

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**



For

UNISON NETWORKS LIMITED

Prepared by: Rebecca Elliot, Veritek Limited

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Date audit report completed: 15 February 2019

Audit report due date: 04-Mar-19

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EXECUTIVE SUMMARY

This Distributor audit was performed at the request of **Unison Networks (Unison)**, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was carried out at Unison's premises in Hastings, on January 30th and 31st, 2018.

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

The audit found 12 non-compliances and makes one recommendation. During the audit period Unison have improved the monitoring of ICPs at the "New" and "Ready" statuses and those pending decommissioning. The reduction from 110 to 39 ICPs pending decommissioning is evidence of this. They have streamlined the new connection process by moving it online and plan to roll out a similar process for the decommissioning of ICPs.

In April 2018, they changed the way NSP updates were processed. This was assessed as part of a material change and approved. The change has not produced the expected outcome resulting in NSP changes being recorded for the incorrect event date. These have been amended as they were discovered but this has caused a high volume of backdated NSP changes to the registry. This has a direct impact on reconciliation hence the audit risk rating of four for this non-compliance. In addition to this it was discovered that the GPS co-ordinates were not being populated to the registry for new ICPs included in these changes. These are being re-populated. Unison have resolved this issue post the site audit and provided proof of these updates working correctly.

Unison continue to make improvements and whilst some non-compliances haven't been cleared the volume of ICPs affected has generally reduced.

The next audit frequency table indicates that the next audit be due in six months. I have considered this result in conjunction with Unison's responses and recommend that the next audit be in 12 months as:

- The overall score just falls into the six months frequency and if the score of one associated with the cleared ICP is removed it moves the next audit frequency to 12 months.
- Seven of the 12 non-compliances identified have strong controls.
- The NSP change issue has been corrected since the site audit and information provided confirms that it is now working as expected.

I thank Roanna and team for their assistance in completing this audit.

The matters raised are shown in the tables below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1)	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Strong	Low	1	Identified
Distributors must create ICPs	3.1	11.4	DUML ICPs not created per NSP for Napier CC, Hastings DC and Hawkes Bay NZTA in accordance with schedule 11.1.	Strong	Low	1	Identified
Provision of ICP Information to the registry manager	3.3	11.7	10 new ICPs electrically connected during the audit period with unmetered load details not recorded in accordance with schedule 11.1.	Moderate	Low	2	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Registry not updated prior to commencement of trading for one ICP.	Strong	Low	1	Disputed
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 42 ICPs (4%).	Moderate	Low	2	Identified
Connection of ICP that is not an NSP	3.6	11.17	One ICP was electrically connected before proposed trader information was provided to the registry.	Strong	Low	1	Identified
Connection of ICP that is not an NSP	3.7	10.31	One ICP was electrically connected before proposed trader	Strong	Low	1	Disputed

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			permission was provided.				
Electrical connection of a point of connection	3.16	10.33A	Streetlight circuits electrically connected without permission being gained from the trader.	None	Low	5	Identified
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	Moderate	Medium	4	Identified
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	Two existing ICPs with an incorrect NSP recorded.	Strong	Low	1	Identified
ICP location address	4.4	2 Schedule 11.1	One ICP does not have a physical address unit number, street number, property name or GPS coordinates to allow it to be readily located.	Strong	Low	1	Cleared
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p) Schedule 11.1	Known unmetered load not recorded in the correct field on the registry. One incorrect initial electrical connection date. Four active ICPs with no initial electrical connection date recorded connected prior to January 2018.	Moderate	Low	2	Identified
Future Risk Rating						21	

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	Description	Recommendation
Electrical connection of a point of connection	3.16	Clause 10.33A	Review the connection of streetlight circuits to ensure that the trader's permission is gained and that the load is being reconciled from the date of the electrical connection.

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 any 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

Unison provided a copy of their organisational structure

1.3. Persons involved in this audit

Auditor:

Rebecca Elliot

Veritek Limited

Electricity Authority Approved Auditor

Unison Networks personnel assisting in this audit were:

Name	Title
Clarissa Bevins	Customer Provisioning Specialist
Corrina Graham	Customer Delivery Administrator
Jason Larkin	Commercial Manager
Raewyn Holloway	Customer Billing Specialist
Roanna Vining	Senior Regulatory Affairs Analyst
Shane Watson	Systems Specialist Financial and Billing

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

All activities are completed directly by Unison.

1.5. Supplier list

All activities are completed directly by Unison.

1.6. Hardware and Software

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

Back-ups are carried out to industry standards.

1.7. Breaches or Breach Allegations

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

1.8. ICP and NSP Data

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

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

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
HAWK	ATI0112	ATIAMURI	ROT0111	HAWK	TAUPROTHAWKG	NP	1/05/08	-
HAWK	FHL0331	FERNHILL			MAGPIESHAWKG	G	1/05/08	15920
HAWK	OWH0111	OWHATA			TAUPROTHAWKG	G	1/05/08	5617
HAWK	RDF0331	REDCLYFFE			MAGPIESHAWKG	G	1/05/08	24149
HAWK	ROT0111	ROTORUA			TAUPROTHAWKG	G	1/05/08	10683
HAWK	ROT0331	ROTORUA			TAUPROTHAWKG	G	1/05/08	11942
HAWK	TRK0111	TARUKENGA			TAUPROTHAWKG	G	1/05/08	3239
HAWK	WRK0331	WAIRAKEI			TAUPROTHAWKG	G	1/05/08	16732
HAWK	WTU0331	WHAKATU			MAGPIESHAWKG	G	1/05/08	23255

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

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date
SMRT	HPL0011	ST AUBYN ST EAST HASTINGS	WTU0331	HAWK	HPL0011SMRTE	E	1/12/2017
TENC	TWQ0011	14 WEST QUAY AHURIRI NAPIER	RDF0331	HAWK	TWQ0011TENCE	E	1/08/2016

A list file detailing the ICP statuses was provided:

Status	Number of ICPs (30 Nov 18)	Number of ICPs (29 Nov 17)
New (999,0)	3	1
Ready (0,0)	183	173
Active (2,0)	111,537	110,618
Distributor (888,0)	2	2
Inactive – new connection in progress (1,12)	148	138
Inactive – electrically disconnected vacant property (1,4)	1518	1558
Inactive – electrically disconnected remotely by AMI meter (1,7)	315	224
Inactive – electrically disconnected at pole fuse (1,8)	18	8
Inactive – electrically disconnected due to meter disconnected (1,9)	32	13
Inactive – electrically disconnected at meter box fuse (1,10)	16	5
Inactive – electrically disconnected at meter box switch (1,11)	10	5
Inactive – electrically disconnected ready for decommissioning (1,6)	39	110
Inactive – reconciled elsewhere (1,5)	-	1
Decommissioned (3)	9708	9278

1.9. Authorisation Received

An authorisation email was provided.

