

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**

For

Aurora Energy Limited



Prepared by: Rebecca Elliot

Date audit commenced: 26 January 2021

Date audit report completed: 29 April 2021

Audit report due date: 11-May-21

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EXECUTIVE SUMMARY

This Distributor audit was performed at the request of Aurora Energy 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 Aurora's offices in Dunedin on March 26th, 2021.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

Aurora has improved their compliance during the audit period. They have changed their ICP creation process which has improved the compliance for new connections. They have robust reporting and processes in place.

The audit found eight non-compliances and makes two recommendations. The next audit frequency table indicates that the next audit be due in 12 months. I have considered this in conjunction with Aurora's comments and agree with this recommendation.

The matters raised are shown in the table below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1)	Some incorrect and some missing initial electrical connection dates.	Moderate	Low	2	Identified
Provision of ICP Information to the registry	3.3	11.7	27 ICPs did not have an initial electrical connection date populated.	Moderate	Low	2	Identified
Timeliness of Provision of ICP Information to the registry	3.4	7(2) of Schedule 11.1	Late update to Ready for 313 (24%) of ICPs electrically connected during the audit period.	Strong	Medium	2	Identified
Timeliness of Provision of Initial electrical connection Date	3.5	7(2A) of Schedule 11.1	68 late initial electrical connection date updates.	Moderate	Low	2	Identified
Changes to registry information	4.1	8 Schedule 11.1	Updates to registry backdated greater than 3 business days.	Moderate	Low	2	Identified
ICP location address	4.4	2 of Schedule 11.1	119 ICPs with duplicate addresses and 2,289 ICPs with insufficient details	Moderate	Low	2	Identified
Registry accuracy	4.6	7(1)(l)&(p) of Schedule 11.1	<p>Eight of the sample checked with the incorrect initial electrical connection dates.</p> <p>27 active ICPs with no initial electrical connection date recorded.</p> <p>NSP dedication flag incorrect for two LE ICPs.</p>	Moderate	Low	2	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Provision of price category codes	4.7	7(3) of Schedule 11.1	Four of the five ICPs sampled with price category codes updated later than 10 business days of electricity being traded.	Strong	Low	1	Identified
Future Risk Rating						15	
Indicative Audit Frequency						12 months	

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	Recommendation
Electrical connection of a point of connection	3.16	Review the connection process for streetlights to ensure that a trader has accepted responsibility for these prior to electrical connection.
ICP location address	4.4	Liaise with District Council to get complete address details.

ISSUES

Subject	Section	Recommendation	Description
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

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

Audit commentary

Aurora has no exemptions in place that are relevant to the scope of this audit.

1.2. Structure of Organisation

Aurora provided the organisation charts for the relevant parts of the organisation:

1.3. Persons involved in this audit

Auditor:

	Company	Role
Rebecca Elliot	Veritek Limited	Lead Auditor
Claire Stanley	Veritek Limited	Supporting Auditor

Aurora personnel assisting in this audit were:

Name	Title
Graham Moore	CIW Co-ordinator
Jon Stone	Commercial Development Manager
Simeon Dwyer	Network Billing Analyst

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 fulfillment 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

Aurora subcontracts Delta and independent contractors to conduct field activities. The management and control areas covered by this audit are conducted by Aurora employees. This matter was discussed during the audit to ensure Aurora understands their responsibilities under this clause.

Audit commentary

Aurora has maintained responsibility for all of their obligations during the audit period.

1.5. Supplier list

Aurora engages Delta and other independent contractors to conduct field activities.

1.6. Hardware and Software

Aurora provided the following information detailing hardware and software used in the processes being audited:

- Aurora connection application database for tracking connection applications,
- GTV for ICP creation, line charge billing and source for Registry updates, and
- ARC GIS.

Aurora's backup arrangement processes are documented under Aurora's Quality Management System – ISO9001:2008. All data is backed-up in accordance with standard industry protocols.

1.7. Breaches or Breach Allegations

Aurora has no breach allegations recorded by the Electricity Authority which are relevant to this audit.

1.8. ICP and NSP Data

Aurora has responsibility for balancing areas in the Otago and Central Otago regions, and the Heritage Estate embedded Network at Te Anau.

The table below lists the relevant NSPs and their associated balancing areas.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
DUNE	CML0331	CROMWELL			CROMWELDUNEG	G	01/05/08	14,532
DUNE	CYD0331	CLYDE			CLYDE00DUNEG	G	01/05/08	7,499
DUNE	FKN0331	FRANKTON			FRANKTODUNEG	G	01/05/08	14,363
DUNE	HWB0331	HALFWAY BUSH			DUNEDINDUNEG	G	01/05/08	34,885
DUNE	SDN0331	SOUTH DUNEDIN			DUNEDINDUNEG	G	01/05/08	20,961
DUNE	HER0111	HERITAGE ESTATE	NMA0331	TPCO	HERITGEDUNEE	E	01/05/08	140

There are seven embedded networks connected to the Aurora network, shown in the table below. The TENC TMT0011 embedded network was created during the audit period. MSC0011 has a new network start date as it was sold to a new Distributor but is not a new embedded network. No embedded networks were decommissioned during the audit period.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date
AJML	MSC0011	MERIDIAN SHOPPING CENTRE	HWB0331	DUNE	MSC0011AJMLE	E	23/03/2020
LLNW	NLK0111	OUTLET ROAD WANAKA	CML0331	DUNE	NLK0111LLNWE	E	12/07/2017
TENC	TFM0011	FIVE MILE SHOPPING CENTRE	FKN0331	DUNE	TFM0011TENCE	E	8/07/2015
TENC	TJW0011	243-261 Princes Street Dunedin	SDN0331	DUNE	TJW0011TENCE	E	1/04/2018
TENC	TQC0011	Queenstown Central	FKN0331	DUNE	TQC0011TENCE	E	11/06/2018
TRPG	WPG0331	WAIPORI GENERATION	HWB0331	DUNE	WPG0331TRPGE	E	1/05/2008
TENC	TMT0011	65-93 Lakeside Road Wanaka Otago	CML0331	DUNE	TMT0011TENCE	E	1/07/2020

Aurora provided a list of all ICPs as at February 2021 by way of a registry “list file”. A summary of this data by “ICP status” is as follows.

