

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**

For

CBRE NETWORKS LTD

Prepared by: Tara Gannon

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EXECUTIVE SUMMARY

This Distributor audit was conducted at the request of **CBRE Networks Ltd (CBRE)** 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.

CBRE's compliance is reliant on the compliance of TENCO, as the contractor. In this report, I have only recorded those matters where issues were discovered or where specific analysis was undertaken.

The audit found six non-compliances, and no recommendations were made. The next audit frequency table indicates that the next audit be due in 18 months. Two of the non-compliances were technical breaches only, and the controls over all areas of non-compliance were found to be moderate or strong. I recommend that the next audit is completed in 24 months.

The matters raised are set out in the table 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	27 ICPs did not have a proposed trader recorded prior to initial electrical connection. 28 ICPs did not have "ready" status recorded prior to initial electrical connection.	Strong	Low	1	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	14 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.	Strong	Low	1	Identified
Connection of ICP that is not an NSP	3.6	11.17	27 ICPs did not have a proposed trader recorded prior to initial electrical connection.	Strong	Low	1	Identified
Connection of NSP that is not point of connection to grid	3.9	10.30	MEP and meter certification not provided to the RM within 5 business days of electrical connection for CGE0011, CSC0011, and CSC0012.	Moderate	Low	2	Identified
Changes to registry information	4.1	8 Schedule 11.1	Seven late updates to decommissioned status.	Strong	Low	1	Identified
Responsibility for metering information when creating an NSP that is not a POC to the grid	6.9	10.25(2)	MEP and meter certification not provided to the RM within 20 business days of meter certification for CGE0011 and CSC0011.	Moderate	Low	2	Identified
Future Risk Rating						8	

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
		Nil	

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

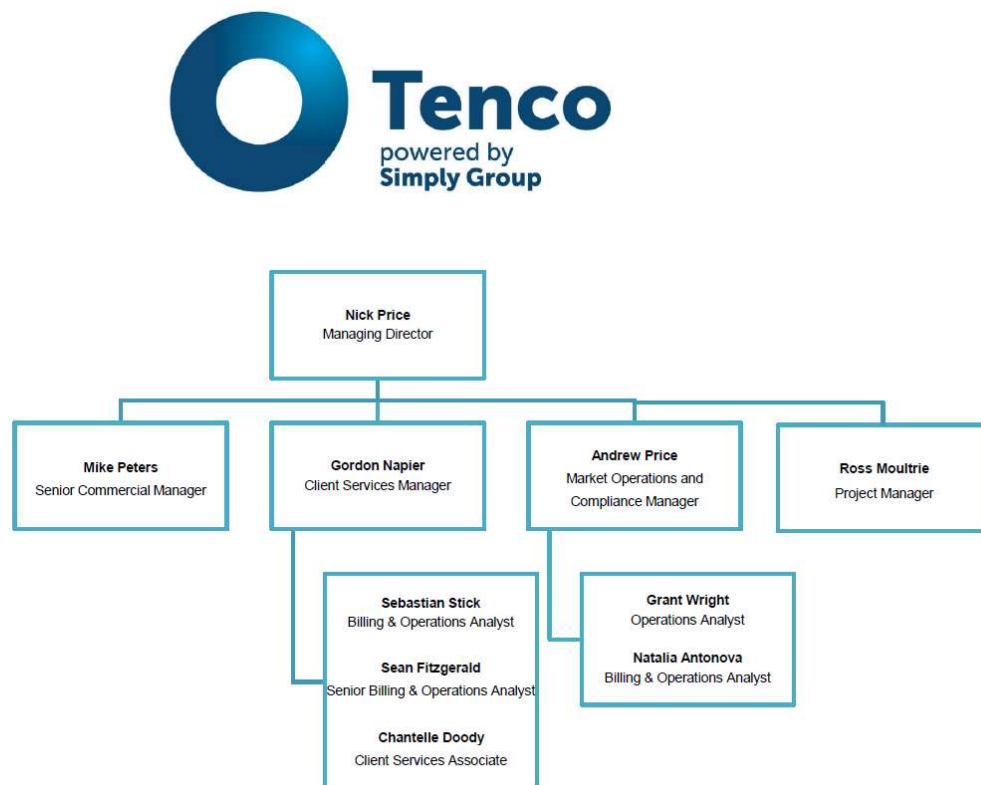
The Electricity Authority website was checked to determine whether CBRE has any Code exemptions in place.

