

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT (MATERIAL CHANGE)**



For

UNISON NETWORKS LIMITED

Prepared by: Rebecca Elliot

Date audit commenced: 29 March 2018

Date audit report completed: 5 April 2018

Audit report due date: 05-Apr-18

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EXECUTIVE SUMMARY

Unison Networks Limited (Unison) intends to change the NSP mapping process for existing ICPs so that NSP changes can be updated to the registry for the correct effective date and within the required timeframe. There is no change to the NSP determination for new ICPs being created.

Clause 16A.11 of Part 16 requires that if a participant intends to make a “material” change to any system or process then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of Unison so that it can be supplied to the Electricity Authority to satisfy the requirements of Clause 16A.11(1).

The audit was conducted in accordance with the Guideline for Distributor Audits version 7.2, which was produced by the Electricity Authority.

I reviewed the process documentation, the test plan and test results. This demonstrated that compliance is likely to be achieved when this change is made.

Unison’s 2018 Distributor audit is currently under review; therefore, their next audit date is yet to be determined. I recommended that their next audit be due March 4th, 2019 and this recommendation remains unchanged.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			Nil				
Future Risk Rating						0	
Indicative Next Audit Frequency						36 months	

RECOMMENDATIONS

Subject	Section	Recommendation (clause)	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

Unison has no exemptions in place that are relevant to the scope of this audit.

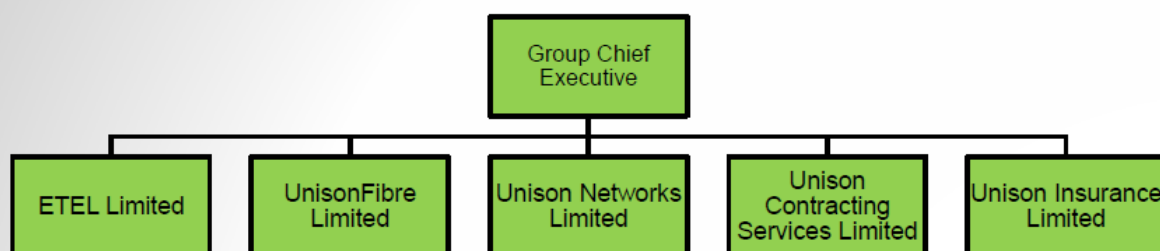
Audit commentary

Not Applicable

1.2. Structure of Organisation

Unison provided an organisational structure:

Unison Networks Limited Group Structure



1.3. Persons involved in this audit

Auditor:

Rebecca Elliot

Veritek Limited

Electricity Authority Approved Auditor

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

Audit observation

Unison does not subcontract any activities within the scope of this audit.

Audit commentary

Not applicable

1.5. Supplier list

Unison does not subcontract any activities within the scope of this audit.

1.6. Hardware and Software

Unison provided the diagram in figure 1 below. This shows the new relationship between the Advanced Distribution Management System (ADMS) and Gentrack in relation to the mapping of NSP to ICPs. The BI_ODS database is new and will compare the NSP connection recorded in ADMS and Gentrack. The diagram in figure 2 below, details database actions taken to compare data and report any exceptions.

