

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**



For

EASTLAND NETWORK LIMITED

Prepared by: Rebecca Elliot, Veritek Limited

Date audit commenced: 5 May 2020

Date audit report completed: 28 June 2020

Audit report due date: 07-Jul-20

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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 at the Eastland's premises in Gisborne, on June 4th, 2020.

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

Eastland have continued to work hard to improve compliance, and this is reflected in the improved result. In this audit I have checked the accuracy of the initial electrical connection dates provided by the field to Eastland with the paperwork provided from the trader's field contractors and found that the dates being provided to Eastland don't appear to be accurate in a small number of cases. I recommend that the date accuracy is checked with the field contractors to ensure they are providing the correct date.

Eastland have a distributed generation project underway to improve this process. I have repeated the last audit's recommendation in relation to this to maintain visibility.

The audit found five non-compliances and three recommendations are made. The audit frequency table indicates that the next audit be due in 18 months. I have considered this result in conjunction with Eastland's responses and agree with this recommendation.

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
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.	Strong	Low	1	Investigating
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
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	24 ICPs with a location address which is not readily locatable.	Strong	Low	1	Identified
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.	Moderate	Low	2	Identified
Future Risk Rating						7	

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	Remedial Action
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.	Investigating
		Check the unmetered load values with the trader for ICPs: <ul style="list-style-type: none"> • 0007000608ENB95, and • 0007000631EN23C. 	Investigating
		Review the population of livening dates with inspectors.	Identified

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.