Audit commentary

Review of exemptions on the Electricity Authority website confirmed that there are no exemptions in place for CBRE.

1.2. Structure of Organisation

TENCO provided an organisation chart:



1.3. Persons involved in this audit

Auditor:

Tara Gannon

Veritek Limited

Electricity Authority Approved Auditor

Personnel assisting in this audit were:

Name	Title	Organisation
Grant Wright	Operations Analyst	TENCO
Nick Price	Managing Director	TENCO

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

Audit observation

TENCO performs all CBRE's responsibilities.

1.5. Supplier list

All activities covered by the scope of this audit are conducted by TENCO.

1.6. Hardware and Software

TENCO manages a database called END (Embedded Network Database), which contains all relevant embedded network data.

A spreadsheet is used to create ICP identifiers. The checksum is created by the "checksum" tool provided by Vector.

Salesforce hosts all the ICP information, and registry information is imported daily. A daily registry validation is performed within Salesforce and any discrepancies are managed using the salesforce dashboard.

Confluence is used to map processes.

1.7. Breaches or Breach Allegations

CBRE has not had any breach allegations relevant to this audit recorded by the Electricity Authority.

1.8. ICP and NSP Data

Review of the NSP table showed CBRE had the following NSPs as at 03/06/19. Active ICP numbers are as at 20/05/19.

Dist	NSP POC	Description	Parent POC	Parent Netwk	Balancing Area	Type	Start date	No of ICPs
CBRE	CGP0011	Grand Plimmer Tower Wellington	CPK0331	CKHK	CGP0011CBREE	EN	01/02/10	62
CBRE	CLC0011	88 Shortland St Auckland	PEN1101	VECT	CLC0011CBREE	EN	01/07/17	18
CBRE	CNL0011	Novell House	CPK0331	CKHK	CNL0011CBREE	EN	1/02/12	44
CBRE	CSE0011	66-86 Jervois Quay	CPK0331	CKHK	CSE0011CBREE	EN	1/10/11	27
NSPs created during the period								
Dist	NSP POC	Description	Parent POC	Parent Netwk	Balancing Area	Type	Start date	No of ICPs
CBRE	CGE0011	8 Tangihua St Auckland	PEN1101	VECT	CGE0011CBREE	EN	1/05/18	20
CBRE	CJC0011	16 Kate Sheppard Pl Wellington	WIL0331	CKHK	CJC0011CBREE	EN	1/02/18	29
CBRE	CSC0011	Blg A 167-191 Victoria St Ack	PEN1101	VECT	CSC0011CBREE	EN	1/12/18	15
CBRE	CSC0012	Blg B 167-191 Victoria St Ack	PEN1101	VECT	CSC0012CBREE	EN	1/12/18	15
NSPs transferred to other networks during the period								
Dist	NSP POC	Description	Parent POC	Parent Netwk	Balancing Area	Type	End date	New Dist
CBRE	CGA0011	48 GREYS AVENUE AUCKLAND	PEN1101	VECT	CGA0011CBREE	EN	31/08/17	TENC
NSPs which were decommissioned during the period, with existing ICPs transferred to a new distributor								
Dist	NSP POC	Description	Parent POC	Parent Netwk	Balancing Area	Type	End date	New Dist
CBRE	CFM0011	FMG House	BPE0331	POCO	CFM0011CBREE	EN	31/08/18	POCO

No NSPs transferred to CBRE from other networks during the audit period.