Status	Number of ICPs 2021	Number of ICPs 2019	Number of ICPs 2018
Distributor (888)	13	9	-
New (999)	211	385	-
Ready (000)	132	106	
Active (2,0)	92,341	91,578	89,572
Inactive - new connection in progress (1,12)	154	154	154
Inactive – electrically disconnected vacant property (1,4)	1,256	1,095	1,022
Inactive – electrically disconnected remotely by AMI meter (1,7)	381	263	190
Inactive – electrically disconnected at pole fuse (1,8)	8	10	7
Inactive – electrically disconnected due to meter disconnected (1,9)	6	5	3
Inactive – electrically disconnected at meter box fuse (1,10)	8	5	1
Inactive – electrically disconnected at meter box switch (1,11)	1	1	0
Inactive – electrically disconnected ready for decommissioning (1,6)	15	11	8
Inactive – reconciled elsewhere (1,5)	0	0	-
Decommissioned (3)	8,478	8,204	7,701

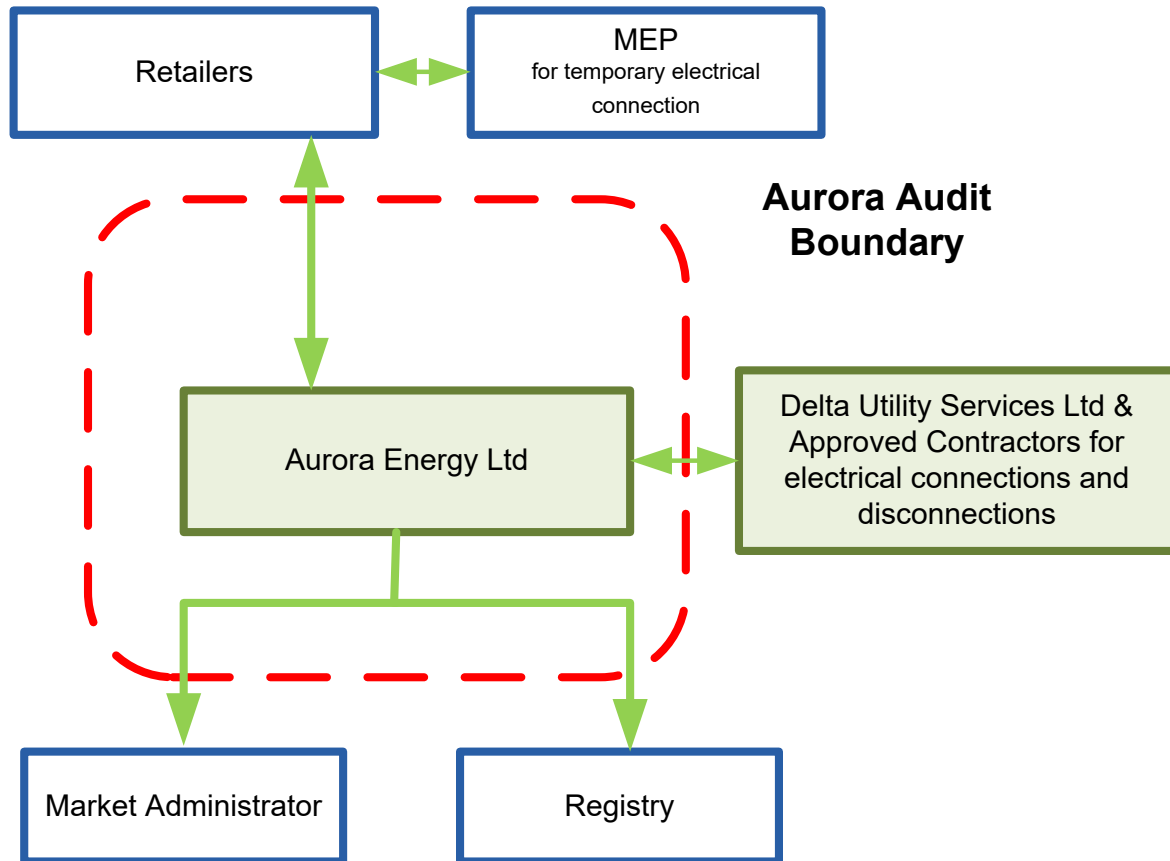
1.9. Authorisation Received

An email authorising the collection of information was provided.

1.10. Scope of Audit

This Distributor audit was performed at the request of Aurora Energy 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 Aurora's head office in Dunedin on March 26th 2021.

The scope of the audit is shown in the diagram below, with the Aurora audit boundary shown for clarity.



All activities covered by this audit are conducted at Aurora's head office in Dunedin.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

1.11. Summary of previous audit

I reviewed Aurora's previous audit report, conducted in April 2020 by Rebecca Elliot of Veritek Ltd.

The current status of the previous audit's findings are shown in the tables below.

