

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**



For

UNISON NETWORKS LIMITED
NZBN: 9429038928437

Prepared by: Steve Woods, Veritek Limited

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Audit report due date: 04-Nov-21

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EXECUTIVE SUMMARY

This Distributor audit was performed at the request of **Unison Networks (Unison)**, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was carried out at Unison's premises in Hastings, on October 6th, 2021.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.1, which was produced by the Electricity Authority.

The audit found ten non-compliances. Whilst this is an increase from the last audit, it's worth mentioning that the non-compliances in **sections 3.4, 3.6 and 3.7** are duplicates and all relate to the same events, which were identified as on-off issues and only related to two ICPs. Incorrect NSP information is recorded twice, in **sections 2.1 and 4.2**. Two of the non-compliances relate to new clauses in the Code, regarding provision of information on Utilities Disputes and management of control device sealing information.

The controls observed during the audit continued to be strong in most areas.

The main outstanding action is to resolve system issues leading to the recording of incorrect NSPs:

- ensure NSPs are accurate and that NSP changes are updated to the registry in a timely manner, and
- continue with improvement actions regarding registry population timeliness.

The next audit frequency table indicates that the next audit be due in 12 months. I agree with this recommendation.

The matters raised are shown in the tables below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1)	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Strong	Low	1	
Removal or breakage of seals	2.3	48(1A) and 48(1B) of Schedule 10.7	Seal information is not recorded and is not traceable to the person fitting the seal. MEPs are not notified when seals are broken.	Moderate	Low	2	
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities Disputes information not provided during phone calls.	Strong	Low	1	
Participants may request distributors to create ICPs	3.2	11.5(3)	Two ICPs not created within three business days and notification not provided to the participant.	Strong	Low	1	
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Registry not updated prior to commencement of trading for two ICPs.	Strong	Low	1	
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late population of the initial electrical connection date for 80 ICPs (4%).	Strong	Low	1	
Connection of ICP that is not an NSP	3.6	11.17	One ICP connected prior to proposed trader being recorded in the registry.	Strong	Low	1	

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Connection of ICP that is not an NSP	3.7	10.31	One ICP connected without a request from a trader.	Strong	Low	1	
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were updated more than three business days after the event date.	Moderate	Low	2	
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	10 ICPs with an incorrect NSP recorded.	Moderate	Low	2	
Future Risk Rating						13	

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

RECOMMENDATIONS

Subject	Section	Clause	Recommendation

ISSUES

Subject	Section	Issue	Description
		Nil	

1.3. Persons involved in this audit

Auditor:

Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Unison Networks personnel assisting in this audit were:

Name	Title
Clarissa Bevins	Customer Provisioning Specialist
Corrina Graham	Customer Delivery Administrator
Jason Larkin	Commercial Manager
Raewyn Holloway	Customer Billing Specialist
Amanda Ward	Customer and Compliance Administrator

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

All activities are completed directly by Unison.

1.5. Supplier list

All activities are completed directly by Unison.

1.6. Hardware and Software

Gentrack is used to create ICPs and interface with the registry. Unison's GIS is Small World, and ADMS is used for real time network monitoring.

System backups are conducted in accordance with Unison's Operational Security Standard which is reviewed by Audit NZ each year.

The frequency and extent of backups is determined by the importance of the information, potential impact of data loss/corruption, and risk management decisions by the system or data owner.

At a minimum, all on premise systems are backed up utilising snapshot technology daily:

- an incremental backup is daily (Monday to Thursday) with 14 days retention,
- a full backup is weekly (Friday) with four weeks retention, and
- a full backup is monthly (First Weekly Backup of Each Month) with seven years retention.

1.7. Breaches or Breach Allegations

The Electricity Authority confirmed that there have been no alleged breaches related to this audit scope for Unison for the audit period.

1.8. ICP and NSP Data

Unison owns and operates the electricity networks in the Hawke's Bay, Taupo, and Rotorua regions.

The table below lists the relevant NSPs and their associated balancing area, and the number of active ICPs connected.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
HAWK	ATI0112	ATIAMURI	ROT0111	HAWK	TAUPROTHAWKG	NP	1/05/08	0
HAWK	FHL0331	FERNHILL			MAGPIESHAWKG	G	1/05/08	16,068
HAWK	OWH0111	OWHATA			TAUPROTHAWKG	G	1/05/08	5,697
HAWK	RDF0331	REDCLYFFE			MAGPIESHAWKG	G	1/05/08	23,583
HAWK	ROT0111	ROTORUA			TAUPROTHAWKG	G	1/05/08	10,389
HAWK	ROT0331	ROTORUA			TAUPROTHAWKG	G	1/05/08	12,463
HAWK	TRK0111	TARUKENGA			TAUPROTHAWKG	G	1/05/08	3,345
HAWK	WRK0331	WAIRAKEI			TAUPROTHAWKG	G	1/05/08	17,521
HAWK	WTU0331	WHAKATU			MAGPIESHAWKG	G	1/05/08	25,210

Unison does not own any embedded networks but has two networks embedded on their network. No embedded networks had start or end dates during the audit period. The embedded networks are detailed in the table below and are discussed in the relevant sections of this report.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date
SMRT	HPL0011	ST AUBYN ST EAST HASTINGS	WTU0331	HAWK	HPL0011SMRTE	E	1/12/2017
TENC	TWQ0011	14 WEST QUAY AHURIRI NAPIER	RDF0331	HAWK	TWQ0011TENGE	E	1/08/2016

A list file detailing the ICP statuses was provided:

Status	Number of ICPs (2021)	Number of ICPs (2019)	Number of ICPs (2018)
New (999,0)		0	3
Ready (0,0)	261	247	183
Active (2,0)	114,276	112,199	111,537
Distributor (888,0)	2	2	2
Inactive – new connection in progress (1,12)	240	177	148
Inactive – electrically disconnected vacant property (1,4)	1,610	1,560	1518
Inactive – electrically disconnected remotely by AMI meter (1,7)	386	430	315
Inactive – electrically disconnected at pole fuse (1,8)	23	18	18
Inactive – electrically disconnected due to meter disconnected (1,9)	46	39	32
Inactive – electrically disconnected at meter box fuse (1,10)	19	17	16
Inactive – electrically disconnected at meter box switch (1,11)	12	14	10
Inactive – electrically disconnected ready for decommissioning (1,6)	23	32	39
Inactive – reconciled elsewhere (1,5)	1	1	-
Decommissioned (3)	10,530	9,991	9708

1.9. Authorisation Received

An authorisation email was provided.