Figure 1

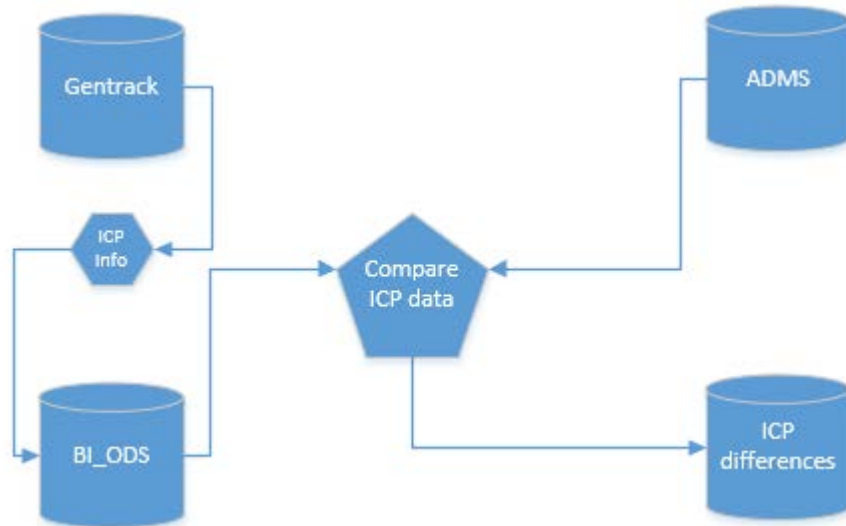
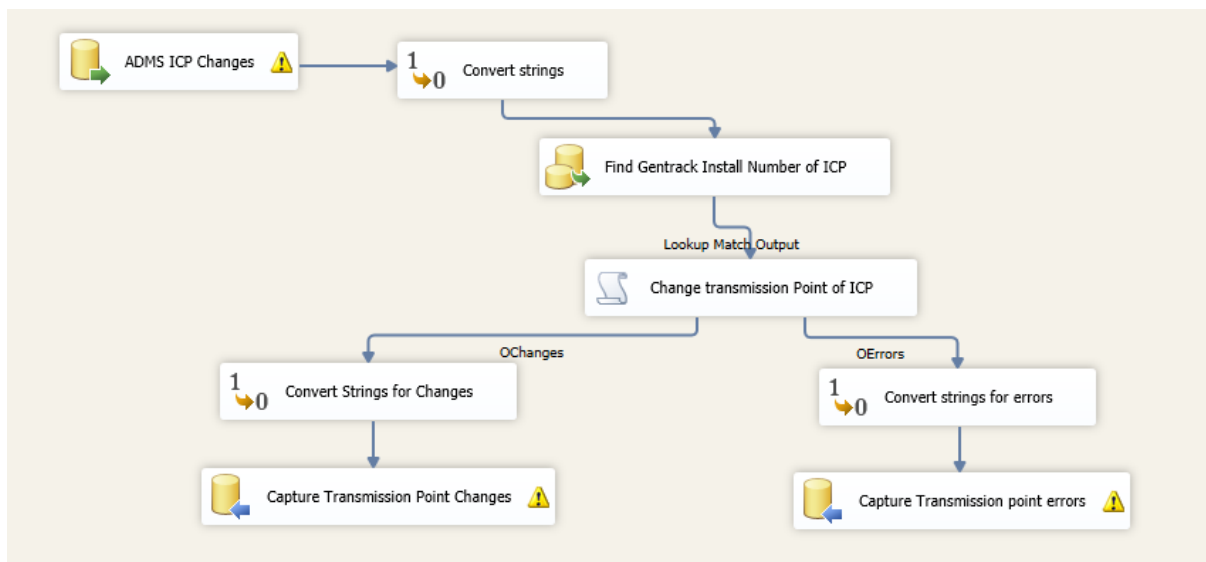


Figure 2



Back ups are carried out to industry standards.

1.7. Breaches or Breach Allegations

Unison has no breach allegations recorded by the Electricity Authority that relate to this audit.

1.8. ICP and NSP Data

The table below lists the relevant NSPs, and their associated balancing areas. There have been no changes made since the last Distributor audit.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
HAWK	ATI0112	ATIAMURI	ROT0111	HAWK	TAUPROTHAWKG	I	1/05/2008	-
HAWK	FHL0331	FERNHILL			MAGPIESHAWKG	G	1/05/2008	15718
HAWK	OWH0111	OWHATA			TAUPROTHAWKG	G	1/05/2008	5617
HAWK	RDF0331	REDCLYFFE			MAGPIESHAWKG	G	1/05/2008	22053
HAWK	ROT0111	ROTORUA			TAUPROTHAWKG	G	1/05/2008	10680
HAWK	ROT0331	ROTORUA			TAUPROTHAWKG	G	1/05/2008	11866
HAWK	TRK0111	TARUKENGA			TAUPROTHAWKG	G	1/05/2008	3199
HAWK	WRK0331	WAIRAKEI			TAUPROTHAWKG	G	1/05/2008	16442
HAWK	WTU0331	WHAKATU			MAGPIESHAWKG	G	1/05/2008	25043