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Provision of registry information	3.4	7(2) of Schedule 11.1	Late update to Ready for 497 (22%) of ICPs electrically connected during the audit period.	Still existing
Population of IECD	3.5	7(2A) of Schedule 11.1	145 late initial electrical connection date updates.	Still existing
Changes to registry information	4.1	8 Schedule 11.1	Updates to registry backdated greater than 3 business days of the event.	Still existing
NSP accuracy	4.2	7(1)(b) of Schedule 11.1	Four ICPs with incorrect NSPs.	Cleared
ICP location address	4.4	2 of Schedule 11.1	Eight ICPs with duplicate addresses and some addresses no longer readily locatable due to addressing update in GTV.	Still existing
Registry accuracy	4.6	7(1)(k)&(p) of Schedule 11.1	1 ICP with incorrect IECD. Known unmetered load not recorded. NSP dedication flag incorrect for 2 LE ICPs.	Still existing
Provision of price category codes	4.7	7(3) of Schedule 11.1	22 ICPs with price category codes updated later than 10 business days.	Still existing
Decommissioned status	4.11	20 of Schedule 11.1	One ICP not updated to decommissioned.	Cleared

Table of Recommendations

Subject	Section	Recommendation	Next action
Electrical connection of a point of connection	3.16	Review the connection process for streetlights to ensure that a trader has accepted responsibility for these prior to electrical connection.	Investigating
Provide ICP information	4.6	Using the audit compliance report, check all ICPs with contractors and inspectors where the trader has a PV1 profile, but Aurora is unaware that solar generation is installed.	Not adopted
		Liaise with trader to confirm the correct unmetered load details for the three ICPs where the loads vary.	Identified
Notification of shared unmetered load	7.1	Investigate the ownership of six lights in Jones Ave, Lake Hayes to determine if these are private or belong to the council	Investigating

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(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 Part 11 is:

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

Audit observation

Aurora's data management processes were examined. The registry list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to confirm compliance.

Audit commentary

Aurora has robust discrepancy reporting in place to identify discrepancies and correct them.

The audit found some ICPs with no initial electrical connection date and some incorrect initial electrical connection dates recorded where these have not been corrected via the data discrepancy process. This is detailed in **section 4.6**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Mar-20 To: 31-Jan-21	Some incorrect and some missing initial electrical connection dates. 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 as they mitigate risk but there is room for improvement. The audit risk rating is assessed to be low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue relates to the late notification of historic events, so no further action is required.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora have implemented an internal report to identify late notifications. When late notifications are identified Aurora will implement a process of notifying and educating contractors in the field.		31 Dec 2021	

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

Code reference

Clause 11.2(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

Aurora's data management processes were examined. The registry list file as at 31/01/21 and the combined audit compliance reports for the audit period of 1/03/20 to 31/01/21 were examined to confirm compliance.

Audit commentary

Aurora has a comprehensive suite of discrepancy reports in place. These are managed on a daily basis to ensure that information is complete and accurate and is not misleading or deceptive. Any incorrect data is corrected upon discovery. I did not identify any examples where errors were not corrected as soon as practicable.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process was examined in detail and is described in **section 3.2** below. A diverse characteristic sample of 20 new connection applications of the 1,313 created were checked from the point of application through to when the ICP was created.

The creation of LE ICPs for the connection of embedded networks to Aurora's network was also examined.

Audit commentary

Aurora creates ICPs as required by clause 1 of schedule 11.1. No examples of points of connection without ICPs were found. The sample checked in **section 3.2** below confirms this.

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. 20 new connection applications of the 1,313 created during the audit period were checked from the point of application through to when the ICP was created. These were selected using the typical characteristic methodology to confirm the process and controls worked in practice.

Audit commentary

ICP requests are received directly from customers or their agents via submission on the Aurora Customer portal CRF database. It is extremely rare for a trader to request an ICP, it would only be for an embedded network.

Aurora have changed their process and they now create the ICP at 'Ready'. Notification is sent to the proposed trader, the customer and electrician when the ICP has been approved and created. The trader is expected to notify Aurora if they reject the ICP, and the customer is notified.

The records for 20 ICPs covering across Aurora's network (including some with unmetered load installed) were examined and confirmed all were requested by the customer. No new connections are requested by traders therefore this clause does not apply. Compliance is confirmed.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The new connection process for populating all required registry fields was examined. The list file was examined for all ICPs created during the audit period.

Audit commentary

Aurora has a fully automated registry update process to ensure all information listed in this clause is provided to the registry. Aurora data is contained in GTV, which is validated against the registry on a regular basis, error logs are created if any fields are different, and these are then investigated. There were 1,313 electrically connected new connection, 27 ICPs did not have the ICED date populated. The timeliness of these updates is detailed in **section 3.4**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7 From: 01-Mar-20 To: 31-Jan-21	27 ICPs did not have an initial electrical connection date populated. 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 as Aurora have sufficient reporting in place to identify this. The audit impact is assessed to be low due to the small number of ICPs with no initial electrical connection date recorded.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue relates to the late notification of historic events, so no further action is required.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora have implemented an internal report to identify late notifications. When late notifications are identified Aurora will implement a process of notifying and educating contractors in the field.		31 Dec 2021	

3.4. Timeliness of Provision of ICP Information to the registry (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 new connection process was examined. The registry list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to confirm the timeliness of the provision of ICP information for new connections.

A diverse characteristics sample of 20 late updates were examined.

Audit commentary

The process for updating the registry is automated for all fields, and the update occurs on a nightly basis. 1,313 ICPs were created during the audit period. 1,020 ICPs were electrically connected. The registry was populated later than the first active date for 313 (24%) ICPs.

The 313 late updates were reviewed:

Late updates	Within 4 bus days	Within 10 bus days	Within 30 bus days	Within 90 bus days
313	274	307	312	313

This is a smaller volume to that found in the last audit. The sample checked found:

- The majority were due to the late receipt of the livening report from the contractor, and
- a small number were due to an error by staff.

Aurora have changed their ICP creation process during the audit period and the effect of this is expected to be more visible in the next audit.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Mar-20 To: 31-Jan-21	Late update to Ready for 313 (24%) of ICPs electrically connected during the audit period. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Strong Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as strong as Aurora have changed the ICP creation process during the audit period so that this issue should not happen in the future unless due to exceptional circumstance. The audit impact is assessed to be medium due to the volume of late updates which prevents the trader from making these ICPs active.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue relates to the late notification of historic events, so no further action is required.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora have implemented an internal report to identify late notifications. When late notifications are identified Aurora will implement a process of notifying and educating contractors in the field.		31 Dec 2021	

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 no later than 10 business days after the date on which the ICP is initially electrically connected.

Audit observation

The new connection process was examined.