Status	Number of ICPs (2019)	Number of ICPs (2017)	Number of ICPs (2015)	Number of ICPs (2014)
New (999,0)	-	-	2	4
Ready (0,0)	1	-	1	3

Active (2,0)	230	170	159	180
Distributor (888,0)	-	-	-	-
Inactive – new connection in progress (1,12)	1	-	1	-
Inactive – electrically disconnected vacant property (1,4)	3	3	3	3
Inactive – electrically disconnected remotely by AMI meter (1,7)	-	-	-	-
Inactive – electrically disconnected at pole fuse (1,8)	-	-	-	-
Inactive – electrically disconnected due to meter disconnected (1,9)	-	-	-	-
Inactive – electrically disconnected at meter box fuse (1,10)	-	-	-	-
Inactive – electrically disconnected at meter box switch (1,11)	-	-	-	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-	-	-	-
Inactive – reconciled elsewhere (1,5)	-	-	-	6
Decommissioned (3)	73	67	60	49

1.9. Authorisation Received

A letter of authorisation was provided.

1.10. Scope of Audit

This Distributor audit was performed at the request of CBRE, 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 scope of the audit is shown in the table below:

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

The audit report for TENCO will be submitted with this audit.

1.11. Summary of previous audit

CBRE provided a copy of their previous audit conducted in August 2017 by Rebecca Elliot of Veritek Limited. The audit recorded three non-compliances described in the table below, and made no recommendations. The current status of the non-compliances is listed below.

Subject	Section	Clause	Non-compliance	Status
Timeliness of provision if initial energisation date	3.5	7(2A) of schedule 11.1	Two initial energisation dates populated late.	Still existing
Electrical connection of an NSP that is not a POC to the grid	3.9	10.30(2) of schedule 11.1	MEP & meter certification not provided to the RM within 5 business days of electrical connection.	Still existing
Changes to registry information	4.1	8 of schedule 11.1	12 changes to registry not updated within three business days of the event.	Still existing

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

The management of this process is discussed in the TENCO report. The registry list file as at 20/05/19 was examined to confirm compliance.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes since the TENCO audit that are expected to negatively impact on CBRE's compliance. Confluence is used to map exception management processes.

Examination of the list file confirmed compliance.

The following NSPs had a change to the NSP they were embedded under during the audit period:

NSP	Formerly embedded under	Old NSP end date	Now embedded under	New NSP start date
CNL0011	WIL0331	13/09/18	CPK0331	14/09/18
CSE0011	WIL0331	09/01/19	CPK0331	10/01/19
CGP0011	WIL0331	13/09/18	CPK0331	14/09/18

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

Processes to provide information were reviewed and observed throughout the audit.

Audit commentary

This area is discussed in several sections in this report.

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 as part of the TENCO report.

The registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were reviewed to identify all new connections during the period and check that ICPs were created as required by this clause.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes since the TENCO audit that are expected to negatively impact on CBRE's compliance.

Examination of the registry list found 34 ICPs were created during the audit period. ICPs were created in accordance with this clause for all new connections.

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 is discussed in the TENCO report. ICP requests are made by embedded network management or traders, with most requests are provided by the embedded network management. If the request is not made by a trader this rule does not apply.

A sample of five new connections were checked to confirm compliance.

Audit commentary

All of the new connections checked were requested by the customer, not the trader.

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 is discussed in the TENCO report.

The registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were reviewed to identify all new connections during the period and check that information was provided as required by this clause.

Audit commentary

Information was provided as required by this clause for all ICPs created during the audit period.

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 registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were examined to determine the timeliness of the provision of ICP information for new connections.

Audit commentary

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

30 of the 34 new ICPs were electrically connected during the period. All 30 ICPs had a pricing code and address recorded prior to electricity being traded at the ICP.

Some ICP information was populated after initial electrical connection, and is recorded as non-compliance below:

- 27 ICPs did not have a proposed trader recorded prior to initial electrical connection. The proposed trader was recorded one business day after initial electrical connection.
- 28 ICPs did not have "ready" status recorded prior to initial electrical connection. The status was updated one business day after initial electrical connection.