1.10. Scope of Audit

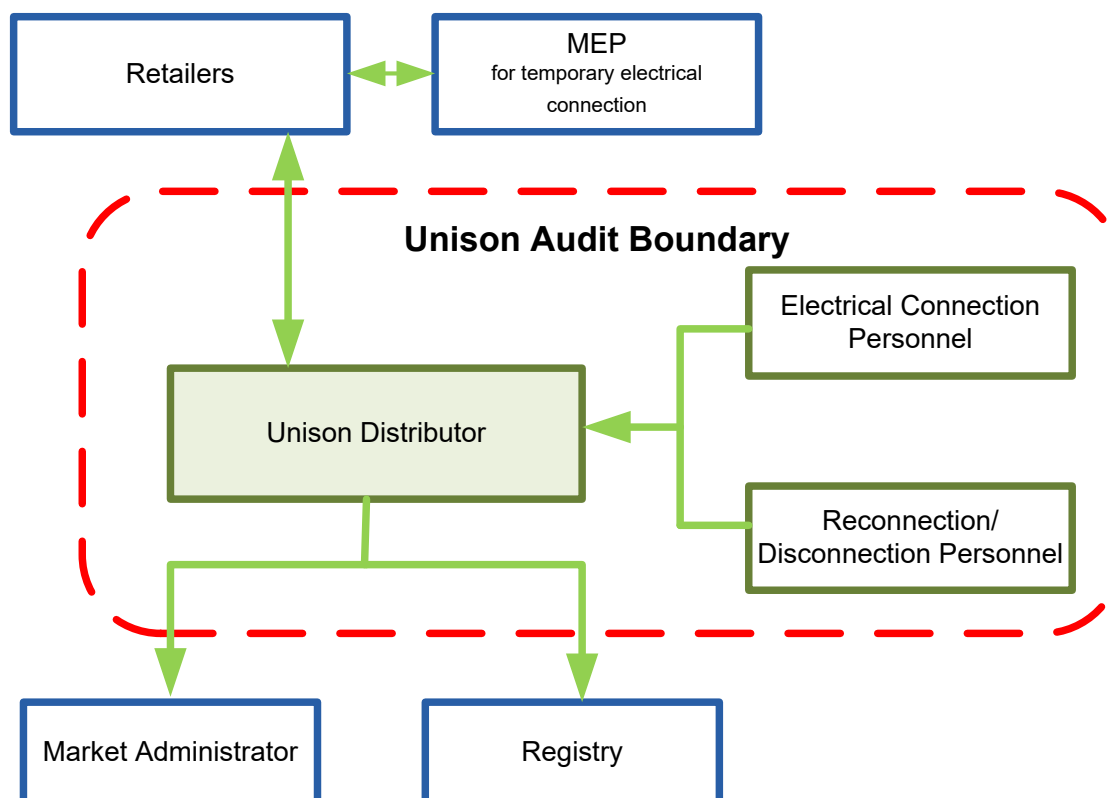
This Distributor audit was performed at the request of Unison, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V16, which was produced by the Electricity Authority.

The table below shows the tasks under clause 11.10(4) of Part 11, which Unison is responsible for. There are no other contractors who assist with these tasks:

Functions Requiring Audit Under Clause 11.10(4) of Part 11	Contractors Involved in Performance of Tasks
The creation of ICP identifiers for ICPs.	Nil
The provision of ICP information to the registry and the maintenance of that information.	
The creation and maintenance of loss factors.	

The scope of the audit below is shown in the diagram below:



1.11. Summary of previous audit

The April 2020 audit was completed by Steve Woods of Veritek Ltd. The audit found six non-compliances and made one recommendation. The matters raised are detailed in the table below:

Subject	Section	Clause	Non-compliance	Status
Requirement to provide complete and accurate information	2.1	11.2(1)	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Still existing
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Registry not updated prior to commencement of trading for five ICPs.	Still existing
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late population of the initial electrical connection date for 61 ICPs (7%).	Still existing
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	Still existing
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	Seven ICPs with an incorrect NSP recorded.	Still existing
ICP location address	4.4	2 Schedule 11.1	One ICP does not have a physical address unit number, street number, detailed property name or GPS coordinates to allow it to be readily located.	Cleared

Subject	Section	Clause	Recommendation	Status
Unmetered load	4.6	clause 7(1) Schedule 11.1	Check unmetered load details for ICPs 0000035631HR7FB, 0000036054HB907 and 0000036055HB542.	Cleared

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

I walked through the process to ensure that registry information is complete, accurate and not misleading or deceptive, including viewing reports used to resolve discrepancies.

The audit compliance reports from 1 February 2020 to 6 September 2021 were examined to confirm compliance.

Audit commentary

Unison runs a set of registry discrepancy reports on a monthly basis. They also monitor the notification files coming back from the registry on a daily basis.

As recorded in **section 4.2**, there were 10 ICPs identified with incorrect NSPs recorded. This is a slight increase from the seven recorded during the last audit.

