

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT**

For

**COUNTIES POWER**

Prepared by: Ewa Glowacka

Date audit commenced: 2 October 2017

Date audit report completed: 26 October 2017

Audit report due date: 28-Oct-17

## TABLE OF CONTENTS

Executive summary .....	4
Audit summary .....	5
Non-compliances .....	5
Recommendations .....	6
Issues 6	
1. Administrative .....	7
1.1. Exemptions from Obligations to Comply with Code (Section 11) .....	7
1.2. Structure of Organisation .....	7
1.3. Persons involved in this audit .....	8
1.4. Use of contractors (Clause 11.2A) .....	8
1.5. Supplier list .....	8
1.6. Hardware and Software .....	8
1.7. Breaches or Breach Allegations .....	8
1.8. ICP and NSP Data .....	9
1.9. Authorisation Received .....	9
1.10. Scope of Audit .....	10
1.11. Summary of previous audit .....	10
2. Operational Infrastructure .....	11
2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1)) .....	11
2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2)) .....	12
3. Creation of ICPs .....	14
3.1. Distributors must create ICPs (Clause 11.4) .....	14
3.2. Participants may request distributors to create ICPs (Clause 11.5(3)) .....	14
3.3. Provision of ICP Information to the registry manager (Clause 11.7) .....	15
3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule 11.1) .....	15
3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1) .....	16
3.6. Connection of ICP that is not an NSP (Clause 11.17) .....	18
3.7. Connection of ICP that is not an NSP (Clause 10.31) .....	18
3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A) .....	19
3.9. Connection of NSP that is not point of connection to grid (Clause 10.30) .....	19
3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30(A)) .....	20
3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1) .....	20
3.12. Loss category (Clause 6 Schedule 11.1) .....	21
3.13. Management of “new” status (Clause 13 Schedule 11.1) .....	21
3.14. Monitoring of “new” & “ready” statuses (Clause 15 Schedule 11.1) .....	21
3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1) .....	22
4. Maintenance of registry information .....	23
4.1. Changes to registry information (Clause 8 Schedule 11.1) .....	23
4.2. Notice of NSP for each ICP (Clauses 7(1), (4) and (5) Schedule 11.1) .....	24
4.3. Customer queries about ICP (Clause 11.31) .....	25

4.4.	ICP location address (Clause 2 Schedule 11.1) .....	25
4.5.	Electrically disconnecting an ICP (Clause 3 Schedule 11.1) .....	27
4.6.	Distributors to Provide ICP Information to the Registry manager (Clause 7(1) Schedule 11.1) .....	27
4.7.	Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1) .....	31
4.8.	GPS coordinates (Clause 7(8) and (9) Schedule 11.1) .....	32
4.9.	Management of “ready” status (Clause 14 Schedule 11.1) .....	32
4.10.	Management of “distributor” status (Clause 16 Schedule 11.1) .....	33
4.11.	Management of “decommissioned” status (Clause 20 Schedule 11.1) .....	34
4.12.	Maintenance of price category codes (Clause 23 Schedule 11.1).....	35
5.	Creation and maintenance of loss factors .....	37
5.1.	Updating table of loss category codes (Clause 21 Schedule 11.1) .....	37
5.2.	Updating loss factors (Clause 22 Schedule 11.1) .....	37
6.	Creation and maintenance of NSPs (including decommissioning of NSPs and transfer of ICPs).....	38
6.1.	Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1) .....	38
6.2.	Provision of NSP information (Clause 26(1) and (2) Schedule 11.1) .....	38
6.3.	Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1) .....	39
6.4.	Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1).....	39
6.5.	Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1) .....	40
6.6.	Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1) .....	40
6.7.	Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2) .....	40
6.8.	Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3)) .....	41
6.9.	Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2)) .....	41
6.10.	Obligations concerning change in network owner (Clause 29 Schedule 11.1) .....	42
6.11.	Change of MEP for embedded network gate meter (Clause 10.22(1)(b)) .....	43
6.12.	Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2) .....	43
6.13.	Transfer of ICPs for embedded network (Clause 6 Schedule 11.2).....	43
7.	Maintenance of shared unmetered load .....	45
7.1.	Notification of shared unmetered load ICP list (Clause 11.14(2) and (4)) .....	45
7.2.	Changes to shared unmetered load (Clause 11.14(5)).....	45
8.	Calculation of loss factors .....	46
8.1.	Creation of loss factors (Clause 11.2).....	46
	Conclusion .....	47
	Participant response .....	47

## EXECUTIVE SUMMARY

This distributor audit was performed at the request of Counties Power (COUP) as required by clause 11.10 of Part 11, to assure compliance with the Electricity Industry Participation Code 2010. The relevant rules audited are as required by the Guidelines for Distributor Audits V7.0 issued by the Electricity Authority

Our main observation is that there are no “owners” within Counties Power, who are responsible for compliance with the Code and data quality. Each department work in their area

The new connection process is robust and well executed but once data is in Navision, there is no administrator who will check, cross check and correct data. We appreciate that Navision is not an ideal system, from time to time it deletes previously uploaded information. Knowing that this can happen means it is even more important to have structured processes, which will allow the monitoring of it and to proactively fix it. The processes should be run on a regular basis.

This was highlighted in the previous audits but with the new audit regime it has become more evident. More non-compliances have been identified, the level of compliance has not improved.

Counties Power in planning to upgrade Navision in the first quarter of 2018, which will address some issues but possibly create a new one. We were advised that the IT department, together with Customer Services, is working on developing a dashboard, which will allow easy access to reports for the monitoring of the quality of data. This should definitely improve the accuracy and completeness of data if properly and consistently executed.

