

It was discussed during the audit. Body Corporate Power does not use non-metering information to determine profile data.

**Audit commentary**

No non-metering information is collected by Body Corporate 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

The correction of NHH readings, if necessary, is completed by JC Consulting.

#### Audit commentary

JC Consulting validates all NHH readings on import to the RM TOOL. Most of reads are provided by MEPs. If any readings are identified as incorrect MEPs or Wells will be contacted.

#### 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

According to the LIS files, Body Corporate Power trades 4 HHH ICPs.

#### Audit commentary

No HHR corrections were made during the period covered by this audit. JC Consulting conducts very thorough HHR data validation to detect possible data inaccuracies.

#### 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

Error and loss compensation was discussed during the audit.

#### Audit commentary

Body Corporate Power stated that they do not have any ICPs for which error or compensation needs to be applied.

#### 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**

Body Corporate Power only receives a copy of raw meter data, and it is archived and never adjusted. The MEPs audit assessed compliance with this clause. Both the EDMl and Wells reports confirm that raw data is never changed or overwritten.

**Audit commentary**

If any correction or copy of raw data is required using the RM TOOL a journal will be created. It is the same journal which is created when metering data is estimated.

**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

Data received from MEPs or agents is marked as actual. Body Corporate Power does not accept customer reads.

#### Audit commentary

The readings are clearly identified in the RM TOOL. We reviewed a sample of five readings (Wells and FCLM) in the RM TOOL and confirmed they were correctly labelled. We traced them from the source file to the JC Consulting system. Each register read or interval read has a flag assigned.

#### Audit outcome

Compliant

### 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 for Mar'19 to Jan'20.

#### Audit commentary

The data provided by JC Consulting was reviewed in **section 11** and **12** to confirm that volumes were based on readings as required.

#### 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**

Meter data is collected by MEPs, EDMl, and Wells.

#### **Audit commentary**

We compared a sample of six ICPs and compared data received from FCLM, Wells and EDMl with data stored in the RM TOOL. We confirmed that data was neither rounded nor truncated.

Compliance with this clause was part of the Wells, EDMl and MEPs audits.

#### **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**

According to the LIS file dated 01/03/2020, Body Corporate Power trades 4 HHR ICPs.

#### **Audit commentary**

JC Consulting confirmed that no HHR data was estimated for Body Corporate Power ICPs.

There is a requirement to use "reasonable endeavours" to ensure that data is accurate to within 10% when data needs to be estimated. JC Consulting has a process in place to meet such requirement if necessary.

#### **Audit outcome**

Compliant

### **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. The process was reviewed during this audit and found compliant.

#### **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.

There is also a process to monitor “possible” bridged meters. Unexpected consumption on deenergised sites is monitored.

#### **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 meter and data storage device event list. Any event that could have affected the integrity of metering data must be investigated.*

#### **Audit observation**

JC Consulting downloads remotely read metering data from MEPs servers, and EDML.

#### **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 and agents are advised if there is an issue.

According to the service agreement with FCLM, the company have an obligation to advise of meter events. The data is received by JC Consulting. No events were reported which could affect the integrity of metering data. Metrix and NGCM provide log files reviewed by JC Consulting.

#### **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

Body Corporate Power is not required to provide information to the grid owner.

#### 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

Body Corporate Power is not required to provide information to the grid owner.

#### 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

Body Corporate Power is not required to provide information to the grid owner.

#### 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

Body Corporate Power is not required to provide information to the grid owner.

#### 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 dated 01/03/2020 was used to identify which profiles are used.

#### Audit commentary

Body Corporate Power uses HHR, RPS, and PV1. 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 reporting is completed by JC Consulting as Body Corporate Power's agent.

We reviewed the GR-100 for May'18 to Jan'20.

#### Audit commentary

We reviewed the ICP days file (AV-110) submitted to the reconciliation manager and GR-100 provided by the reconciliation manager. We confirm that there was a very small difference between ICP days calculated by the registry and JC Consulting. By submitting consecutive revision 7 and 14 this resolved the discrepancies.



## 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*

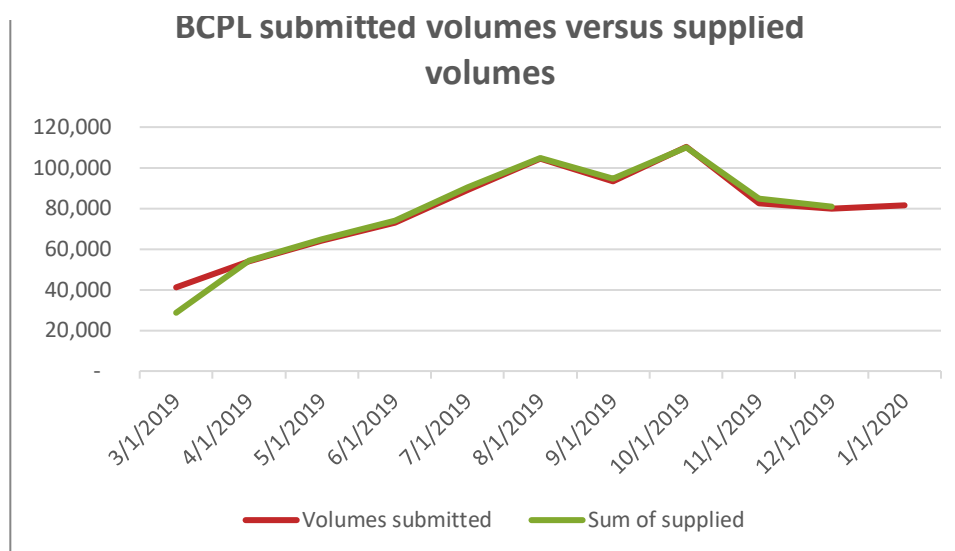
*15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