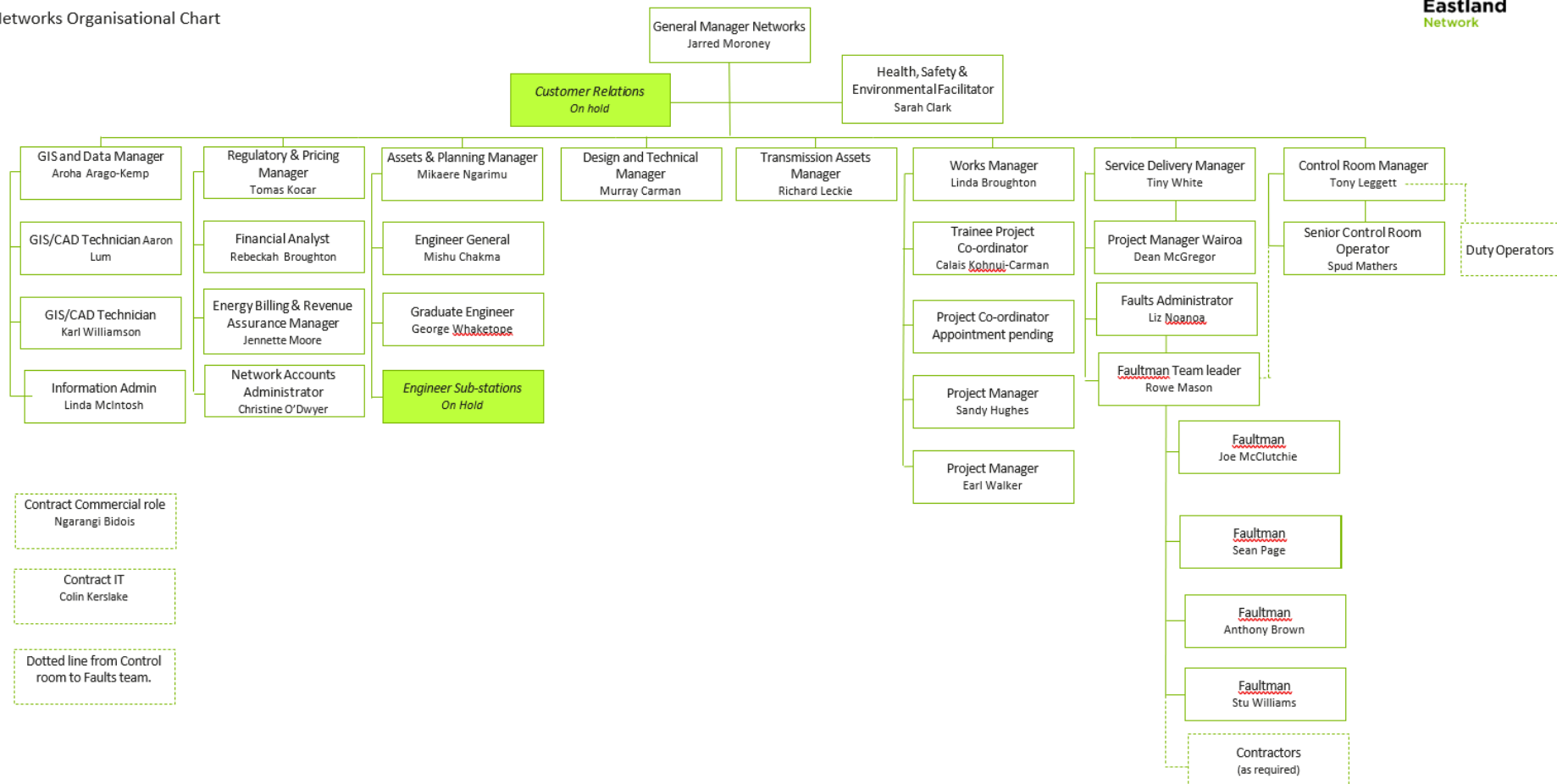
Audit commentary

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:

Networks Organisational Chart



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
Jennette Moore	Billing and Revenue Assurance Manager
Karl Williamson	GIS/CAD Technician
Linda 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
Apex Power Systems Ltd	Gisborne	Jason Collier
Inline Construction Ltd	Gisborne	Aaron McKinnon
Power Connections Ltd	Gisborne	Glen McKinnon
Power Technologies Ltd	Gisborne	Steven Clark (Foxy)
Eastech Ltd	Gisborne	Dennis McConnell
Eastech Ltd	Gisborne	Tony Leggett
Inspectors		
Company	Location	Name
ECIS Ltd	Gisborne	Jai Goodyear
Mark Gregory	Wairoa	Mark Gregory

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.
- 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.
- Information Group carry out image captures on weeknights. But these aren't backups, they are captured to allow recovery of accidental changes to the work files that may occur, and to allow year-on-year comparisons with system status files etc. They also form the basis for a DR where operational files can be carried offsite for worst-case scenario. Status: Increasingly redundant.

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 at 30/04/20:

Status	Number of ICPs (2020)	Number of ICPs (2019)	Number of ICPs (2018)
New (999,0)	0	1	0
Ready (0,0)	32	28	15
Active (2,0)	25,741	25,599	25,549
Distributor (888,0)	0	0	0
Inactive – new connection in progress (1,12)	12	10	12
Inactive – electrically disconnected vacant property (1,4)	442	450	415
Inactive – electrically disconnected remotely by AMI meter (1,7)	82	89	73
Inactive – electrically disconnected at pole fuse (1,8)	14	16	6
Inactive – electrically disconnected due to meter disconnected (1,9)	15	15	5
Inactive – electrically disconnected at meter box fuse (1,10)	4	2	3
Inactive – electrically disconnected at meter box switch (1,11)	4	3	1
Inactive – electrically disconnected ready for decommissioning (1,6)	5	6	8
Inactive – reconciled elsewhere (1,5)	0	0	0
Decommissioned (3)	3,931	3,881	3,808

1.9. Authorisation Received

Eastland provided a letter of authorisation.

