

Electricity Industry Participation Code Distributor Contractor Audit Report

For

TEG & Associates Limited

Prepared by Rebecca Elliot – Veritek Limited

Date of Audit: 15/07/17

Date Audit Report Complete: 08/08/17

Executive Summary

TEG & Associates Limited (TEG) provides registry management services to embedded networks (Distributors), and is considered a “contractor” under clause 11.2(A) of part 11.

TEG provides registry services under clause 11.10(4) of part 11 which form part of the following functions, and which require auditing:

- 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.

This audit was performed at the request of TEG, so that it can be supplied to Distributors to encompass the Electricity Industry Participation Code requirement for an annual audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits version 7.1, as published by the Electricity Authority.

TEG does not conduct all activities that Distributors have responsibility for. An individual audit and associated report is still required for each Distributor that TEG acts as a contractor for, in order to confirm those areas that TEG is not responsible for. Specifically, in reference to item “c” above, TEG does not determine the loss factors but does “load” the loss factors as advised to by the client to the loss factor table.

This report examines the processes and controls that TEG has in place for the registry functions it carries out. TEG is the contractor for 11 Distributors. The list and event detail reports for six of these networks were checked as part of this audit. All of these will be examined and the outcomes recorded in the relevant Distributor’s report. This will include any non-compliances found.

TEG has made improvements to the processes in place to manage the activities it undertakes for Distributors. They have refined the activity log to include the source of each action taken. The checks of the activity log have found all but a small handful of events not logged. From October 2016, TEG now runs an access based query tool every third day to highlight any changes made to an ICP for which it is the registry contractor for. This enables TEG to proactively manage any changes that need to be made to the registry. This has improved accuracy overall, and no duplicate addresses were found.

I make two recommendations, these are detailed below.

Table of Recommendations

Subject	Section	Clause	Description	Remedial Action
Provision of information to the registry	3.3	11.7	Record all changes when creating new ICPs in the activity log.	Investigating
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1)	Monitor NSP supply point table to ensure that NSP meter certifications are kept current.	No action

Persons involved in this Audit

Name	Company
Ewa Glowacka	TEG & Associates
Rebecca Elliot	Veritek Limited

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1. Administrative

1.1 Summary of Previous Audit

TEG provided a copy of their previous audit conducted in August 2016 by Rebecca Elliot of Veritek Limited. The findings from this audit are detailed below with the current status of the findings.

Table of Recommendations

Subject	Section	Clause	Description	Status
Changes to registry information	3.1	11.2 of part 11 & 8 of schedule 11.1	Maintain a complete log for all requests carried out as a contractor.	Still existing but I note that log was largely complete
ICP Location Address	3.2	2& 7(1)(a) of schedule 11.1	Review process to verify address changes so that duplicate addresses aren't inadvertently created.	Cleared

1.2 Scope of Audit

TEG provides registry management services to Distributors, and is considered a “contractor” under clause 11.2(A) of part 11.

TEG provides registry services under clause 11.10(4) of part 11 which form part of the following functions, and which require auditing:

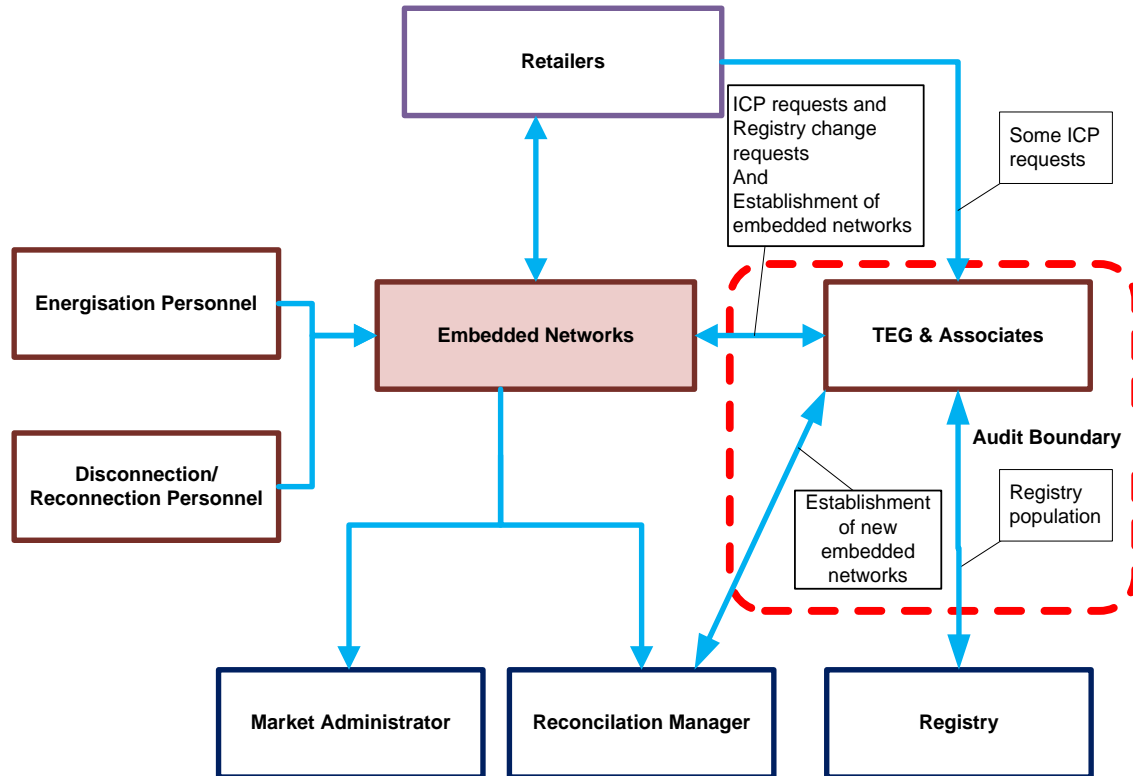
- a) the creation of ICP identifiers for ICPs
- b) the provision of ICP information to the registry and the maintenance of that information
- c) the creation and maintenance of loss factors.