#### Audit observation

JC Consulting submits AV-120 every month. The data is provided by Body Corporate Power from their billing system. We confirm it was submitted for all revisions in the period covered by this audit.

#### Audit commentary

The graph below shows a comparison between volumes submitted and supplied (billed).



## 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

JC Consulting provided a set of submission files (AV140) for March'19 to Jan'20. GR-090 (missing ICPs) was reviewed for the same dates.

## Audit commentary

We compared volumes in HHRVOLS and HHRAGGR for the months Nov'19 to Jan'20. There were no differences between the volumes and aggregates.

Reconciliation Manager Functional Specification in section 3, described HHRAGGR as HHR submission information that is aggregated per ICP for the whole month.

There is a misalignment between the Code requirements and RM file specification. It is a problem well known to the Authority and is awaiting a resolution.

## Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Mar-19 To: 29-Feb-20	HHRAGGR files do not contain electricity supplied information Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Body Corporate Power submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an industry wide problem which we are aware of. Our submissions are via our Agent, we will monitor industry workflows and responses form EA		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Update RM file Specification to Align with EA Code Requirement		ongoing	

## 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

Body Corporate Power trades 4 HHR ICPs. Data is collected by EDM I (1002059115UNEE9) and FCLM. Compliance with this clause has been demonstrated by EDM I as part of its agent audit, which was reviewed during this audit.

#### Audit commentary

The data provided is daylight saving adjusted using the “trading period run on” technique. FCLMs compliance with this clause is covered by their MEP audit.

#### Audit outcome

Compliant

### 12.2. Creation of submission information (Clause 15.4)

#### Code reference

Clause 15.4

#### Code related audit information

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

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

#### Audit observation

JC Consulting calculates and provides reconciliation files on behalf of Body Corporate Power. At the time of audit reconciliation data is provided for both HHR and NHH ICPs.

#### Audit commentary

We checked the timing of file submissions and confirm that for Mar’19 to Jan’20 data was submitted in time.

Accuracy of submissions between HHRVOLS and HHRAGGR were checked in **section 11.4**.

#### 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

Data is provided monthly by MEPs and agents. All HHR and NHH data is screened by JC Consulting running different validations such as missing data, high values etc. The current month submissions are compared with last month submissions.

#### Audit commentary

JC Consulting thoroughly validates and checks volume data before submission files are sent to the reconciliation manager.

We compared consecutive submissions for Nov'18 and Dec'18 and found them to contain the same NSPs. The RM TOOL inserts zeros lines where an NSP has been included in a previous revision, but it is not present in the current revision. It could be caused by withdrawn switches.

#### 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

The LIS file was reviewed. Body Corporate 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

The LIS file was reviewed. Body Corporate 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

The LIS file was reviewed. Body Corporate Power is not a grid owner.

##### 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

All relevant revisions were submitted on day 13 by JC Consulting.

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

##### Audit commentary

No reconciliation files were submitted late to the reconciliation manager.

JC Consulting provided evidence that any updates to metering information are submitted to the reconciliation manager. On day 4 Body Corporate Power's own profile to calculate NHH submissions is used, they are replaced as soon as GR-030 is available (day 13)

##### 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 submits reconciliation files on behalf of Body Corporate Power. To assess compliance we reviewed GR-170NHH for the period Feb'18 to Dec'18.

##### Audit commentary

The analysis showed that Body Corporate Power replaced volume information by the 14 month revision cycle. Volume information was created using estimated readings and validated meter readings. For all reviewed months by revision 7 all estimated readings were replaced by historical estimates/actual.

##### 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)(b)):*
  - 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 apply to the raw meter data (clause 2(3)):*
  - a) *for each ICP, the compensation factor that is recorded in the registry (clause 2(3)(a))*
  - b) *for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(3)(b))*

### Audit observation

We reviewed submission files by JC Consulting for the audit period.

### Audit commentary

No ICPs with unmetered load are supplied. Body Corporate Power only used RPS, PV1, and HHR profiles; no certified control devices were used to create volumes. We crosschecked the registry file and reconciliation files for three months and confirm that volumes were submitted for all ICPs.

This audit identified a mismatch of submissions profile between the registry and submitted files for four ICPs. It was noted in the previous audit.