The list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to determine the timeliness of the provision of the initial electrical connection date. A diverse characteristics sample of 10 late updates were examined.

Audit commentary

The liveness reports provided by the contractors have the initial electrical connection date recorded on them. This date is entered into Gentrack which then writes this to the registry. The discrepancy reporting in place identifies any potential discrepancies.

There were 1047 initial electrical connection date updates in the LIS file. The audit compliance report identified 68 (6%) late updates. The sample of ten late updates examined found the majority were due to late notification from the field contractors, or no notification received from the contractor, these were identified via report monitoring and followed up.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Mar-20 To: 31-Jan-21	68 late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as Aurora have sufficient reporting in place to identify this, but there is an opportunity to improve the return of paperwork from the field. There is no impact on settlement. The only potential impact is where a trader may wish to compare their Active date to the IECD, so the impact is considered minor, leading to an audit risk rating of low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue relates to the late notification of historic events, so no further action is required.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora have implemented an internal report to identify late notifications. When late notifications are identified Aurora will implement a process of notifying and educating contractors in the field.		31 Dec 2021	

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 registry list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to determine the timeliness of the provision of ICP information for new connections.

Audit commentary

The new connections process was examined, and the process includes a notification to the proposed trader to confirm responsibility. All of the ICPs recorded in section 3.4, had a trader recorded at the “New” status hence compliance is confirmed with this clause.

This clause requires that a distributor must not connect an ICP across which unmetered load is shared unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load. Aurora does not allow or intend to allow any new shared unmetered load connections. Review of a registry list confirmed there is no shared unmetered load recorded against any Aurora ICP. The potential lights identified in the last audit from the QLDC streetlight audit were found to be on one of the Powernet embedded networks.

Audit outcome

Compliant

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The new connection process was examined. The combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined.

Audit commentary

The new connections process sends a notification to the proposed trader to confirm responsibility, the trader must advise if they decline, the trader is recorded in the registry. There are no ICPs without a proposed trader recorded in the registry.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

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

Audit observation

The new connection process was examined in **section 3.2**. The registry list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to confirm compliance.

Audit commentary

The new connection process requires that the trader arrange for electrical connection and they in turn have an 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 examined.

Audit commentary

No new embedded NSPs have been created by Aurora during the audit period.

Audit outcome

Compliant

3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30(A))

Code reference

Clause 10.30(A)

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.

Audit observation

The NSP table was reviewed.

Audit commentary

No new embedded NSPs have been created by Aurora.

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:

yyyyyyyyyyxxccc where:

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

Audit observation

The new connection process was examined and a sample of 20 ICPs were checked.

Audit commentary

ICPs are created in GTV. All ICPs are created in the appropriate format. The sample checked confirmed compliance.

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 list file was examined to confirm all active ICPs have a single loss category code.

Audit commentary

Each ICP only has a single loss category, which clearly identifies the relevant loss factor. Each loss category code has a different loss factor for day and night, and summer and winter.

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 registry list for 31/01/21 was examined to determine compliance.

Audit commentary

The new connections process has changed during the audit period, and they now create the ICP at the ‘Ready’ status unless there is work to be done on the network.

Examination of the list file found 211 ICPs at the “New” status. There were no ICPs at “New” with initial electrical connection dates populated. The monitoring of ICPs at this 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 calendar 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

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

Audit commentary

Aurora requests updates for ICPs at “New” and “Ready” on an ongoing basis from the proposed traders and the applicant. Response from traders is variable.

There are 73 ICPs at “New” and 18 ICPs at “Ready” that have been there for longer than 24 months. An extreme sample of ten at each status was examined and found all had been followed up with the traders. Ten have since been confirmed as no longer required.

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

This requirement was discussed, and the list file was examined.

Audit commentary

There is one embedded generator with a capacity greater than 10MW that has a specific loss category code. There has been no new embedded generation greater than 10MW created during the audit period. Aurora is aware of this requirement.

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 process to connect streetlights was discussed. All new streetlights are assumed to belong to the local council unless Aurora are advised otherwise. These are added to GIS and then added to the Aurora database, and it is this database that Aurora bills the trader from.

The recommendation from the last audit remains, the process for new streetlight connections is to be reviewed to ensure that all such connections have a trader accept responsibility, to ensure that lights are being captured in the council database which is used for reconciliation prior to electrical connection.

Recommendation	Description	Audited party comment	Remedial action
Electrical connection of a point of connection	Review the connection process for streetlights to ensure that a trader has accepted responsibility for these prior to electrical connection.	Aurora Energy will review the process for streetlight connections to ensure that traders accept responsibility for these prior to electrical connection.	Identified

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 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 registry list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined. A diverse sample of a minimum of ten (or all if there were less than ten examples) backdated events by event type were reviewed to determine the reasons for the late updates.

The management of NSP changes was examined.

Audit commentary

Address events

There were 46,846 address updates that did not relate to the initial population of address data (which is discussed separately in **section 3.4**).

97.23% were made on time with an average time to update the registry of 2.55 days. There were 1222 late address updates. The sample checked of these found that all related to corrections or updates, requested by the Trader. Aurora were advised when updating these addresses, they should not be backdated in future.

Network Events

The network events evaluated excluded those relating to the population of the initial electrical connection dates (discussed in **section 3.5**), NSP changes (discussed below) and the initial network events relating to the creation of ICPs.

The network event compliance report was examined and recorded five late network updates. These were reviewed and found that these were corrections to the 'Dedicated NSP' flag.

Distributed Generation

The distributed generation process is described in **section 4.6**. 60.10% of all distributed generation network updates were made on time with an average time to update the registry of 17.61 days. There were 81 late distributed generation updates. The sample checked found they were all late due to late notification from the field.

NSP Changes

There were 8 late NSP changes reported. The late updates were reviewed:

Late updates	Within 18 bus days	Within 50 bus days	Within 317 bus days
8	1	3	8

- 5 updates were due to 2 GXP's being merged
- 3 updates were to correct GXP

The late updating of the NSP changes is recorded as non-compliance.