No other information errors were identified.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 01-Feb-20 To: 06-Sep-21	Not all practicable steps are taken to ensure that the information provided is complete and accurate. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	The registry discrepancies processes are robust, and the number of discrepancies was low. The inaccurate information has a small impact on other participants and on settlement, therefore the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
The four remaining ICP's showing on incorrect GXP's have now been corrected in the Registry	20/10/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will work with our IT team to identify whether there are further automated controls that can be put in place.	To be determined based on complexity of any solution.	

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

Unison's data management processes were examined. The registry list file and audit compliance report as of 6 September 2021 were examined to confirm compliance.

Audit commentary

Unison has processes in place to identify and resolve registry discrepancies as described in **section 2.1**. I saw evidence of incorrect information being corrected during the audit.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

- *notify the metering equipment provider and trader*

Audit observation

Processes for removal or breakage of seals were reviewed. I checked five recent examples.

Audit commentary

When fault work is required during normal business hours, the normal process is that the trader's contractor conducts the necessary work, which may involve bridging of load control switches. Unison may be requested to conduct this work after hours, and as they fit their own seals, then notification is provided to the trader so they can arrange for the MEP to complete remedial actions and re-certify if required.

Whilst this is a long-standing process and appears to be an effective way of dealing with fault work, the Code now has additional requirements which are not met by this process. These requirements are:

- to have a process for tracing the new seal to the person fitting the seal - seal details are not currently recorded in the metering report, and
- to notify the MEP and the trader - the trader is notified but the MEP is not notified.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.3 With: Clause 48(1A) and 48(1B) of Schedule 10.7 From: 01-Feb-21 To: 06-Oct-21	Seal information is not recorded and is not traceable to the person fitting the seal. MEPs are not notified when seals are broken. 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 recorded as moderate because control devices are sealed, and notification is provided to the MEP via the trader. Minor process modifications will ensure compliance. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not Applicable		Not Applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are aware of the new requirements and will implement necessary education for faults staff on these regulations.		Within the next two months.	

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

I checked all relevant communication methods to ensure compliance is achieved.

Audit commentary

The website contains a page with the Utilities Disputes contact details. This page is accessed from a link on the home page.

Outbound communications to consumers contain appropriate details. I checked three different types of communication to confirm this.

The IVR messages for the general and faults lines are planned to be updated to include reference to Utilities Disputes. The update is planned for October 20th, 2021.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11.30A From: 01-Apr-21 To: 05-Oct-21	Utilities Disputes information not provided during phone calls. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong at the time the audit was finalised, because Unison had specific plans in place to resolve this at the time of the audit. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The IVR is now in place		4/11/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Not applicable	Not applicable	
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3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process was examined in detail and is described in **section 3.2**.

A diverse characteristics sample of 15 new connection applications of the 2,522 created since 1 February 2020 were checked from the point of application through to when the ICPs were created.

Audit commentary

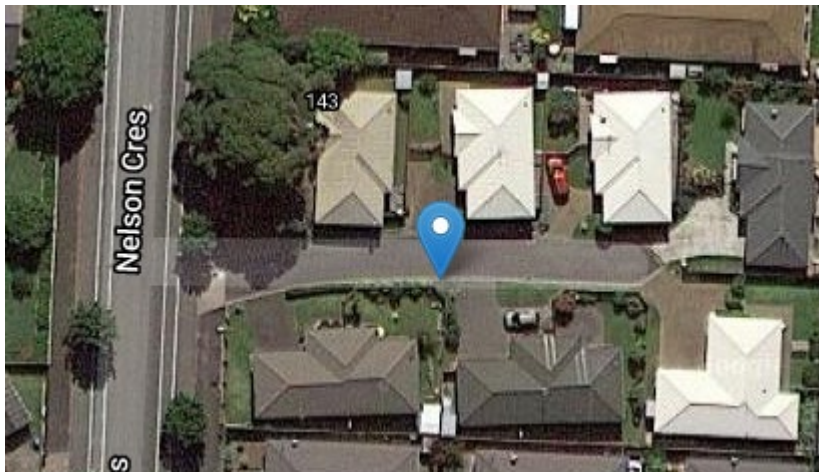
Unison creates ICPs as required by clause 1 of schedule 11.1.

During previous audits, it was recorded that the Napier City Council DUMML database contained private lights and that reconciliation was not occurring for these items of load. Further investigations by Unison have confirmed some lights are definitely owned by Council and these have been put back into the Council's database. Some were confirmed as metered, and no further action is required. One ICP has had unmetered load added. I investigated two examples (four lights in total), to determine whether shared unmetered load ICPs needed to be created. The first example was three lights on a private right of way off Barton Place, as shown in the picture below.



Unison confirmed the streetlight circuit does not extend up this right of way, therefore these lights are not connected to Unison's network. The definition of "shared unmetered load" is "...unmetered load at a single point of connection that is distributed across more than one ICP". The definition of a "point of connection" is "...a point at which electricity may flow into or out of a network...". The lights are not fed from a "point of connection" because they are not connected to Unison's network, therefore they cannot be considered "shared unmetered load". This will be raised with Napier City Council during the next distributed unmetered load audit scheduled for December 2021.

The next example is a light on a private right of way off Nelson Crescent.



Unison provided correspondence from 1994 between the developer and Napier City Council confirming that Napier City Council would be responsible for the ongoing costs of the light. The developer was required to make a one-off contribution to these costs. I therefore do not consider this light is "shared unmetered load".

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

The new connection process was examined in detail. A diverse characteristics sample of 15 new connection applications of the 2,522 created since 1 February 2020 were checked from the point of application through to when the ICPs were created.