TENCO added the ICPs to the registry at "new" status to allow the MEPs to add meters ready for the embedded network start date of 01/12/18. The late updates occurred because "ready" status was not valid until the change of network was complete on 01/12/18, and the proposed trader was populated at the same time. Because 01/12/18 was a Saturday, the updates were processed on the morning of 03/12/18.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Dec-18 To: 03-Dec-18	27 ICPs did not have a proposed trader recorded prior to initial electrical connection. 28 ICPs did not have "ready" status recorded prior to initial electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	This is a technical non-compliance only, which occurred because the embedded network start date fell on a weekend. The code does not allow an extension to the deadline for recording a proposed trader and status update under these circumstances. The impact is low, because the proposed trader and ready status were recorded within one business day of initial electrical connection.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted, this is a technical non-compliance as we had engaged with the retailers and each network and moved the ICP's to Ready first thing on the next business day following the start date for the Embedded Network – as we are not a 7 day a week business, we could not avoid this non-compliance in this case.		03/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Were we have a network starting on a weekend day we will look to request our registry staff to update Registry on the weekend as opposed to waiting until the first business day following.		On Going	

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 subclause (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 registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were examined to determine the timeliness of the provision of initial electrical connection date information for new connections.

Audit commentary

30 of the 34 ICPs created during the audit period were electrically connected.

16 ICPs had the initial electrical connection date populated on the registry within ten business days of electrical connection, and 14 ICPs had initial electrical connection dates populated 27-30 business days after initial electrical connection. This is recorded as non-compliance below.

TENCO confirmed that the ICPs should have been updated to active on 03/12/18, the embedded network start date. Exceptional circumstances prevented the dates from being updated on time.

TENCO's dashboard identifies any ICPs where the trader has moved the ICP to active status which do not have initial electrical connection dates populated. There was a delay in identifying these ICPs because the trader completed a late update to active status.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.5 With: Clause 7(2) of Schedule 11.1 From: 01-Dec-18 To: 21-Jan-19	14 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection. 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. Exceptional circumstances prevented the initial electrical connection dates from being updated on time, and controls are in place to identify missing and update missing initial electrical connection dates. The impact is low, because there is no direct impact on settlement and the initial electrical connection dates were recorded within 30 business days of initial electrical connection.

Actions taken to resolve the issue	Completion date	Remedial action status
The IED was input when the ICP's were set to Active in Registry by the retailer – we had to chase them for this as had sent them connection details in the lead up to the network go live.	Jan-19	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We managed the network go live and worked with the retailer on the claiming of the ICP's – we should have input on the IED on the 3 rd of December when we knew that the ICP's were live and will do so going forward.	August-19	

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 as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were examined to determine compliance.

Audit commentary

As discussed in the TENCO agent audit report, the new connection process requires applications for new connections to be approved by traders.

Review of the registry list confirmed that a trader is currently recorded for all active ICPs.

As recorded in **section 3.4**, 27 ICPs did not have a proposed trader recorded prior to initial electrical connection. The proposed trader was recorded one business day after initial electrical connection.

TENCO added the ICPs to the registry at “new” status to allow the MEPs to add meters ready for the embedded network start date of 01/12/18. The late updates occurred because ready status was not valid until the change of network was complete on 01/12/18, and the proposed trader was populated at the same time. Because 01/12/18 was a Saturday, the updates were processed on the morning of 03/12/18.

A review of the registry list confirmed that there is no known shared unmetered load on CBRE's network.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.6 With: Clause 11.17 From: 01-Dec-18 To: 03-Dec-18	27 ICPs did not have a proposed trader recorded prior to initial electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	This is a technical non-compliance only, which occurred because the embedded network start date fell on a weekend. The code does not allow an extension to the deadline for recording a proposed trader under these circumstances. The impact is low, because the proposed trader and ready status were recorded within one business day of initial electrical connection.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted, this is a technical non-compliance as we had engaged with the retailers and each network and moved the ICP's to Ready and populated proposed retailer, NSP and pricing first thing on the next business day following the start date for the Embedded Network – as we are not a 7 day a week business, we could not avoid this non-compliance in this case.		03/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will change our process to update the proposed retailer at new status in the future as opposed to loading at the time of network go live.		On going	

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**. The registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were examined to determine compliance.

Audit commentary

As discussed in the TENCO agent audit report, the new connection process requires applications for new connections to be approved by traders. A sample of five of the 30 new connections which were electrically connected during the audit period were reviewed, and were approved to be connected by the trader.

Review of the registry list confirmed that a trader is currently recorded for all active ICPs.