8 non-compliances were found and one recommendation recorded. It is more than last year. One of the reasons but not only, is a new audit template provided by the Authority was used to create this report. This template has been separating some previous non-compliances out, which resulted in two non-compliances instead one in this report. It gives the Authority better understanding nature of non-compliances

We thank Counties Power for its full and complete cooperation in this audit.

## 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) of Part 11	Some information in the registry still must be corrected or populated	Moderate	Low	2	Identified
Requirements to correct errors	0	11.2(2) of Part 11	Incorrect data is corrected but in some cases, it is identified late and results in backdating transactions in the registry.	Moderate	Low	2	Identified
Timeliness of provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	27 ICPs (2.8%) electrically connected since the last audit had Initial Electrical Connection Date populated later than 10 business days	Moderate	Low	2	Identified
ICP location address	4.4	2 of Schedule 11.1	2,041 ICPs have duplicate addresses, a location address does not allow ICPs to be readily located	Moderate	Low	2	Identified
Changes to registry information	4.1	8 of Schedule 11.1	Some updates to network, pricing information and the "decommissioning" status in the registry for were done later than 3BD.	Weak	Low	3	Identified
Distributor to provide ICP information to the registry manager	4.6	7(1) of Schedule 11.1	Incorrect or missing information in the registry for UML, Initial Electrical Connection Date, NSPs	Weak	Low	3	Identified
Management of "ready" status"	4.9	16 of Schedule 11.1	Counties Power receives confirmation from a trader accepting responsibility for the ICP after the registry changes the ICP status to "ready" because a proposed trader specified by a	Moderate	Low	2	Identified

			customer was uploaded				
Maintenance of price category codes	4.12	23 of Schedule 11.1	Three new price category codes were not uploaded 2 months earlier than the date the code takes effect (only three days in advance)	Weak	Low	3	Identified
Future Risk Rating						19	

Future risk rating	1-2	3-6	7-9	10-19	20-24	25+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Recommendation	Description
Distributor to provide ICP information to the registry manager	4.6	Set up process for comparing NSPs assignment of ICPs in the registry and Counties Power GIS system	Further investigation is recommended into the allocation of ICPs to NSPs in the registry and validation of the Dedicated flag

## ISSUES

Subject	Section	Issue	Description



### 1.3. Persons involved in this audit

Name	Title	Company
John Ewens	Revenue Analyst	Counties Power Ltd
Tracey Hopkinson	Customer Care	Counties Power Ltd
Dale Oliver	Systems Analyst	Counties Power Ltd
Mandy Seabroock	Service Delivery Management	Counties Power Ltd
Geoff Douch	General Manager Asset Management	Counties Power Ltd
Ewa Glowacka	EGR Approved Auditor	TEG & Associates Ltd

### 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

There are no contractors who assist with, or are used in, Counties Power operations that were audited.

#### Audit commentary

During the audit, we did not identify any contractors which assist Counties Power to meet their obligations relevant to the scope of this audit.

### 1.5. Supplier list

Navision System is provided by Microsoft.

### 1.6. Hardware and Software

Navision System is the main software application used for network management and ICP creation, storing information about installations, and communication with the registry.

### 1.7. Breaches or Breach Allegations

Counties Power has stated it has no breaches of the Electricity Industry Participation Code 2010 relating to this audit.



## 1.8. ICP and NSP Data

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
COUP	BOB0331	Bombay			BALAREACOUPG	G	01/05/08	4,417
COUP	BOB1101	Bombay			BALAREACOUPG	G	01/05/08	23,066
COUP	GLN0332	Glenbrook			BALAREACOUPG	G	01/05/08	10,126
COUP	MTG0111	Mangatangi	BOB0331	COUP	BALAREACOUPG	I	01/05/08	0

Counties Power provided a list of all ICP's as of the 29 September 2017. The total number of ICPs in the registry was 46,477.

Status	Number of ICPs (29/9/17)	Number of ICPs (2016)	Number of ICPs (2016)
New (999,0)	100	215	216
Ready (0,0)	346	457	278
Active (2,0)	41,608	40,671	39,568
Distributor (888,0)	0	0	0
Inactive – new connection in progress (1,12)	60	45	31
Inactive – electrically disconnected vacant property (1,4)	717	642	596
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	1	0
Inactive – electrically disconnected at pole fuse (1,8)	3	1	0
Inactive – electrically disconnected due to meter disconnected (1,9)	10	1	2
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	0
Inactive – electrically disconnected at meter box switch (1,11)	2	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	150	732	646
Inactive – reconciled elsewhere (1,5)	0	0	0
Decommissioned (3)	3,481	2,567	2,457

## 1.9. Authorisation Received

Counties Power provided a letter of authorisation to the auditors permitting the collection of data from other parties for matters directly related to the audit.

### 1.10. Scope of Audit

This audit was performed at the request of Counties Power as required by clause 11.10 of Part 11, to assure compliance with the Electricity Industry Participation Code 2010. The audit covers the following processes under clause 16A.23 of Part 16A, performed by Counties Power:

- (a) -The creation of ICP identifiers for ICPs
- (b) -The provision of ICP information to the registry and the maintenance of that information
- (c) - The creation and maintenance of loss factors

The audit was carried out on the Counties Power premises at Glasgow Rd in Pukekohe, on the 2/3 October 2017.

