

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**



For

**EASTLAND NETWORK LIMITED
NZBN 9429039629548**

Prepared by: Rebecca Elliot, Veritek Limited

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EXECUTIVE SUMMARY

This Distributor audit was performed at the request of **Eastland Network Limited (Eastland)**, 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 remotely due to the COVID 19 pandemic via teams between 22-25 November 2021.

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

Eastland have robust processes in place and strive to attain a high level of compliance. This audit found nine non-compliances and makes six recommendations. This is an increase in the number of non-compliances reported in the last audit and is due to:

- one non-compliance being recorded for code that came into effect in April 2021 and Eastland have already largely addressed. This is detailed in **section 2.4**, and
- the pricing review that was undertaken during the audit period caused a resource constraint meaning that some BAU processes were paused and not all activity was able to be actioned on time or be completed; the pricing review is now complete and all BAU processes are in operation, so this is not expected to occur again, and it only affected a small number of ICPs.

The non-compliances identified affected a small number of ICPs and have little or no direct impact on reconciliation. The future risk rating indicates that the next audit is due in 12 months. I have considered this in conjunction with:

- eight out of ten non-compliances reported have strong control ratings confirming that controls overall are strong,
- where possible during the audit, Eastland have addressed non-compliances as has been detailed in audit, and
- Eastland's comments.

I recommend that the next audit be in 14 months time.

I thank Jennette and the team for their assistance to complete this audit.

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 correct errors	2.2	11.2(2) and 10.6(2)	Corrections not actioned as soon as practicable.	Strong	Low	1	Identified
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities disputes information not provided as required by the code.	Strong	Low	1	Identified
Provision of ICP Information to the registry manager	3.3	11.7	Seven electrically connected ICPs with no initial electrical connection date populated.	Strong	Low	1	Investigating
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Late update to "ready" for three of 290 ICPs electrically connected during the audit period.	Strong	Low	1	Identified
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 some ICPs.	Strong	Low	1	Identified
Monitoring of "new" & "ready" statuses	3.14	15 Schedule 11.1	One ICP not decommissioned set up in error.	Strong	Low	1	Identified
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	Moderate	Low	2	Identified
ICP location address	4.4	2 Schedule 11.1	Four ICPs with duplicate addresses. 21 ICPs with a location address which is not readily locatable.	Strong	Low	1	Investigating

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p) Schedule 11.1	One ICP with the incorrect initial electrical connection date. Seven ICPs with missing initial electrical connection dates.	Strong	Low	1	Identified
Future Risk Rating						10	

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	Description
Removal or breakage of seals	2.3	Managing bridging of load control	Ensure all personnel engaged in load control device bridging are qualified to perform the bridging and sealing activities.
			Prepare and maintain a training and competency schedule for all relevant personnel.
			Ensure that re-sealing occurs when bridging activities are conducted by non-ATH approved personnel.
			Ensure MEPs are notified as well as traders that bridging has occurred.
ICP location address	4.4	ICPs without readily locatable addresses	Investigate populating GPS co-ordinates for the ICPs without readily locatable addresses recorded.
Distributed generation	4.6	Unknown DG	Outline to Solar installers that notification must be provided of inspection and testing results. Consider observing testing and inspection at the expense of distributed generators.

ISSUES

Subject	Section	Issue	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

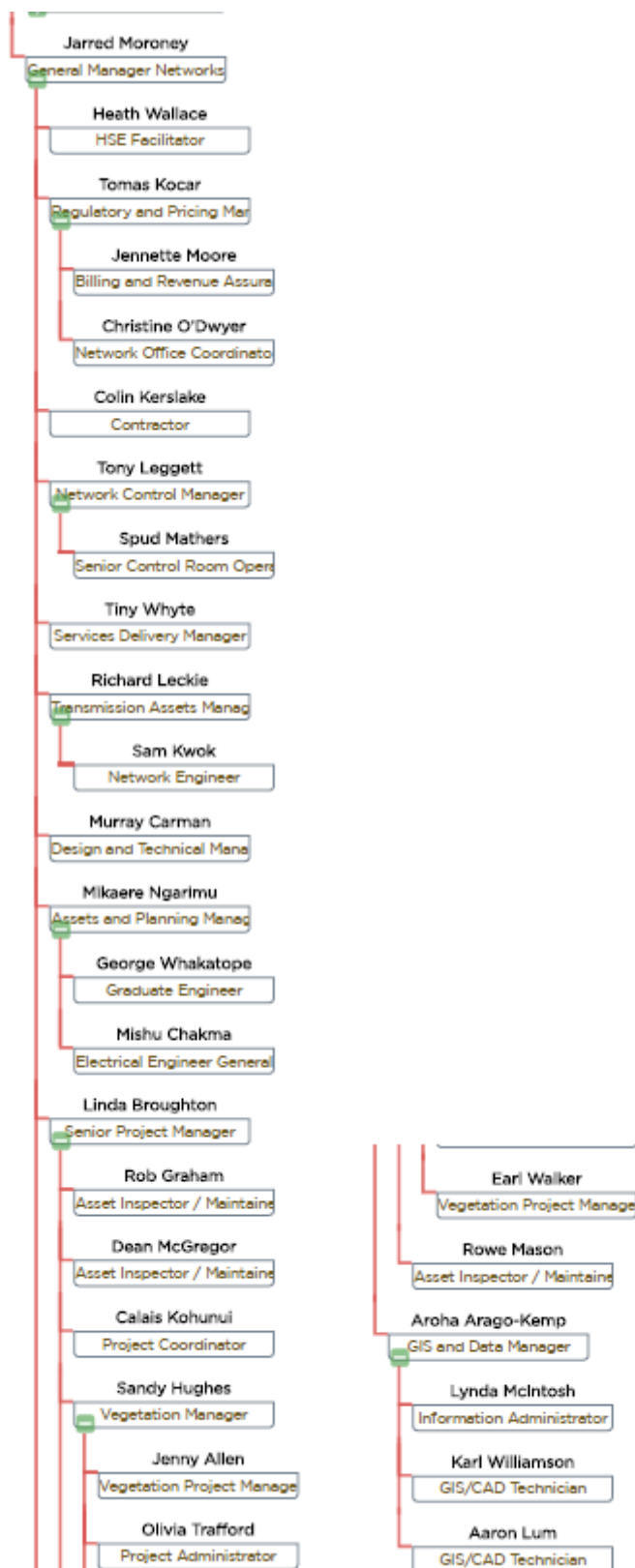
The Authority website was checked to determine whether there are code exemptions in place.