Non-compliance is recorded in **sections 3.4** and **3.6** for the 27 ICPs which did not have a proposed trader recorded prior to initial electrical connection. The proposed trader was recorded one business day after initial electrical connection.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

advising all traders would impose a material cost on the distributor, and

in the distributor's reasonable opinion the advice would not result in any material benefit to any of the traders.

Audit observation

The new connection process was examined in **section 3.2**. The registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were examined to determine compliance.

Audit commentary

All electrically connected ICPs had certified meters prior to their initial electrical connection date. TENCO confirmed that no ICPs were temporarily electrically connected.

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

The following NSPs were created during the audit period:

NSP	NSP start date
CGE0011	01/05/18
CJC0011	01/02/18
CSC0011	01/10/18
CSC0012	01/10/18

Notifications are made directly on the RM portal. NSPs and dates of connection were provided on time, but the MEP and certification expiry date were provided late for CGE0011, CSC0011 and CSC0012.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.9 With: Clause 10.30 From: 01-May-18 To: 03-Oct-18	MEP and meter certification not provided to the RM within 5 business days of electrical connection for CGE0011, CSC0011, and CSC0012. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating
Low	The controls are rated as moderate, because there is some room for improvement. The impact is low, because there is no direct impact on settlement.

Actions taken to resolve the issue	Completion date	Remedial action status
The MEP details were updated late here for CGE0011 this was an oversight on our end as ended up understaff following the unexpected leaving of 1 team member, for CSC0011 and CSC0012 the metering paperwork came to us late which resulted in us in turn being late to update the NSP metering table on the RM portal.	Jun/July-18 & Jan-19	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have increased our resource and are putting better controls on these key steps in the setup of new Embedded Networks to ensure that the updates meet the requirements of Code.	2019	

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

The following NSPs were created during the audit period:

NSP	NSP start date
CGE0011	01/05/18
CJC0011	01/02/18
CSC0011	01/10/18
CSC0012	01/10/18

TENCO confirmed that none of the NSPs were temporarily electrically connected.

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 ICP creation process is discussed in the TENCO report.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes to this process since the last TENCO audit.

TENCO’s END (Embedded Network Database) is used to create ICP identifiers and the checksum is created by the “checksum” tool provided by Vector.

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 as at 20/05/19 was examined to confirm whether all active ICPs have a single loss category.

Audit commentary

Each active ICP only 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 registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 was examined to determine compliance.

The ICP creation process was reviewed as part of the TENCO agent audit.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes to this process since the last TENCO audit.

No ICPs currently have “new” status. 33 ICPs were created at “new” status during the audit period. All were later moved to “ready” then “active” status, except three ICPs which were no longer required and were decommissioned.

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

Monitoring of “new” and “ready” status is discussed in the TENCO report. The list file as at 20/05/19 was examined.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes to this process since the last TENCO audit.

Examination of the list file found no ICPs at “new” status and one ICP at “ready” status. No ICPs have been at “new” or “ready” status for over 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 registry list as at 20/05/19 was examined to determine compliance.

Audit commentary

Review of the registry list confirmed that no embedded generation is connected.

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 registry list as at 20/05/19 was reviewed to determine compliance.

Audit commentary

CBRE obtains permission from the trader before electrically connecting ICPs, as discussed in **section 3.2**.

Review of the registry list confirmed that no unmetered load is connected, apart from residual load ICPs. CBRE does not intend to connect any other unmetered load to the network in the future.

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 three business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or three business days after the distributor has decommissioned the ICP.

Audit observation

The management of this process is discussed in the TENCO report. I also examined the event detail report for 01/01/18 to 20/05/19 to identify late changes to registry information during the audit period.

Initial population of data for new connections is discussed in **sections 3.4** and **3.5**.

Audit commentary

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

Address events

14 address updates not relating to initial population of address data for new connections were identified. All the address updates were made within three business days of the event date.

Network events

172 network updates not relating to initial population of data for new connections were identified.

19 of the network updates were late but were associated with decommissioning events, therefore I have recorded the non-compliance in relation to the decommissioning events which are discussed in detail below. I found that several of the decommissioned ICPs had caused more than one late network event. The other 153 updates were within three business days of the event date.