Pricing events

All pricing updates are made in GTV. These then write to the registry overnight.

There were 11,946 pricing updates that did not relate to the initial population of pricing data (which is discussed separately in **section 3.4** and **section 4.7**).

99.5% were made on time. The 174 late updates were reviewed:

Late updates	Within 10 bus days	Within 20 bus days	Within 30 bus days	Within 90 bus days	Within 365 bus days	Within 1,552 bus days
174	80	123	137	156	166	174

A sample of 20 late updates were checked. All were backdated to correct pricing because:

- they were notified late,
- or were corrections to pricing.

Decommissioning Status Events

The decommissioning process is discussed in **section 4.11**. The event detail report and audit compliance report were reviewed. There were 232 ICPs decommissioned. 91.74% were compliant with an average of 2.73 business days to update which is a reflection of Aurora's robust management of this process. 20 ICPs were updated late. These were examined and found that the majority were due to late notification.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Mar-20</p> <p>To: 31-Jan-21</p>	<p>Updates to registry backdated greater than 3 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are rated as moderate. Aurora has robust reporting in place which identifies discrepancies which ensures that discrepancies are identified but some errors still occur.</p> <p>The Audit risk rating is low as the majority of the changes have no impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Aurora backdates network pricing events where information that leads to a change in price category or pricing attribute has not been provided or has not been provided on time by a contractor. It would be disadvantageous to consumers to comply with this requirement in circumstances where Aurora has not applied altered pricing information in error, or where contractors have not provided Aurora information in a timely fashion.</p> <p>Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information.</p>		No Change	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information.</p> <p>As noted in 3.5, above, Aurora will continue to work on educating contractors in the field to ensure accurate information is provided in a timely fashion.</p> <p>We will review the circumstances surrounding the NSP change. Review the process for managing any future changes.</p>		31 Dec 2021	

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

Code reference

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

Code related audit information

The distributor must notify the registry of the NSP identifier of the NSP to which the ICP is usually connected under Clause 7(1)(b) of Schedule 11.1.

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 reporting identified 11 active ICPs where 10% or fewer ICPs on a street have a different NSP and there are fewer than three ICPs with a different NSP. All were examined to determine if the correct NSP has been assigned.

Audit commentary

The controls in place to ensure new ICPs have the correct NSP are robust. The GXP determination for the two areas outside of Dunedin are allocated based on geographical location in GIS. For ICPs in the Dunedin area the NSP is assigned at the time the ICP is plotted in the GIS. Where the GXP boundaries meet this is determined by the transformer the ICP will be connected to, as determined in GIS. Validation is in place to ensure NSP accuracy.

All 11 ICPs were checked and confirmed to be correctly mapped.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was discussed to confirm policy.

Audit commentary

Requests for ICP identifiers are not a common occurrence, however Aurora provides this information if the requesting party has authorisation.

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 file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to confirm compliance.

Audit commentary

GTV is checked to confirm that there are no existing ICPs with the same address. If the address is not readily locatable the applicant is contacted to get further details. The location is plotted in the GIS system.

The audit compliance report recorded 119 active ICPs where the address is duplicated. These were all examined and found there was insufficient information to meet the requirement of this clause.

A check of the list file identified 2,289 active ICPs that had no street number and potentially insufficient details to readily locate these ICPs. 785 of these have a lot and DP number recorded. This is not sufficient for a meter reader to locate the property. This is due to the ICP applications only having a lot and DP number and there is no process to update these once the ICP is created unless the retailer requests the address to be updated at a later date. The typical sample of 20 ICPs checked found:

- four were correct, the details in the property name were sufficient to be readily locatable, and
- the remaining did not have a sufficient address details provided.

The majority of these ICPs have insufficient details to ensure they are readily locatable. I recommend that the District Council is contacted to seek additional address details to update GTV and the registry.

Recommendation	Description	Audited party comment	Remedial action
ICP location address	Liaise with District Council to get complete address details.	<p>This issue has likely resulted to changes to the registry 'Property Name' field. Aurora will review our historic data to determine whether this information can be added to the registry in a different field.</p> <p>If this is not possible, we will liaise with the district council to obtain complete address details.</p>	Identified

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 01-Mar-20 To: 31-Jan-21	119 ICPs with duplicate addresses and 2,289 ICPs with insufficient details Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is an opportunity for improvement. The audit risk rating is low as this has no direct impact on reconciliation but could affect meter readers ability to get manual reads.		
Actions taken to resolve the issue		Completion date	Remedial action status
The identified non-compliant ICPs will be investigated and corrected.		31 Jul 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora will perform a monthly check for duplicate addresses and correct where identified. The reasons for duplicate addresses will be investigated to minimise the risk of reoccurrences.		31 Jul 2021	

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

This was examined as part of the new connection process and proof of process was checked as part of the sample of 20 new connections examined.

Audit commentary

For new connections, this clause is well understood, and the policy is to allow shared service mains, but individual fusing is required. A section in the “network connection inspection form” requires that fusing information be notified.

Audit outcome

Compliant

4.6. Distributors to Provide ICP Information to the Registry (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:

- *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 one 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*
 - c) *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 file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to confirm compliance. A sample using typical characteristics of data discrepancies were checked.

Audit commentary

Aurora has a fully automated registry update process to ensure all information listed in this clause is provided to the registry. Aurora data is contained in GTV, which is validated against the registry on a regular basis, error logs are created if any fields are different, and these are then investigated.

All ICP information was checked and confirmed compliant unless discussed below:

Initial Electrical Connection Date

Aurora require livening paperwork to be returned to them by the contractors and the initial electrical connection date is taken from this.

1,047 ICPs have had the initial electrical connection date updated between 1/03/20 and 31/01/21. The audit compliance reporting identified 29 ICPs with date inconsistencies between the initial electrical connection date, the active date, and the meter certification date. A typical sample of ten ICPs were checked and found that they were all updated according to the livening report that was received. Two were unmetered BTS supplies. The remaining eight ICPs were found to have the incorrect initial electrical connection date. Aurora are correcting these. This is recorded as non-compliance below.