Audit commentary

Review of exemptions on the Authority website confirmed that there are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Eastland provided a copy of their organisation structure:



1.3. Persons involved in this audit

Auditor:

Rebecca Elliot

Veritek Limited

Electricity Authority Approved Auditor

Eastland Networks personnel assisting in this audit were:

Name	Title
Aroha Arago-Kemp	Acting GIS and Data Manager
Jarred Moroney	General Manager Networks
Jennette Moore	Billing and Revenue Assurance Manager
Lynda McIntosh	Information Admin

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

Eastland provided a list of approved contractors. These are set out in **section 1.5**.

1.5. Supplier list

Eastland provided a list of approved contractors, which is summarised below:

Network Construction/Maintenance/Livening Agents		
Company	Location	Name
AC Electrical Services Gisborne Ltd	Gisborne	Stu Blair
Apex Power Systems Ltd	Gisborne	Jason Collier
East Coast Power Lines	Wairoa	Corny Groen
Electrinet	Gisborne	Toby Pickering
Inline Construction Ltd	Gisborne	Aaron McKinnon
Power Connections Ltd	Gisborne	Glen McKinnon
Powerline Technologies Ltd	Gisborne	Steven Clark (Foxy)
ScanPower Ltd	Dannevirke	Dave Smith
Unison Contracting Services Ltd	Hastings	Mark Lawrie
Inspectors		
Company	Location	Name
ECIS Ltd	Gisborne	Jai Goodyear
Mark Gregory	Wairoa	Mark Gregory
AC Electrical Services Gisborne Ltd	Gisborne	Stu Blair

1.6. Hardware and Software

Eastland continues to use the Gentrack Velocity system for most of the functions covered by this audit. Their GIS is called “Powerview”. Security and backup arrangements are as follows:

- files stored on the Egnyte server (Z:\) are maintained with versioning (the ability to rollback to previous files) on the cloud with two local copies of the files (as virtual appliances/servers) in Carnarvon St and Gladstone Rd,
- file and critical application servers at Eastland are backed up on the hour with a backup copy synchronised with the Cloud DR solution every six hours, except database servers which are synced every hour, and
- with Disaster Recovery, there are dedicated backup appliances in Carnarvon St and Gladstone Rd which backs up the target servers which can be recovered virtually either locally (i.e., on the appliance or restored to the virtual infrastructure) and if both sites are lost, recovered within the DR Cloud service provider; local backups are stored for three months onsite while the Cloud backups are kept forever.

1.7. Breaches or Breach Allegations

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

1.8. ICP and NSP Data

Eastland has responsibility for the Eastland local network, which has one NSP and one balancing area. There have been no changes during the audit period. The table below sets out the details.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
EAST	TUI1101	TUIA FOR EAST			TUI1101EASTG	G	1/04/2015	25,741

There are no embedded networks connected to the Eastland network.

A list file detailing the ICP statuses was provided as of 30 September 2021:

Status	Number of ICPs (2021)	Number of ICPs (2020)	Number of ICPs (2019)
New (999,0)	0	0	1
Ready (0,0)	37	32	28
Active (2,0)	25,708	25,741	25,599
Distributor (888,0)	0	0	0
Inactive – new connection in progress (1,12)	24	12	10
Inactive – electrically disconnected vacant property (1,4)	461	442	450
Inactive – electrically disconnected remotely by AMI meter (1,7)	101	82	89
Inactive – electrically disconnected at pole fuse (1,8)	30	14	16
Inactive – electrically disconnected due to meter disconnected (1,9)	11	15	15
Inactive – electrically disconnected at meter box fuse (1,10)	4	4	2
Inactive – electrically disconnected at meter box switch (1,11)	4	4	3
Inactive – electrically disconnected ready for decommissioning (1,6)	9	5	6
Inactive – reconciled elsewhere (1,5)	163	0	0
Decommissioned (3)	4,071	3,931	3,881

1.9. Authorisation Received

Eastland provided a letter of authorisation.

1.10. Scope of Audit

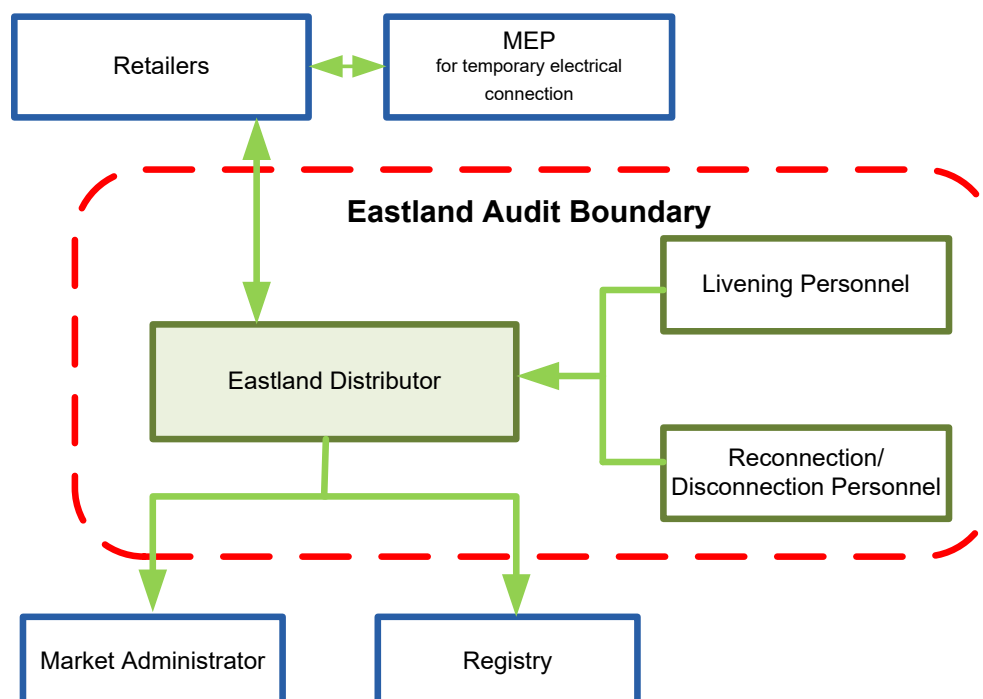
This Distributor audit was performed at the request of Eastland, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