Pricing events

65 pricing updates not relating to initial population of pricing data for new connections were identified. All updates were within three business days of the event date.

Status events

Seven status updates were identified, excluding updates to “new” and “ready” for new connections.

- Three updates to decommissioned set up in error (3,1) were correctly backdated to the ICP creation date, resulting in the update being 185 business days after the event date.

- Four updates to decommissioned set up in error (3,2 or 3,3) were updated more than three business days after the event date. I found the delays were caused by late trader updates to ready for decommissioning status, which must be processed prior to decommissioning. All four ICPs were decommissioned within two business days of the trader's ready for decommissioning status update.

NSP changes

Review of the registry list for 01/01/18 to 20/05/19 confirmed that no NSP changes occurred during the audit period.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 19-Mar-18 To: 08-Oct-18	Seven late updates to decommissioned status. 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	Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. The late decommissioned status updates were found to be delayed by late trader updates to ready for decommissioning status, and processed within two business days of the trader's update.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted above by our auditor the registry updates required by a distributor were completed within 1 business day of the trader making the change in registry so we therefore could not have completed this change any earlier than we have.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
None as systems are in place but a reliant on other industry participants to meet their obligations to allow us to be compliant.		N/A	

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

Code reference

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

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO report.

The registry list as at 20/05/19 and NSP table were compared to determine compliance.

The registry list for 01/01/18 to 20/05/19 was reviewed to identify any ICPs which had a change of NSP during the audit period.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes to this process since the last TENCO audit.

I compared the registry list and NSP table and confirmed that all active ICPs were mapped to an NSP consistent with the ICP address information.

Review of the registry list for 01/01/18 to 20/05/19 confirmed that no NSP changes occurred during the audit period.

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 3 business days after receiving a request for that information.

Audit observation

The management of customer queries was examined.

Audit commentary

CBRE occasionally receives direct requests for ICP identifiers. These are provided immediately, by looking up the ICP based on information that the customer provides.

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 during the TENCO agent audit. The registry list as at 20/05/19 was reviewed to determine compliance.

Audit commentary

Review of the registry list did not identify any duplicate or difficult to locate addresses.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO report.

Audit commentary

Compliance is recorded for TENCO.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)*
- *the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)*
- *the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)*

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

- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)*
- *if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):*
 - a) *the nameplate capacity of the generator; and*
 - b) *the fuel type*
- *the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).*

Audit observation

Processes to ensure information is accurate were examined during the TENCO agent audit. The registry list as at 20/05/19 was reviewed to determine compliance.

For the 30 new connections which were electrically connected during the audit period, the initial electrical connection date and earliest active date were aligned.

Audit commentary

Review of the registry list and comparison with the meter event details report did not identify any inaccurate information.

Audit outcome

Compliant

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO report.

The registry list as at 20/05/19 and event detail report for 01/01/18 to 20/05/19 were reviewed to identify all new connections during the period and check that pricing information was provided as required by this clause.

Audit commentary

The process followed by TENCO is compliant.

Pricing information was updated on the registry before trading of electricity commenced for all CBRE's 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 as at 20/05/19 was examined to confirm compliance.

Audit commentary

CBRE does not record GPS coordinates on the registry.

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 ICPs at “ready” status were reviewed as part of the TENCO agent audit.

The registry list as at 20/05/19 was reviewed to identify all ICPs at “ready” status.

Audit commentary

One ICP which has not been electrically connected is at “ready” status.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

The registry list for 01/01/18 to 20/05/19 was reviewed to identify any ICPs at distributor status.

Audit commentary

The distributor status was not used at all during the audit period.

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 management of this process is discussed in the TENCO report. The registry list as at 20/05/19, and event detail report for 01/01/18 to 20/05/19 were reviewed to determine compliance.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes to this process since the last TENCO audit.

Seven ICPs were decommissioned during the audit period, and the registry was updated in accordance with this clause. The timeliness of updates to decommissioned status are discussed in **section 4.1**.

No ICPs are currently at ready for decommissioning status.

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 to determine compliance.