Audit commentary

Unison receives all applications for new connections from customers or their agents. All applications are completed online and are received via a dedicated inbox. Upon receipt of the application, it is reviewed and then forwarded to the nominated trader to accept the nomination. The process once the application is received is unchanged with these being managed within Gentrack, attaching all associated documentation to the relevant ICP, and creating a robust audit trail. Gentrack will not allow ICPs with

duplicate addresses to be created. ICPs are created at the “ready” status unless there is network extension required. In these cases, they are created at the “new” status. The ICP’s are not created until all the relevant details have been provided. New ICPs are electrically connected by a Unison approved connection agent engaged by the trader. Unison issues an authority to electrically connect the ICP to the agent, and a "certificate of livening" is returned to Unison by the livening agent.

If an ICP cannot be created within three days of the acceptance from the trader being received an email is sent to the trader advising of the reason for the delay.

I checked the records for 15 new connections. five were created within three business days. 10 were created later than three business days, and normally notification would be provided with the reasons the ICP cannot be created immediately, but for ICPs 0000047096HB574 and 0000048249HB48F, the notifications were not available.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 11.5(3) From: 11-Mar-20 To: 11-Sep-20	Two ICPs not created within three business days and notification not provided to the participant. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong; these two notifications appear to be one-off issues and it’s also possible the notifications were sent but merely cannot be located. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not applicable		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Being more vigilant with correspondence from Retailers and Electricians to prevent time breaches. Better recording of notifications.		Ongoing. Review 2022 audit.	

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

A diverse characteristics sample of 15 new connection applications of the 2,522 created since 1 February 2020 were checked from the point of application through to when the ICP was created, to confirm the process and controls worked in practice.

Audit commentary

The new connection application form is online and includes all the relevant fields to populate the registry including unmetered load details.

A review of the sample of new connections confirmed that the ICP information provided to the registry by Unison was complete, including unmetered load details.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The event detail report for 1 February 2020 to 6 September 2021 was examined to determine the timeliness of the provision of ICP information for new connections. The audit compliance reporting was also examined.

Audit commentary

The distributor must provide to the registry the information listed in clause 7(1) of schedule 11.1 as soon as practicable, and before electricity is traded at the ICP.

2,522 new ICPs were created since 1 February 2020. Of those, 2,057 have been completed and connected. I reviewed these completed new connections to identify ICPs where information was provided late. There were two examples where the status change to “ready” occurred later than the electrical connection date. The details are shown in the table below.

ICP	Ready input date	Electrical connection date	Comments
0000046673HRD82	14/01/2020	10/01/2020	The field technician inadvertently electrically connected the incorrect ICP.

0000046772HB066	05/03/2020	21/02/2020	The ICP was created at “new” to allow the MEP to issue CTs (the MEPs internal process requires an ICP to issue CTs). The ICP was then electrically connected without Unison’s knowledge or approval.
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Unison has strong controls in place to ensure the new connections process operates as expected. The two issues above were exceptions caused by other parties however non-compliance still exists.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Jan-20 To: 05-Feb-20	Registry not updated prior to commencement of trading for two ICPs. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because most registry updates occurred on time. The audit risk rating is low because the status changes occurred as soon as Unison became aware of the issues.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will request a reminder to our authorised contractors at their next review to ensure they are only livening as per the authorisation that has been given by us.		Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The event detail report, audit compliance report and the registry list for 1 February 2020 to 6 September 2021 were examined to determine the timeliness and accuracy of initial electrical connection dates for the 2,057 completed new connections.

- The 11 updates over 20 days were checked to determine the reasons for the delay.
- The audit compliance report was checked for ICPs with an IECD populated, where the status was not “active”. Two examples were identified, and in both cases, the IECD was correct, and the traders have now updated the status to “active”.

Audit commentary

Unison expects a “certificate of livening” to be returned to them by the livening agent for each new connection. Once this is received the registry is updated. They also monitor the registry for any “active” status updates and there is an additional check as part of the registry discrepancy process.

The 2,057 completed new connections were reviewed:

- 1,977 (96%) had initial electrical connection dates updated within ten business days, and
- 80 (4%) had initial electrical connection dates populated more than ten business days after initial electrical connection; of those, 11 were populated later than 20 business days of connection.

11 updates over 20 days were checked to determine why they were late. Nine were due to late notification from livening agents and in two cases, there was no notification at all so the trader’s “active” date was used. Unison implemented a “Digital Livening Certificate” with all livening agents so that paperwork is completed on site. This has improved the level of compliance. An additional control is that there is a daily report of changes to “active” where a livening certification has not been received and the IECD is populated based on this information, then is checked against the livening certificate when it arrives. Contact is made with relevant livening agents for ICPs where the certificate should have been received.

I checked all currently active ICPs created since the requirement to record an initial electrical connection date was introduced, and found they had all had initial electrical connection dates recorded.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Feb-20 To: 06-Sep-21	Late population of the initial electrical connection date for 80 ICPs (4%). Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	Controls are rated as strong. Improvements were made during the audit period and the percentage compliance has improved to 96%. The potential impact is low, of the 80 late updates, 11 were updated later than 20 business days of the initial electrical connection date.

Actions taken to resolve the issue	Completion date	Remedial action status
We obviously need to reinforce with the livening agents the importance of providing the appropriate paperwork in a timely fashion.	Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The new connection process was examined in **section 3.2**.

The event detail file and registry list were examined to determine compliance.

Audit commentary

The new connection process requires applications for new connections to be submitted by traders.

Review of the registry list confirmed that a trader is currently recorded for all active and inactive ICPs, and no shared unmetered load is recorded on Unison's network.