This audit was performed at the request of TEG, so that it can be supplied to Distributors to encompass the Electricity Industry Participation Code requirement for an annual audit, in accordance with clause 11.10 of Part 11.

TEG has responsibility for creation of ICPs and for populating the registry based on information supplied by Distributors. Whilst TEG has some influence over the accuracy and timeliness of information populated on the registry, the overall responsibility for accuracy and timeliness remains with the Distributors. Specifically, in reference to item “c” above, TEG does not calculate the loss factors. This is done by the client and is then provided to TEG to either “create” or update on the loss factor table.

TEG does not have responsibility for liaison with the market administrator. An individual audit and associated report is still required for each Distributor that TEG acts as a contractor for in order to confirm those areas that TEG is not responsible for. Comment is made in each section of the report in relation to this matter.

The scope of the audit is shown in the diagram below, with the TEG audit boundary shown for clarity.



The audit was conducted in accordance with the Guideline for Distributor Audits version 7.1, as published by the Electricity Authority.

1.3 Balancing Areas and ICP Data

Balancing area and ICP information is contained in the individual Distributors' audit reports.

1.4 Exemptions from Obligations to Comply with Code (Section 11 of Electricity Industry Act 2010)

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.

There are no exemptions that have been granted to Distributors that affect TEG's operation.

1.5 Structure of Organisation

Ewa Glowacka conducts all relevant activities at TEG & Associates.

1.6 Supplier List

TEG does not use any contractors in the provision of services to Distributors.

1.7 Hardware and Software

TEG uses the Registry interface to carry out the contractor registry updates. The ICP creation process varies dependent on the Distributor. For some Distributors, the consecutive numbers for each individual network are used, which is determined using the LIS registry file for the relevant Distributor. Ongoing backup arrangements are therefore not critical to the TEG operation.

TEG keeps a log of requests from the embedded network owners in a spreadsheet. This is not mandatory but provides a readily trackable audit trail. The log records the requester, request source, network it relates to, action required, date received, effective date (event date) and the date actioned on the registry.

TEG uses an access based query tool to manage registry changes. This includes checking for duplicate addresses, addresses that are hard to locate, installations where import/export meter is installed but a no distributed generation is recorded, ICPs in the new or ready state for more than 24 months, trader has unmetered load indicated but distributor has no unmetered load details. This tool uses the LIS and PR255 files. Any changes made as a result of its output are detailed in the activity log.

2. Operational Infrastructure

2.1 Requirement to Provide Complete and Accurate Information (Clause 11.2(1) of Part 11)

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

TEG's data management processes were examined. The list files for a sample of six Distributors where TEG is the contractor for were examined to confirm compliance.

Audit Commentary

TEG is reliant on the information provided by the embedded network owner. TEG checks the accuracy of data using the access query tool to identify potential missing or inaccurate information. This has been in place since October 2016. This query is run every three days and any ICPs requiring changes are actioned accordingly. Examination of the list and event detail reports and the activity log confirmed compliance.