Audit commentary

Three price category codes were end dated 30/04/19. No other price categories were created or amended during the audit period.

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 to determine compliance.

Audit commentary

CBRE has not created any new loss category codes 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 to determine compliance.

Audit commentary

CBRE end dated loss factor code CBRNL01 effective from 31/05/18.

CBRE updated the loss factor values for the following codes during the audit period:

Loss factor	Updated from
CBCKL01	01/07/19
CBCKL02	01/07/19
CBLLC01	01/06/18 and 01/05/19
CBREL1	01/06/18

There was a maximum of two loss factors per loss factor category code per month, and all trading periods had a single applicable loss factor.

The loss factor table was updated as required by this clause.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

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

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

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

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

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

Audit observation

The NSP table was examined. Notifications were reviewed.

Audit commentary

CFM0011 was decommissioned during the audit period, and notice was provided to the reconciliation manager as required by this clause.

Four NSPs were created during the audit period:

NSP	Start date	Comment
CGE0011	1/05/2018	ICPs transferred from Vector.
CJC0011	1/02/2018	ICPs transferred from Wellington Electricity.
CSC0011	1/10/2018	New ICPs created by CBRE.
CSC0012	1/10/2018	New ICPs created by CBRE.

Written notice was provided to all parties as required by this clause.

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 examined. Notifications were reviewed.

Audit commentary

Four NSPs were created during the period:

NSP	Start date
CGE0011	1/05/2018
CJC0011	1/02/2018
CSC0011	1/10/2018
CSC0012	1/10/2018

Requests to create NSP identifiers were provided to the RM as required by this clause.

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 examined. Notifications were reviewed.

Audit commentary

Four new balancing areas were created during the period:

NSP	Balancing area	Start date
CGE0011	CGE0011CBREE	1/05/2018
CJC0011	CJC0011CBREE	1/02/2018
CSC0011	CSC0011CBREE	1/10/2018
CSC0012	CSC0012CBREE	1/10/2018

Balancing area notifications were provided to the RM as required by this clause.

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 1 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 and the registry list for 01/01/18 to 20/05/19 were examined. Notifications were reviewed.

Audit commentary

Four NSPs were created during the period:

NSP	Start date	Comment
CGE0011	1/05/2018	ICPs transferred from Vector.
CJC0011	1/02/2018	ICPs transferred from Wellington Electricity.
CSC0011	1/10/2018	New ICPs created by CBRE.
CSC0012	1/10/2018	New ICPs created by CBRE.

Written notice was provided to all parties as required by this clause.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was examined.

Audit commentary

No balancing areas were changed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must 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 examined.

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 and the registry list for 01/01/18 to 20/05/19 were examined. Notifications were reviewed.

Audit commentary

The process followed by TENCO is compliant.

For two NSPs, ICPs transferred from an existing network:

NSP	Start date	Comment
CGE0011	1/05/2018	ICPs transferred from Vector.
CJC0011	1/02/2018	ICPs transferred from Wellington Electricity.

In all cases notification was provided more than three days before the transfer took effect.

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 management of this process is discussed in the TENCO report. The NSP table was examined.

Audit commentary

The process followed by TENCO is compliant. The NSP table was reviewed:

Distributor	NSP POC	Description	MEP	Certification Expiry
CBRE	CGE0011	8 Tangihua St Auckland	AMCI	10/04/2023
CBRE	CGP0011	Grand Plimmer Tower Wellington	FCLM	25/11/2019

Distributor	NSP POC	Description	MEP	Certification Expiry
CBRE	CJC0011	16 Kate Sheppard Pl Wellington	AMCI	11/12/2022
CBRE	CLC0011	88 Shortland St Auckland	AMCI	11/06/2022
CBRE	CNL0011	Novell House	AMCI	2/09/2020
CBRE	CSC0011	Blg A 167-191 Victoria St Ack	AMCI	26/11/2023
CBRE	CSC0012	Blg B 167-191 Victoria St Ack	AMCI	12/12/2023
CBRE	CSE0011	66-86 Jervois Quay	AMCI	1/08/2021

Meter certification details have not been updated for any NSPs since 01/01/2018.