I reviewed the 2,057 completed new connections on the event detail report to identify ICPs where information was provided late. All ICPs had a proposed trader populated prior to connection, except for one (ICP 0000046673HRD82) which is discussed in **section 3.4**, where connection occurred without a proposed trader being recorded in the registry because the incorrect ICP was connected.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.6 With: Clause 11.17 From: 01-Jan-20 To: 05-Feb-20	One ICP connected prior to proposed trader being recorded in the registry. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because connection occurred without Unison's knowledge for this ICP because the incorrect ICP was connected. The audit risk rating is low because registry updates occurred as soon as Unison became aware of the issues.		
Actions taken to resolve the issue		Completion date	Remedial action status
Same situation as Clause 3.4 "We will request a reminder to our authorised contractors at their next review to ensure they are only living as per the authorisation that has been given by us."		Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The new connection process was examined in **section 3.2**. A diverse characteristics sample of 15 new connection applications of the 2,057 created and connected since 1 February 2020 were checked to determine if the ICPs were connected at the request of the trader.

Audit commentary

The new connection process requires acceptance of applications for new connections from traders prior to the creation of the ICP.

As recorded in **section 3.6**, one ICP was connected in error without a request by the trader. This is a one-off issue and only occurred once during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.7 With: Clause 10.31 From: 01-Jan-20 To: 05-Feb-20	One ICP connected without a request from a trader. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because connection occurred without Unison's knowledge for this ICP because the incorrect ICP was connected. The audit risk rating is low because registry updates occurred as soon as Unison became aware of the issues.		
Actions taken to resolve the issue		Completion date	Remedial action status
Same comments as per Clause 3.4 "We will request a reminder to our authorised contractors at their next review to ensure they are only living as per the authorisation that has been given by us."		Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

advising all traders would impose a material cost on the distributor, and in the distributor's reasonable opinion, the advice would not result in any material benefit to any of the traders.

Audit observation

The new connection process was examined in **section 3.2**. The event detail file and registry list for 1 February 2020 to 6 September 2021 were examined to determine compliance.

Audit commentary

Unison's processes are robust in relation to this clause as an ICP will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP. No temporarily connected ICPs were identified.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

The distributor must, within five business days of connecting the NSP that is not a point of connection to the grid, advise the reconciliation manager of the following in the prescribed form:

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

Audit observation

The NSP table was reviewed.

Audit commentary

No new NSPs were created by Unison during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

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

A distributor may only electrically connect an NSP if:

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

Audit observation

The NSP table was reviewed.

Audit commentary

No new NSPs were created by Unison during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

xxxxxxxxxxccc where:

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

Audit observation

The process for the creation of ICPs was examined.

Audit commentary

ICP numbers are created in Gentrack. The process for the creation of ICPs was examined, and all ICPs are created in the appropriate format.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The process of allocation of the loss category was examined.

The list file as of 6 September 2021 was examined to confirm all active ICPs have a single loss category code.

Audit commentary

Loss factors are determined from the information provided on application for a new connection.

The registry list was examined and all active and inactive ICPs have a single loss category code. Each loss category code clearly identifies the relevant loss factor.

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

The ICP creation process was reviewed. The event detail file and registry list for 1 February 2020 to 6 September 2021 were examined to determine compliance.

Audit commentary

Unison creates all ICPs at “ready”, unless they know a network extension is needed.

No ICPs currently have “new” status recorded. 22 were created at “new” during the audit period and this status was confirmed as correct. Monitoring of ICPs with the “new” and “ready” status is discussed in **section 3.14**.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

The process to monitor ICPs at “new” and “ready” status was reviewed. The audit compliance report for 1 February 2020 to 6 September 2021 was examined to determine compliance.

All ICPs with “new” or “ready” status for more than 24 months were investigated to confirm whether the correct status was applied, and whether compliance is achieved.

Audit commentary

ICPs at the “new” and “ready” statuses are checked periodically and an email is sent to each trader to request confirmation the ICP is still required.

Examination of the registry list found:

Status	Number of ICPs at status as of 6 September 2021	Number of ICPs at status for more than 12 months	Number of ICPs at status for more than 24 months
New (999,0)	-	-	-
Ready (0,0)	261	52	18

All ICPs at ready status for more than 24 months were checked, and I found the oldest creation date was 11 February 2016. Unison have contacted the trader for all:

- 12 have been confirmed as still required by the trader, and
- six have since been confirmed to be no longer required and have been “decommissioned - set up in error”.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The registry list for 1 February 2020 to 6 September 2021 was examined to determine compliance.

Audit commentary

No new embedded generation stations with capacity greater than 10 MW were connected during the audit period.

Unison supplies two embedded generation stations with a capacity of 10 MW or more. Both have individual loss categories, which were not assigned to any other ICPs during the period.

ICP	Generation start date	Loss Category
0000018218HRB13	21/08/2009	CBTPO
0000962306TU084	1/04/2007	RKTPO

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

Sub-clause (4) states that no participant may electrically connect a point of connection without the permission of the Reconciliation Participant. The electrical connection of streetlight circuits, which are a point of connection, was examined.

Audit commentary

The connection of streetlight circuits was discussed. Unison requires the new connection process to be used for newly electrically connected streetlight circuits. The process identifies the relevant ICP and includes approval from the trader. I checked a recent example to confirm the process was robust and was used correctly.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

The disconnection process was examined.

Audit commentary

Unison will only undertake an electrical disconnection when a request is received from a trader, or for safety. In both instances Unison will liaise with the relevant trader.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

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

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

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

Audit observation

Processes for meter bridging were reviewed. Two recent examples were checked.

Audit commentary

Unison bridge meters very rarely and only after all the conditions detailed above are met. In the rare instance when this occurs, the trader is advised of the bridging via email with all the relevant details as part of the work being closed out. In both cases checked, the meters were faulty and were bridged to ensure consumers were not disadvantaged. Traders were notified the next day.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

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

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

Audit observation

The management of registry updates was reviewed.

The event detail report and audit compliance report for 1 February 2020 to 6 September 2021 was reviewed to determine compliance. A diverse sample of 39 backdated events were reviewed to determine the reasons for the late updates.

There were no late NSP changes.

Audit commentary

When information that is held by the registry changes, the distributor responsible for that ICP must provide notice to the registry of that change within three business days of that change taking effect. The event detail reports were examined to identify backdated event updates.