2.2 Requirement to Correct Errors (Clause 11.2(2) of Part 11)

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

TEG's data management processes were examined. The list files for a sample of six Distributors where TEG is the contractor for were examined to confirm compliance.

Audit Commentary

TEG is reliant on the information provided by the Distributor. TEG checks the accuracy of data using the access query tool to identify potential missing or inaccurate information. This query is run every three days and actioned accordingly. Examination of the list and event detail reports confirmed that the query is being run and the activity log confirmed that any incorrect or missing data is corrected as soon as practicable. Compliance is confirmed.

3. Creation of ICPs

3.1 Distributors Must Create ICPs (Clause 11.4 of Part 11)

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

Audit Observation

The new connection process was examined in detail and is described in **Sections 3.2 & 3.4**. TEG's ICP creation process was examined and is discussed in detail in **Section 3.10**.

Audit Commentary

TEG creates ICPs on behalf of Distributors in accordance with clause 1 of schedule 11.1. Compliance is confirmed.

3.2 Participants May Request Distributors to Create ICPs (Clause 11.5(3) of Part 11)

The distributor, within three business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.

Audit Observation

The new connection process was examined in detail. The clause assumes that ICP requests will be made by Retailers, however the process for embedded networks managed by TEG is different and most ICP requests are made by the embedded network management who received the requests from the customer. TEG's activity log, the event detail reports and list files of six Distributors that TEG is the contractor for were examined for ICPs created during the audit period.

Audit Commentary

ICP request processes differ for each Distributor, as listed below:

- A full ICP number is provided to TEG by the Distributor.
- ICP request is provided to TEG by the Distributor; TEG then creates the ICP number and populates the registry with the relevant information.
- ICP request is provided by the Trader, using the application for supply form. TEG creates the ICP and populates the registry with the relevant information.

The log of updates to the registry maintained by TEG was examined in conjunction with the relevant event detail reports and this identified 181 ICPs created during the audit period. All were created within three days of the request being received with the exception of:

- 22 ICPs were requested on 22/2/17 but these were not created until 2/3/17. These related to a new embedded network being created (this was an existing customer network) on 1/3/17. These ICPs were not new connections as such but as the network commenced on 1/3/17 these were created after electricity commenced trading. The late creation of 22 ICPs is recorded as non-compliance in the relevant Distributor's report.

3.3 Provision of ICP Information to the Registry (Clause 11.7 of Part 11)

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

Audit Observation

The new connection process for populating all required registry fields was examined. TEG's activity log, the event detail reports and list files of six Distributors that TEG is the contractor for were examined for ICPs created during the audit period.

Audit Commentary

TEG updates the registry via the web interface and maintains a log of all ICP activity, based on information provided by the Distributors.

As noted in **Section 3.2**, 22 ICPs were not created until after electricity had commenced trading. This is recorded as non-compliance in the relevant Distributor's report.

Two others were created with an incorrect start date so had to be corrected to an earlier start date. These corrections occurred after energisation and therefore these ICPs were not created before electricity commenced trading. One was created at "new" not "ready". This was due to human error. These occurred prior to the access query tool being used. Such incidents would now be picked up via this tool. The activity log records the initial ICPs creation at "Ready" but contains no record of the corrections made in September. Therefore, the activity log is incomplete. TEG provided the email requests to correct the ICP start date. The non-compliance is recorded in the relevant Distributor's report.

The activity log is complete for all initial requests made but any subsequent changes to new ICPs do not appear to be tracked. I recommend these are included in the log.

Recommendation	Description	Audited party comment	Remedial action
Regarding: 11.7	Record all changes when creating new ICPs in the activity log.	It is helpful to have all activities recorded in "log of updates of registry" but it is only the supporting tool. All original request via email are archived and easily accessible. I do appreciate that it makes easier to do an audit having the spreadsheet but it has minimal impact on compliance	Being considered

3.4 Timeliness of the Provision of ICP Information to the Registry (Clause 7(2) of Schedule 11.1)

This information is provided as soon as practicable, and before electricity is traded at the ICP.

Audit Observation

The new connection process was examined. TEG's activity log, the event detail reports and list files of six Distributors that TEG is the contractor for were examined for ICPs created during the audit period.

Audit Commentary

As noted in **Sections 3.2 and 3.3**, 22 ICPs were not created until after electricity had commenced trading. This is recorded as non-compliance in the relevant Distributor's report.

Two others were created with an incorrect start date so had to be corrected to an earlier start date. These corrections occurred after energisation and therefore these ICPs were not created before electricity commenced trading. The activity log records the initial ICPs creation at "Ready" but contains no record of the corrections made in September. TEG provided the email requests to correct the ICP start date. The non-compliance is recorded in the relevant Distributor's report.