Unison provided a list of all ICPs as at 30/11/17 during their Distributor audit. This information is shown in the table below:

Status	Number of ICPs (29 Nov 2017)
New (999,0)	1
Ready (0,0)	173
Active (2,0)	110618
Distributor (888,0)	2
Inactive – new connection in progress (1,12)	138
Inactive – electrically disconnected vacant property (1,4)	1558
Inactive – electrically disconnected remotely by AMI meter (1,7)	224
Inactive – electrically disconnected at pole fuse (1,8)	8
Inactive – electrically disconnected due to meter disconnected (1,9)	13

Status	Number of ICPs (29 Nov 2017)
Inactive – electrically disconnected at meter box fuse (1,10)	5
Inactive – electrically disconnected at meter box switch (1,11)	5
Inactive – electrically disconnected ready for decommissioning (1,6)	110
Inactive – reconciled elsewhere (1,5)	1
Decommissioned (3)	9278

1.9. Authorisation Received

A letter of authorisation was not required.

1.10. Scope of Audit

Unison intends to change the NSP mapping process for existing ICPs so that NSP changes can be updated to the registry for the correct effective date and within the required timeframe. There is no change to the NSP determination for new ICPs being created.

Clause 16A.11 of Part 16 requires that if a participant intends to make a “material” change to any system or process then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of Unison so that it can be supplied to the Electricity Authority to satisfy the requirements of Clause 16A.11(1).

The audit was conducted in accordance with the Guideline for Distributor Audits version 7.2, which was produced by the Electricity Authority.

The table below shows the areas within the scope of the audit, which will be affected by the system change.

Area	Within audit scope
Creation of ICPs	✗
Maintenance of registry information	✓
Creation and maintenance of loss factors	✗
Creation and maintenance of NSPs	✓
Maintenance of shared unmetered load	✗

Calculation of loss factors	✗
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All activities covered by this audit are conducted at Unison's office in Hastings.

1.11. Summary of previous audit

Unison provided a copy of their previous audit report, conducted by Rebecca Elliot of Veritek Limited in January 2018. The status of the previous non-compliances and recommendations are detailed below:

NON-COMPLIANCES

Subject	Section	Non Compliance	Status
Requirement to provide complete and accurate information	2.1	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Investigating
Requirement to correct errors	2.2	Errors not corrected as soon as practicable.	Identified
Provision of ICP Information to the registry manager	3.3	3 new ICPs electrically connected during the audit period with unmetered load details not recorded in accordance with schedule 11.1.	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	Registry not updated prior to commencement of trading for 5 ICPs.	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	Late population of the initial electrical connection date for 45 ICPs (4%).	Identified
Connection of ICP that is not an NSP	3.6	Two ICPs were electrically connected before proposed trader information was provided to the registry.	Identified
Monitoring of "new" & "ready" statuses	3.14	ICPs greater than 24 months not monitored.	Identified
Changes to registry information	4.1	Some price, network, status, and address changes were backdated.	Investigating
Notice of NSP for each ICP	4.2	One existing ICP with an incorrect NSP recorded.	Investigating
ICP location address	4.4	One ICP does not have a physical address unit number, street number, property name or GPS coordinates to allow it to be readily located.	Cleared
Provide ICP Information to the Registry manager	4.6	Known unmetered load not recorded and three incorrect initial electrical connection dates.	Identified
Management of "decommissioned" status	4.11	Status mismatch between Gentrack and the Registry for four ICPs.	Investigating
Responsibility for	6.8	Site not certified between 17/4/17-	Investigating