1.10. Scope of Audit

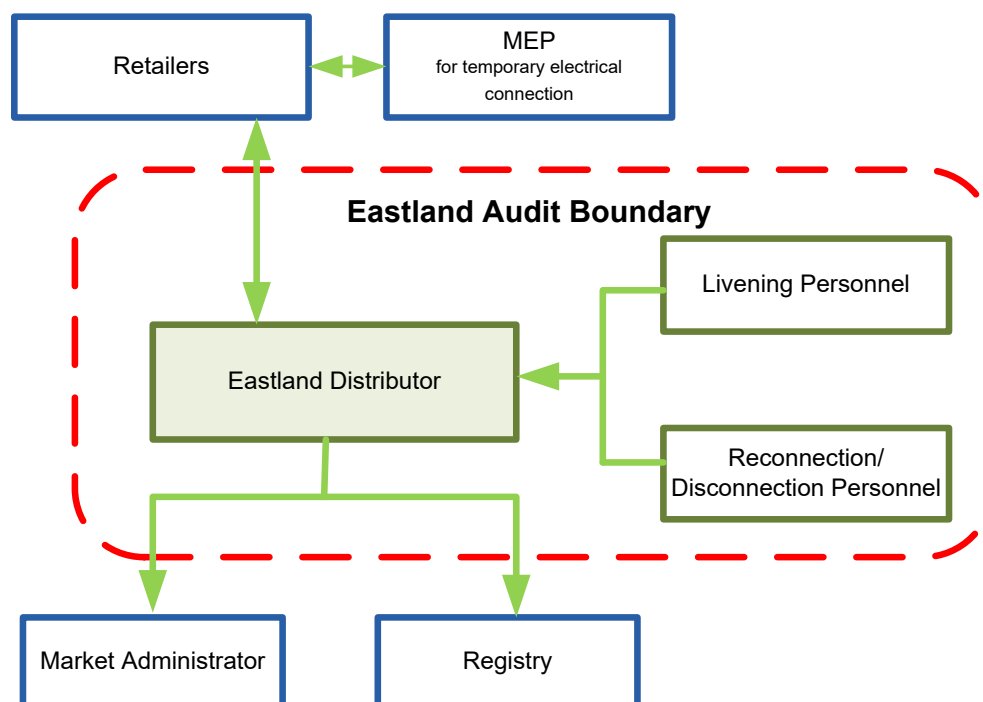
This Distributor audit was performed at the request of Eastland, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

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 2019 by Steve Woods of Veritek Limited was reviewed. That audit found six non-compliances and made five 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
Requirement to provide complete and accurate information	2.1	11.2(1)	Information provided not complete and accurate in all instances.	Cleared
Requirement to correct errors	2.2	11.2(2)	Errors not corrected as soon as practicable.	Cleared
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 6 ICPs (3%).	Still existing
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	Still existing
ICP location address	4.4	2 Schedule 11.1	Four ICPs with duplicate addresses.	Still existing
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p) Schedule 11.1	Two incorrect initial electrical connection dates. 21 ICPs with distributed generation recorded by the trader but Eastland has no details recorded	Still existing

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.	Being considered

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 at 30/04/20 and the combined registry compliance audit reports covering the period from 1/06/19 to 30/04/20 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. Eastland take all practicable steps to meet the requirements of this clause.

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 at 30/04/20 and the combined registry compliance audit reports covering the period from 1/06/19 to 30/04/20 were examined to confirm compliance.

Audit commentary

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.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process was examined in detail and is described in **section 3.2**. A diverse characteristics sample of ten new connection applications of the 181 created since June 2019 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 ten new connection applications of the 181 created since June 2019 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 ten new connection applications of the 181 created since June 2019 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

The process for updating the registry is automated for all fields, and the update occurs on a nightly basis. All had the correct information populated as required by this clause. Review of the sample of new connections confirmed that the ICP information provided to the registry by Eastland was correct.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The new connection process was examined. The registry list for 30/04/20 and the combined registry compliance audit reports covering the period from 1/06/19 to 30/04/20 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 137 new ICPs were created and electrically connected. The audit compliance report identified two ICPs of the 137 (98.5% compliance) were made ready after electrical connection had occurred. These were examined and found both were advised by the trader as not required so they were updated to "Decommissioned set up in error". These ICPs were then electrically connected and the events were reversed as soon this was advised that the ICPs were required but this occurred after electrical connection had occurred.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 19-Aug-19 To: 23-Sep-19	Late update to ready for two ICPs electrically connected during the audit period. Potential impact: Low 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 processes in place ensure that the information is provided to the registry prior to electricity being traded and the two late incidents were exceptions. The actual impact is none but low is the only option available.		
Actions taken to resolve the issue		Completion date	Remedial action status
ENL will continue processes of monitoring & review already maintained as part of BAU. Those exceptions identified in this audit period to be followed up.		1/9/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
ENL will investigate toward potential further control measures, to mitigate exceptions such as those identified in this audit period.		1/9/2020	

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 30/04/20 and the combined registry compliance audit reports covering the period from 1/06/19 to 30/04/20 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 180 initial electrical connection date updates in the event detail report. The audit compliance report identified 30 (17%) late updates. The sample of ten late updates examined found:

- five were due to late paperwork back from the field,
- four were repopulated due to be being stripped out by a later event date so were not populated late, and
- one was a correction made as a result of the last audit.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 16-Oct-17 To: 24-Mar-20	Late population of the initial electrical connection date for some ICPs. Potential impact: Low Actual impact: Low Audit history: Three 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
Improvement: The frequency of requests to ENL livening agents to submit this data will be implemented as part current processes and BAU.		31/7/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Improvement: The frequency of requests to ENL livening agents to submit this data will be implemented as part current processes and BAU.		31/7/2020	

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 30/04/20 and the combined registry compliance audit reports covering the period from 1/06/19 to 30/04/20 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 two ICPs that were updated to ready late. These were both decommissioned as requested by the trader and then reversed when the trader advised they were electrically connected. Both had a nominated trader recorded.