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

The table below shows the tasks under clause 11.10(4) of Part 11, which Eastland 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 is shown in the diagram below:



1.11. Summary of previous audit

The previous audit conducted in June 2020 by Rebecca Elliot of Veritek Limited was reviewed. That audit found five non-compliances and made three recommendations. The current status of the non-compliances and recommendations are detailed in the table below:

Table of non-compliance

Subject	Section	Clause	Non-compliance	Status
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Late update to ready for two ICPs electrically connected during the audit period.	Still existing for different ICPs
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 some ICPs.	Still existing for different ICPs
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	Still existing for different ICPs
ICP location address	4.4	2 Schedule 11.1	24 ICPs with a location address which is not readily locatable.	Still existing for different ICPs
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p) Schedule 11.1	Four incorrect initial electrical connection dates. Two missing initial electrical connection dates.	Still existing for different ICPs

Table of Recommendations

Subject	Section	Recommendation	Status
Distributors to provide ICP information	4.6	Outline to Solar installers that notification must be provided of inspection and testing results. Consider observing testing and inspection at the expense of distributed generators.	Repeated
		Check the unmetered load values with the trader for ICPs: <ul style="list-style-type: none"> • 0007000608ENB95, and • 0007000631EN23C. 	Cleared
		Review the population of liveness dates with inspectors.	Adopted

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

Eastland's data management processes were examined. The list file as of 30 September 2021 and the combined registry compliance audit reports covering the period from 1 May 2020 to 30 September 2021 were examined to confirm compliance.

Audit commentary

Eastland has a fully automated registry update process, which ensures all information listed in this clause is provided to the registry.

Examination of the combined audit compliance reports and the list file found seven electrically connected ICPs with no initial electrical connection date recorded (detailed in **section 3.3**). I also found seven ICPs that have been electrically disconnected (detailed in **section 4.11**) and one ICP that was no longer required (detailed in **section 3.14**) that had not been updated on the registry. The normal registry discrepancy process was unable to be undertaken for some periods during the audit period due to resource constraints. This has resulted in some discrepancies not being identified and corrected as the earliest opportunity. This was to the pricing review that was undertaken. This project is now complete, and the BAU registry discrepancy processes are being carried out again. This is recorded as non-compliance in **section 2.2**.

Audit outcome

Compliant

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

Eastland's data management processes were examined. The list file as of 30 September 2021 and the combined registry compliance audit reports covering the period from 1 May 2020 to 30 September 2021 were examined to confirm compliance.

Audit commentary

Normally Eastland run a data discrepancy report on a daily basis. In addition to the daily report there is a larger suite of monthly discrepancy reports that are run after the billing run (and before bills are issued) to ensure that information is complete and accurate and not misleading or deceptive. Any incorrect data found is corrected upon confirmation of the error.

The normal registry discrepancy process was unable to be undertaken for some periods during the audit period due to resource constraints. This has resulted in some discrepancies not being identified and corrected as the earliest opportunity. This was largely due to a complete pricing review and restructure. This project is now complete, and the BAU registry discrepancy processes are being carried out again.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.2 With: Clause 11.2(2) and 10.6(2) From: 01-May-20 To: 30-Sep-21	Corrections not actioned as soon as practicable. 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 as the BAU processes have been reinstated and corrections are being actioned as soon as practicable. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Reporting and file checks reinstated for regular review		Nov 21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

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 personnel 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

The PR-255 file was examined to determine whether load control devices existed on the network. The management of removal and breakage of seals was discussed.

Audit commentary

Eastland may remove or break a seal to bridge load control switches after hours as a result of direct contact from a customer. The trader is notified the next day of the bridging. Whilst no examples of these types of jobs were identified during the audit I recommend Eastland takes the following steps to ensure future compliance:

1. Ensure all personnel engaged in load control device bridging are qualified to perform the bridging and sealing activities.
2. Prepare and maintain a training and competency schedule for all relevant personnel.
3. Ensure that re-sealing occurs when bridging activities are conducted by non-ATH approved personnel.
4. Ensure MEPs are notified as well as traders that bridging has occurred.

Recommendation	Description	Audited party comment	Remedial action
Load control switch bridging	Ensure all personnel engaged in load control device bridging are qualified to perform the bridging and sealing activities.	Staff assessed and deemed competent during ACH authorisation process	Identified
	Prepare and maintain a training and competency schedule for all relevant personnel.	AHC refresher training matrix	Identified
	Ensure that re-sealing occurs when bridging activities are conducted by non-ATH approved personnel.	Forms & Seals provided for relay by-pass jobs	Identified
	Ensure MEPs are notified as well as traders that bridging has occurred.	Tiny - Information returned to Billing and Revenue Assurance Manager to advise MEP & Retailer Jennette – Traders/Metering teams/MEP will be sent the form upon receipt.	Identified

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

The Disputes Resolution information was examined for Eastland to determine compliance. The Eastland website was checked, correspondence to consumers was provided by Eastland and the phone messaging was examined.

Audit commentary

Examination of customer facing communications found Utilities disputes information:

- was not evident on the website,
- was not provided in email signatures,
- was not provided as part of inbound customer calls, and
- was not included on outbound correspondence to customers.