### 1.11. Summary of previous audit

The previous audit was carried out on 29/30 August 2016 by Ewa Glowacka (TEG & Associates Ltd). The findings of that audit are shown below:

Subject	Clause	Non-compliance	Cleared
"New" or "Ready" status for 24 calendar months or more	15 of Schedule 11.1	ICPs with the status "New" or "Ready" longer than 24 months not monitored	Cleared, the process is in place
ICP Information provided to the registry	7(1)(l)(m)(p) & 7(2A) of Schedule 11.1	Not all information is entered into the registry or is not correct or missing.	Still existing
Update of NSP changes	8(4) of Schedule 11.1	No notice of NSP changes for 2,582 ICPs	Cleared
Changes to ICP information in registry	8(2)(b) of Schedule 11.1	Changes to some ICP information outside of 3 business days	Still existing
The ICP status of "Decommissioned"	20(2)(a) of Schedule 11.1 11.2 of Part 11	No supporting documentation to confirm that electrical installations associated with the ICP were physically removed;	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

Compliance with these clauses was reviewed to assess if all practicable steps had been taken to provide accurate information. It is on-going battle of Counties Power to have a complete and accurate.

#### Audit commentary

The new connection process is robust and well executed but once data is in Navision, there is no administrator who will check, cross check and correct data on regular basis. There is a plan to appoint such person.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1)  From: 16-Aug-16 To: 15-Sep-17	Some information in the registry still must be corrected or populated  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as moderate. Counties Power tries to have complete and accurate data but there is still room for improvement; no impact settlement outcomes therefore audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Counties Power has appointed a Customer Connections Co-ordinator and has created the role of Customer Connections Manager with responsibility for compliance with registry requirement. Development of reports to identify transactions that are delayed or non-compliant is continuing as is development of procedures to ensure compliance.		30/6/18	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Some reports now available to monitor compliance	30/6/18	

## 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

We did not observe a structured approach to maintaining the quality of data in the registry. It is more like a catch-up approach. It is an urgent need to put more emphasis on quality of data. The discovered errors are correct but it is usually it is outside of requirements set in the Code.

### Audit commentary

We appreciate that Navision is not an ideal system, from time to time it deletes previously uploaded information etc. Knowing that this can happen means it is even more important to have structured processes, which will allow the monitoring of it and to proactively fix it. The to upgrade Navision in the first quarter of 2018, which will address some issues.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.2 With:  From: 16-Aug-16 To: 15-Sep-17	Incorrect data is corrected but in some cases, it is identified late and results in backdating transactions in the registry.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as moderate, Audit risk rating is assessed as low because Counties Power pursue data correction but it is not a structure process. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status

Counties Power has appointed a Customer Connections Co-ordinator and has created the role of Customer Connections Manager with responsibility for compliance with registry requirement. Development of reports to identify transactions that are delayed or non-compliant is continuing as is development of procedures to ensure compliance.	30/6/18	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Some reports now available to monitor compliance	30/6/18	

### 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

A customer, or his/her representative/electrician, makes a request for a new connection using the Application Form for Network Connection. All applications are to be submitted via the website at [www.countiespower.com/connect](http://www.countiespower.com/connect). The Network-New Connection Team ensures that an application is completed with all necessary information. If any of the fields of information are not provided, they contact the person who submitted the application to obtain the missing data.

Before a new ICP is created and a customer advised, the team checks to see if a customer already exists in Navision and whether there is already an ICP for this connection to avoid duplication. The capacity of the transformer in the area is checked. If additional work is required, a customer is expected to pay a capital contribution before the work goes ahead. The Application Form for Network Connection including the ICP identifier is scanned and emailed to a customer and a proposed trader.

After a customer receives an ICP for a new connection, he/she or their electrician communicates with the chosen trader. The trader sends Counties Power a service request (SR) to hang meters and electrically connect the ICP to the network.

Counties Power uses Navision to create ICP identifiers for connections on its networks. The ICP number is based on a sequential account number from Navision. Once the unique number is assigned to the customer, a two-letter code "CN" is added.

##### Audit commentary

We reviewed 20 new installations, they are listed in section 3.4. The new installations process is well designed and executed.

##### Audit outcome

Compliant

#### 3.2. Participants may request distributors to create ICPs (Clause 11.5(3))

##### Code reference

Clause 11.5(3)

##### Code related audit information

*The distributor, within 3 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

This clause is not applicable to Counties Power because an ICP identifier is issued to a customer or his/her representative. Compliance was not assessed.

### Audit commentary

This clause is not applicable to Counties Power because an ICP identifier is issued to a customer or his/her representative. Compliance was not assessed.

### Audit outcome

Not applicable

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

### Code reference

Clause 11.7

### Code related audit information

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

### Audit observation

The Network-New Connection Team created an ICP identifier following the process as described in section 3.1. Navision creates the UIS file and it is uploaded to the registry overnight to create the ICP in the registry. A new ICP is uploaded with all information, including a proposed retailer, which allow the registry to assign the status of "Ready"

### Audit commentary

We examined the LIS file dated 29 September 2017 and confirm all mandatory information was recorded.

### Audit outcome

Compliant

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

### Code reference

Clause 7(2) of Schedule 11.1

### Code related audit information

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

### Audit observation

We randomly chose 20 new installations, connected since the last audit, to confirm that ICPs were uploaded to the registry before being electrically connected (prior to electricity being traded). The summary of chosen connections is shown below:

ICP	ICP created	Request to connect and electrically connect (SR)	Initial Electrical Connection Date
1099575422CNADE	23/08/2016	31/01/2017	03/02/2017
1099575427CN791	23/08/2016	23/08/2016	29/08/2016
1099575443CN96B	29/08/2016	01/09/2016	05/09/2016

1099575470CN253	02/09/2016	15/09/2016	22/09/2016
1099575532CN977	15/09/2016	17/10/2016	19/10/2016
1099575564CN0F0	23/09/2016	03/10/2016	22/12/2016
1099575576CNAD8	27/09/2016	23/03/2017	03/05/2017
1099575587CN68A	04/10/2016	20/01/2017	25/01/2017
1099575596CN062	05/10/2016	11/10/2016	13/10/2016
1099575607CN0C3	10/10/2016	25/11/2016	05/12/2016
1099575659CNB50	25/10/2016	27/10/2016	07/11/2016
1099575747CNB62	17/11/2016	30/06/2017	04/07/2017
1099575751CN040	22/11/2016	28/11/2006	29/11/2016
1099575781CND02	30/11/2016	06/12/2016	09/12/2016
1099575857CNEC0	12/01/2017	20/01/2017	27/01/2017
1099575949CNEF2	09/02/2017	20/02/2017	22/02/2017
1099575975CNA14	20/02/2017	22/02/2017	24/02/2017
1099576085CN1EA	21/03/2017	27/03/2017	27/06/2017