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 ten new connection applications of the 181 created since June 2019 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 1/06/19 to 30/04/20 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. No temporarily connected ICPs were identified.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

No new NSPs were created by 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:

xxxxxxxxxxccc where:

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

Audit observation

The process for the creation of ICPs was examined.

Audit commentary

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

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The 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 1/06/19 to 30/04/20 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” or “Ready” for greater than 24 months.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

- *The loss category code must be unique; and*
- *The distributor must provide the following to the reconciliation manager:*
 - 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 at 30/04/19 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

The electrical connection of street light circuits, which are a point of connection, was examined.

Audit commentary

All new streetlight circuits are metered with individual ICPs. The same new connection process is used as with all other ICPs. Compliance is recorded for the new connection process in **section 3.7**.

The Gisborne District Council DUMML audit found four additional lights that have been added to existing streetlight circuits. Eastland expects all new lighting to be connected to metered circuits but the Council are not adhering to this. The council contractor sends through bulk database changes intermittently. Eastland are working with the council to improve the data flow and that all new streetlights must be connected to a metered circuit.

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 30/04/20 and the registry compliance audit report covering the period from 1/06/19 to 30/04/20 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.

Address events

299 address updates were identified. 297 were updated within than three business days after the event, and two were late.

97.26% were made on time with an average time to update the registry of 14.86 days. There were two late address updates. These were examined and found both were corrections. This is recorded as non-compliance below.

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 recorded 180 late network updates. This was reviewed and found:

- 58 late distributed generation updates which are covered by another of the compliance reports and are discussed below so these have been excluded,
- 80 late initial electrical connection updates which are covered by another of the compliance reports discussed in **section 3.5** so these have been excluded,
- three change of trader events which occur as the ICP is made “ready” and this occurs prior to electrical connection and therefore these have also been excluded, and
- one ICP where a pricing change also sent a network update to the registry, but nothing was changed.

This leaves 38 genuine late network updates. These all related to distributed unmetered load updates. The sample of events examined found three unmetered load changes on the DUML ICPs were updated as soon as the data was provided by the council. As the DUML ICPs are reconciled using database information there is no requirement to update the registry UML field going forward.

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 58 late distributed generation updates, 98.31% were updated late with an average time to update of 25.37 days. 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.

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 its pricing during the audit period, hence there were 26,485 pricing updates that did not relate to the initial population of pricing data (which is discussed separately in **section 3.4** and **section 4.7**).

99.03% were made on time confirming the process was well managed. There were 257 late updates. A sample of ten updates over 30 business days late were checked. All were backdated to correct pricing post the pricing review as soon as they were advised by the trader.

Status events

The process is discussed in **section 4.11**. 33.33% of all disconnection status updates were made on time with an average time to update the registry of 12.88 days. There were 31 late decommissioning status updates. The sample checked found all were due to late paperwork or confirmation from the inspectors that the decommission was completed correctly. The registry is only updated once this has been provided.

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-Jun-19 To: 30-Apr-20	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
Plans to undertake an Education program for Electrical workers and Approved Contractors in the Region is being discussed. This is a project planned for this coming year		In progress, July 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Daily checking of NOT files for changes notified via registry for decommission and metering are followed up with checks with the Engineer and Approved Contractors if paperwork has been received. Where metering has gone in but Solar is not yet active or approved for injection the Engineer is flagged to check with the installer and the Electricity High Risk Register is also checked. See 4.6.		July 2020	

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 will not allow duplicate addresses 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 no duplicate addresses were identified. Examination of the list file identified 24 active ICPs with lot numbers only. All related to new subdivisions where road names and street numbers can take some time to be assigned especially as these tend to be holiday houses. These were all reviewed and a street number has been added where possible leaving three ICPs where there is no gazetted address as yet.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Jun-19 To: 30-Apr-20	24 ICPs with a location address which is not readily locatable. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong 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
ENL are investigating the installation address details and will update accordingly as correct and quantified information is obtained.		31/7/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
ENL will continue with the current control measures in place as part of BAU. In addition, a process improvement to actively review any ICP installation addresses as they come to light and/or known to be new development areas.		Ongoing	

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 at 30/04/20 and the audit compliance report for the audit period from 1/06/19 to 30/04/20 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

The current process is that 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. This process generally takes more than three business days to complete as detailed in **section 4.1** above. There is a project underway to review and refine this process. I have repeated the audit recommendation made in the last audit 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.