During the audit the Utilities dispute information:

- was added to the website and is now on the front page of the website,
- has been added to email signatures,
- is intended to be added to the IVR; this is under investigation, and
- has been added to all customer facing letter templates.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11.30A From: 01-Feb-21 To: 25-Nov-21	Utilities disputes information not provided as required by the code. 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 now as this was addressed during the audit. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
All known areas of media have been updated to include prominent and clear advice for UDL contact and resolution. Phone messaging is in the process of being restructured to include detail. Letter templates, all correspondence will include UD information.		Nov21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Above		Above	

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 345 created since May 2020 were checked from the point of application through to when the ICPS were created. There were no ICPS electrically connected with distributed generation associated so there were none to be examined. Eastland does not allow unmetered load connections on their network and has no embedded networks connected to their network.

Audit commentary

Eastland creates ICPS as required by clause 1 of schedule 11.1.

The process in place is robust and has good controls in place. 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. A diverse characteristics sample of 15 new connection applications of the 345 created since May 2020 were checked to determine whether the ICPS had been created within three business days of a request by a trader. There were no ICPS electrically connected with distributed generation associated so there were none to be examined.

Audit commentary

For all new connections an “engineering review” is completed prior to the application for an ICP. The application for service form (AFS) is normally completed by the electrician and includes the nominated trader. This is provided to one of Eastland’s approved contractors, who approves the application from an engineering perspective, and then submits it to Eastland for the final approval and the creation of an ICP. This process is being digitised so that all applications will be received electronically.

The date the AFS is submitted to Eastland is entered into Gentrack as the “received date”; the ICP is then created and provided to the retailer by email. There is a blanket acceptance in place with traders and if a trader rejects the ICP then it is moved back to the “new” status until a trader accepts responsibility. If the nomination is rejected by the trader, Eastland contacts the customer to request they nominate a new trader.

The sample checked confirmed that all were created within three days of the request.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The new connection process was examined in detail and is described in **section 3.2**. The list file was checked and a diverse characteristics sample of 15 new connection applications of the 345 created since May 2020 were checked from the point of application through to when the ICPs were created to confirm the process and controls worked in practice.

Audit commentary

Eastland has a fully automated registry update process to ensure all information listed in this clause is provided to the registry. Information was provided as required by this clause for all ICPs created during the audit period, except for eight electrically connected ICPs with no initial electrical connection dates recorded. These were examined and found:

- three were prior to May 2020 and were found to have been stripped out due to subsequent network events,
- ICP 0000261359EN8DD has since been returned to “inactive - new connection in progress by the trader as it was incorrectly recorded as active, and
- the remaining four ICPs were sent to the registry but the failed registry acknowledgement was missed resulting in these not being populated. This is recorded as non-compliance below and in **sections 2.2 and 4.6**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7 From: 03-Sep-13 To: 27-Sep-21	Seven electrically connected ICPs with no initial electrical connection date populated. 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 moderate as this is usually captured but there is room for improvement. There were only seven initial electrical connection dates missing. The impact on participants is minor because this field is used to validate other fields against.		
Actions taken to resolve the issue		Completion date	Remedial action status
Investigation undertaken - Five items have resolved (some as a result of Registry failed to acknowledge, trader error & historical error) balance to resolve still in progress.		60% complete remainder in progress.	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Access to Audit Compliance reports 1-9 regarding timeliness and 10-16 about potential data accuracy issues are being looked into for access via ENL Registry Manager.		TBC	

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 new connection process was examined. The registry list for 30 September 2021 and the combined registry compliance audit reports covering the period from 1 May 2020 to 30 September 2021 were examined to determine the timeliness of the provision of ICP information for new connections.

Audit commentary

The process is described in **section 3.3**. The event detail report identified that 290 new ICPs were created and electrically connected. The audit compliance reports identified three ICPs of the 290 (99.9% compliance) were made “ready” after electrical connection had occurred. These were examined and found all were delayed due to the trader not accepting the nomination until after electrical connection had occurred. These were backdated between two and eight days after electrical connection.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 20-Apr-21 To: 06-May-21	Late update to “ready” for three of 290 ICPs electrically connected during the audit period. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as the processes in place ensure that the information is provided to the registry prior to electricity being traded. The audit risk rating is assessed to be low as only three ICPs were affected, and they were late a maximum of eight business days.		
Actions taken to resolve the issue		Completion date	Remedial action status
Trader delay in processing – appears all three are now resolved in system		22/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Regular correspondence/direct dialogue to trader has been implemented to identify the issues at the earliest time that report indicates late update to “ready” by trader.		1/12/2021	

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 manager 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 registry list for 30 September 2021 and the combined registry compliance audit reports covering the period from 1 May 2020 to 30 September 2021 were examined to determine the timeliness of the provision of the initial electrical connection date. A diverse characteristics sample of ten late updates were examined.

Audit commentary

Eastland runs a daily report identifying any ICPs with an “active” date and no initial electrical connection date recorded. Eastland send an email to the livening agents requesting that the paperwork be submitted. The energy safety site where electrical connections are recorded is also monitored and this date is used in lieu of the paperwork. However, despite these efforts, paperwork is sometimes late from the field. Eastland intend to work with the network approved contractors to improve the return of paperwork.

There were 319 initial electrical connection date updates in the event detail report. The audit compliance report identified 46 (14%) late updates. The sample of ten late updates examined found:

- six were due to late paperwork back from the field,
- two were identified as being electrically connected but Eastland had to chase the contractors to receive the paperwork,
- ICP 0000401018EN601 was a correction to the active date, and
- ICP 0009801120WWFFC was late due to the metering being recorded against the incorrect ICP which required investigation and was updated as soon as it was resolved.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-May-20 To: 30-Sep-21	Late population of the initial electrical connection date for some ICPs. 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	Controls are rated as strong, as they are sufficient to ensure that the timeliness of initial electrical connection dates are at an acceptable level. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Eight anomalies were accounted for during audit session – no further action required. Remainder 2 ICP's a result of contractor paperwork errors – both corrected on follow up as a result of identification from internal report runs.		22/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Have recently increased the parameters of the reporting run to encompass a larger period to capture these discrepancies – which enables investigation and resolutions to follow asap.		22/12/2021	

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 for 30 September 2021 and the combined registry compliance audit reports covering the period from 1 May 2020 to 30 September 2021 were examined to determine the timeliness of the provision of ICP information for new connections.