#### Audit commentary

The process is robust. None of these installations were electrically connected without an ICP being assigned. We also checked the EDA file for the period 16/8/16 to 15/9/17 to see if there were any instances when an ICPs was uploaded later than within the usual few days. We identified 9 ICPs, over Christmas time, uploaded within 14 BD. None of them were electrically connected before the ICP was recorded in the registry.

#### Audit outcome

Compliant

### 3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)

#### Code reference

*Clause 7(2A) of Schedule 11.1*

#### Code related audit information

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



### Audit observation

967 ICPs were electrically connected since the last audit. Using the EDA file for the period 16/8/16 to 15/9/17 we checked to see if the Initial Electrical Connection Date was uploaded to the registry within the required 10BD.

### Audit commentary

According to our investigation, for 27 ICPs (2.8%), the registry was notified late of the Initial Electrical Connection Date. The date range was between 12 to 196 BD. It is an unexpected result because Counties Power electrically connects and hangs meters for all installations therefore the date is known the same day or the following day.

It is a proof that even if the company has easy access to the information, it does not mean that it will translate to full compliance with this clause. There is a need for it to be checked to make sure the information is uploaded to the registry. Counties Power is working on such a report.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	27 ICPs (2.8%) electrically connected since the last audit had Initial Electrical Connection Date populated later than 10 business days  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded the controls as moderate. Only 2.7% of new installations were effected by this non-compliance. The current process is good but requires additional enhancements.		
Actions taken to resolve the issue		Completion date	Remedial action status
CP has commissioned reporting to identify any delays in updating the registry before non-compliance.  Organisation structure change to provide ownership of ICP creation and related code compliance		30/6/18	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
CP has commissioned reporting to identify any delays in updating the registry before non-compliance.  Organisation structure change to provide ownership of ICP creation and related code compliance		30/6/18	

### 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

Counties Power follows the connection process set out in clause 10.31. Before an ICP is connected, the company receives an SR from a trader, chosen by a customer, asking for the connection of the ICP. Counties Power acts as the trader's agent to electrically connect an installation. The trader is recorded in the registry as soon as a new ICP is uploaded to the registry. The SR is treated as confirmation of acceptance of the ICP. Some traders change the status to "Inactive – new connection in progress" (1,12) well before a SR to electrically connect is issued while others send the SR, which is understood by Counties Power as another way of accepting responsibility for the ICP. More and more traders have started using this and it is a standard process for Genesis and Trustpower.

#### Audit commentary

The process adopted by Counties Power is compliant, meeting the requirements of this clause. An ICP is not connected unless a trader is recorded in the registry as accepting responsibility for the ICP.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.31

#### Code related audit information

*A distributor must not connect an ICP that is not an NSP unless requested to do so by the trader trading at the ICP.*

#### Audit observation

Counties Power does not connect an ICP unless requested to do so by the trader who will be trading at the ICP. The company receives SR from a trader chosen by a customer, in which they are asking the ICP to be electrically connected and to install meters. Traders do not exactly distinguish between connection and electrical connection, they see it as a single step. In reality, a connection and electrical connection happens when Counties Power's inspector is on site.

Once the installation is electrically connected by Counties Power inspectors, the certificate of compliance is scanned and sent to the trader. The notification includes details of the meters installed on the site.

### Audit commentary

Commonly the request to connect and electrically connect is in the same request, the Code does not require this to be the case but it is practical to combine it.

### Audit outcome

Compliant

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

### Code reference

*Clause 10.31A*

### Code related audit information

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

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

### Audit observation

Counties Power has not been asked to temporarily electrically connect any installation since the last audit.

### Audit commentary

If Counties Power is asked by an MEP to temporarily electrically connect it would, but it has not occurred.

### 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 5 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

Counties Power does not have any NSP on its network that is not a point of connection to the grid.

### Audit commentary

Compliance was not assessed because Counties Power does not have such NSPs.

#### **Audit outcome**

Not applicable

### **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**

Counties Power does not have any NSP on its network that is not a point of connection to the grid.

#### **Audit commentary**

Compliance was not assessed because Counties Power does not have such NSPs.

#### **Audit outcome**

Not applicable

### **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**

Counties Power uses Navision to create ICP identifiers for connections on its networks. The ICP number is based on a sequential account number from Navision. Once the unique number is assigned to the customer, a two-letter code "CN" is added.

#### **Audit commentary**

We examined the LIS files. There is a unique distributor code "CN" as part of each ICP Identifier on the Counties Power network. Navision is configured to only create ICPs with this distributor code.

#### **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 LIS registry file date 29 September 2017 was examined and we confirm compliance. The registry design prohibits the assigning of more than a single loss category to an ICP. The registry interface won't allow you to assign more than a single loss category using the registry web interface sending a file via FTP server.

#### Audit commentary

All ICPs recorded in the registry have a single loss category code except some ICPs with the status "Decommissioned".

#### 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

According to the new connection process, Counties Power uploads all ICP information, the registry assigns the status of "ready". Counties Power does not use the status "new".

#### Audit commentary

We checked the EDA file to see if the process is followed. We found only four ICPs for which the status "new" was assigned. Three of them were corrected. There is still one ICP 1099575716CNF2F left, created on 8/11/16 and Navision changed its status from "ready" to "New" on 17/5/17.