The audit compliance report identified 27 active ICPs with no initial electrical connection date recorded. A typical sample of ten of these were examined and found:

- no living report has been received for three ICPs. Aurora has been chasing to get these,
- five were incorrectly recorded on the report and all were electrically connected prior to this code requirement coming into effect,
- the initial electrical connection date was not updated due to human error, and
- one ICP was correct in Gentrack but this had not flowed to the registry. It is unknown why this had occurred but there was no evidence of this being a widespread issue.

Distributed Generation

The distributed generation process was examined. Aurora has an application process which requires a form to be submitted by the owner. Aurora reviews the application and approval is issued. An inspection must be completed, and copies of all documentation be provided to Aurora prior to connection. Aurora monitors the EIEP1 file for generation where it is not expected. Any found are investigated.

Aurora is implementing a new process to ensure the rules in the code are complied with by the Trader and Customers. There will be a follow-up process for any that are identified as not compliant.

Examination of the list file found 1,419 ICPs with generation capacity recorded. All had an installation type of "B" or "G" and the fuel type and generation capacity recorded.

I checked the distributed generation information populated on the registry against the paperwork provided for a sample of ten ICPs and found that information aligned in all instances.

The audit compliance report identified 39 active ICPs where the trader's profile indicates distributed generation is present and Aurora have none recorded. The typical sample of ten ICPs were checked and found:

- applications have been received for seven ICPs, but no notification has been received to confirm that the installation has been completed.
- no application had been received in three instances.

Aurora are reviewing this process to ensure that paperwork is returned in a more timely manner.

Unmetered Load

The ACA form requires all unmetered load to be detailed on it.

Review of the registry list confirmed that there was no shared unmetered load. In the last audit it was reported that there were a small number of private streetlights identified in the QLDC DUMML audit to be investigated. These lights are connected to one of the Powernet's embedded networks and are therefore not Aurora's responsibility.

I checked that the unmetered load values matched for the 154 active ICPs where both the Aurora and the trader have values recorded and found all matched with the exception of five ICPs. These were checked and I found:

- four require investigation to confirm which description is correct, and
- Aurora's calculated value was correct for ICP 0000207976DED8A.

Dedicated vs non-dedicated

The application of dedicated vs non-dedicated flag was examined. This was examined and found to be correct in relation to the balancing areas for the GN reconciled ICPs.

The LE ICPs were examined and found two of the LE ICPs (0000510729CEBC6 and 0000511495CE8C9) have the flag incorrectly set to "N". This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1)(l)&(p) of Schedule 11.1 From: 01-Mar-20 To: 31-Jan-21	Eight of the sample checked with the incorrect initial electrical connection dates. 27 active ICPs with no initial electrical connection date recorded. NSP dedication flag incorrect for two LE ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. There is reporting in place to identify discrepancies but there is room for improvement. The audit risk rating is low as the errors found have a minor effect on reconciliation.	
Actions taken to resolve the issue		Completion date
Non-compliant ICPs will be investigated and corrected.		31 Jul 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Aurora will implement a process to review the registry audit compliance report each month and remediate and investigate non-compliance events.		31 Jul 2021
		Identified

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 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 registry list for 9/04/20 and the combined registry compliance audit reports covering the period from 1/07/18 to 31/03/20 were reviewed to determine compliance.

Audit commentary

The price code is added to all ICPs at the “ready” status.

There were 14 ICPs with pricing changes backdated more than 10 business days from the date of electrical connection. Five were investigated and found:

- two were identified as errors due to new staff missing populating the pricing information,
- one was initially an unmetered BTS then moved to being a permanent supply, so the backdating of the pricing event is recorded as non-compliance in section 4.1 but is compliant here,
- one was due to starting as an unmetered BTS supply then moving to permanent supply, but the event date of the permanent supply was not populated causing it to be backdated incorrectly, and
- one was due to no pricing populated at ‘new’ status, the ICP was then backdated to the “ready” status which caused the pricing event to be backdated. This is unlikely to occur going forward as ICPs are being created at the ‘Ready’ status and pricing is populated the same time.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.7 With: Clause 7(3) of Schedule 11.1 From: 01-Mar-20 To: 31-Jan-21	Four of the five ICPs sampled with price category codes updated later than 10 business days of electricity being traded. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong as Aurora has changed the ICP creation process and most ICPs are created at the “ready” status and pricing is populated at that time. The audit risk rating is low as the number of late pricing updates is small compared to the overall number of new connections.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue identified relates to the late notification of historic events, so no further action is required.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As noted above, Aurora have made changes to the connection process to prevent this issue occurring in the future.		Completed	

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 co-ordinates (optional), it must meet the NZTM2000 standard in a format specified by the Authority.

Audit observation

I checked the list file for ICPs with GPS co-ordinates recorded.

Audit commentary

GPS co-ordinates are not recorded.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The registry list file as at 31/01/21 and the combined registry compliance audit reports covering the period from 1/03/20 to 31/01/21 were examined to confirm compliance.

All ICPs at “ready” status had a single price category assigned and proposed trader identified.

Audit commentary

Aurora have changed their process and they now create the ICP at ‘Ready’. Notification is sent to the proposed trader, customer, and electrician when the ICP has been approved and created. The trader is expected to notify Aurora if they reject the ICP, and the customer is notified.

All ICPs only have one price category code.

The registry list showed 132 ICPs currently at “ready” status, 35 have been at “ready” status for more than two years. This is discussed further in **section 3.14**.

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

I checked the list file to confirm compliance.

Audit commentary

The list file contained 13 embedded network (LE) ICPs. I checked these against the NSP mapping table and confirmed the details are recorded correctly on 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

I examined the physical process for decommissioning ICPs along with the timeliness and accuracy of registry updates.