1.10. Scope of Audit

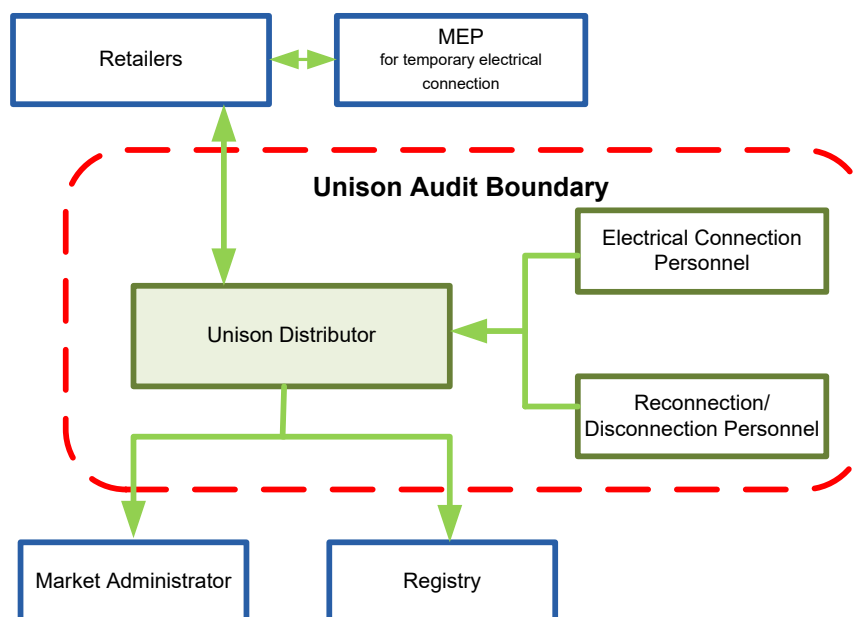
This Distributor audit was performed at the request of Unison, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

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

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

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

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



1.11. Summary of previous audit

The April 2018 material change audit completed by Rebecca Elliot recorded full compliance and did not raise any recommendations or issues.

The March 2018 reconciliation participant audit was completed by Rebecca Elliot. The audit found 13 non-compliances and made three recommendations. The matters raised are detailed in the table below:

Subject	Section	Clause	Non-compliance	Status
Requirement to provide complete and accurate information	2.1	11.2(1)	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Still existing
Requirement to correct errors	2.2	11.2(2)	Errors not corrected as soon as practicable.	Cleared
Provision of ICP Information to the registry manager	3.3	11.7	3 new ICPs electrically connected during the audit period with unmetered load details not recorded in accordance with schedule 11.1.	Still existing
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Registry not updated prior to commencement of trading for 5 ICPs.	Still existing.
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late population of the initial electrical connection date for 45 ICPs (4%).	Still existing.
Connection of ICP that is not an NSP	3.6	11.17	Two ICPs were electrically connected before proposed trader information was provided to the registry.	Still existing.
Monitoring of "new" & "ready" statuses	3.14	15 Schedule 11.1	ICPs greater than 24 months not monitored.	Cleared
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	Still existing.
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	One existing ICP with an incorrect NSP recorded.	Still existing.

Subject	Section	Clause	Non-compliance	Status
ICP location address	4.4	2 Schedule 11.1	One ICP does not have a physical address unit number, street number, property name or GPS coordinates to allow it to be readily located.	Still existing.
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p) Schedule 11.1	Known unmetered load not recorded and three incorrect initial electrical connection dates.	Still existing.
Management of “decommissioned” status	4.11	20 Schedule 11.1	Status mismatch between Gentrack and the Registry for four ICPs.	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1)(b)	Site not certified between 17/4/17- 12/7/17	Cleared

Subject	Section	Clause	Recommendation	Status
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	Review analysis of ICP to NSP mapping to ensure no historic mis-mapped ICPs.	Cleared
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p) Schedule 11.1	Adopt the recommended EA unmetered load format.	Cleared
Notification of shared unmetered load ICP list	7.1	Clause 11.14(2) and (4)	Unison work with the relevant traders to resolve “private” lights - either council add them back into their database or shared unmetered load is created to account for this load.	Cleared

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

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

The registry list file as at 30/11/2018 was examined to confirm compliance.

Audit commentary

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

Information mismatches are managed well through these BAU processes. The previous audit noted that ICPs that at “new” and “ready” for greater than 24 months and ICPs being made “inactive - ready for decommissioning” by traders were not being regularly monitored. The processes were reviewed, and these are now monitored as part of BAU processes.

The last audit recorded that Gentrack had a software bug resulting in some decommissioned status mismatches between the registry and Gentrack. This was investigated further, and the mismatches were found to be as a result of an update to align Gentrack with the all the inactive reasons in the registry e.g. all statuses additional to vacant (1,4) and ready for decommissioning (1,6). Approximately 1,500 ICPs were updated with the correct statuses on 1/1/17 with an event date for the same date. Therefore, if a trader backdates any of these ICPs with the status to “inactive - ready for decommissioning” prior to January 2017, Gentrack will ignore this as there is a subsequent inactive reason. The improved monitoring of ICPs pending decommission will identify any such status misalignments for this group of ICPs. The decommissioning process is discussed in **section 4.11**.

Unison changed the updating of NSP changes during the audit period. This change was subject to a material change audit. Testing provided indicated that the change would be successful, and the change was approved. The change has not produced the expected results. NSP changes were being loaded effective for the same date as the update but the change had occurred 14 days prior. Unison are testing a revised automated process to rectify this. The incorrect NSP updates have been corrected but this has caused an increase in volume of network changes and a large proportion of backdated network events. These are recorded as non-compliance in **section 4.1**.

Five ICPs identified in **section 4.2** were recorded against the correct NSP but had the wrong town recorded. These have been corrected but are recorded here as non-compliance.

The gate meter was recertified during the audit period but the incorrect meter certification expiry date is recorded on the NSP supply point table. This is discussed further in **section 6.8** and is recorded as non-compliance below.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2(1) and 10.6(1)</p> <p>From: 01-Dec-17</p> <p>To: 30-Nov-18</p>	<p>Not all practicable steps are taken to ensure that the information provided is complete and accurate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The registry discrepancies processes are robust</p> <p>The inaccurate information has no direct impact on reconciliation therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>System Change for ICP switching between NSPs</p> <p>Unison has revised the automated process to populate NSP changes for ICP switches. We have provided the auditor with a test report that gives assurance that this change has now worked as intended in the material change request. The unintended consequence of GPS coordinates not updating for new ICPs has also been corrected. Although the provision of GPS coordinates is not an audit requirement, Unison has put this process in place to ensure ICPs are readily identifiable.</p> <p>Recertification Date of Atiamuri Gate Meter</p> <p>Unison has provided Reconciliation Manager with the correct recertification date of the Atiamuri gate meter so that the NSP Supply Point Table can be updated.</p>		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>System Change for ICP Switching Between NSPs</p> <p>Unison will set up regular system reporting and interrogation of the accuracy of the system change for populating NSP information for ICP switching. These reports will be run nightly for the first month, and if no issues are identified, will move to fortnightly reporting. This will provide a regular compliance check to ensure that any failures of this process will be identified early and minimise the impact on reconciliation should any failure occur.</p>		31 March 2019 / Ongoing regular reporting	

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

Unison's data management processes were examined. The registry list file as at 30/11/18 was examined to confirm compliance.

Audit commentary

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

Audit outcome

Compliant

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 20 new connection applications of the 1,266 created since 01/12/17 were checked from the point of application through to when the ICPs were created. The sample included ICPs with unmetered load, distributed generation, different traders, price categories, loss categories and NSPs.