#### 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 analysis of the LIS file identified 98 ICPs (last year 213) with the status “New” and 75 (last year 97) ICPs with the status “Ready”, which were created more than 24 months ago. The “oldest ICP with the status “New” was created in the year 2000. The oldest ICP with the status “Ready” was created in the year 2008.

There has been slow progress in this area, as numbers show. A decrease of 115 ICPs with the status “new” and 22 fewer ICPs with the status “Ready.”

#### **Audit commentary**

All ICPs “older” than 24 months were referred to traders. Where responses have been received the data has been updated. Outstanding traders are being chased. It was identified as a non-compliance in the last audit. We are pleased to note, a process has been put in place therefore the previously identified non-compliance is cleared.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 7(6) Schedule 11.1*

#### **Code related audit information**

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

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

#### **Audit observation**

We examined the LIS file dated 29 September 2017. Counties Power does not have an embedded generation station that has a capacity of 10 MW or more on its network. There are two generators, Electra generator (1099568476CN11D) of capacity 4.7 MW and Landfill generators (1099568913CN6AA) 7.0 MW.

#### **Audit commentary**

Counties Power does not have on its network an embedded generating station that has a capacity of 10 MW or more.

#### **Audit outcome**

Compliant

## 4. MAINTENANCE OF REGISTRY INFORMATION

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

#### Code reference

*Clause 8 Schedule 11.1*

#### Code related audit information

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

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

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

*If the change to the NSP identifier is for more than 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

We examined the EDA file for the period of 16/08/16 to 15/09/17 to assess compliance. The results are shown below:

Activity	No of updates	No of updates later than 3BD	Date range of updates [BD]	Comment
Address	1,588	75 (4.7%)	4 to 167	Last audit 35.3%
Network	2,811	419 (14.9%)	4 to 2193	Last audit 45.8% (2,582 updates related to a shift of ICPs from BOB0331 to BON 1101)
Pricing	7,256	3,246 (44.8%)	4 to 1370	Last audit 40%
Status (0)	976			
Status (999)	4			
Status (3)	912	708 (77.7%)		

#### Audit commentary

Addresses – there is decrease of number of updates outside of 3BD. More than 95% of address was updated within 3BD

Pricing – The most backdated ICPs were 1099570808CNE36 (1370 BD) and 1099570922CN8F (1175 BD)6. 1099570808CNE36 – it is Telecom cabinet, ICP was created in 2012 it was a mistake to update pricing so far back. 1099570922CN8F6 – Community services, it was error.

Counties Power updated 96% of price category codes within 24 BD. Update are done at traders' request or if incorrect information is identified by the company. As a general rule, Counties Power does not run washups therefore backdating changes of price category codes therefore there is no financial impact. It is pure administrative change.

**Network** – The most backdated updates were due to population of the Initial Electrical Date and embedded generation (solar) details. The number of network updates was much smaller than last year.

Recently Counties Power introduced a new functionality in Navision, which alerts an operator when an update is outside of the Code requirements. It is too early to evaluate an impact of it.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	Some updates to network, pricing information and the “decommissioning” status in the registry for were done later than 3BD.  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate. Some update like pricing are done as per traders’ requests, it could disadvantage a customer if the company allows only go back by 3 BD. No impact on settlement outcomes therefore audit risk rating assigned as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Develop process changes to ensure more timely response to retailer requests.  CP has commissioned the development of reporting to identify non-compliance.		31/12/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Develop process changes to ensure more timely response to retailer requests.  CP has commissioned reporting to identify non-compliance		31/12/17	

#### 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**

Counties Power has three NSPs on its network, BOB0331, BOB01101, and GLN02332. At the time of ICP creation a transformer is assigned from which this installation will be fed. We examined the LIS file to assess compliance.

#### **Audit commentary**

In section 4.6 we describe that for a number of ICPs the incorrect NSP identifier was assigned. All three NSPs belong to the same balancing area but incorrect NSP allocation can lead to incorrect balancing consumption across the NSPs.

#### **Audit outcome**

Compliant

### **4.3. Customer queries about ICP (Clause 11.31)**

#### **Code reference**

*Clause 11.31*

#### **Code related audit information**

*The distributor must advise a customer (or any person authorised by the customer) or embedded generator of the customer or embedded generator's ICP identifier within 3 business days after receiving a request for that information.*

#### **Audit observation**

Any request from a customer for advice on an ICP for an existing connection is answered immediately, while the customer is on the phone.

#### **Audit commentary**

Calls from customers do not happen often but Counties Power receives many phone calls from electricians asking them to confirm an ICP or asking for additional information or clarification.

#### **Audit outcome**

Compliant

### **4.4. ICP location address (Clause 2 Schedule 11.1)**

#### **Code reference**

*Clause 2 Schedule 11.1*

#### **Code related audit information**

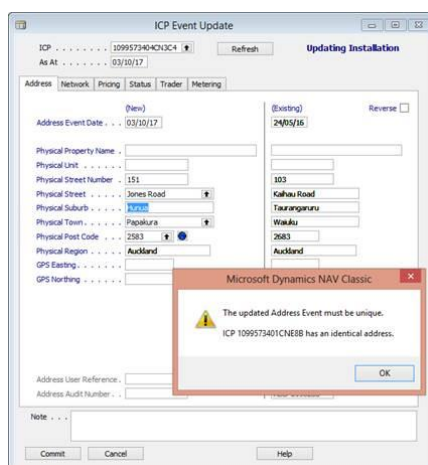
*Each ICP identifier must have a location address that allows the ICP to be readily located.*

#### **Audit observation**

The LIS file dated 29 September 2017 was examined. We identified 2,041 ICPs (status “active” and “Vacant”) with identical addresses. If GPS coordinates were recorded in the registry it would help but they are not.