Subject	Section	Non Compliance	Status
metering information for NSP that is not a POC to the grid		12/7/17	

RECOMMENDATIONS

Subject	Section	Recommendation	Status
Notice of NSP for each ICP	4.2	Review analysis of ICP to NSP mapping to ensure no historic mis-mapped ICPs.	Investigating
Provide ICP Information to the Registry manager	4.6	Adopt the recommended EA unmetered load format.	Identified
Notification of shared unmetered load ICP list	7.1	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.	Identified

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(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 Part 11 is:

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

Audit observation

I checked whether implementation of the change to the management of NSP changes was likely to cause non-compliance with this clause.

Audit commentary

Implementation of the NSP change process is likely to improve compliance with this clause. No examples of incomplete, misleading or deceptive information were identified.

Audit outcome

Compliant

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

Code reference

Clause 11.2(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

I checked whether implementation of the change to the management of NSP changes was likely to cause non-compliance with this clause.

Audit commentary

Implementation of the NSP change process is likely to improve compliance with this clause as the correct NSP information will be provided to the registry thereby illuminating errors. The recommendation to review potentially mismapped ICPs identified during the last audit is in progress and this material change will not affect this process.

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

3.3. Provision of ICP Information to the registry (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

This clause relates to the creation of an ICP and there is no change to the process for determining the NSP when creating new ICPs and the NSP is always known at the time of creation.

Audit commentary

This clause relates to the creation of an ICP and there is no change to the process for determining the NSP when creating new ICPs and the NSP is always known at the time of creation.

Audit outcome

Not applicable

3.4. Timeliness of Provision of ICP Information to the registry (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

This clause relates to the updating of newly connected ICP and there is no change to the process for determining the NSP when creating new ICPs and the NSP is always known at the time of creation.

Audit commentary

This clause relates to the updating of newly connected ICP and there is no change to the process for determining the NSP when creating new ICPs and the NSP is always known at the time of creation.

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 sub-clause (1)(p) to the registry no later than 10 business days after the date on which the ICP is initially energised.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

3.9. Connection of an 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 market administrator.*

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 calendar 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 provide notice to the registry 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

This material change audit relates only to the process for the changing from one NSP to another for existing ICPs. As noted in **section 3.3**, there is no change to the process for determining the NSP when creating new ICPs and this change has no effect on any other ICP changes. I examined the new process including the test plan and test results to confirm compliance.

Audit commentary

The existing process of NSP changes does not meet the code requirement to update the registry if the NSP for an ICP changes for changes that last for more than 14 days. The existing process was resulting in the incorrect effective date being recorded on the registry and therefore was non-compliant.

This material change will allow the full integration between 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. I reviewed the process documentation during the last Distributor audit and confirmed that the change should achieve compliance. At that time, it was designed to report every NSP change for the correct event date to the registry as soon as an NSP changed for an ICP. This exceeds the requirement to notify NSP changes greater than 14 days and would result in all NSP changes being updated to the registry. Unison have revised the process and only NSP changes that exceed 14 days in duration will be updated to Gentrack and then the registry. I have reviewed the updated process documentation and the test plan and results and confirm that compliance should be met.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The distributor must notify the registry of the NSP identifier of the NSP to which the ICP is usually connected under Clause 7(1)(b) of Schedule 11.1.

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

This material change audit relates only to the process for the changing from one NSP to another for existing ICPs. As noted in **section 3.3**, there is no change to the process for determining the NSP when creating new ICPs. I examined the new process including the test plan and test results to confirm compliance.