Audit commentary

The process remains unchanged during the audit period, traders engage agents who are approved to work on Eastland's network to conduct electrical connection activities. Eastland does not conduct electrical connection; however, the design of the new connections process includes a step where the trader accepts responsibility in accordance with this clause. Eastland network creates all ICPs at "ready" with a proposed trader. All ICPs were recorded in the registry with a nominated trader recorded including the three ICPs that were updated to "ready" late.

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 in **section 3.2**. A diverse characteristics sample of 15 new connection applications of the 345 created since May 2020 identified from the list file were checked to determine if the ICPs were connected at the request of the trader.

Audit commentary

Eastland creates all new ICPs at "ready" and all have a trader who has accepted responsibility for the ICP as confirmed by examination of the list file.

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 compliance audit report for 1 May 2020 to 30 September 2021 was examined.

Audit commentary

Eastland'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. Two ICPs had a meter certification date earlier than that of the first active and the initial electrical connection date. These were examined and found:

- ICP 0002710699EN18F was temporarily electrically connected to certify the meter; this was done without the approval of the network and Eastland are investigating the activities of this electrician, and
- ICP 0000093410WW19B is recorded on the registry with a meter certification date of 7 December 2020 but an active and electrical connection date of 8 December 2021; this was queried with the field technician who confirmed that electrical connection occurred on 8 December 2021 and therefore the meter certification date is incorrect.

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 Eastland 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 NSPs were created by Eastland 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:

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

Audit commentary

Each active ICP has a single loss category, which 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 were examined to determine compliance.

Audit commentary

Eastland creates all ICPs at “ready”, unless they know a network extension is needed. If a trader rejects the ICP then it is moved back to the “new” status until a trader accepts responsibility.

There were no ICPs at the “new” status.

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 registry compliance audit report covering the period from 1 May 2020 to 30 September 2021 was examined to identify any ICPs that had been at “new” and “ready” for more than 24 months.

Audit commentary

Each month Eastland monitors a report of ICPs at the “ready” status. Any record on this report that is older than approximately six months is investigated with the trader.

There were no ICPs at the “new” status and one ICP at the “ready” status for greater than 24 months. ICP 0099041041WWB75 was confirmed to be not required by the trader on 26 January 2021 but this was missed due to human error and has now been “decommissioned - set up in error”

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.14 With: Clause 15 of Schedule 11.1 From: 26-Jan-21 To: 15-Nov-21	One ICP not decommissioned set up in error. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as the process in place mitigates risk to an acceptable level. The audit risk rating is actually none but low is the only available option.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continue current reporting checks and schedules		Nov21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Above		Nov21	

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The list file as of 30 September 2021 was examined.

Audit commentary

Eastland does not supply any embedded generation stations with a capacity of 10 MW or more.

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

New streetlight connections are allowed to be unmetered connections. For all new streetlight connections, the new connection process is expected to be followed with an AFS application being submitted by the council. A notification is then sent to the nominated trader, but it was not clear if an approval is being received from all traders in relation to these where the lights are being added to an existing streetlight ICP. Eastland are investigating this to confirm that these are being received before streetlights are electrically connected. I found no evidence of streetlight connections being connected without trader approval being gained.

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

Eastland will only undertake an electrical disconnection when a request is received from a trader, or for safety. In both instances Eastland 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 one business day and include the date of bridging in its advice.

Audit observation

Processes for meter bridging were reviewed.

Audit commentary

Eastland do not bridge meters on their network. This work is completed by an MEP's authorised agent on behalf of a trader.

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 eight 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 for 30 September 2021 and the registry compliance audit report covering the period from 1 May 2020 to 30 September 2021 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.

No NSP changes were made as Eastland has only one NSP.

Audit commentary

Eastland has a fully automated registry update process, which ensures all information listed in this clause is provided to the registry.

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

Update	Date	Late	% Compliant	Average days
Address	2020	2	97.26%	N/A
	2021	2	98.48%	0.06
Price codes	2020	257	99.03%	N/A
	2021	2,318	92.50%	3.32
Status	2020	31	33.33%	12.88
	2021	97	24.11%	6.84
Network (excl. new connection & Distributed Generation)	2020	38	N/A	N/A
	2021	210	N/A	N/A
Distributed Generation	2020	58	1.69%	25.37
	2021	97	7.50%	23.09

NSP changes were not examined as Eastland has only one NSP.

Address events

There were two late address updates. These were examined and found both were corrections relating to the same address. This is recorded as non-compliance below.

Pricing events

Eastland continue to backdate pricing events, but only if it is found that the customer has been billed incorrectly. This meets the requirement to provide correct and accurate information but does cause non-compliance for the late updating of the registry in these instances.

Eastland has reviewed it's pricing during the audit period, hence there were 30,905 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**) and an increase in the number of backdated pricing changes. A diverse characteristic sample of 20 late updates were checked and found:

- eight were due to being identified as part of the EIEP reports and as these are received monthly the tariff change was backdated to the start of the month,
- seven were corrections to tariff and required investigation before the pricing could be corrected, and
- five were due to the tariff changes discussed above.

Status events

The process is discussed in **section 4.11**. 56 (57%) of the 97 late decommissioning events relate to the streetlight ICP amalgamation for the Wairoa DC streetlights. These were updated one day late. A typical sample of ten of the remaining 41 late decommissioned ICPs were examined and found that:

- nine were delayed due to resource constraints and notifications not being provided from the field; these occurred during the pricing review and have resulted in some decommissioning events being updated late, and
- ICP 0002710493EN919 was delayed due to subsequent events by other participants that had to be reversed before the decommissioning status could be updated.

Network events

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

The network event compliance report was examined and found 210 genuine late network updates. These all related to distributed unmetered load updates. These were being updated as part of the billing process and were backdated to the start of the month. I checked a typical sample of ten ICPs and found that the relevant Council streetlight database is now being used for reconciliation and the ICPs consolidated so these updates are no longer required.

As the report included a large number of incorrect events in it, I am unable to determine the compliance percentage but given the small volume of genuine late network events compliance is expected to be high.