### Audit commentary

We discussed this non-compliance with Counties Power. They were surprised by our discovery. Navision has a built-in algorithm not allowing duplicate address as per screen shot below. After a closer look at addresses in Navision, the conclusion was that not all address fields in Navision are “translated” to address fields in the registry.



It shows again how important it is to regularly compare the registry data with Navision data. It appears that it is not being done by Counties Power.

### Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>2,041 ICPs have duplicate addresses, a location address does not allow ICPs to be readily located</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>We have recorded the controls as moderate. Navision has a built-in business rule not allowing duplicate addresses but there is no follow up to check if information from Navision is correctly uploaded to the registry; no impact on settlement outcomes therefore audit risk rating is recorded as low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

Review compliance requirements for addresses and modify data entry processes to ensure compliance. Update non-compliant addresses	31/3/18	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Review compliance requirements for addresses and modify data entry processes to ensure compliance. Update non-compliant addresses	31/3/18	

#### 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

There are no known situations where an ICP could not be de-energised without the de-energisation of another ICP. The company policy precludes such a situation.

##### Audit commentary

This clause has been in place for a number of years and Counties Power was always found compliant. Before a new ICP is created, a connection is validated (visually) in GIS to make sure that such a situation does not occur.

##### 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 types
  - c) the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).

#### **Audit observation**

The LIS and Metering Information files (PR-255) dated 29 September 2017 were examined to assess compliance.

We identified the following areas, where information was incomplete or missing:

1. No UML details in the “Unmetered Load Details – distributor” field in the registry for 8 ICPs but traders recorded daily units.
2. 14 ICPs have Import/Export meters installed and programmed as EG. No information recorded by Counties Power. In most cases meters are installed by Counties Power MEP, therefore information should be readily available. There is a similar problem with the population of the Initial Electrical Connection Dates.
3. 39,018 ICP have the Dedicated flag assigned as “Y”. 3,828 ICPs have the Dedicated flag assigned as “N”. If the ICP has the Dedicated flag as “Y” assigned, it means that Counties Power cannot reconfigure points of connection within its network so that supply is provided from another NSP for a significant number of ICPs. It sounds rather unusual. We would expect it to be a “fully meshed” network.
4. Initial Electrical Connection Date –Incorrect date for 164 ICPs. Some ICPs were created in 1999 or 2005 so it is rather unlikely that some of them were first electrically connected, for example, in 2014. Our assumption is that it is the date that solar panels were installed.
5. 17 ICPs had incorrect flag in the installation type field. It was “L” instead of “B” where solar was installed.
6. Different NSPs on the same street –We ran an additional query during this audit “Different ICPs on the same street”. We don’t have enough geographical knowledge of Counties Power’s network to fully evaluate it. Randomly we checked a very small number of ICPs and it appears that there could be some incorrect information. Some examples are shown below:

Street name	BOB0331	BOB1101	GLN0332	Total number of ICPs
Aulyn Drive		2	8	10
Awhitu Road		1	268	269
Bassett Road		6	2	8
Blackbridge Road	2	5	37	44
Bollard Road	1	61		62
Bovill Way	1	11		12
Brookfield Road	1	12		13
Buckland Road	1	141		142
Chamberlain Road	45	1		46
Fraser Road	13	1		14
Hillpark Drive	3	96		99
Kaiaua Road	144	1		145

Keri Vista Rise	1	176		177
Kitchener Road		136	1	137
Maunsell Road	8	180		188
Sutton Road	1	23		24
Trig Road	1	19		20
Waiuku-Otaua Road		1	34	35
Wattle Bay Road	1		16	17

### Audit commentary

Overall the compliance with this clause has not improved since the last audit. There is an on-going problem of incorrect population of the Initial Electrical Connection Dates, UML, correct flag for embedded generation installation. We discussed with Counties Power how accurate the information is regarding which NSP is feeding each ICP. The comment was that there is no process in place to compare registry information with the Counties Power GIS system. Counties Power set up only one balancing area, BALAREACOUPG, so we would expect that there should not be a significant impact on reconciliation. The reconciliation manager uses the concept of balancing areas to group NSPs and re-allocate (balance) consumption across the NSPs, without needing the distributor to provide minute-by-minute information on which NSP is supplying which ICP. There are 27 metering installations of category 4 and 5 on the Counties Power network. According to the registry information 23 of them can be supply only from a dedicated NSP.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.6 With: 7 (1) of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	Incorrect or missing information in the registry for UML, Initial Electrical Connection Date, NSPs  Potential impact: Low  Actual impact: Low  Audit history: Three times previously  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as weak, the same problems as identified in previous audits, no structured process to validate data. Audit risk rating is recorded as low, because of the small number of ICPs effected. NSPs incorrect allocations need to be further investigated.		
Actions taken to resolve the issue		Completion date	Remedial action status

Monitoring reports have been commissioned to identify non-compliance. Organisation structure change to provide ownership of ICP creation and related code compliance	31/3/18	Choose an item.
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Monitoring reports have been commissioned to identify non-compliance. Organisation structure change to provide ownership of ICP creation and related code compliance	31/3/18	

Recommendation	Description	Audited party comment	Remedial action
Set up process for comparing NSPs assignment of ICPs in the registry and Counties Power GIS system	Further investigation is recommended into the allocation of ICPs to NSPs in the registry and validation of the Dedicated flag		Counties Power will define sections of the network where ICPs dedicated to one NSP. All ICPs to be reviewed to ensure alignment with this  ICP management processes reviewed to alignment with data held on the registry

#### 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**

As a part of the new connections process, Counties Power assigns the actual price category code and the actual changeable capacity of the ICP at the time an ICP is created.