Audit commentary

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

There is an historic issue with council DUML ICPs. When these were created for the councils, they were based on a council function e.g. street lighting vs parks and amenities, but are not NSP specific. Therefore, some of these loads will be being reconciled against the incorrect NSP but these will be within the same balancing area. This has been corrected for Rotorua Lakes Council but will need to be corrected for Napier City Council, Hastings District Council and Hawkes Bay NZTA. The lack of ICP per NSP for these DUML loads is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.1 With: 11.4</p> <p>From: 01-Sep-99 To: 30-Nov-18</p>	<p>DUML ICPs not created per NSP for Napier CC, Hastings DC and Hawkes Bay NZTA in accordance with schedule 11.1.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong as the current process is robust. The non-compliance relates to historical DUML ICP creation</p> <p>The audit risk rating is low as the missing ICPs are all within the same balancing area.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Unison has successfully engaged with Rotorua Lakes Council and acquired the corrected the information DUML ICPs for that region. Taupo District Council Lights relate to a single NSP so no change is required. In the case of Hawke' Bay councils the previous audit identified a number of lights not recorded in the DUML database. We have first focussed on addressing this to ensure completeness. Unfortunately, responsibility for a significant number of these lights believed to be the responsibility of a council has not yet been resolved. We put this down to the relative priority of this issue for councils who outsource management of lighting data and assets. Based on recent engagement and progress we are optimistic this will soon be resolved and we can progress the reallocation of lighting among ICPs based on the corrected database.</p>		TBC – Dependent on third party provision of information.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>In addition to the above engagement with streetlight owners, their agents and retailers we will also be ensuring all new lighting connections are approved by the retailer, including Unison providing the DUML ICP details for the correct NSP to the retailer and council (or their agent). This corrective action is further detailed in our response to audit finding 3.16 in respect of Code obligation under 10.33A.</p>		TBC – Dependent on third party provision of information.	

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 20 new connection applications of the 1266 created since 01/12/17 were checked from the point of application through to when the ICPs were created.

Audit commentary

Unison receives all applications for new connections from customers or their agents. This process was modified in June 2018. All applications are now completed online rather than in hard copy. All applications are received via a dedicated inbox. Upon receipt of the application, it is reviewed and then forwarded to the nominated trader to accept the nomination. The process once the application is received is unchanged with these being managed within Gentrack, attaching all associated documentation to the relevant ICP and creating a robust audit trail. Gentrack will not allow ICPs with duplicate addresses to be created. ICPs are created at the "Ready" status unless there is network extension required. In these cases, they are created at the "New" status. The ICP's are not created until all the relevant details have been provided. New ICPs are electrically connected by a Unison approved connection agent engaged by the trader. Unison issue an authority to electrically connect the ICP to the agent, and a "certificate of livening" is returned to Unison by the livening agent.

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

One example was found of the ICP being created without the notification being sent to the trader to accept for ICP 0000042377HRF0D. This was in March 2018 prior to the new system going live and prior to the automation of notifications being sent. The ICP was subsequently accepted when the trader sent through the request for the electrical connection to progress.

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

A diverse characteristics sample of 20 new connection applications of the 1,266 created since 01/12/17 were checked from the point of application through to when the ICP was created, to confirm the process and controls worked in practice.

Audit commentary

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

Review of the sample of new connections confirmed that the ICP information provided to the registry by Unison was complete except for ten ICPs with an unmetered load associated with them. These were the ICPs created for the Rotorua Lakes Council to map the load to the correct NSP as historically these were mapped to one NSP. This is discussed further in **section 3.1**. The unmetered load details were recorded in the distributor installation detail field under the pricing section but were not populated in the unmetered load field in the Network section on the registry.

The 2018 audit found three ICPs with unmetered load that were electrically connected during the audit period and had no unmetered load recorded. These details were provided as part of the ICP application process. These were populated post the last audit. The accuracy of these is discussed in **section 4.6**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: 11.7 From: 09-Oct-18 To: 30-Nov-18	10 new ICPs electrically connected during the audit period with unmetered load details not recorded in accordance with schedule 11.1. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as all other details were correctly recorded the details were recorded, but not in the correct area in the registry The audit risk rating is low as only ten ICPs were affected during the audit period.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has updated the Registry to show the UML details relating to the ten ICPs electrically connected during the audit period. Unison also notes that we had been advised by a previous auditor not to put the value of the distributed UML in the UML field.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Unison are investigating changes to the new connections wizard to allow for populating UML information. This will minimise human error in populating information.		31 March 2019	

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The event detail report for 01/12/17 to 30/11/18 was 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.

1,266 new ICPs were created since 01/12/17. Of those, 1,010 have been completed and connected. I reviewed these completed new connections on the event detail report to identify ICPs where information was provided late:

- 0000042645HB5D0 was electrically connected on 22/05/18. The ICP was originally created on 24/5/18 for an active date of the same day but was found later to have been electrically connected on 22/5/18 therefore the point of connection but did not have a proposed trader, ready status, pricing or address details recorded on the registry until 24/05/18. This was due to the incorrect property being electrically connected in the first instance. The contractor submitted the application as soon as the error was identified. Unison have advised the contractor that if this happens in the future the power must be disconnected until the ICP has been issued.
- The other 1,009 new connections had a proposed trader, ready status, pricing or address details recorded on the registry prior to initial electrical connection.

The late update of the registry for one new connection is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 22-May-18 To: 24-May 18	Registry not updated prior to commencement of trading for one ICP. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	Controls are rated as strong because almost all registry updates occurred on time. The audit risk rating is low because one of the 1010 new ICPs (0.09%) was affected, and the information was provided two business days late.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>The clause in question states: “The distributor must provide the information specified in subclauses (1)(a) to (1)(o) to the registry manager as soon as practicable after the ICP identifier for the ICP to which the information relates is created, and before electricity is traded at the ICP.”</p> <p>When the PoC was livened in error no ICP identifier was in existence, and no trader was associated with the PoC. This clause was not breached because as soon as the separate request was received to liven the ICP the registry information was updated.</p>	N/A	Disputed
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p>We disagree with this audit finding. There was no request to liven the PoC in question until 24/05. It is purely a coincidence that it was livened in error 2 days prior. Had there been no request to create and liven this ICP it would have been electrically disconnected correcting the original error and there would have been no status change in registry information</p> <p>The alleged breach of S11.1 7 (2) (which we dispute) is based on the discrepancy in the livening date populated and the date the ICP identifier and associated information was populated which differ by two days only as a consequence of the coincident nature of the two distinct and separate events. Firstly, the operational error which was pending correction, and secondly a separate request to create an ICP and liven which was received before the original error had been corrected. We do not believe these two separate events can be combined in this way to establish a breach, although we acknowledge that the original error does constitute a breach of 11.17 (as detailed further in the audit report).</p> <p>We observe that the situation is in no way a reflection of inadequate controls. If such a series of events is to be determined to be a breach, it only serves to incentivise recording information to ensure audit compliance ahead of accuracy.</p> <p>Finally, we note the feedback received from the auditor that the alleged breach shall remain recorded as a breach in the audit report for reasons of consistency with past distributor audits however, we question whether it is necessary to continue to treat a matter as a breach for reasons of consistency when the alleged breach has been shown not to exist. The accuracy of this and future audits should be the priority, not consistency with past audits.</p>	N/A	
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3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The event detail report and the registry list for 01/12/17 to 30/11/18 were examined to determine the timeliness and accuracy of initial electrical connection dates for the 1,010 completed new connections.