3.5 Timeliness of the Provision of the Initial Energisation Date (Clause 7(2A) of Schedule 11.1)

*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

The process for populating all the initial energisation date was examined. TEG's activity log, the event detail reports and list files of six Distributors that TEG is the contractor for were examined for ICPs created during the audit period.

Audit Commentary

TEG updates the registry based on request from the Embedded Networks, or as a result of the access query tool that is run every three days that checks the registry for any changes made. Changes are tracked in the activity log and this includes the source of the change made i.e. as a result of an email request or a change on the registry.

The Distributor can be late in notifying these to TEG, or in most instances does not provide any notification at all if the Distributor has not received the information themselves. TEG now identifies any ICPs have been made active but have no initial energisation date populated via the access query tool. In these cases, TEG populates the same active date as the Retailer for some Distributors. This complies with the requirement to populate the initial energisation date, but as there is no verification that the retailer's active date is correct it could potentially be misleading. This is discussed in **Section 4.6**. The decision to use the same active date as the Retailer was made by distributors. If the Retailer has backdated their event this will cause the Distributor to backdate their event. The late updating of the population of the initial energisation date is recorded as non-compliance in the relevant Distributor's report.

The activity log identified 152 updates to the initial energisation date. All were updated to the registry within two business days of the request/notification. Compliance is confirmed.

3.6 Connection of ICPs (Clause 11.17 of Part 11)

A distributor must, when electrically connecting an ICP that is not also an NSP, follow the electrical connection process set out in Clause 10.31.

The distributor must not electrically 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 electrically connect an ICP unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load.

Audit Observation

The new connection process was examined. The list files for six Distributors that TEG is the contractor were examined to confirm that all ICPs at the status of “ready” have a trader nominated.

Audit Commentary

ICP requests are provided to TEG by Trustpower or the Distributor. TEG will not upload an ICP to the registry unless the Trader details are supplied. TEG does not have responsibility for checking with Traders that they have accepted responsibility. All ICPs created had a Trader nominated. As discussed in **Section 3.4**, 24 ICPs were created after electrical connection to the newly created embedded network. 22 of these were created after energisation had occurred. The non-compliance is recorded in the relevant Distributor’s report.

3.7 Electrical Connection of ICPs (Clause 10.28(7) of Part 10)

A network owner must not electrically connect a new point of connection that is to be quantified by metering unless requested to do so by the:

- MEP (for a temporary energisation); or*
- Reconciliation participant responsible for ensuring there is a metering installation.*

Audit Observation

This process is the responsibility of the Distributor therefore this clause was not assessed as part of this audit.

Audit Commentary

N/A

3.8 Electrical Connection of an ICP that is not an NSP (Clause 10.31 of Part 10)

A distributor must not electrically connect an ICP that is not also an NSP unless:

- the trader trading at the ICP has requested the electrical connection; or*
- the MEP who has an arrangement with the trader trading at the ICP has requested temporary energisation of the ICP.*

Audit Observation

This process is the responsibility of the embedded network owner, therefore this clause was not assessed as part of this audit.

Audit Commentary

N/A

3.9 Electrical Connection of NSP that is not a point of connection to the grid (Clause 10.30(2))

A distributor must, within five business days of electrically connecting an NSP that is not also a point of connection to the grid, notify the reconciliation manager of the following in the prescribed form:

- the NSP electrically connected*
- the date of the electrical connection*
- the participant identifier of each MEP*
- the certification expiry date for each metering installation.*

Audit Observation

The NSP table was checked for new NSPs. The process for the notification to the Reconciliation Manager was examined.

Audit Commentary

TEG have been working to clause 10.25(2) which requires that the Distributor to advise the Reconciliation Manager of the same details as above within 20 days of energisation. I note that this was also what was being audited to previously. TEG will endeavour to provide this information to the Reconciliation Manager within five business days if electrical connection and energisation occur simultaneously (which is likely for 99% of new NSPs). They are reliant on this information being provided by the Distributor.

There were two new NSPs connected during the audit period. The required details were submitted to the Reconciliation Manager within the required timeframes.

3.10 Definition of ICP Identifier (Clause 1(1) of Schedule 11.1)

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

The new connection process was examined and all ICPs created during the audit period were examined. This is detailed in **Section 3.2** above.