Clause	Description	Audited party comment	Remedial action
7(1)(o) of Schedule 11.1	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.	Where metering has gone in and metering detail is found in NOT files ICPs are checked but where Solar is not yet active or approved for injection the Engineer is flagged to check with the installer and the Electricity High Risk Register is also checked. Review is currently underway of the ENL process, this is likely to include the requirement of ENL on site at time of inspection to ensure confirmation is received.	Investigating

Examination of the list file found 313 ICPs with generation capacity recorded. All had an installation type of "B" and the fuel type and generation capacity recorded.

The audit compliance report identified four active ICPs where the trader's profile indicates distributed generation is present and Eastland have none recorded. There were checked and found:

- two were awaiting inspection before they are updated on the registry,
- one has been disconnected until it passes inspection, and
- ICP 0000001942ENC2E has no injection metering recorded on the registry and no application has been received, therefore it appears that the trader's profile is incorrect.

Unmetered load

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

Eastland does not allow any new unmetered connections to their network. All new streetlighting is expected to be metered.

Eastland has an unmetered load recorded for all active ICPs with the UML flag set to Y. Examination of the list file found two ICPs with an unmetered load that is different to the that recorded by the trader. The load matches to the details provided to Eastland but I recommend that these loads are checked with the trader to confirm which value is correct.

Clause	Description	Audited party comment	Remedial action
7(1)(o) of Schedule 11.1	Check the unmetered load values with the trader for ICPs: <ul style="list-style-type: none"> • 0007000608ENB95 and • 0007000631EN23C. 	Awaiting response from Trader	Investigating

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.

180 new connections were identified in the event detail report. The audit compliance reporting identified 11 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, incorrect for four ICPs and I was unable to be determined for one ICP:

ICP	Earliest meter Certification date	Initial Electrical Connection date	Earliest retailer active date	Comments
0000480881EN93F	25/02/2020	24/02/2020	25/02/2020	Unable to determine correct liven date - Eastland paperwork indicates 24/2/20 but Contact paperwork indicates 25/2/20 and first meter reading was provided 27/2/20. See evidence below.
0000911491WWBEC	21/02/2020	17/02/2020	05/02/2020	Eastland's paperwork indicates liven date is correct. This will be checked in the Genesis audit to confirm. This is a cat 4 site.
0000230169EN7F6	29/01/2020	29/01/2020	11/02/2020	The Retailer's active date is incorrect.
0000230170EN30A	29/01/2020	29/01/2020	05/02/2020	The Retailer's active date is incorrect.
0000029675ENDDE	14/02/2020	31/10/2019	14/02/2020	The Retailer's active date is incorrect.
0000230141EN8B7	11/02/2020	14/10/2019	14/10/2019	The Retailer's active date is incorrect.
0000091742WW955	31/01/2020	30/01/2020	31/01/2020	Eastland's date is incorrect-human error.
0000192844EN5ED	16/01/2020	17/12/2019	16/01/2020	The Retailer's active date is incorrect.
0002601471ENE0B	04/12/2019	03/12/2019	04/12/2019	Eastland paperwork indicates 3/12/19 but Genesis paperwork indicates 4/12/19 with a start read of 0000 indicating Genesis' start date is correct . See evidence below.
0000003140ENFE6	19/09/2019	18/09/2019	19/09/2019	Eastland's date is incorrect-human error.
0000241075ENC58	15/08/2019	14/08/2019	15/08/2019	Eastland paperwork indicates 14/08/19 but Genesis paperwork indicates 15/08/19 with a start read of 0000 indicating Genesis' start date is correct . See evidence below.