Distributed Generation

The distributed generation process is described in **section 4.6**. There were 97 late distributed generation updates to existing ICPs with 7.5% of all updates sent to the registry within the required timeframe. A typical sample of ten ICPs were checked and found that this is due to the EIEP1 files being the trigger to update the registry and this is done on a monthly basis.

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-May-20 To: 30-Sep-21	Some price, network, status, and address changes were backdated. 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 as the controls will mitigate risk most of the time. The audit risk rating is low as the updates have little to no impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Paperwork return remains slow from installers. 'Profile' field changes in the daily Registry files are being monitored and a monthly PR255 report is being run at the end of each month to check for metering changes.		Nov21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Above		Nov21	

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 registry list and event detail report were reviewed to determine compliance.

Audit commentary

There is no uncertainty regarding NSP and ICP relationships on Eastland's network, as there is only one NSP and one balancing area. The NSP for each ICP is notified to the registry as part of the new connections process.

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 examined.

Audit commentary

Eastland 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 was reviewed to determine compliance for all active ICPs.

Audit commentary

Gentrack flags to users if a duplicate address is going to be created for new ICPs. Sometimes a duplicate address may be created as a result of an address change request from a trader. These are identified via discrepancy reporting. The audit compliance report was reviewed and identified four ICPs with two duplicated addresses. Two were due to the street number and not the lot number being recorded. This has been corrected. The remaining two ICPs are detailed below:

ICP	Address	ICP creation date	Comments
0000281445EN311	40 Pickering Street	01/04/1999	This ICP was decommissioned on the registry on 19/02/18. Upon investigation when the ICP below was applied for it was found that this ICP was still electrically connected with a meter in place, hence it was returned to active. The submission volumes relating to this ICP will be examined in the next Genesis RP audit.
0000281446ENFD1	40 Pickering Street	14/06/2021	A new connection application was received for this address and at the time it was created the ICP above was decommissioned so no duplicate was flagged.

Eastland are doing a field visit to determine the correct address and make the ICPs both readily locatable.

Examination of the list file identified 21 active ICPs with addresses that do not appear to be readily locatable. These were examined and found:

- the addresses for nine ICPs have been updated and they are now readily locatable, and
- the remaining 13 ICPs have no gazetted street number and no additional details are available to make these readily locatable so I recommend investigating if GPS co-ordinates can be added to these ICPs.

Section	Description	Audited party comment	Remedial action
4.4	Investigate populating GPS co-ordinates for the ICPs without readily locatable addresses recorded.	Discussed with ENL Registry Manager whom advised we cannot capture/record this in Gentrack/Registry	Not adopted

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-May-20 To: 30-Sep-21	Four ICPs with duplicate addresses. 21 ICPs with a location address which is not readily locatable. 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	Controls are rated as strong as controls are robust. The audit risk rating is low there were only a small number of ICPs that were not readily locatable.		
Actions taken to resolve the issue		Completion date	Remedial action status
Two ICPs duplicates have been corrected the other two remain under investigation awaiting site visit report from ENL assigned contractor. 21 ICP's not readily locatable are being reviewed and investigated to extents to confirm.		31/3/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
ENL will continue with the current control measures in place. Current actions are as best practicable and with best endeavours to the process. Will review possible further actions moving forward.		31/3/2022	

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 Eastland network. The new connection process includes a step where the isolation point is identified as part of the application.

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*
- *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 30 September 2021 and the audit compliance report for the audit period from 1 May 2020 to 30 September 2021 were reviewed to determine compliance. A sample using typical characteristics of data discrepancies were checked.

Audit commentary

Eastland has a fully automated registry update process, which ensures all information listed in this clause is provided to the registry. All ICP information was checked and confirmed compliant unless discussed below:

Distributed generation

Distributed Generators must apply to Eastland to get approval to connect distributed generation. Once Eastland has granted approval, it is very difficult for them to find out when the inspection and connection has occurred. The most common way they find out is through monitoring of EIEP files to check for a generation row. Once aware of the presence of distributed generation, Eastland confirms that the installation has been inspected by checking the high-risk database and confirms the capacity and fuel type before loading to this to Gentrack. As reported in the last audit, and as detailed in **section 4.1** this process generally takes more than three business days to complete. The project to review this process was put on hold while the pricing review was underway and will be revisited to review and refine this process. I have repeated the last audit recommendation to maintain visibility of two additional steps that can be taken to improve this process:

- Eastland should outline their concerns to the solar installation contracting companies and also use this opportunity to clarify that the Distributed Generators have a responsibility under Clause 7 of Schedule 6.1 to supply written confirmation of the testing and inspection results, and
- Eastland can also insist on observing the testing and inspection process for all connections at the expense of the Distributed Generator.

Subject	Description	Audited party comment	Remedial action
Distributed Generation	Outline to Solar installers that notification must be provided of inspection and testing results. Consider observing testing and inspection at the expense of distributed generators.	ENL is meeting with an approved Electrical Inspector and Engineers late January. New Process and forms to be introduced. Material to include inverter standards and timing requirements. Discussion of ENL being present at testing & inspection to be regenerated with potential applicable fee being discussed. ENL Connection Standards are currently being reviewed and updated and will include further information for DG connections.	Identified

Examination of the list file found 411 ICPs with generation capacity recorded. All had an installation type of "B" or "G" and the fuel type and generation capacity recorded.

The audit compliance report identified three active ICPs where the trader's profile indicates distributed generation is present and Eastland have none recorded. These have all since been confirmed to have distributed generation installed and the registry has been updated.

Unmetered load

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

New streetlight connections are allowed to be unmetered connections. Eastland has an unmetered load recorded for all active ICPs with the UML flag set to Y. Examination of the list file confirmed that all loads matched that of the traders. The two ICPs with an unmetered load difference reported in the last audit have resolved. ICP 0007000608ENB95 has been decommissioned and the unmetered load has been removed as it has been confirmed it is not present on ICP 0007000631EN23.