Audit Commentary

The process for the creation of ICPs was examined. As described in Section 3.2 above, the full ICP number is provided to TEG. For those ICP numbers requested by the trader where TEG is required to create them a LIS file is requested for the relevant network, and the next sequential number is taken to ensure they are all unique. The next step depends on whether multiple ICPs are being created or a single ICP. For the creation of multiple ICPs the numbers are entered including the two-letter Distributor code into a purpose designed spreadsheet which then creates the full ICP number including the checksum. The spreadsheet was provided by the registry. For the creation of a single ICP, TEG uses the checksum facility provided by the registry in their website. Compliance is confirmed.

3.11 Loss Category (Clause 6 of Schedule 11.1)

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

Audit Observation

The process of populating information to the registry is covered in Section 3.3 for new connections and Section 4.6 for existing ICPs. The list files for six of six Distributors that TEG is the contractor were examined to confirm that all ICPs have a single loss category code.

Audit Commentary

Loss category codes are provided by Distributors or their contractors. TEG updates the loss category code table on behalf of Distributors. A check of the list files confirmed that each ICP has only one loss category code. Compliance is confirmed.

3.12 Management of “New” Status (Clause 13 of Schedule 11.1)

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

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

Audit Observation

The new connection process was examined. The list and event detail files for six of six Distributors that TEG is the contractor were examined in relation to the use of the “New” status.

Audit Commentary

All ICPs are created at “Ready” once the details of the proposed Trader details have been provided to TEG. The “New” status is normally only used if an ICP is no longer required and is to be decommissioned. One ICP was created at new and then updated to “ready” after energisation had occurred. As detailed in **Section 3.3**, this was due to human error and would now be picked up via the access query tool. Compliance is confirmed.

3.13 Monitoring of “New” & “Ready” Statuses (Clause 15 of Schedule 11.1)

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

The process of the management of ICPs at the “ready” and “new” statuses was examined. The list file for six embedded network owners was examined for any ICPs at these statuses for greater than 24 months.

Audit Commentary

TEG monitors this via the registry discrepancy tool. New connections on the embedded networks for which TEG is the registry contractor do not sit at these statuses for long periods. A check of the list files found no ICPs that have been at “New” or “Ready” for more than 24 months. Compliance is confirmed.

3.14 Embedded Generation Loss Category (Clause 6 of Schedule 11.1)

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

The loss category code must be unique; and the distributor must provide the following to the reconciliation manager:

- the unique loss category code assigned to the ICP*
- the ICP identifier of the ICP*
- the NSP identifier of the NSP to which the ICP is connected*
- the plant name of the embedded generating station.*

Audit Observation

This requirement was discussed and the list file was examined.

Audit Commentary

There is no embedded generation on any network which TEG manages the registry function that has a generation capacity greater than 10MW.

4. Maintenance of Registry Information

4.1 Changes to Registry Information (Clause 8 of Schedule 11.1)

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

The process to manage ICP changes were examined. The event detail reports for six networks which TEG provides the registry management services for the audit period of July 2016 through to June 2017 were examined. TEG also provided their log of registry changes made during the audit period.

NSP changes were examined and none had occurred.

Audit Commentary

TEG keeps a log of such requests. Analysis found 113 events recorded and all but one was updated within three business days of the request. This was an ICP decommissioning request. TEG provided the emails from the client confirming that TEG was waiting for confirmation from them before the registry update occurred. Therefore, they were actioned as soon as confirmation was received from the client but this had not been tracked in the log. This will be recorded as non-compliance in the relevant Distributor's audit.

Analysis of the event detail reports found 20 updates changing the reconciliation type from GN to EN for ICPs that had been transferred to a new embedded network. These were updated four days from the event date. These were not logged in TEG's activity log therefore I am unable to determine where the delay has occurred.

This is an improvement on the last audit's findings. TEG processes have been strengthened during the audit period with the access query tool now proactively highlighting discrepancies, but the log is still manual so human errors will still occur. The late updating of events on the registry is recorded as non-compliance in the relevant Distributor's reports.

4.2 Notice of NSP for Each ICP (Clauses 7(4), 7(5) & 8(3) of Schedule 11.1)

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

The new connection process was examined and is described in detail in Sections 3.3 above. The list files for six networks which TEG provides the registry management services were checked.

Audit Commentary

TEG populates the NSP for each ICP on the registry manually at the time when ICP is loaded into the registry. Due to the nature of embedded networks there is no uncertainty regarding the ICP and NSP relationships. All of the list files checked confirmed compliance.

4.3 Customer Queries About ICP (Clause 11.31 of Part 11)

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

Audit Observation

The management of customer queries was examined.

Audit Commentary

TEG may receive direct requests for ICP identifiers and these can be provided immediately. This has not occurred, and is unlikely to occur. Compliance is confirmed.