ICP 0000480881EN93F

Eastland paperwork:

Date Lived: 241 02/2020

Signed: [Signature]

Name: J.E. COLLIER

Contact Paperwork:

Remarks: <input type="checkbox"/> Further work required by Contact?	
Hang/liven/inspect.Signal Strength : 29	
SUBCODE:	Attachments: Add
(Circle One)	Charge Contact No Charge
Premium Pricing	
After Hours? (Circle One) <u>No</u> After Hours Public Holidays	Location Type: (Circle One) <u>Urban</u> Rural Remote
Other: <input type="checkbox"/> Key Required <input type="checkbox"/> Appointment <input checked="" type="checkbox"/> 3 Phase Metering	
No Asbestos Asbestos - Minor Asbestos - Major	
Date Work Completed: 25 Feb 2020	Time Work Completed: 4:11:57 PM
Completed By: AMS	Closure Code: Completed

ICP 0002601471ENE0B:

Eastland paperwork:

Date Lived: 3/12/19

Signed: [Signature]

Name: Raymond Larsen

RECEIVED
05 DEC 2019

Vers

Genesis paperwork:

0002601471ENE0B

▼ Electricity New BTS Connection - Completion Details

Completion Date	4/12/2019
Meter Location	OLW
Additional Comments	Hang-liven-inspect (AES)/Attend second visit. Was also advised ti
Site Left Energised	Yes

Current Read	Current Read Date
000000	4/12/2019

ICP 0000241075ENC58

Eastland paperwork:

Date Lived: 14/8/19

Signed: [Signature]

Name: Raymond Larsen

RECEIVED
16 AUG 2019

Genesis paperwork:

0000241075ENC58

▼ Electricity New Permanent Connection - Completion Details

Completion Date	15/08/2019
Meter Location	FW
Additional Comments	Hang-liven-inspect (AES)/CommsCode : 8456 Signal Strength : 24/Cert #:A1322044/Com Type:Full/Meter # 19A025078: ph 1 UN24
Site Left Energised	Yes

Current Read	Current Read Date
000000	15/08/2019

The date discrepancies indicate that potentially the Eastland inspectors maybe pre-dating paperwork. I recommend this is discussed with the inspectors.

Clause	Description	Audited party comment	Remedial action
7(1)(o) of Schedule 11.1	Review the population of livening dates with inspectors.	Email advise is in progress to Inspectors and Livening Agents in this regard by 31/7/2020.	Identified

The audit compliance report identified four active ICPs with no initial electrical connection date recorded. Two have since been updated as part of BAU. The remaining two were examined and found to have been missed due to human error.

The audit compliance reporting found one ICP at the "Ready" status with an initial electrical connection date recorded. ICP 0009010441WWB7C was examined and confirmed that this has been electrically connected since 30/04/20 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: 01-Jun-19 To: 30-Apr-20	Four incorrect initial electrical connection dates. Two missing initial electrical connection dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate, because they mitigate risk most of the time. 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
Email advise is in progress to Inspectors and Livening Agents in this regard by 31/7/2020.		1/8/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional resource allocation and process improvement to monitoring/review existing processes and follow up timely receipt of livening agent data		31/7/2020 Ongoing	

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. 205 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 30/04/20 and the combined registry compliance audit reports covering the period from 1/05/19 to 30/04/20 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 32 ICPs currently at “ready” status, none have been at “ready” status for more than two years.

As discussed in **section 4.6**, one ICP was identified in the audit compliance reporting as at 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 ten 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”. A “site verification” process is then followed to ensure that electrical installations associated with ICPs are physically removed before the “Decommissioned” status is used. Gentrack is updated and this then updates to the registry.

There were only five ICPs at “Ready for decommissioning”. One ICP has since been decommissioned. The remaining four are awaiting a site verification before they are decommissioned. The COVID-19 pandemic has delayed getting these inspected.

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

14 new pricing codes were notified on 30/01/20 with an effective date of 1/04/20.

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

No loss factors were changed during the audit period.