Initial electrical connection date

A query is in place to identify date mismatches between the initial electrical connection date and the retailer’s first active date, but there are still cases where it’s difficult to determine the correct date. As noted in **section 2.1**, these queries were carried out where possible during the pricing review but not as frequently as normal. This resulted in some mismatches not being corrected as soon as possible.

290 new electrically connected ICPs were identified in the list file. The audit compliance reporting identified eight ICPs with date inconsistencies between the initial electrical connection date, the active date and the meter certification date. These were checked and found Eastland’s initial electrical connection date to be correct for six ICPs and incorrect for two ICPs as detailed below:

ICP	Earliest meter Certification date	Initial Electrical Connection date	Earliest retailer active date	Days difference between first active and IECD	
0000315071ENCCA	27/05/2021	26/05/2021	23/06/2021	0	Meter was certified one day after electrical connection.
0000401628EN7FF	23/06/2021	26/11/2020	23/06/2021	209	The BTS for this ICP was never loaded and the ICP wasn’t made active on the registry until the permanent supply. The trader has since corrected the active date to align with Eastland’s date.
0000035084EN4EB	21/10/2020	21/10/2020	22/10/2020	1	The trader’s active date is incorrect.
0000520146EN897	26/08/2020	13/08/2020	26/08/2020	13	The trader’s active date is incorrect.
0000230173ENFCA	01/07/2020	24/06/2020	24/06/2020	0	Meter was certified late.
0000130782EN92A	11/06/2020	20/05/2020	20/05/2020	0	Meter was certified late.
0002710699EN18F	17/03/2021	19/03/2021	19/03/2021	0	Meter was temporarily electrically connected to certify the meter as detailed in section 3.8 .
0000093410WW19B	07/12/2020	08/12/2020	08/12/2020	0	Active date for ICP was confirmed to be correct with the inspector. Meter certification appears to be incorrect as detailed in section 3.8 .

Eastland adopted the last audit's recommendations and are in the process of updating their new connection standards to further assist in getting the correct information. The audit compliance report identified eight active ICPs with no initial electrical connection date recorded. These were examined and found:

- three were prior to May 2020 and were found to have been stripped out due to subsequent network events,
- ICP 0000261359EN8DD has since been returned to "inactive - new connection in progress by the trader, and
- the remaining four ICPs were sent to the registry but the failed registry acknowledgement was missed resulting in these not being populated. This is recorded as non-compliance below and in **sections 2.2 and 3.3.**

The audit compliance reporting found one ICP at the "ready" status with an initial electrical connection date recorded. ICP 0000510620EN8C6 was examined and confirmed that this has been electrically connected since 6 October 2021 and has since been made active by the trader for the same date.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1)(m) & (p) Schedule 11.1 From: 03-Sep-13 To: 27-Sep-21	One ICP with the incorrect initial electrical connection date. Seven ICPs with missing initial electrical connection dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as they mitigate risk to an acceptable level. The audit risk rating is recorded as low as the overall number of variances is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Reporting and daily file notification checks reinstated.		Nov21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Above		Nov21	

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 registry list were reviewed to determine compliance.

Audit commentary

Eastland is able to confirm these details in the majority of cases prior to electrical connection of the ICP. If any changes are required these are updated as soon as possible. 290 new connections were completed and made active during the period reviewed. The backdated price category changes were checked and confirmed that none were related to new connections.

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 was reviewed to determine compliance.

Audit commentary

Eastland do not populate GPS co-ordinates.

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

Processes to manage the “ready” status were reviewed.

The registry list for 30 September 2021 and the combined registry compliance audit reports covering the period from 1 May 2020 to 30 September 2021 were examined.

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

Audit commentary

The new connection process is detailed in **section 3.2**. Eastland creates all ICPs at the “ready” status, unless they know a network extension needed, or an ICP is rejected by the nominated trader. As noted in **section 3.2**, this has not occurred during the audit period.

Eastland’s process achieves the outcome required by this clause. When ICPs are created at “ready” a proposed trader and price category is recorded in every instance.

The registry list showed 37 ICPs currently at “ready” status, and one has been at the “ready” status for more than two years. This is discussed in **section 3.14**.

As discussed in **section 4.6**, one ICP was identified in the audit compliance reporting as of the “ready” status with an initial electrical connection date recorded. This was examined and confirmed that the date has been correctly populated, and the trader was late in updating the ICP to active.

The records of 15 recently created ICPs were examined, and compliance is confirmed.

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 event detail report and registry list were reviewed to identify ICPs at distributor status.

Audit commentary

Eastland does not have any embedded networks or shared unmetered load; therefore, there are no ICPs with a “distributor” status. This was confirmed by checking the list file.

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 event detail report and registry list were reviewed to identify ICPs at decommissioned status. The eight ICPs at the “ready for decommissioning” status were examined. A sample of ten ICPs decommissioned using the typical sample methodology were checked to confirm that the appropriate checks were carried out.

Audit commentary

All ICPs that have been electrically disconnected for more than 280 days are monitored. Notification is sent to the retailers of these ICPs, with a request for permission to permanently decommission. If this is confirmed by the trader, the process to decommission the site is followed. Requests for decommissioning are also received directly from traders. In all instances written permission must then be received from the property owner. Only once this has been received will the ICP be moved to “ready for decommissioning”. With the dissolution of East tech during the audit period, this work has passed to Electrinet to action on Eastland’s behalf. Notifications are provided back to Eastland. Gentrack is updated, and this then updates to the registry. Notifications are not always being provided to Eastland and this has resulted in a decline in timeliness to updates to the registry as detailed in **section 4.1**.

During the pricing review the decommissioning of ICPs was paused due to resource constrained. This has been restarted in the last month. Examination of the list file found nine ICPs at “ready for decommissioning”. Two ICPs have since been decommissioned as part of BAU. The remaining seven were examined and found:

- notification was sent to the registry for five ICPs but failed to update and the failed registry notification were missed due to resource constraints; these have since been updated on the registry, and
- the remaining two ICPs were missed due to resource constraints and have since been updated on the registry.

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

12 new pricing codes were notified on 30 January 2021 with an effective date of 1 April 2021.

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 factors 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

Two loss factors were updated during the audit period. Both were notified compliantly.