- The ten latest updates were checked to determine the reasons for the delay.
- All ICPs where an initial electrical connection date was populated but the trader did not record active status were identified and checked.

Audit commentary

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

The 1,010 completed new connections were reviewed:

- 968 (96%) had initial electrical connection dates updated within ten business days;
- 42 (4%) had initial electrical connection dates populated more than ten business days after initial electrical connection; of those, 36 were populated within 20 business days of connection.

The ten latest updates were checked to determine why they were late, and all were due to the trader updating the ICP to active late and Unison not receiving the paperwork. Unison updated these as soon as they were able to.

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

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 04-Jan-18</p> <p>To: 06-Dec-18</p>	<p>Late population of the initial electrical connection date for 42 ICPs (4%).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate, as they are sufficient to ensure that initial electrical connection dates are accurate and populated on time most of the time.</p> <p>The potential impact is low, of the 42 late updates, 36 were updated within 20 business days of the initial electrical connection date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison notes the non-compliance findings; however, there is no further action we can take to resolve the issue in the Registry.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>In the last Audit report Unison noted that we would implement a full performance management review of third parties (livening agents) who work on our network. This relationship and performance framework was deferred due to a wider review of third party contractor management, but is set down in the workplan in the 2019/20 financial year. This work is now in the workplan for the 2019/20 financial year.</p> <p>Unison has developed a mobile web portal for livening agents to submit livening certificates onsite. This will reduce the delay in Unison receiving the relevant paperwork. The test phase is about to commence with our main agent, before being rolled out to all livening agents.,</p>		<p>End of 2019</p> <p>June 2019</p>	

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.

Audit observation

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

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

Audit commentary

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

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

I reviewed the 1010 completed new connections on the event detail report to identify ICPs where information was provided late:

- 0000042645HB5D0 was electrically connected on 22/05/18 but did not have a proposed trader recorded on the registry until 24/05/18; and
- the other 1,009 new connections had a proposed trader recorded on the registry prior to initial electrical connection.

The late update of the registry for one new connection is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 22-May-18</p> <p>To: 24-May 18</p>	<p>One ICP was electrically connected before proposed trader information was provided to the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because almost all registry updates occurred on time.</p> <p>The audit risk rating is low because one of the 1,010 new ICPs (0.09%) was affected, and the information was provided two business days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The incorrect livening of the ICP in question was a genuine error made by a third party, Vircom (the incorrect fuse holder in the pedestal next to two new builds was livened, despite Unison providing the correct address information). Vircom reported the error to Unison straight away, after which the usual business processes were followed. Unison has advised Vircom to disconnect the ICP if an incorrect livening occurs again in the future.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
There are no further actions Unison can take to prevent a genuine error made by a third party. Unison's processes in this area are strong, as noted by the auditor, and these cannot prevent all human errors.		??	

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.

Audit observation

The new connection process was examined in **section 3.2**. A diverse characteristics sample of 20 new connection applications of the 1266 created since 01/12/17 were checked to determine if the ICPs were connected at the request of the trader.

Audit commentary

The new connection process requires acceptance of applications for new connections from traders prior to the creation of the ICP. The sample checked confirmed compliance for all but one ICP. ICP 0000042645HB5D0 was electrically connected on 22/05/18 but did not have a proposed trader or ready status recorded on the registry until 24/05/18. Unison received a request for the connection from the trader and met the requirements of this clause, but this was not received until after the ICP was connected. This is also recorded as non-compliance in **sections 3.4** and **3.6**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.7 With: Clause 10.31 From: 22-May-18 To: 24-May 18	One ICP was electrically connected before proposed trader permission was provided. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because almost all registry updates occurred on time. The audit risk rating is low because one of the 1010 new ICPs (0.09%) was affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
		N/A	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We disagree that this clause has been breached. Clause 10.31 clearly relates to the intentional temporary connection of an ICP and the conditions under which a participant is permitted to do this. This was not intentional and in fact not temporary as the ICP was never disconnected following the initial error. We acknowledge that the error was a breach of 11.7 covered in the previous audit section but disagree that it breaches clause 10.31.		N/A	

3.8. 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.*

Audit observation

The new connection process was examined in **section 3.2**. The event detail file and registry list for 01/12/17 to 30/11/18 were examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

3.10. 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

Any NSPs that are temporarily electrically connected follow the same process as those all other new connections. No temporarily connected NSPs were identified.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

xxxxxxxxxxccc where:

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

Audit observation

The process for the creation of ICPs was examined.

Audit commentary

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

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The process of allocation of the loss category was examined.

The list file as at 30/11/18 was examined to confirm all active ICPs have a single loss category code.

Audit commentary

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

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

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

The ICP creation process was reviewed. The event detail file and registry list for 01/12/17 to 30/11/18 were examined to determine compliance.

Audit commentary

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

Three ICPs currently have “new” status recorded, and I confirmed that the correct status was applied. Monitoring of ICPs with the “New” and “Ready” status is discussed in **section 3.14**.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

The process to monitor ICPs at “new” and “ready” status was reviewed. The event detail file and registry list for 01/12/17 to 30/11/18 were examined to determine compliance.

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

Audit commentary

The process to monitor ICPs at the “New” and “Ready” statuses are checked monthly and an email is sent to each trader to request confirmation of the ICP still being required.

Examination of the registry list found:

Status	Number of ICPs at status as at 30/11/18	Number of ICPs at status for more than 12 months	Number of ICPs at status for more than 24 months
New (999,0)	3	-	-
Ready (0,0)	183	54	23

All ICPs at ready status for more than 24 months were checked, and I found the oldest creation date was 2/12/2014. Unison have contacted the trader for all:

- 21 have been confirmed as still required by the trader;
- no response has been received from trader for ICP 0000039201HR782; and
- one has since been confirmed to be no longer required and this has been “Decommissioned-set up in error”.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The registry list for 01/12/17 to 30/11/18 was examined to determine compliance.

Audit commentary

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

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

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

Audit outcome

Compliant

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

Code reference

Clause 10.33A

Code related audit information

- (1) A reconciliation participant may electrically connect a point of connection, or authorise the electrical connection of a point of connection, only if—*
 - (a) the reconciliation participant is recorded in the registry as being responsible for the ICP; and*
 - (b) 1 or more certified metering installations are in place at the ICP in accordance with this Part; and*
 - (c) in the case of an ICP that has not previously been electrically connected, the owner of the network to which the point of connection is connected has given written approval of the electrical connection.*
- (2) A reconciliation participant described in subclause (1)(a)—*
 - (a) may authorise the electrical connection of an ICP if—*
 - (i) a metering installation is in place at the ICP; and*
 - (ii) the metering installation is operational but not certified; and*
 - (iii) the reconciliation participant arranges for the certification of the metering installation to be completed within 5 business days of the ICP being electrically connected;*
 - (b) may electrically connect an ICP if the point of connection is solely for unmetered load.*
- (3) A reconciliation participant must not authorise the electrical connection of a point of connection in either of the following circumstances:*
 - (a) a distributor has electrically disconnected the point of connection for safety reasons, and has not subsequently approved the electrical connection of the point of connection;*
 - (b) electrically connecting the point of connection would breach the Electricity (Safety) Regulations 2010.*
- (4) No participant may electrically connect a point of connection or authorise the electrical connection of a point of connection, other than a reconciliation participant in the circumstances described in subclause (1), (2), or (3).*

Audit observation

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

Audit commentary

The connection of street light circuits was discussed. Unison are connecting streetlight circuits but there is no permission being gained from the trader concerned of streetlight circuits being lived. This is recorded as non-compliance. I recommend that Unison review this process to ensure that these items are being reconciled from the point of electrical connection.