Address events

There were three late address updates. 99.95% of address updates were compliant. All three late updates resulted from traders asking Unison to reverse their address event so that the trader could change a status for a prior date. It doesn't seem correct that the registry will not allow a status to be changed without the reversal of an address event. This has been raised with the retailer concerned.

Network events (Distributed Generation)

There were 26 late updates to distributed generation fields. 97.64% of updates were on time and the average business days to supply updates was 0.55. I checked 12 examples and the main reason for late updates was late notification from the field or corrections to event dates. The expected connection date is used as the event date and if the completion notification has a different date, the event date is corrected.

Network events

There were three late network events, excluding NSP and DG changes. One was the removal of unmetered load and two were changes to the proposed trader.

Pricing events

22,771 pricing updates were identified. 6,234 of these (27%) were updated more than three business days after the event. 213 (0.9%) were updated more than 30 business days after the event. The ten latest updates were reviewed, and I found:

- two were late requests from traders,
- three were late notifications of the installation of DG, and
- five were late notification of upgrades or downgrades; three were completed without Unison's knowledge.

I also checked five late updates where the updates were 20 to 23 business days. These were all late notification of the installation of DG.

Status events

Unison is notified of ICPs ready for decommissioning via requests received from traders. The work is then issued to an approved contractor. Once the paperwork has been received back from the contractor, Unison requests the trader to move the ICP to "inactive - ready for decommissioning" status and will decommission the ICP once it is at that status. Unison expects traders to notify them once the status has been changed and they also monitor ICPs being moved to the "inactive - ready for decommissioning" status and follow up with the trader if no request to decommission has been received.

40 status updates were later than three business days from the date the trader changed the status to "ready for decommissioning". Compliance was 92.98% and the average days to update the registry was 2.21 business days. I checked 16 examples and in all cases the issue was late notification to Unison by traders.

Change of NSP

Reporting is in place for NSP changes, which shows differences between the "advanced data management system" and Gentrack. This reporting shows the number of days the difference is present to ensure registry updates occur on time. No late NSP updates were identified.

The backdating of events to the registry is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Feb-20 To: 06-Sep-21	Some price, network, status, and address changes were updated more than three business days after the event date. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison requested a change to the Code regarding the 3 day notification period for Pricing Events several years ago but clearly nothing has happened in this regard. Many of the late changes are requested by the retailer and we have agreed to make the changes.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		N/A	

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

Code reference

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

Code related audit information

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

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

Audit observation

The process to determine the correct NSP was examined. The audit compliance report was checked, and 52 outliers were checked where the other ICPs on the same road were recorded against a different NSP.

Audit commentary

I compared the list of 52 potential discrepancies against the findings from the last audit and I eliminated 38 ICPs, leaving 14 to be checked. Four were confirmed as being on the correct NSP. 10 were confirmed as incorrect and six have been updated.

Each ICP application is checked in the GIS and the correct transformer is selected in Gentrack based on the geographical connection point. Sometimes transformers are not set up in Gentrack and the incorrect transformer is therefore selected. There is a known issue with connectivity between the advanced data management system, GIS and Gentrack which is leading to some of these discrepancies.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 01-Feb-20 To: 06-Sep-21	10 ICPs with an incorrect NSP recorded. 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 rather than strong because there is a system issue needing resolution to ensure NSPs are correct. The audit risk rating is low as only 10 ICPs were found to be mis-mapped and none were in the incorrect balancing areas.		
Actions taken to resolve the issue		Completion date	Remedial action status
All the incorrect entries have now been corrected		20/10/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to work with our IT department to resolve issues going forward.		N/A	

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was examined.

Audit commentary

Unison seldom receives direct requests for ICP identifiers. ICP identifiers can be provided immediately on request once the address has been confirmed.

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The process to determine correct and unique addresses was examined. The registry list as of 6 September 2021 was reviewed to determine compliance for all active and inactive ICPs.

Audit commentary

Duplicate addresses

A check is performed in GIS and Gentrack to confirm that new addresses created are not duplicates. Analysis of the registry list did not identify any active ICPs with duplicate addresses.

Not readily locatable

All ICPs with a blank street number or property name have GPS coordinates recorded and can therefore be located.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process was discussed.

Audit commentary

For new connections, this clause is well understood and there are no shared service mains on the Unison network.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

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

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

Audit observation

The management of registry information was reviewed. The registry list as of 6 September 2021 was reviewed to determine compliance.

A typical sample of data discrepancies were checked.

Audit commentary

Registry data validation processes are discussed in **section 2.1**. All ICP information was checked and confirmed compliant unless discussed below.

NSPs

Assignment of NSPs was reviewed in **section 4.2**.

Installation type and generation details

The distributed generation process has not changed during the audit period. Unison requires an application from any customers wanting to connect distributed generation. The application has a proposed connection date, which is entered into Gentrack and therefore the registry. Once installation is complete, Unison receives paperwork back from the field and Gentrack is then changed if the date is different to that proposed. As noted in **section 4.1**, paperwork can be slow in being returned. Unison runs a monthly check of all ICPs that have a distributed generation profile where Unison has no distributed generation recorded. Additional to this the EIEP files are monitored to identify any ICPs where generation is recorded but where Unison has no distributed generation is recorded. All such instances are investigated. All pending applications are managed on an aging basis to ensure these are being updated as soon as possible.

Analysis of the registry list confirmed there are 2,456 ICPs with generation capacity recorded, an increase from 1,676 last year. All ICPs with generation capacity have a fuel type and installation type of "B" or "G" recorded on the registry.

There were 18 ICPs with a generation profile and no generation capacity recorded by Unison; these were examined, and I found:

- nine ICPs have had their solar installations removed,
- solar applications have not been received for six ICPs and the EIEP files do not indicate generation is present, and
- three ICPs do not have solar installed, the trader's profile is incorrect.