#### **Audit commentary**

The actual price category code is assigned based on capacity information given by a customer. It discussed with a customer, they are customers on TOU tariff. There are 27 ICPs for which chargeable capacity is populated in the registry.

#### **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 LIS file dated 23 August 2017 was reviewed. GPS coordinates are not populated in the registry.

#### **Audit commentary**

This clause is not applicable to Counties Power because GPS coordinates are not populated in the registry. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.9. Management of "ready" status (Clause 14 Schedule 11.1)**

#### **Code reference**

*Clause 14 Schedule 11.1*

#### **Code related audit information**

*The ICP status of "Ready" must be managed by the distributor and indicates that:*

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

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

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

#### **Audit observation**



The new connection process adopted by Counties Power means that when an ICP is uploaded to the registry it contains all the information required, which allows the registry to assign the status of “ready”. The ICP has a single price category assigned.

#### Audit commentary

At the time, the registry assigns the status “Ready”, Counties Power does not have a confirmation from the trader that it will take responsibility for the ICP. The traders’ acceptance of the ICP is received later.

#### Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: 14 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>Counties Power receives confirmation from a trader accepting responsibility for the ICP after the registry changes the ICP status to “ready” because a proposed trader specified by a customer was uploaded</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>We have recorded the controls as moderate. Counties Power has a good process in place to receive confirmation from a trader accepting responsibility for the ICP but it is received after an ICP has the status changed to “ready” in the registry. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Counties Power will raise this issue with the EA as we believe the setting of the status to “Ready” is a Registry function. CP enter the proposed retailer only.		30/6/18	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Counties Power will raise this issue with the EA as we believe the setting of the status to “Ready” is a Registry function. CP enter the proposed retailer only.		30/6/18	

#### 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**

Counties Power does not have any ICP with the status of “distributor”, which represents a shared unmetered load installation or the point of connection between an embedded network and its parent network.

#### **Audit commentary**

Counties Power does not have plans to have shared unmetered load or embedded networks on its network.

#### **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**

Counties Power decommissions an ICP upon a trader or customer instruction. Any request from a trader is confirmed verbally with a customer. Counties Power could also have a request from a contractor to decommission an ICP. The job is issued to a lineman, who inspects the site and removes all equipment, such as meters and ripple relay. The trader is notified of the outcome.

We sampled 10 decommissioned ICPs to follow the decommissioning process. The results are shown in the table below:

ICP	Site visit	Trader date to change status to 1.6	Registry update by COUP	Comments
0001083011CN72D	02/12/2015	02/12/2015	20/09/2016	Meters removed 12 months ago
0001123281CN049	21/03/2017	16/06/2017	22/06/2017	Requested by inspector
0001123601CN902	18/05/2016	12/07/2016	16/09/2016	Meters returned to the office, bldg. demolished
0001123641CNBA7	18/05/2016	12/07/2016	16/09/2016	

0001363321CN21F	31/05/2017	14/07/2017	15/07/2017	Trader request
0001571520CN29A	09/02/2017	28/02/2017	01/03/2017	Customer request
0001737903CN98E	30/03/2015	10/08/2016	19/09/2016	
0001914160CNB88	23/06/2017	18/07/2017	12/09/2017	Trader request
0002073601CN5D1	27/03/2017	31/03/2017	01/04/2017	Installers of AMI meter found the site demolished
0002123010CN227	21/08/2017	22/08/2017	23/08/2017	Trader request

### Audit commentary

The last audit noted non-compliance in this area because we were not able to trace paperwork from a request to a report from the field. This time it was easily traceable by going through notes in Navision. From a timeliness of registry updates point of view, this area does not get much attention from either traders or Counties Power. The 10 examples show how slowly, for some of them, traders change the status to “1,6” and later Counties Power to “003”. There are a few examples when the updates happen in very timely manner. The difficulties that Counties Power faces is that they must wait for a traders’ update. Navision is not particularly well designed to cope with “holding back” registry updates.

### 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 2 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 Codes table in the registry was examined. There are currently 17 price category codes assigned to Counties Power. There used to be 44 price category codes but as of 1/4/17, 24 of them were disestablished. On 1/8/17 another 3 price category codes were ended in the registry.

On 1 April 2017 Counties Power entered three new price code categories:

- 60 - Residential Low User- Smart
- 70 - Residential Regular User – Smart
- 80 - General Consumer – Smart

### Audit commentary

The registry was notified on 28 March 2017 (three days before), which is identified as non-compliance because the registry needs to be notified 2 months before the date the code takes effect.

The same non-compliance was identified in 2014 when Counties Power added four new price category codes. It appears that Counties Power does not have an effective process in place to notify the registry about a new price category code in a compliant manner.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.12 With: 23 of Schedule 11.1  From: 01-Feb-17 To: 01-Apr-17	Three new price category codes were not uploaded 2 months earlier than the date the code takes effect (only three days in advance)  Potential impact: Low  Actual impact: Low  Audit history: Once before  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	We identified controls as weak. The same non-compliance was identified a few years ago. There is no documented process in place but at least the company remembers to do it. There was no impact on customers and settlement income therefore audit risk rating is identified as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Procedures for price structure changes will be documented		31/12/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Procedures for price structure changes will be documented		31/12/17	

## 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 Code table in the registry was reviewed during this audit.

#### Audit commentary

Counties Power did not upload any new Loss Category Codes to the registry since the last audit.

#### 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 2 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 Code table held by the registry was reviewed during this audit. Loss factors have single value for a whole year, which cover a range of trading periods. There are no seasonal loss factor codes for summer or winter.

#### Audit commentary

Counties Power uploaded loss factors in 2011 and has not changed since then.

#### Audit outcome

Compliant

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

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

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

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

*If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between 2 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

Counties Power did not create a new or decommissioned any NSP since the last audit.