Recommendation	Description	Audited party comment	Remedial action
Electrical connection of a point of connection	Review the connection of streetlight circuits to ensure that the trader's permission is gained and that the load is being reconciled from the date of the electrical connection.	<p>Unison notes that we have incorrectly interpreted this clause in the Code and not included a single streetlight being connected to an existing DUMML ICP as a point of connection. However, we do have strong processes in place for gaining approval from a trader before electrically connecting a point of connection. We will ensure that streetlight circuits are now included in this process.</p> <p>As context to this recommendation and breach, Unison understands that the Trader is responsible for the accuracy of the DUMML database and subsequent reconciliation. We also note that we have been processing the connection of additional lighting points and circuits to existing ICPs in line with common industry practice, and that this matter has not been raised in previous audits which have found Unison's controls in this area to be strong. However, we appreciate the incorrect interpretation now being drawn to our attention and will include streetlighting connections in our new connection trader approval process immediately.</p>	Identified

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.16</p> <p>With: Clause 10.33A(4)</p> <p>From: 01-Jan-18</p> <p>To: 30-Nov-18</p>	<p>Streetlight circuits electrically connected without permission being gained from the trader.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as none as there is no process in place to gain permission from the trader for the connection of streetlight circuits.</p> <p>The risk rating is low as the volume of new streetlight circuit connections in relation to the overall network will be small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison notes that we have incorrectly interpreted this clause in the Code and not included a single streetlight being connected to an existing DUMML ICP as a point of connection. However, we do have strong processes in place for gaining approval from a trader before electrically connecting a point of connection. We will ensure that streetlight circuits are now included in this process.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As context to this recommendation and breach, Unison understands that the Trader is responsible for the accuracy of the DUMML database and subsequent reconciliation. We also note that we have been processing the connection of additional lighting points and circuits to existing ICPs in line with common industry practice, and that this matter has not been raised in previous audits which have found Unison's controls in this area to be strong. However, we appreciate the incorrect interpretation now being drawn to our attention and will include streetlighting connections in our new connection trader approval process immediately.		Completed	

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 14 days, the time within which notification must be effected in accordance with Clause 8(3) of Schedule 11.1 begins on the 15th day after the change.

Audit observation

The management of registry updates was reviewed.

The event detail report for 01/12/17 to 30/11/18 was reviewed to determine compliance. A diverse sample of 40 backdated events were reviewed to determine the reasons for the late updates, including ten late address, network, pricing, and status events.

The management of NSP changes was examined, and 15 NSP changes were reviewed.

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

2,252 address updates were identified. 14 of these (0.6%) were updated more than three business days after the event, and five were updated more than 30 business days after the event.

The ten latest updates were checked. Changes to address made in Gentrack cannot be backdated as they always take effect from the day they are made. The late updates reviewed found that these were made directly into the registry. Eight of these were made to replace an earlier reversed event. The trader had requested Unison to reverse their address event so that they could reverse their event. The remaining two were due to corrections.

Network events

There were 15,978 network events that did not relate to the initial population of trader and initial electrical connection dates for new connections (which are discussed separately in **sections 3.4 and 3.5**). This is an increase from the 2,219 identified in the last audit. As discussed in **section 2.1**, the change made to NSP changes made has not worked in production as expected, therefore upon discovery these have been corrected.

6,396 of these (40%) were updated more than three business days after the event. 6,032 (38%) were updated more than 30 business days after the event. The backdating of NSP changes will have contributed to this volume. Due to the variety of changes that can occur in a network update it is not always possible to identify the specific volume of network events that relate to NSP changes. This is discussed below in this section under the heading **NSP changes**.

The sample of ten late updates more than 30 business days after the event date were reviewed and found:

- five related to corrections to unmetered load details;
- two were correction to the initial electrical connection dates;
- two were backdated NSP changes;
- one related to the population of distributed generation details; the installation was thought to have been cancelled and then it was confirmed to be installed and updated accordingly on the registry.

Pricing events

11,627 pricing updates were identified. 6,433 of these (55%) were updated more than three business days after the event. 152 (1.3%) were updated more than 30 business days after the event. The ten latest updates were reviewed and found:

- six were due to late paperwork being provided in relation to upgrades;
- ICPs 0006601796TU239 and 0000040214HR679 were due to late paperwork and in these instances, they were expected to be a BTS but these were connected as permanent supplies, so the pricing was backdated to be correct;
- ICP 0000032928HR868 was to correct Gentrack - the registry was correct, but a duplicate event was created to replace which then updated and corrected Gentrack; and
- ICP 0000261284TU96A was inadvertently backdated to the incorrect year; this was identified as part of the BAU discrepancy checks and the event was reversed and corrected the next business day.

Unison proposed a code change to allow backdated pricing events in 2016, and also provided a submission on the switch process review in November 2018 regarding backdated pricing events. The code change has not been made and the switch process review is still underway, therefore late pricing events remain non-compliant for this audit.

Status events

The decommissioning process has changed during the audit period and further changes are planned. This is discussed in **section 4.11**. Unison are notified of ICPs ready for decommissioning via requests received from traders. The work is then issued to an approved contractor. Once the paperwork has been received back from the contractor, Unison request the trader to move the ICP to “Inactive - ready for decommissioning” status and will decommission the ICP once it is at that status. Unison also monitor ICPs being moved to the “Inactive - ready for decommissioning” status and follow up with the trader if no request to decommission has been received.

373 status updates to decommissioned were identified. 182 of these (49%) were updated more than three business days after the event. 40 were updated more than 30 business days after the event. Ten late updates over 30 business days were reviewed and found six were due to late paperwork being received. The remaining four ICPs were identified by Unison as long term disconnected BTS sites. They queried this with the trader who confirmed they should be decommissioned and then backdated these to “inactive - ready for decommissioning” for the correct date and Unison decommissioned them. These all occurred prior to the code change that now measures the updating of decommissioned ICPs from the later date of either the effective event date or the date the trader moves the ICP to the “inactive - ready for decommissioning status”.

Change of NSP

The process of NSP changes has changed during the audit period. The process change was assessed in a material change audit. It was expected to fully integrate the ADMS real time monitoring system and Gentrack, so that updates to NSPs flow through to Gentrack correctly and therefore get updated on to the registry with the correct effective date and within the required timeframe and only notify NSP changes that exceed 14 days in duration.

The change has not produced the expected results. NSP changes were being loaded effective for the same date as the update but the change had occurred 14 days prior. Unison are testing a revised automated process to rectify this. The incorrect NSP updates have been corrected but as discussed above, this has caused an increase in volume of network changes and a large proportion of backdated network events. However, I was able to identify bulk updates on specific dates that indicate the large volumes of backdated network events relate to this. For example, there were 2,147 network updates on 17/7/18 and 1,917 (89%) of these were backdated.

A sample of 15 of these ICPs were reviewed and found all were backdated due to network reconfiguration. The mapping of ICP to NSP is discussed in **section 4.2**.