Audit commentary

ICP decommissioning processes are well documented. Where the trader has updated the status to “ready for decommissioning” Aurora will actively manage these ICPs to ensure they obtain a decommissioning report.

Ready for Decommissioning

There were 15 ICPs with a status of “ready for decommissioning” during the audit.

Decommissioning

There were 232 ICPs identified as decommissioned during the audit period.

The timeliness of status updates is detailed 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

I checked the price category code table for any new or changed codes during the audit period.

Audit commentary

There were no changes made during the audit period. Aurora understands the requirement to provide notification of new price category codes.

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

I checked the loss category code table for any new codes during the audit period.

Audit commentary

There were no additional codes 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 on the registry, the distributor must enter the replaced loss factor on the table in the registry.

Audit observation

I checked the loss category code table for any changed factors during the audit period.

Audit commentary

Each ICP only has a single loss category, which clearly identifies the relevant loss factor. Each loss category code has a different loss factor for day and night, and summer and winter. There were 18 loss factor changes during the audit period. The notification date was January 2020 for start date 1st October 2020, which achieves compliance with the requirement to provide two months' notice.

Changes to Aurora's loss factors are always effective on the first of any month and all trading periods only have one loss factor.

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 two local networks, the distributor must notify 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 notify 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 notify the reconciliation manager of the creation or decommissioning.

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:

- notify the reconciliation manager*
- notify the market administrator*
- notify each affected reconciliation participant*
- comply with Schedule 11.2.*

Audit observation

The NSP table on the registry was examined.

Audit commentary

No NSPs were created or decommissioned that were an interconnection point between two local networks.

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 1 calendar month before the NSP is electrically connected or the ICP is transferred.

Audit observation

The NSP table on the registry was examined.

Audit commentary

No NSPs were created 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 notify 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 on the registry was examined.

Audit commentary

No new balancing areas were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must notify the reconciliation manager at least one calendar 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 on the registry was examined.

Audit commentary

Aurora have 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 notify 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 three business days after the change takes effect.

Audit observation

The NSP table on the registry was examined.

Audit commentary

No balancing areas were changed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must notify any trader trading at the ICP of the transfer at least one calendar 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 notify the market administrator in the prescribed form, no later than three business days before the transfer takes effect.

Audit observation

The NSP table was reviewed.

Audit commentary

Aurora has not acquired any networks.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1)&(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, and evidence of all updates made to the Reconciliation Manager via the portal.

Audit commentary

The NSP table was reviewed.

The NSP supply point table was reviewed. Aurora have only one embedded network. This was recertified during the audit period. Notification to the Reconciliation Manager was provided within the required timeframe.

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:*
 - a) the reconciliation participant for the NSP (Clause 10.25(2)(b)(i)); and*
 - b) the MEP for the NSP (Clause 10.25(2)(b)(ii)); and*
 - c) no later than 20 business days after the data of certification of each metering installation, advise the reconciliation participant for the NSP of the certification expiry date (Clause 10.25(2)(c)).*

Audit observation

The NSP table on the registry was examined.

Audit commentary

No NSPs were created 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 notify:

- *the previous network owner (Clause 29(1)(a) of Schedule 11.1)*
- *the reconciliation manager (Clause 29(1)(b) of Schedule 11.1)*
- *the market administrator (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 calendar month notification is required before the acquisition (Clause 29(2) of Schedule 11.1).

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

Aurora has not acquired any networks during the audit period.

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 notify the reconciliation manager and the gaining MEP.

Audit observation

The NSP supply point table was examined.

Audit commentary

The MEP has not changed for Heritage Estate.

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 market administrator 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 table on the registry was examined.

Audit commentary

Aurora has not acquired any networks 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 table on the registry was examined.

Audit commentary

Aurora has not acquired any networks 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 notify the registry 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 notify the registry 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

Aurora does not have any shared unmetered load. The streetlight audit reports carried out in the Aurora network area were checked for any potential shared unmetered load.

Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected. The potential shared unmetered load lights discussed in the last audit were confirmed to be on one of the Powernet embedded networks and not Aurora's network.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

Aurora does not have any shared unmetered load.

Audit commentary

Aurora does not have any shared unmetered load.

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

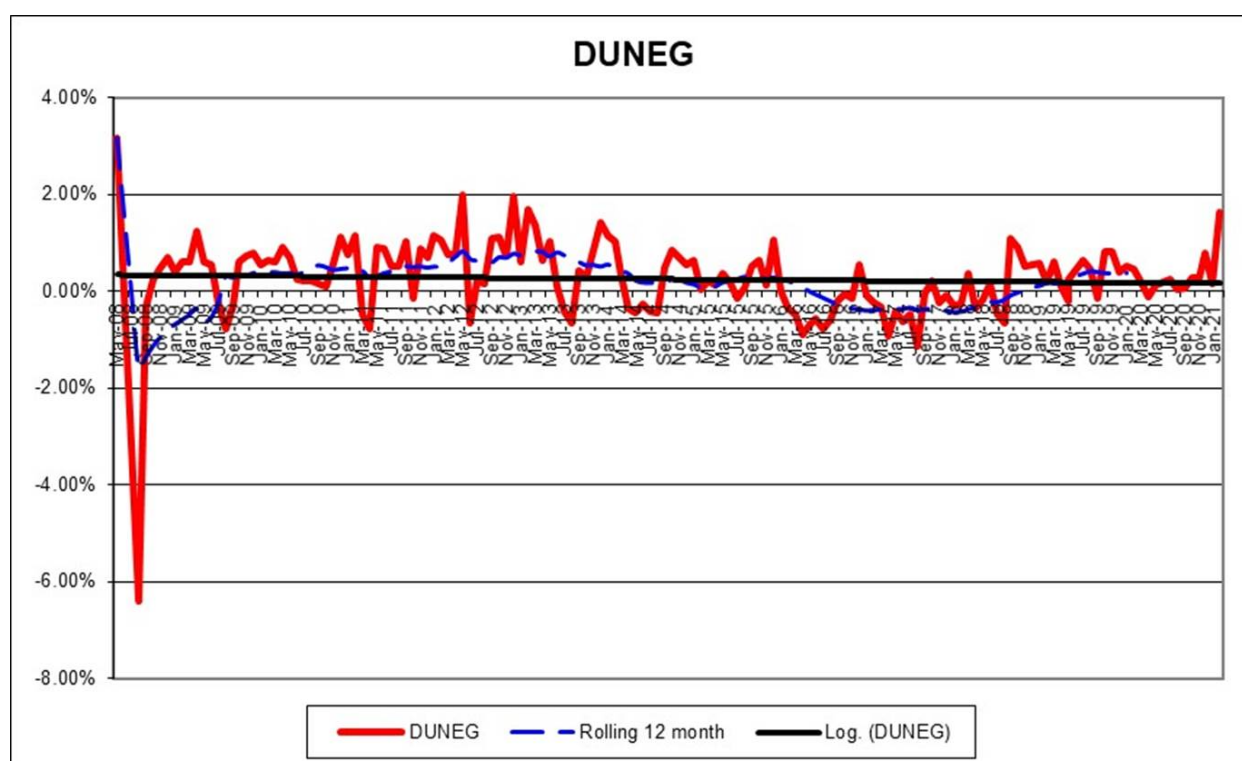
Aurora publishes reconciliation losses, which include technical losses and non-technical losses. I reviewed the process and supporting documentation in relation to the calculation of loss factors.