4.4 ICP Location Address (Clauses 2 & 7(1)(a) of Schedule 11.1)

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

Audit Observation

The process to manage address accuracy was examined and the list file was analysed. The list file for six networks managed by TEG were checked to confirm ICP location addresses are readily locatable.

Audit Commentary

TEG does not have responsibility for ensuring addresses are readily locatable, but does monitor this requirement when creating ICPs. TEG have added a check for this via the access query tool that is run every three days across all networks that TEG is a contractor for. Analysis of the list files confirmed all addresses were readily locatable and no duplicates were found. Controls are strong and compliance is confirmed.

4.5 ICP De-energisation (Clause 3 of Schedule 11.1)

Each new ICP created after 7 October 2002 must be able to be de-energised without de-energisation of any other ICP. This is unless it is an ICP that represents the consumption calculated by difference between the total consumption for the embedded network and all other ICPs on that embedded network.

Audit Observation

This is the Distributor's responsibility as TEG provides registry management support only. Therefore, this was not assessed as part of this audit.

Audit Commentary

N/A

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

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

c) the initial energisation date of the ICP (Clause 7(1)(p) of Schedule 11.1).

Audit Observation

The new connection and updating of ICP information processes for populating all required registry fields was examined. The list files and event detail reports for six networks which TEG provides the registry management services were examined to check for the population of all required information and its alignment with the trader where appropriate e.g. Initial energisation date, distributed generation, unmetered load if known. Any variances found were checked.

Audit Commentary

The check of the list files confirmed that all information is populated correctly. Specific commentary is provided in relation to the headings below.

Initial Energisation Date

TEG updates the registry based on request from the Embedded Networks or as a result of access query tool that is run every three days that checks the registry for any changes made. Changes are tracked in the activity log and this includes the source of the change made i.e. as a result of an email request or a change on the registry.

Distributors are actively seeking this information from the traders and MEPs but they are continuing to have difficulties in getting it. The Distributor can be late in notifying these to TEG, or does not provide any notification at all if the Distributor has not received the information themselves. TEG identifies any ICPs have been made active but have no initial energisation date populated via the access query tool. In these cases, as requested by the embedded network owner, TEG populates the same active date as the Retailer. This complies with the requirement to populate the initial energisation date, but as there is no verification that the retailer's active date is correct it could potentially be misleading. This is recorded as non-compliance in the relevant Distributor's audit reports.

The list files checked found that all new connections had an initial energisation date populated and all matched with the exception of one. TEG has populated the date advised by the network owner. This was a TOU site and I am unable to determine which date is correct. Compliance is confirmed.

Distributed Generation

The Distributor advises TEG of any new distributed generation. This is only added to the registry once installation has been confirmed. This is also checked as part of the access query tool. The query looks for any metering with injection being installed or change of profile. TEG then goes back to the Distributor to advise of potential distributed generation being installed to be investigated. Of the list files were examined only one network was found to contain distributed generation. There were 13 ICPs with distributed generation and all were recorded correctly. Compliance is confirmed.

Unmetered Load

TEG will update the registry with unmetered load details at the request of Distributors or their contractors. TEG also checks for this as part of the access query tool. Of the list files examined only one network was found to contain unmetered load. The unmetered load has been recorded correctly for the two ICPs with unmetered load recorded against them. Compliance is confirmed.

4.7 Provision of Information to Registry after the Trading of Electricity at the ICP Commences (Clause 7(3) of Schedule 11.1)

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

The new connection process was examined as detailed in **Sections 3.2, 3.4 & 3.10**.

Audit Commentary

All the required details are provided at the time of the ICP creation therefore this information is provided as required by this clause. Compliance is confirmed.

4.8 GPS Co-ordinates (Clause 7(8) & (9) of Schedule 11.1)

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

Audit Observation

The list files for six networks managed by TEG were checked and found none use GPS co-ordinates for location of ICPs, therefore this was not examined.

Audit Commentary

N/A

4.9 Management of "Ready" Status (Clause 14 of Schedule 11.1)

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 management of ICPs in relation to the use of the "ready" status was examined. The list files and event detail report for a sample of six Distributors managed by TEG for the period from July 2016 to June 2017 were examined in relation to the use of the "ready" status.

Audit Commentary

An ICP is created on the Registry at “Ready” when TEG enters all the required information via the Registry interface including the proposed Trader who taken responsibility for the ICP. The proposed Trader is advised by the relevant Distributor. All ICPs only have a single price category code. Compliance is confirmed.