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: 1/12/17 To: 30/11/18	Some price, network, status, and address changes were updated more than three business days after the event date. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	Controls were as rated as weak at the time of the site audit as the change to NSP updates has not produced the desired outcome and created a high volume of backdated NSP changes. Unison have corrected this as of February 1 st and provided evidence to support this therefore I have rated the overall controls as moderate. The risk rating is medium, as the correct NSP is required to ensure that volumes are reconciled correctly.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison acknowledges the non-compliances identified here. However, we note that there is no further action we can take to resolve the non-compliances identified.		N/A	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Address Events:</p> <p>Unison notes that changes of address events are arguable not a late update as it is replacing information already in the Registry, at the Trader's request. There is no option available to put in a 'correct' date.</p> <p>Network Events/NSP Changes:</p> <p>Unison has revised the automated process to populate NSP changes for ICP switches. We have provided the auditor with a test report that gives assurance that this change has now worked as intended in the material change request. The unintended consequence of GPS coordinates not being populated for new ICPs has also been corrected. Although the provision of GPS coordinates is not an audit requirement, Unison has put this process in place to ensure ICPs are readily identifiable.</p> <p>Unison will set up regular system reporting and interrogation of the accuracy of the system change for populating NSP information for ICP switching. These reports will be run nightly for the first month, and if no issues are identified, will move to fortnightly reporting. This will provide a regular compliance check to ensure that any failures of this process will be identified early and minimise the impact on reconciliation should any failure occur.</p> <p>Pricing Events:</p> <p>As noted by the Auditor, Unison proposed a code change to allow backdating of pricing events, providing there is agreement between the distributor and retailer. The Code change was included in the Authority's 'Switching' consultation, which we have submitted on. It is expected the Code change will occur in 2019.</p> <p>Status Events:</p> <p>Unison has done a thorough review of its decommissioning process and we have now identified a good process for actively managing and reducing the number of ICPs that are "inactive ready for decommissioning" and "decommissioned". To implement this process with external parties, we are creating a new service request workflow for permanent disconnection in our Gentrack system which will allow Unison to initiate and control the decommissioning process.</p>	<p>N/A</p> <p>Completed</p> <p>31 March 2019 / Ongoing regular reporting</p> <p>TBA 2019 (dependent on Authority schedule)</p> <p>31 March 2019</p>	

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 for 01/12/17 to 30/11/18 were reviewed to determine compliance. 15 streets with active ICPs connected to more than one NSP were checked.

Audit commentary

Each ICP application is checked in the GIS and the correct transformer is selected based on the geographical connection point.

The registry list was reviewed to determine whether all active ICPs with the same physical address street, suburb, and town combination had the same NSP recorded. 254 streets had active ICPs connected to more than one NSP, compared to 258 streets at the time of the last audit. Some of these were main roads, which were expected to have ICPs connected to more than one NSP. I provided a list of 254 streets with potential incorrect NSP allocation and requested a sample of 15 streets with 19 questionable ICPs be checked. Unison checked all 254 streets where most of the ICPs were connected to one NSP, but a small number were connected to another, and found all but two ICPs were connected to the correct NSP. Five ICPs were found to have the incorrect town assigned and these have been corrected. This is recorded as non-compliance in **section 2.1**. The process in place to create ICPs has robust checks to ensure that the ICP is mapped to the correct NSP.

Unison commented in the last audit that Gentrack had a connectivity issue between GIS and Gentrack. Gentrack had advised that the problem appeared to be a base fix affecting all installations (not just Unison's) and implemented a fix to cover all versions of the software. I found no evidence of this occurring in this audit.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 1/1/18 To: 30/11/18	Two existing ICPs with an incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as the GIS clearly identifies transformer and therefore NSP connection point. The audit risk rating is low as only two ICPs were found to be mis-mapped and the list of 254 roads checked so no further incidents of this are expected to be found.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has investigated this ICP and we have amended the Registry to reflect the correct NSP.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As highlighted, there is scope for data capture errors which are unavoidable but of very low incidence. We propose to monitor this on a monthly basis to mitigate the risk going forward.		Completed	

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was examined.

Audit commentary

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

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The process to determine correct and unique addresses was examined. The registry list as at 30/11/18 was reviewed to determine compliance for all active and inactive ICPs.

Audit commentary

Duplicate addresses

A check is performed in GIS and Gentrack to confirm that new addresses created are not duplicates.

Analysis of the registry list did not identify any active ICPs with duplicate addresses.

Not readily locatable

983 of the 111,537 active ICPs do not have GPS coordinates recorded. 982 of the ICPs without GPS coordinates had sufficient address information recorded to allow them to be readily locatable. ICP 0000043059HR360 (Wairakei Drive, Wairakei) does not have sufficient information recorded to locate the ICP as a result. The volume of ICPs without GPS co-ordinates has increased during the audit period due to the NSP update process change which stopped the GPS co-ordinated being populated for new ICPs created. These are being repopulated and ICP 0000043059HR360 was corrected on 25/01/19.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 04-Sep-18 To: 25/1/19	One ICP does not have a physical address unit number, street number, property name or GPS coordinates to allow it to be readily located. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong and the risk as low, because only one ICP had an address that could not be readily located.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has corrected the address details in the Registry for the one ICP and the GPS details of ICPs have been repopulated.		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The NSP switching system change had an unintended consequence that prevented GPS coordinates being populated for new ICPs. Although the provision of GPS coordinates is not an audit requirement, Unison has this process in place to ensure ICPs are readily identifiable. The process has been amended to allow for this information to continue to be populated as intended.		Completed	

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process was discussed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)*
- *the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)*
- *the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)*
- *the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)*
- *the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):*
 - a) *the unique loss category code assigned to the ICP*
 - b) *the ICP identifier of the ICP*
 - c) *the NSP identifier of the NSP to which the ICP is connected*
 - d) *the plant name of the embedded generating station*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)*
- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):*
 - a) *a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity*
 - b) *a blank chargeable capacity if the capacity value can be determined from metering information*
 - c) *the actual chargeable capacity of the ICP in any other case*
- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1)*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)*
- *the status of the ICP (Clause 7(1)(k) of Schedule 11.1)*
- *designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause*

7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)

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

Audit observation

The management of registry information was reviewed. The registry list as at 30/11/18 was reviewed to determine compliance.

A typical sample of data discrepancies were checked.

Audit commentary

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

NSPs

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

LE ICP 0000041159HB181 was not recorded as a dedicated NSP. This has been corrected before the site audit.

Installation type and generation details

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

Analysis of the registry list confirmed there are 1,346 ICPs with generation capacity recorded, an increase from 978 last year. All ICPs with generation capacity have a fuel type and installation type of "B" or "G" recorded on the registry.

There were 20 ICPs with injection/export metering indicated by the MEP on the registry and no generation capacity recorded by Unison. These were examined and found:

- the trader has the HHR profile assigned for 11 of these ICPs; six have no distributed generation installed and five have had applications received of which four have since been confirmed as installed and the distributed generation details have been updated on the registry and one installation is still pending;
- the trader has a profile indicating distributed generation is present for five ICPs; two have since been updated with distributed generation details as part of BAU, two have no distributed generation installed (ICP 0000029588HB3DF has only solar hot water installed and ICP 0076714303HB268 has not been installed and no generation is evident in the EIEP file); ICP 0000590734TUFEA has had no paperwork back to confirm that the installation has been completed and this is being followed up;
- the trader has the RPS or GXP profile assigned for five ICPs; applications have been received for all of these. Two have since been installed and updated on the registry. The installation has been cancelled for two and one installation is still pending.