Audit commentary

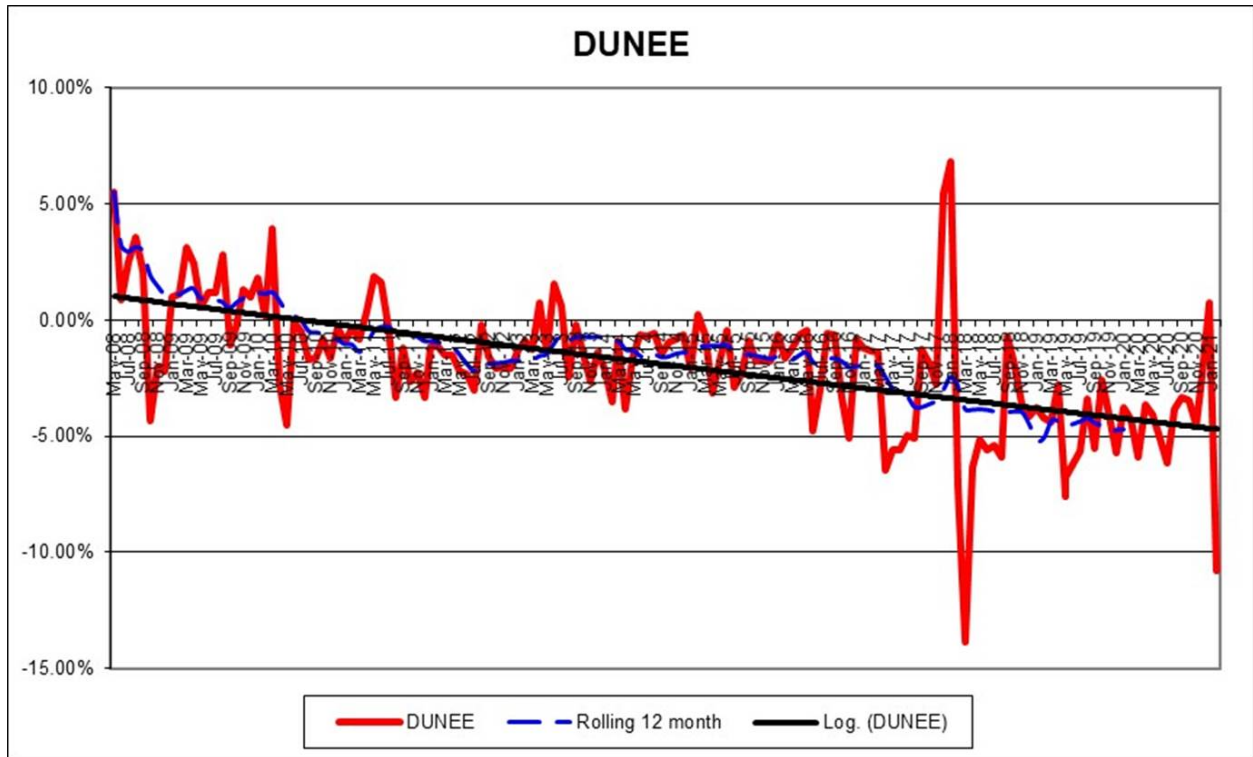
Grid Connected NSPs

There are different loss factors for summer/winter and day/night. These are revised annually based on historic data over several years. The process achieves compliance with clause 11.2.

The table below shows that UFE is within the +/-1%.



Heritage Estate Embedded Network



Whilst the losses are outside of the expected threshold for the Heritage Estate embedded network, I checked how these are calculated and confirm that the methodology is compliant, and the variance is due to the way load is reconciled.

Audit outcome

Compliant

CONCLUSION

Aurora has improved their compliance during the audit period. They have changed their ICP creation process which has improved compliance for new connections. They have robust reporting and processes in place.

The audit found eight non-compliances and makes two recommendations. The next audit frequency table indicates that the next audit be due in 12 months. I have considered this in conjunction with Aurora's comments and agree with this recommendation.

PARTICIPANT RESPONSE

Aurora Energy accept the areas of non-compliance identified in the audit report and are pleased that the process improvements Aurora have undertaken in the past year have resulted in improved compliance.

In response to each non-compliance instance we have stated the actions we intend to take to further improve compliance over the next year. In particular we have already begun reviewing the registry compliance report on a monthly basis and will implement processes to remediate issues of non-compliance identified. We will also continue to educate contractors in the field about their obligations to ensure that we are able to update the registry in a timely manner.