Unison has good controls in place in relation to the management of distributed generation.

Unmetered load

Part 11 states the distributors must provide unmetered load type and capacity of the unmetered load to the registry “if known”.

Review of the registry list identified 173 active ICPs with unmetered load recorded by the trader and no unmetered load recorded by Unison, a decrease from 193 identified during the previous audit. These are all historic. Unison is populating these in the recommended format if the load can be confirmed.

For all active ICPs with unmetered load recorded by Unison, the trader also has unmetered load details populated.

I checked the accuracy of the unmetered load details recorded by Unison against the trader’s unmetered load details for the 176 ICPs where Unison’s field was populated in the recommended format.

Four ICPs had a difference greater than ± 0.1 kWh. Unison’s field was correct for two and corrections were made for the other two to match the trader’s field.

Initial Electrical Connection date

The importance of this information has been communicated to Unison’s approved livening agents as part of regular roadshows.

I reviewed all completed new connections on the event detail report to confirm whether an initial electrical connection date was recorded, and if the date was consistent with the dates populated by the trader and MEP.

I checked all 23 ICPs where Unison’s date was different to the active date and the certification date, where these two dates were the same. In all cases documentation was provided confirming the IECD was correct.

The list file was checked since part ten came into effect for any active ICPs that have no initial electrical connection date recorded. No examples were identified.

Compliance is recorded because no data was identified as missing.

Audit outcome

Compliant

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

The management of registry information was reviewed. The event detail report and audit compliance report for 1 February 2020 to 6 September 2021 were reviewed to determine compliance.

Audit commentary

I reviewed all completed new connections in the audit compliance report and found all had a pricing category entered within 10 days of being electrically connected.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The registry list as of 6 September 2021 was reviewed to determine compliance. GPS coordinates were mapped for a sample of 100 ICPs to determine their accuracy.

Audit commentary

Only 228 ICPs do not have GPS coordinates.

Where Unison have populated GPS coordinates, these are provided in the correct format.

Audit outcome

Compliant

4.9. Management of “ready” status (Clause 14 Schedule 11.1)

Code reference

Clause 14 Schedule 11.1

Code related audit information

The ICP status of “Ready” must be managed by the distributor and indicates that:

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

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

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

Audit observation

The processes to manage the ready status were reviewed.

The registry list as of 6 September 2021 was reviewed to identify and check ICPs at the “ready” status. A diverse sample of ten ICPs at “ready” status were checked.

Audit commentary

Unison creates all ICPs at the “ready” status, unless they know a network extension is needed.

The registry list showed 261 ICPs currently at “ready” status, 18 of those have been at “ready” status for more than two years and are discussed further in **section 3.14**. All had a single price category assigned and proposed trader identified.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

The registry list as of 6 September 2021 was reviewed to identify ICPs at distributor status. All ICPs with distributor status were reviewed.

Audit commentary

Unison supplies two ICPs with distributor status; they are points of connection between the embedded networks and Unison’s network. Both have an LE ICP recorded on the registry.

There is no shared unmetered load recorded in the registry.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The registry list as of 6 September 2021 was reviewed to identify ICPs at “decommissioned” and “ready for decommissioning” status. All 23 ICPs at “ready for decommissioning”, and 16 “decommissioned” ICPs were checked.

Audit commentary

The decommissioning process is discussed in **section 4.1**. Reporting in place to identify ICPs at the “inactive - ready to be decommissioned” status and this is checked regularly to identify any ICPs that traders have moved to this status but for which Unison have received no request. The volume of ICPs at this status has reduced from 32 in the last audit to 23.

Analysis of the 23 ICPs at the “ready for decommissioning” status found the following:

- six are now decommissioned,
- 10 are awaiting completion paperwork,
- two do not appear to be ready for decommissioning, and
- there is no correspondence from the trader for five ICPs.

The following table shows a breakdown of ICPs by year.

Ready for decommissioning since	ICP count
2015	2
2019	2
2020	2
2021	11

Late updates to decommissioned status are recorded as non-compliance in **section 4.1**.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

The price category code table on the registry was examined.

Audit commentary

Four new pricing codes were entered on 18 January 2021 with a start date of 1 April 2021. The required notification time was met.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 Schedule 11.1

Code related audit information

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

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

A loss category code takes effect on the specified date.

Audit observation

The loss category code table on the registry was examined.

Audit commentary

No new loss category codes have been created during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

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

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

Audit observation

The loss category code table on the registry was examined.

Audit commentary

The following loss category codes had their consumption loss factor adjusted effective from 1 April 2021:

- CBTPO,
- H3H,
- H3L,
- H3M,
- R3M,
- R3H, and
- R3L.

The generation loss factors were updated for CBTO, R3N and RKTPO.

In all cases, notification was provided on 19 January 2021 and only one loss factor applied per month.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

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

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

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

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

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

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

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

Audit observation

The NSP table was examined.

Audit commentary

No NSPs have been created or decommissioned during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

No NSPs have been created or decommissioned during the audit period.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

No balancing area changes have occurred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

Unison has not created any new embedded networks during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

No balancing area changes have occurred during the audit period for Unison's NSPs.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

No existing ICPs became NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

The NSP supply point table was examined, along with evidence of all updates made to the Reconciliation Manager via the portal.

Audit commentary

The NSP supply point table was reviewed, and it showed the following interconnection point certification expiry has not changed.

Distributor	NSP POC	Description	MEP	Old certification Expiry	New certification expiry
HAWK	ATI0112	ATIAMURI	MRPL	26/07/23	-

The certification expiry date is correct.

Audit outcome

Compliant

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

- no later than five business days after the date of certification of each metering installation, advise the reconciliation manager of
 - a) the MEP for the NSP (Clause 10.25(2)(c)(i)); and
 - b) the NSP of the certification expiry date (Clause 10.25(2)(c)(ii)).