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

Unmetered load

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

As noted in **section 3.3**, unmetered load is into the incorrect field in Gentrack for ten new DUML ICPs and therefore is not recorded on the registry. Unison are correcting this. This is recorded as non-compliance below.

The three new connections with unmetered load not loaded in the last audit have had the unmetered load details added.

Review of the registry list identified 230 active ICPs with unmetered load recorded by the trader and no unmetered load recorded by Unison, a decrease from 324 identified during the 2018 audit. These are all historic. Unison are populating these in the recommended format if the load can be confirmed.

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

I checked the accuracy of the unmetered load details recorded by Unison against the trader’s unmetered load details and found 35 ICPs where the difference was more than ± 0.1 kWh. 25 of these relate to pay phones where the trader has a burn time of 12 hours and Unison has 24 hours. This load relates to the lighting in telephone boxes and Unison are adjusting their load to align with the traders. Seven related to CCTV cameras and three related to bus shelters. The unmetered load matched to the new connection application form (this includes the three ICPs with unmetered load that were found to be missing in the last audit referred to in **section 3.3**) for these ICPs.

Initial Electrical Connection date

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

I reviewed the 1,010 completed new connections on the event detail report to confirm whether an initial electrical connection date was recorded, and if the date was consistent with the dates populated by the trader and MEP.

ICP 0000043815HBA73 had an initial electrical connection date populated but the ICP was at the “Ready” status. The ICP was checked and the trader has made the ICP active for the same date as the initial electrical connection date.

56 of the 1,010 completed new connections had initial electrical connection dates inconsistent with the earliest active date and/or meter certification date. Of those, 45 did not match the earliest active date and 51 did not match the meter certification date. A sample of ten ICPs with date differences were checked, to determine whether Unison's records were correct and found:

- seven were correct and the trader's date is incorrect based on the livening certificate provided to Unison;
- ICP 0000041742HRB5B was livened with no meter installed on 5/2/18 and the meter was hung two days later; Unison has spoken with the contractor concerned to advise this practice is unacceptable;
- ICP 0000041583HB253 electrical connection date is different to the traders as Unison is populating the "connected" date for the central supply connected which is where there is a shared service main to a separate distribution point (central supply point) which is not owned by Unison and where electrical connection can occur at a later date without Unison's knowledge; and
- ICP 0000042265HRC21 was electrically connected on 19/4/18 but the liven certificate has the liven date incorrectly recorded as 18/4/18 however the earth loop test was completed on 19/4/18 which aligns with the traders.

The incorrect initial electrical connection dates identified in the 2018 audit have been corrected.

The list file was checked since part ten came into effect for any active ICPs that have no initial electrical connection date recorded. This found four ICPs that have never had an initial electrical connection date populated. Three of these were due to the ICPs being decommissioned as set up in error, but then the connection went ahead. In these instances, they were updated manually and not as part of normal BAU so the step to populate the initial electrical connection date step was missed. The remaining ICP occurred as part 10 came into effect and was missed. All have now been updated in the registry.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(m) & (p) Schedule 11.1</p> <p>From: 1/12/17</p> <p>To: 30/11/18</p>	<p>Known unmetered load not recorded in the correct field on the registry.</p> <p>One incorrect initial electrical connection date.</p> <p>Four active ICPs with no initial electrical connection date recorded connected prior to January 2018.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 as Unison mitigate risk most of the time but there is room for errors to occur, specifically in relation to the recording of unmetered load.</p> <p>The audit risk rating is recorded as low as the overall number of variances is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML: Where unmetered load has been identified in the audit but not recorded, Unison has updated this in the Registry to include the unmetered load details.</p> <p>Initial Electrical Connection Date: Unison has corrected the initial electrical connection date for ICP 0000042265HRC21.</p>		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Unmetered Load:</p> <p>As noted in our response to 3.3, Unison are investigating changes to the new connections wizard to ensure correct population of UML information. This will minimise human error in populating information.</p> <p>Initial Electrical Connection Date:</p> <p>Unison notes that due diligence needs to be applied when inputting ICP information manually.</p>		31 March 2019	

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 for 01/12/17 to 30/11/18 were reviewed to determine compliance.

Audit commentary

1,010 new connections were completed and made active during the period reviewed. I reviewed these completed new connections on the event detail report and found all had a pricing category entered within 10 days of being electrically connected.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The registry list as at 30/11/18 was reviewed to determine compliance. GPS coordinates were mapped for a sample of 237 ICPs to determine their accuracy.

Audit commentary

110,554 of the 111,537 active ICPs (99.1%) have GPS coordinates recorded.

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

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

Processes to manage the ready status were reviewed.

The registry list as at 30/11/18 was reviewed to identify and check ICPs at the “Ready” status. A diverse sample of ten ICPs at ready status were checked.

Audit commentary

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

0000042645HB5D0 was electrically connected on 22/05/18 but did not have “ready” status recorded on the registry until 24/05/18. This is recorded as non-compliance in **section 3.4**.

The registry list showed 183 ICPs currently at “Ready” status, 23 of those have been at “Ready” status for more than two years and are discussed further in **section 3.14**. All had a single price category assigned and proposed trader identified.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

The registry list as at 30/11/18 was reviewed to identify ICPs at distributor status. All ICPs with distributor status were reviewed.

Audit commentary

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

There is no known shared unmetered load connected to Unison's network. Unison are working with the traders in relation to some potential shared unmetered load for the Napier City Council. This is discussed further in **section 7.1**.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The registry list as at 30/11/18 was reviewed to identify ICPs at decommissioned and ready for decommissioning status. A diverse sample of 10 ICPs ready for decommissioning, and 10 decommissioned ICPs were checked.

Audit commentary

The decommissioning process is discussed in **section 4.1**. Reporting in place to identify ICPs at the "inactive - ready to be decommissioned" status and this is checked regularly to identify any ICPs that traders have moved to this status but for which Unison have received no request. The volume of ICPs at this status has reduced from 110 in the last audit to 39.

Unison are reviewing this process and plan to move it to be online to streamline this process. Full decommissions will only be able to be undertaken by Unison contractors and not approved agents. This will provide Unison greater control over these.

Examination of the list file found 39 ICPs are at “ready for decommissioning” status.

Ready for decommissioning since	ICP count
2003	2
2012	1
2016	1
2017	8
2018	27

A sample of the ten oldest ICPs at ready for decommissioning status were checked to determine whether the status was correct, and why they have not been decommissioned:

- three have since been decommissioned;
- Unison are in discussion with the trader in relation to five ICPs as to the correct status of these ICPs; and
- two have been decommissioned but no paperwork has been received to support this (one is an ICP amalgamation). Unison are chasing this with the trader.