### 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**

To assess compliance we reviewed AV-080 for June'19 to Jan'20.

#### **Audit commentary**

We confirm that historical and forward estimates were included in all files 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 when actual read is not available.

#### **Audit commentary**

We asked JC Consulting to provide three examples of calculations relevant to Body Corporate Power in the audit period. According to the EDA files there were not many transactions which require calculation of historical estimates. Installations traded by Body Corporate Power are mainly read remotely.

The scenarios provided covered the following scenarios:

- Switching In
- Switching Out
- Meter change

We checked calculations and confirm their correctness.

#### **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

We reviewed the estimation process. The average daily consumption provided by a losing retailer is used by JC Consulting or daily average consumption from the previous read to read.

### Audit commentary

Using GR170NHH we checked variances between submission day 4 and day 13, the variances were negligible.

By revision 3 forward estimates are mostly replaced by historical estimates.

### 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

We examined the EDA file and the Audit compliance Report from the point of view of profile changes. The most common profile change is from RPS to RPS PV1 when export/import meter is installed. The final read from the removed meter is recorded in the RM TOOLS and used for reconciliation purposes.

### Audit commentary

According to the Audit Compliance Report, 6 profile changes occurred in the audit period. For any profile changes the validated meter reading was on the same day.

### 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

Body Corporate Power provided submission files for Mar'19 to Jan'20.

#### Audit commentary

We reviewed files and confirm that the format of submission files is compliant. We reviewed HHRVOLS and HHRAGGR in **section 11.4**. NHHVOLS were discussed in **section 12.9**.

#### 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

Body Corporate Power provided submission files for Mar'19 to Jan'20, which were reviewed.

#### Audit commentary

Submission information for NHH and HHR is rounded to two decimal places. It was discussed with the company 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

We reviewed GR-170NHH provided by the reconciliation manager covering submissions for Dec'18 to Nov'19, which covers files submitted in the audit period.

#### Audit commentary

The analysis of GR-170NHH showed that Body Corporate Power did not meet the historical estimates attainment requirements for revision 3 for Aug'19 (WRD0331) and Nov'19 (ALB0331).

#### Audit outcome

# Non-compliant

Non-compliance	Description		
Audit Ref: 13.3 With: 10 of Schedule 15.3 From: 01-Mar-19 To: 29-Feb-20	Historical estimates target not met for revision 3 for Aug'19 (WRD0331) and Nov'19 (ALB0331) Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. There is a solid, robust process to monitor data and create reconciliation files. Audit rating is assigned as low because historical estimates column in NHHVOLS is not used for reconciliation purposes.		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL trades a very limited number of ICPs. If meter cannot be read due to location (not accessible by WELLS) then we may need to seek customer reads to avoid estimates.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitor Read Files and seek Customer or Retailer Reads to avoid historical estimate targets.		1 <sup>st</sup> April 2020	

## CONCLUSION

### PARTICIPANT RESPONSE

#### **Summary:**

We agree with the Auditors assessment and to the recommendation to renew for a period of 12 months. We are interested in the EA's opinion of correct status for the situation at Crest Apartments which has resulted in 26 of the Risk Assessment Points. We would welcome any dialog from the EA on how we may have approached this differently regarding compliance. We would like to point out that our Risk Assessment Rating would have been 8 without the non-compliance caused by Crest Apartments.

#### **Background on Crest Apartments:**

Crest at 199 Great North Rd,

ICP # 1002065646LC59B (Retail)

ICP # 1002065647LC9DE (Common Area and Gate Meter during construction)

The network was originally scoped as a customer network. BCPL on transfer from BTS to permanent supply transferred the ICPs for Retail and Common Area to Nova Energy.

The switchboard for apartments was set up with 400KVA metering and CTs with all electricity flowing through certified ICP 1002065647LC9DE.

On December 4<sup>th</sup> Settlement (Occupiers of the building Settling) occurred and residents started moving in. BCPL noticed that volume through the Common Area meter did not match either Retail or Common Area Consumptions (from the invoices provided by Nova Energy).

BCPL was received data from FCLM from the submetering for each apartment, this volume was higher than what we had on the invoice.

On inspection BCPL identified that the meter setup was incorrect in both labelling and configuration. We immediately notified Vector, created 50 new ICPs and populated the registry as "installation in progress" as you cannot have two traders on a single ICP (Common Area).

Vector also relabelled the ICPs Retail and Common Area (previously retail had volume and Common was assumed to be the apartment gate meter) The retail area was temporarily disconnected on-site but volume was showing. In contrast Common Area has ceased recording volume so we knew that labels were wrong, both ICPs were with Nova Energy.

Once we had gained an understanding, we requested Vector to create new ICPs for 50 apartment installations.

At the time of audit volumes were not submitted to the reconciliation manager for the 50 "sub-meters".

To remedy the situation BCPL requested Vector to reset the ICP creation dates to 01/08/2019 and will assign the status "Active" so that all volumes will be submitted to the reconciliation manager.