Audit commentary

This material change will allow the full integration between the ADMS real time monitoring system and Gentrack, so that any changes to the NSP that an ICP is connected to will flow through to Gentrack correctly and therefore get updated on to the registry with the correct effective date and within the required timeframe. I reviewed the process documentation during the last Distributor audit and confirmed that the change should achieve compliance. At that time, it was designed to report every NSP change for the correct event date to the registry as soon as an NSP changed for an ICP. This exceeds the requirement to notify NSP changes greater than 14 days and would result in all NSP changes being updated to the registry. Unison have revised the process and only NSP changes that exceed 14 days in duration will be updated to Gentrack and then the registry. I have reviewed the updated process documentation and the test plan and results and confirm that compliance should be met.

The recommendation to review potentially mismapped ICPs identified during the last audit is in progress and this material change will not affect this process.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 of 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 difference between the total consumption for the embedded network and all other ICPs on the embedded network.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

4.6. Distributors to Provide ICP Information to the Registry (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:

- *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

I checked the process documentation and the test results to confirm that the NSP changes will flow correctly to Gentrack and confirmed if any other ICP information is impacted by this process change.

Audit commentary

The new process for the updating of NSP changes for an ICP will be a nightly process which compares the ICP's connectivity between ADMS (the real time distributor management system) and the NSP that the ICP is connected to in Gentrack. This process is carried out in a separate database called "BI-ODS" (refer figure 1 in **section 1.6**). Within this database any NSP connectivity differences are identified and for how long the difference has been present. Once a difference has been identified for 14 days i.e. day 15 of the difference, this triggers an update to Gentrack to change the NSP connectivity. This is carried out via an update file to Gentrack using the Gentrack webservice function from the BI_ODS database. Once updated in Gentrack the update flows through to the registry via the existing update function (this function is existing and unchanged). There is an audit trail for all steps and any exceptions are reported and will be reviewed as part of the BAU process (refer figure 2 in **section 1.6**).

Within the current process to update NSPs there is an automatic update that takes place between GIS and Gentrack. It is this process that is causing the incorrect effective date to be recorded for NSP changes as it takes the update in GIS date as the effective date rather than the actual event date. This process is to be turned off when the new process is deployed as the old process will effectively be redundant. To leave it in place would cause correct updates to be overwritten when the GIS system is updated which is not done in real time. Unison have confirmed with Gentrack that the process can be stopped and this has been tested to confirm this and to check that no other processes are impacted.

I have reviewed the process documentation and the test plan and results and confirm that compliance should be met. I confirmed that this material change does not affect any other ICP information as required by this clause.

Audit outcome

Compliant

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

The distributor must provide the following information to the registry 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 on the registry, the distributor must enter the replaced loss factor on the table in the registry.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 notify 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 notify 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 notify 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:

- notify the reconciliation manager*
- notify the market administrator*
- notify each affected reconciliation participant*
- comply with Schedule 11.2.*

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPS.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPS.

Audit outcome

Not applicable

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 calendar month before the NSP is electrically connected or the ICP is transferred.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify the reconciliation manager at least one calendar 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 notify any trader trading at the ICP of the transfer at least one calendar month before the transfer.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify the market administrator in the prescribed form, no later than three business days before the transfer takes effect.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 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 notify 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify:

- *the previous network owner (Clause 29(1)(a) of Schedule 11.1)*
- *the reconciliation manager (Clause 29(1)(b) of Schedule 11.1)*
- *the market administrator (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 calendar 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify the reconciliation manager and the gaining MEP.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 market administrator 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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 notify the registry 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 notify the registry 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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

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 notify all traders affected by that change or decommissioning as soon as practicable after the change or decommissioning.

Audit observation

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

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

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit commentary

This process will not change as a result of the change to the management of NSP changes for existing ICPs.

Audit outcome

Not applicable

CONCLUSION

The process documentation, test plan and test results demonstrate that compliance is likely to be achieved when the NSP mapping process change for existing ICPs is implemented.

PARTICIPANT RESPONSE

Unison Networks Limited has reviewed the findings of this material change audit. We are comfortable with the Auditor's commentary and conclusion.