4.10 Management of “Distributor” Status (Clause 16 of Schedule 11.1)

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

Audit Observation

The management of ICPs in relation to the use of the “distributor” status was examined. The list files for a sample of six Distributors managed by TEG for the period from July 2016 to June 2017 in relation to the use of the “distributor” status.

Audit Commentary

It is unlikely that TEG will deal with any ICPs with a “Distributor” status because they do not deal with shared unmetered load, and there are no embedded networks connected to existing embedded networks for which TEG is a contractor.

4.11 Management of “Decommissioned” Status (Clause 20 of Schedule 11.1)

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

Decommissioning only occurs when:

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

Audit Observation

The management of ICPs in relation to the use of the “decommissioned” status was examined. The list files and event detail report for a sample of six Distributors managed by TEG for the period from July 2016 to June 2017 were examined in relation to the use of the “decommissioned” status.

Audit Commentary

TEG has been requested by Distributors to decommission ICPs during the audit period. The Distributor confirms that the electrical installation is physically removed. TEG then changes the status on the registry to “decommissioned”. The event date recorded on the registry is the actual date of decommissioning. No ICPs were found with the status of “ready for decommissioning” in the list files checked. The timeliness of these updates is discussed in **Section 4.1**. Compliance is confirmed.

4.12 Maintenance of Price Category Codes (Clause 23 of Schedule 11.1)

The distributor must keep up to date the table in the registry of the price category codes that may be assigned to ICPs on each distributor's network by entering in the table any new price category codes. Each entry must specify the date on which each price category code takes effect, which must not be earlier than two months after the date the code is entered in the table.

A price category code takes effect on the specified date.

Audit Observation

The price category code tables for all of the Distributors managed by TEG were examined.

Audit Commentary

TEG updates the price category code table when requested to do so by Distributors. 11 new price category codes were created during the audit period. All related to new embedded networks and were notified within the required timeframe. Compliance is confirmed.

5. Creation and Maintenance of Loss Factors

5.1 Updating Table of Loss Category Codes (Clause 21 of Schedule 11.1)

Distributors must keep up to date the table in the registry of the loss category codes that may be assigned to ICPs on each distributor's network, by entering in the table any new loss category codes. Each entry must specify the date on which each loss category code takes effect, which must not be earlier than two months after the date the code is entered in the table.

Audit Observation

The updating of the loss category table and the loss category code table on the registry was examined for all of the Distributors that TEG is the registry contractor to.

Audit Commentary

As noted in **Section 8** below, the Distributor calculates the loss factors and TEG updates the table of loss category codes when requested to do so by Distributors. Four new loss factor codes were created during the audit period. These were notified within the required timeframe. Compliance is confirmed.

5.2 Updating Loss Factors (Clause 22 of Schedule 11.1)

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

The updating of the loss category table and the loss category code table on the registry was examined for all of the Distributors that TEG is the registry contractor to.

Audit Commentary

As noted in **Section 8** below, the Distributor calculates the loss factors and TEG updates the table of loss category codes when requested to do so by Distributors. There were no loss factor updates made during the audit period.

6. Creation and Maintenance of NSPs

6.1 Creation and Decommissioning of NSPs (Clause 11.8 of Part 11 & Clause 25 of Schedule 11.1)

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

The process for the creation and decommissioning of NSPs was examined. The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to. Three new NSPs were created and none were decommissioned during the audit period.

Audit Commentary

TEG relies on the information provided to it by the Distributor. TEG sends all the relevant notifications as required by this clause once all the information has been received.

The notifications for the three new NSPs created were provided. Compliance is confirmed.

6.2 Provision of NSP Information (Clauses 26(1) & (2) of Schedule 11.1)

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

The process for the creation of NSPs was examined. The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to. Three new NSPs were created and none were decommissioned during the audit period.

Audit Commentary

The process is discussed in **Section 6.1**. Notification was provided in the correct time for the three new networks created. Compliance is confirmed.

6.3 Notice of Balancing Areas (Clauses 24(1) & 26(3))

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

The process for the creation of NSPs was examined. The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to.

Audit Commentary

The process is discussed in **Section 6.1**. TEG provided correct notification of the relevant balancing areas for the three newly created NSPs referred to in **Section 6.1**

6.4 Notice of Supporting Embedded Network NSP Information (Clause 26(4) of Schedule 11.1)

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

The process for the creation of NSPs was examined. The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to. Three new NSPs were created and none were decommissioned during the audit period.

Audit Commentary

The process is discussed in **Section 6.1**. TEG provided correct notification of the relevant balancing areas for the newly created NSP referred to in **Section 6.1**.