Issues identified in the 2018 audit were followed up:

- Three of the four ICPs decommissioned in Gentrack but were not on the registry have now been decommissioned in the registry while ICP 0001262586UN05F is still at awaiting decommissioning but is noted in this audit as awaiting paperwork to be returned for an ICP amalgamation. The issue identified in the last audit of ICPs decommissioned in Gentrack but not on the registry was thought to be a software bug, was investigated further, and the mismatches were found to be as a result of an update to align Gentrack with the all of the inactive reasons in the registry e.g. all statuses additional to vacant (1,4) and ready for decommissioning (1,6). Approximately 1,500 ICPs were updated with the correct statuses on 1/1/17 with an event date for the same date. Therefore, if a trader backdates any of these ICPs with the status to “inactive - ready for decommissioning” prior to January 2017, Gentrack will ignore this as there is a subsequent inactive reason. The improved monitoring of ICPs pending decommission will identify any such status misalignments for this group of ICPs.
- ICPs 0000650635TU2AF & 0000650638TUDF4 are still in dispute between Unison and the trader recorded in the last audit; these are included in the five ICPs noted above that are in discussion with the trader;
- The three ICPs that were awaiting paperwork to be returned were decommissioned;
- A request for decommissioning has been received from the trader for ICP 0005001096TU797, and the ICP has been decommissioned.

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

No new pricing codes have been entered since 1 April 2016.

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

The following loss codes had their consumption loss factor adjusted effective from 01/04/19:

- CBTPO
- H3H
- H3L
- R3H; and
- R3L.

In all cases, notification was provided on 02/11/18 and only one loss factor applied per month.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

If the distributor is creating or decommissioning an NSP that is an interconnection point between 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 examined.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

No balancing area changes have occurred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

No existing ICPs became NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

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

Audit commentary

The NSP supply point table was reviewed:

Distributor	NSP POC	Description	MEP	Old certification Expiry	New certification expiry
HAWK	ATI0112	ATIAMURI	MRPL	06/08/18	06/08/21

The NSP was recertified during the audit period. This meter certification was provided. The meter expiry date recorded on the meter certificate is 26/7/23. This is different to the date recorded on the table. This is recorded as non-compliance in **section 2.1**. The Reconciliation Manager provided a log of the update. The update was provided on 17/8/18 and was therefore notified within 20 business days of recertification.

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

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

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

at least one 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

Unison have not initiated any changes of network owner.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

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

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit observation

The registry list as at 30/11/18 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

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

Unison have worked with both councils to progress the potential shared unmetered load:

- Hastings District Council - the potential shared unmetered load has been confirmed to be connected to a metered streetlight circuit.
- Napier City Council - Unison have provided the relevant ICPs for the pensioner village lights. They are still awaiting the outcome of Napier City Council's investigation into the remaining private lights before it can be determined whether any shared unmetered load exists or not.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list as at 30/11/18 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

Review of a registry list confirmed there is no shared unmetered load connected to any Unison ICP, and no changes to shared unmetered load have occurred during the audit period.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

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

Unison provided their CM2002 System Loss Allocation Standard, and system loss allocation spreadsheet. The loss factor table on the registry was reviewed.

Audit commentary

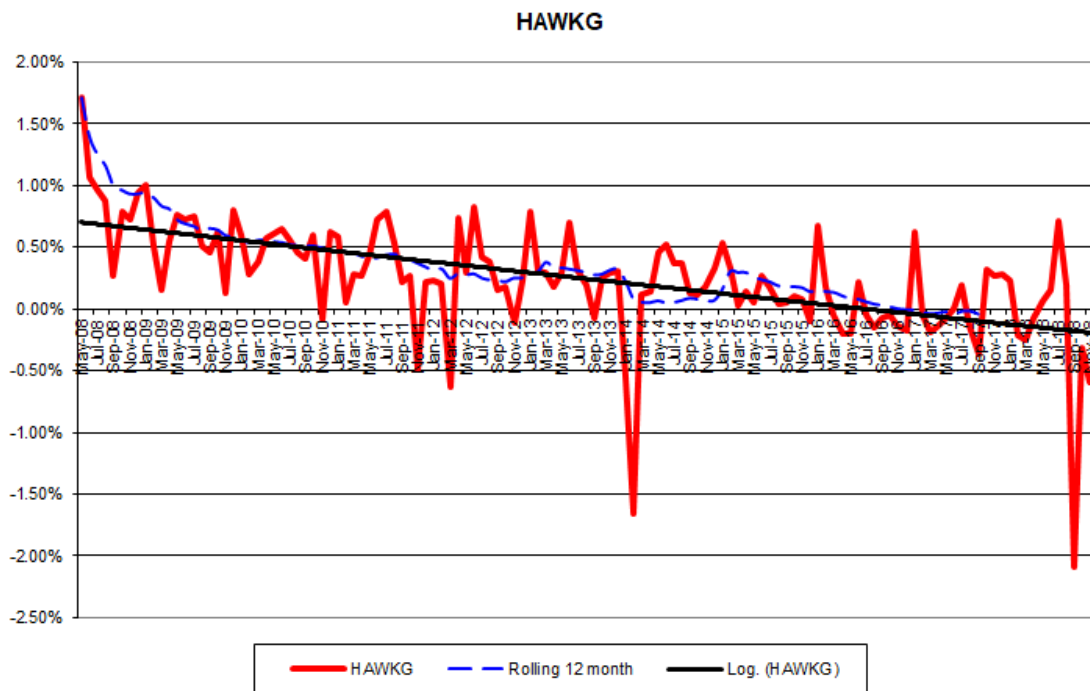
Unison’s provided their documented loss factor processes. These follow the “Guidelines on the calculation and the use of loss factors for reconciliation purposes v2.1”.

Loss factors were revised on 06/09/18, and the following loss codes had their consumption loss factor adjusted effective from 01/04/19:

- CBTPO
- H3H
- H3L
- R3H; and
- R3L.

I confirmed that the updated loss factor codes were consistent with the revised loss factor calculations.

The Electricity Authority provided the reconciliation losses which indicate losses are tracking within the +/- 1% threshold indicated in the guideline. The Electricity Authority confirmed that by the 14 month wash up, losses were tracking at less than 0.1% (0.1 to -0.05%) since April 2016.



Audit outcome

Compliant

CONCLUSION

The audit found 12 non-compliances and makes one recommendation. During the audit period Unison have improved the monitoring of ICPs at the “New” and “Ready” statuses and those pending decommissioning. The reduction from 110 to 39 ICPs pending decommissioning is evidence of this. They have streamlined the new connection process by moving it online and plan to roll out a similar process for the decommissioning of ICPs.

In April 2018, they changed the way NSP updates were processed. This was assessed as part of a material change and approved. The change has not produced the expected outcome resulting in NSP changes being recorded for the incorrect event date. These have been amended as they were discovered but this has caused a high volume of backdated NSP changes to the registry. This has a direct impact on reconciliation hence the audit risk rating of four for this non-compliance. In addition to this it was discovered that the GPS co-ordinates were not being populated to the registry for new ICPs included in these changes. These are being re-populated. Unison have resolved this issue post the site audit and provided proof of these updates working correctly.

Unison continue to make improvements and whilst some non-compliances haven’t been cleared the volume of ICPs affected has generally reduced.

The next audit frequency table indicates that the next audit be due in six months. I have considered this result in conjunction with Unison’s responses and recommend that the next audit be in 12 months as:

- The overall score just falls into the six months frequency and if the score of one associated with the cleared ICP is removed it moves the next audit frequency to 12 months.
- Seven of the 12 non-compliances identified have strong controls.
- The NSP change issue has been corrected since the site audit and information provided confirms that it is now working as expected.

I thank Roanna and team for their assistance in completing this audit.

PARTICIPANT RESPONSE

Unison have reviewed this report and their comments are recorded in the body of the report. No further comments were provided.