TENCO submitted a code change request on 29/05/19, asking the Authority to consider including embedded network gate meter details on the registry, so that the MEP can maintain these details. The request is under consideration.

Audit outcome

Compliant

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

Audit observation

The NSP table was examined. Notifications were reviewed.

Audit commentary

Four NSPs were created during the period:

NSP	Start date
CGE0011	1/05/2018
CJC0011	1/02/2018
CSC0011	1/10/2018
CSC0012	1/10/2018

Notifications are made directly on the RM portal. NSPs and dates of connection were provided on time, but the MEP and certification expiry date were provided late for CGE0011 and CSC0011.

NSP	Cert date	Reconciliation manager update
CGE0011	11/04/2018	Between 06/06/18 and 25/07/18.
CSC0011	26/11/2018	Between 05/01/19 and 31/01/19.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: Clause 10.25(2)</p> <p>From: 01-Dec-18</p> <p>To: 03-Dec-18</p>	<p>MEP and meter certification not provided to the RM within 20 business days of meter certification for CGE0011 and CSC0011.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate, because there is some room for improvement.</p> <p>The impact is low, because there is no direct impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The MEP details were updated late here for CGE0011 this was an oversight on our end as ended up understaff following the unexpected leaving of 1 team member, for CSC0011 the metering paperwork came to us late which resulted in us in turn being late to update the NSP metering table on the RM portal.		Jun/July-18 & Jan-19	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We have increased our resource and are putting better controls on these key steps in the setup of new Embedded Networks to ensure that the updates meet the requirements of Code.	2019	

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 table was examined.

Audit commentary

CBRE has not acquired any NSPs from other networks during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO report. The NSP table was examined to determine whether there have been any MEP changes during the audit period.

Audit commentary

There have been no MEP changes during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The NSP table and the registry list for 01/01/18 to 20/05/19 were examined. Notifications were reviewed.

Audit commentary

The process followed by TENCO is compliant.

For two NSPs, ICPs transferred from an existing network:

NSP	Start date	Comment
CGE0011	1/05/2018	ICPs transferred from Vector.
CJC0011	1/02/2018	ICPs transferred from Wellington Electricity.

Review of the registry list confirmed that all ICPs with event start dates after 01/01/18 were new connections, had a status change from inactive to active during the period, or had transferred from one of the new NSPs above. No other ICPs were been transferred from existing networks to CBRE.

Consent information was obtained and provided within the required timeframe in accordance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table was examined.

Audit observation

CBRE has not acquired any networks. As detailed in **section 6.12**, some ICPs transferred from a parent network to an embedded network. No ICPs transferred to a CBRE embedded network from another embedded network, therefore this clause does not apply.

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

The registry list for 01/01/18 to 20/05/19 was examined to determine compliance.

Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

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 for 01/01/18 to 20/05/19 was examined to determine compliance.

Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The calculation of loss factors is discussed in the TENCO report.

Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no changes to this process since the last TENCO audit.

TENCO derives loss factors for loss category codes from the published parent network loss factors for similar installations. It is expected that ICPs on embedded networks will have the same loss factor as a similar type of connection on the parent network.

To do this, TENCO determines the gateway loss factor from the LE ICP's loss factor, then determines the local network loss factor which would be likely to apply to the embedded network ICPs if they were connected to the local network. TENCO then calculates the overall loss factor, and multiplies this by the local network loss factor to determine the value for each embedded network loss factor code.

TENCO maintains the internal loss factors in the registry, and within their pricing schedules which are issued to retailers.

I stepped through the process and confirmed that the loss factors were calculated and assigned as expected.

Audit outcome

Compliant

CONCLUSION

CBRE's compliance is reliant on the compliance of TENCO, as the contractor. In this report, I have only recorded those matters where issues were discovered or where specific analysis was undertaken.

The audit found six non-compliances, and no recommendations were made. The next audit frequency table indicates that the next audit be due in 18 months. Two of the non-compliances were technical breaches only, and the controls over all areas of non-compliance were found to be moderate or strong. I recommend that the next audit is completed in 24 months.

PARTICIPANT RESPONSE

TENCO have reviewed this report on behalf of CBRE, and their comments are contained within its body.