Audit observation

The NSP supply point table was reviewed.

Audit commentary

Unison have not connected any new NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

at least one month's notification is required before the acquisition (Clause 29(2) of Schedule 11.1).

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

Unison have not initiated any changes of network owner.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

There have been no changes to the MEP during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

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

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit observation

The registry list as of 6 September 2021 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

A review of the registry list confirmed there is no shared unmetered load connected to any Unison ICP.

In **section 3.1**, I discusses some lights recorded in the Napier City Council streetlight database as “private” and I examined whether they may be “shared unmetered load”. My conclusion is that they are not shared unmetered load installations and Unison does not need to create ICPs for them.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list as of 6 September 2021 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

Review of a registry list confirmed there is no shared unmetered load connected to any Unison ICPs.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The “Guidelines on the calculation and the use of loss factors for reconciliation purposes” was published on 26 June 2018. I have assessed Unison’s process and compliance against the guideline’s recommended thresholds.

Unison provided their CM2002 Loss Factors Methodology and Disclosure document dated 1 December 2021. The loss factor table on the registry was reviewed.

Audit commentary

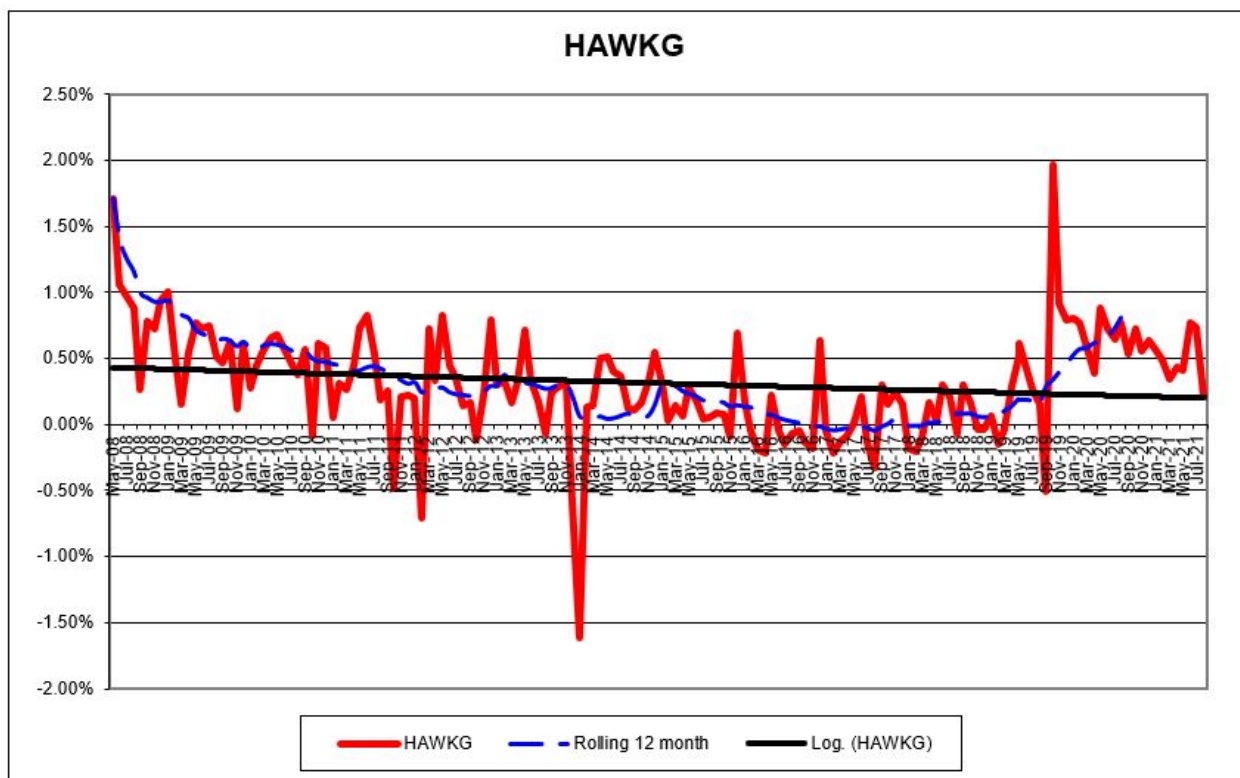
Unison provided their documented loss factor processes. These follow the “Guidelines on the calculation and the use of loss factors for reconciliation purposes v2.1”.

The following loss category codes had their consumption loss factor adjusted effective from 1 April 2021:

- CBTPO,
- H3H,
- H3L,
- H3M,
- R3M,
- R3H, and
- R3L.

The generation loss factors were updated for CBTO, R3N and RKTPO.

The Electricity Authority provided the UFE graph which indicate losses are tracking within the +/- 1% threshold indicated in the guideline. The Electricity Authority confirmed that losses were tracking at less than 1.0% for an extended period of time.



Audit outcome

Compliant

CONCLUSION

The audit found ten non-compliances. Whilst this is an increase from the last audit, it's worth mentioning that the non-compliances in **sections 3.4, 3.6 and 3.7** are duplicates and all relate to the same events, which were identified as on-off issues and only related to two ICPs. Incorrect NSP information is recorded twice, in **sections 2.1 and 4.2**. Two of the non-compliances relate to new clauses in the Code, regarding provision of information on Utilities Disputes and management of control device sealing information.

The controls observed during the audit continued to be strong in most areas.

The main outstanding action is to resolve system issues leading to the recording of incorrect NSPs:

- ensure NSPs are accurate and that NSP changes are updated to the registry in a timely manner, and
- continue with improvement actions regarding registry population timeliness.

The next audit frequency table indicates that the next audit be due in 12 months. I agree with this recommendation.

PARTICIPANT RESPONSE