#### Audit commentary

No new NSP was created or decommissioned since the last audit. There are no plans to create a new NSP in the near future.

#### 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 2 local networks. In all other cases, the request must be made at least 1 month before the NSP is electrically connected or the ICP is transferred.*

#### Audit observation

Counties Power has not created a new NSP since the last audit, as described in the previous section. The reconciliation manager was not asked to create a unique NSP identifier.

#### **Audit commentary**

This clause is not applicable because Counties Power has not created a new NSP since the last audit. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **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**

Counties Power did not create any new NSP since the last audit.

#### **Audit commentary**

Counties Power has not created any new NSP. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

*Clause 26(4) Schedule 11.1*

#### **Code related audit information**

*If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must give notice to the reconciliation manager at least 1 month before the creation or transfer of:*

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

#### **Audit observation**

Counties Power did not create any new NSP or transfer any ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor.

#### **Audit commentary**

Counties Power did not become the owner of embedded network. Compliance was not assessed.

**Audit outcome**

Not applicable

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

**Code reference**

*Clause 24(2) and (3) Schedule 11.1*

**Code related audit information**

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

**Audit observation**

Counties Power has one balancing area, BALAREACOUPG. There were no changes to it.

**Audit commentary**

Examination of the NSP mapping table in the registry showed that there were no changes to the balancing areas in the last 12 months.

**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 1 month before the transfer.*

**Audit observation**

Counties Power has not transferred any ICP which resulted in an ICP becoming an NSP.

**Audit commentary**

Counties Power did not establish any embedded network. Compliance was not assessed.

**Audit outcome**

Not applicable

**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 3 business days before the transfer takes effect.*

### Audit observation

Counties Power did not transfer any ICPs in the last 12 months

### Audit commentary

Counties Power did not establish any embedded network. There are no such plans for the future. Compliance was not assessed

### Audit outcome

Not applicable

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 1 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

Counties Power does not have any NSPs that are not connections to the grid for which they are responsible.

### Audit commentary

This clause is not applicable to Counties Power because they do not have responsibility for an NSP that is not a point of connection to the grid. Compliance was not assessed.

### Audit outcome

Not applicable

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**

Counties Power does not have any NSPs that are not connections to the grid for which they are responsible.

#### **Audit commentary**

This clause is not applicable to Counties Power because they do not have responsibility for an NSP that is not a point of connection to the grid. Compliance was not assessed

#### **Audit outcome**

Not applicable

### **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 1 month notification is required before the acquisition (Clause 29(2) of Schedule 11.1).*

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

#### **Audit observation**

In the last 12 months, Counties Power did not acquire all or part of a new network.

#### **Audit commentary**

This clause is not applicable to Counties Power because the situation did not occur. Compliance was not assessed.

#### **Audit outcome**

Not applicable

#### 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

Counties Power is not responsible for any embedded network.

##### Audit commentary

This clause does not apply to Counties Power because they are not the owner of embedded networks. Compliance was not assessed.

##### Audit outcome

Not applicable

#### 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

Counties Power did not establish any embedded network in the last 12 months.

##### Audit commentary

This clause does not apply to Counties Power because it did not establish an embedded network. Compliance was not assessed.

##### Audit outcome

Not applicable

#### 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**

Counties Power did not establish any embedded networks since the last audit.

**Audit commentary**

This clause does not apply to Counties Power because it has not established an embedded network. Compliance was not assessed.

**Audit outcome**

Not applicable

## 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

We reviewed the LIS file dated 29 September 2017 file to assess if there is any shared unmetered load connected to the network. Counties Power has no shared unmetered load on its network.

#### Audit commentary

The company policy is not to permit the installation of shared unmetered load.

#### 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

As described in the above section, there is no shared unmetered load on the Counties Power network.

#### Audit commentary

This clause does not apply to Counties Power because there is no shared unmetered load on its network and there are no plans to have it. Compliance was not assessed.

#### Audit outcome

Not applicable

## 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 Counties Power network is supplied from BOB0331, BOB1101 and GLN0332. These NSP's supply 9 zone substations. Generation is situated at Hampton Downs (5MW) connected to the Pukekawa Feeder, Pukekawa substation (Bombay 33kV) and at Dent Place (4MW) connected to the Red Hill feeder, Opaheke Substation (BOB1101). Smaller generators are connected to the Mangatawhiri substation (BOB0331) and also to the Opaheke substation.

All substation incomers and feeders within the Counties Power system are HHR metered. The incomers at Pukekohe and Opaheke substations are metered with half-hour demand meters. The generation from Hampton Downs and Dent Place is obtained from HHR metering.

Counties Power is in the process of gradually upgrading all their feeders. The changes to Counties Power's network configurations are happening in preparation of a significant increase in new subdivisions in its area due to a growing population in Auckland.

#### Audit commentary

The loss factors were not reviewed this year but the results were very similar to the previous calculations so Counties Power decided not to update the registry table. Loss factor codes are published on the Counties Power's website.

#### Audit outcome

Compliant

## CONCLUSION

### PARTICIPANT RESPONSE

- Counties Power has reviewed our responsibilities for code compliance and identified in each area responsible “owners” within the business. Business process are being reviewed to ensure these responsibilities are met.
- Counties Power has engaged a consultant to lead organisational change of processes and reporting to achieve code compliance.
- Counties Power has made changes to our organisation structure, creating roles with responsibility for the creation of customer connections designed to ensure compliance with the code. We have made appointments to some of these roles.
- Counties Power is developing procedures and processes around new roles to ensure compliance with the code.
- Counties Power is implementing a suite of reports to identify non-compliance and potential non-compliance.
- Counties Power has identified code compliance as a key requirement of ongoing business system development.