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 months 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:

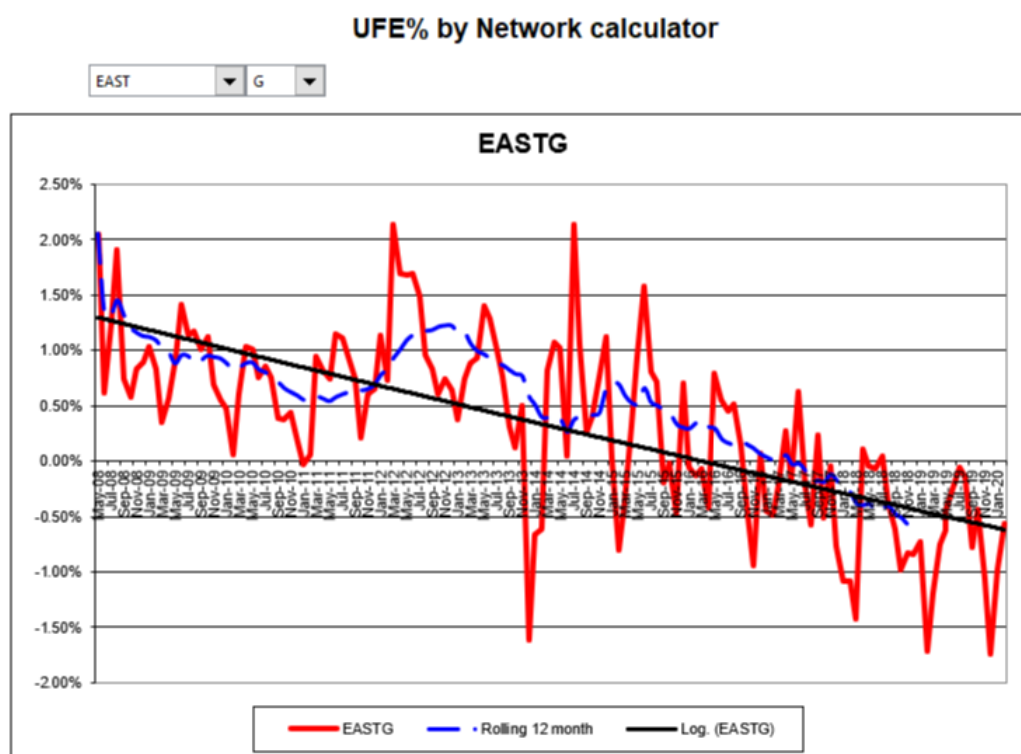
- a) complete and accurate
- b) not misleading or deceptive
- c) not likely to mislead or deceive.

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 continued to work hard to improve compliance, and this is reflected in the improved result. In this audit I have checked the accuracy of the initial electrical connection dates provided by the field to Eastland with the paperwork provided from the trader's field contractors and found that the dates being provided to Eastland don't appear to be accurate in a small number of cases. I recommend that the date accuracy is checked with the field to ensure they are providing the correct date.

Eastland have a distributed generation project underway to improve this process. I have repeated the last audit's recommendation in relation to this to maintain visibility.

The audit found five non-compliances and three recommendations are made. The audit frequency table indicates that the next audit be due in 18 months. I have considered this result in conjunction with Eastland's responses and agree with this recommendation.

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

PARTICIPANT RESPONSE

The Audit results have been carefully reviewed and additional checks have been undertaken where noted to improve compliance. However as per last years audit, we still encounter some “lead or lag” times for field documentation on connections and decommissions.

Distributed Generation is consistently being checked and monitored as the uptake of these connections is increasing in the Region. The difficulty we are still facing is the provision of final ROI/COC documentation, in particular where the installers provide their own Inspectors and electricians. Paperwork can have a significant “lag time” often with the Installer being from out of town. This can cause additional delay in being able to meet compliance requirements. The Applicant themselves is often of the understanding that the Installer has dealt with all installation and connection details and there is nothing for them to do with relation to the Distributors requirements and is often unaware of any issue until they receive a letter or contact from our Network Engineer or Inspector.

The current project for DG connections includes a recommendation to be on site when the final inspection and documentation is signed off. In addition with the DG connection standard and processes we are reviewing how battery technology is being implemented and what records are needed to ensure sites meet compliance standards and records are kept.

We have also found that some Retailers/Traders are prone to provide estimated injection figures where an ICP is seen to have a meter that is capable of and has an ‘I’ channel setup. We have found this prevalent where replacement metering is being installed and switching is occurring, primarily with IHUB metering. The Gaining Retailer is submitting data based on the meter configuration and not on site specific DG connections. This has been discovered when DG submission is found in the Retailer EIEP1 files when processed.

Eastland has worked hard over the last 12 months improving and reviewing current our processes and have appreciated Veritek’s pragmatic approach and assistance in recommending improvements to assist us with meeting compliance.