The accuracy of the loss factors is discussed in **section 8**.

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 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.

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 reviewed.

Audit commentary

Eastland has not created or decommissioned any NSPs 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

Eastland 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 three 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 Eastland'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

Eastland 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.

Audit commentary

No NSPs were created during the audit period.

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 supply point table was reviewed.

Audit commentary

Eastland 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

Eastland 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

Eastland has no embedded networks connected to their network.

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

Eastland is not responsible for embedded network gate meters.

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

Eastland 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 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

Eastland does not allow any shared unmetered load connections on its network, and it does not have any existing shared unmetered load connections.

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 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

As detailed in **section 7.1**, Eastland have no shared unmetered load connections on their network.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

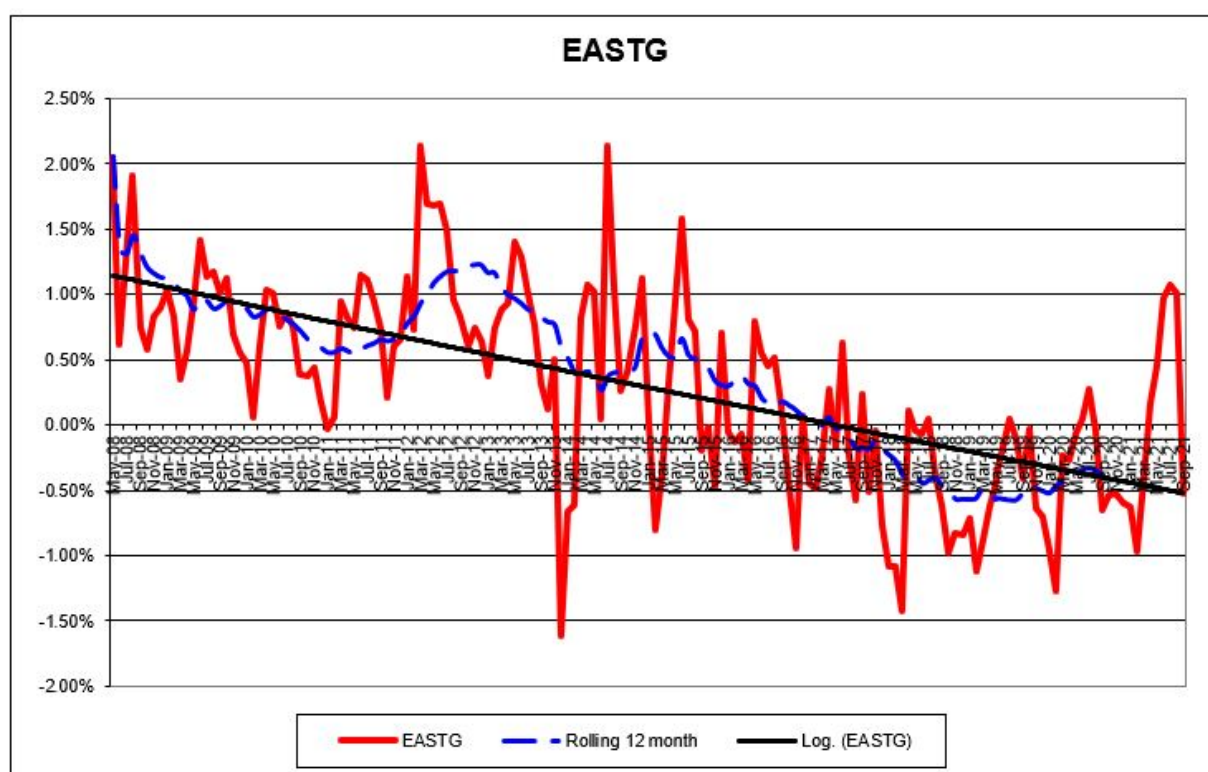
- a) complete and accurate
- b) not misleading or deceptive
- c) not likely to mislead or deceive.

Audit observation

Eastland 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

Eastland review their loss factors on an annual basis. The table below shows that UFE is within the +/- 1%:



Audit outcome

Compliant

CONCLUSION

Eastland have robust processes in place and strive to attain a high level of compliance. This audit found nine non-compliances and makes six recommendations. This an increase in the number of non-compliances reported in the last audit and is due to:

- one non-compliance being recorded for code that came into effect in April 2021 and Eastland have already largely addressed. This is detailed in **section 2.4**, and
- the pricing review that was undertaken during the audit period caused a resource constraint meaning that some BAU processes were paused and not all activity was able to be actioned on time or be completed; the pricing review is now complete and all BAU processes are in operation, so this is not expected to occur again, and it only affected a small number of ICPs.

The non-compliances identified affected a small number of ICPs and have little or no direct impact on reconciliation. The future risk rating indicates that the next audit is due in 12 months. I have considered this in conjunction with:

- eight out of ten non-compliances reported have strong control ratings confirming that controls overall are strong,
- where possible during the audit, Eastland have addressed non-compliances as has been detailed in audit, and
- Eastland's comments.

I recommend that the next audit be in 14 months time.

PARTICIPANT RESPONSE

The last 18 months has brought significant change to Eastland Network as a business. 2 tariff rebuilds, a business re-set and management changes has impacted on processes and resources in a challenging time in the industry.

The Audit has been carefully reviewed with discussions undertaken to identify where additional checks and investigations can be implemented to improve compliance matters. 2 new processes have been undertaken, 1 for Relay By-passes and 1 relating to decommissioning confirmations. Processes that have been intermittent are now back on a regular schedule and will contribute to an improved compliance standard moving forward.

DG and batteries are now being seen in our region more and a discussion had with Veritek and email contact made with the EA Senior Advisor – Compliance, has confirmed the ‘Type’ and ‘Capacity’ required for correct imputation to Registry. Current entries will be reviewed and checked to ensure they have been recorded as ‘Other’ where necessary.

The Initial Energisation Date (IED) as mentioned in previous Audits is still difficult to reconcile on occasions as Trader information can either “lead or lag” in this area.

We thank Veritek for the time and assistance given and discussions had. As always this is an informative process and one we appreciate the positive engagement from.