6.5 Maintenance of Balancing Area Information (Clauses 24(2) & (3) of Schedule 11.1))

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

The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to. No balancing areas were changed during the audit period, therefore this was not assessed as part of this audit.

Audit Commentary

N/A

6.6 Notice When an ICP Becomes an NSP (Clause 27 of Schedule 11.1)

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

The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to. TEG has not been required to provide notice of an ICP becoming an NSP in accordance with this clause, and compliance has therefore not been examined.

Audit Commentary

N/A

6.7 Notification of the Transfer of ICPs (Clauses 1-4 of Schedule 11.2)

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

The process for the creation of NSPs was examined. One of the three new embedded networks required ICPs to be transferred.

Audit Commentary

TEG has provided notice for the transfer of ICPs to one new NSP created during the audit period. The correct notifications were provided in the required timeframe.

6.8 Responsibility for Metering Information for NSP that is not a POC to the Grid (Clause 10.25(1) of Part 10)

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)).*

Audit Observation

The management of the meter certifications on the NSP supply point table was examined. The NSP supply point table was examined and evidence of all updates made to the Reconciliation Manager via the portal.

Audit Commentary

TEG relies on the Distributor to advise of NSP metering recertification. Examination of the NSP supply point table found all energised NSP points have a valid MEP and current certification recorded, with the exception of four NSPs with expired certification recorded. The controls are weak in this area and I recommend that either TEG or the Distributor monitor the NSP supply point table to ensure that the NSP meter certifications are kept current. Non-compliance is recorded in the relevant Distributors' report.

Recommendation	Description	Audited party comment	Remedial action
Regarding: clause 10.25(1)	Monitor NSP supply point table to ensure that NSP meter certifications are kept current	It is not TEG responsibility	No action

6.9 Responsibility for Metering Information when creating an NSP that is not a POC to the Grid (Clause 10.25(2) of Part 10)

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

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

Audit Observation

The NSP table on the registry was examined for all of the Distributors that TEG is the registry contractor to. Three NSPs were created during the audit period. Two of these are energised and one is yet to be electrically connected. Therefore there is no metering in place for this network.

Audit Commentary

TEG updates these as soon as they are provided by the Distributor. The notifications for the two new embedded networks were provided and compliance is confirmed.

6.10 Obligations Concerning Change in Network Owners (Clause 29 of Schedule 11.1)

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 1 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

One of the three new networks created one was part of an existing network. The process and notifications for this were examined.

Audit Commentary

TEG provides these notifications to the relevant parties as soon as they are confirmed by the Distributor. They were provided within the required timeframe for the network concerned. Compliance is confirmed.

6.11 Electrically Connecting NSP that is not a POC to the Grid (Clause 10.30(1) of Part 10)

A distributor must not electrically connect an NSP that is not a point of connection to the grid unless:

- *a reconciliation participation has requested the electrical connection (Clause 10.30(1)(a)); or*
- *a metering equipment provider (authorised by the trader) has requested the electrical connection for a temporary energisation of the ICP (Clause 10.30(1)(b)).*

Audit Observation

This process is the responsibility of the Distributor not TEG. TEG is only advised once this permission has been gained, therefore this clause was not assessed as part of this audit.

Audit Commentary

N/A

6.12 Change of MEP Embedded Network Gate Meter (Clause 10.22(1)(b) of art 10)

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

The process to manage any changes of MEPs was examined. The NSP supply point table was examined and found no changes to any MEPs had occurred during the audit period.

Audit Commentary

This would be advised by the Distributor and updated on the network supply point table as required. Compliance is confirmed.

6.13 Confirmation of Consent for Transfer of ICPs (Clauses 5 & 8 of Schedule 11.2)

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

The management of the transfer of ICPs was examined. One new embedded network had ICPs transferred from a parent network.

Audit Commentary

The Distributor issues the permission requests to the traders and provides the responses to TEG to confirm that these have been gained. All relevant permissions were provided for the one NSP with transferred ICPs. Compliance is confirmed.

6.14 Transfer of ICPs- Embedded Network (Clauses 6 of Schedule 11.2)

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

Audit Observation

The management of the transfer of ICPs was examined. One new embedded network had ICPs transferred from a parent network.

Audit Commentary

TEG works closely with the Distributor to ensure that any transfers relate to all of the ICPs to be on that embedded network. The new embedded network created during the audit period was confirmed to include all ICPs. Compliance is confirmed.

7. Maintenance of Unmetered Load

7.1 Notification of Shared Unmetered Load ICP list (Clause 11.14(2) & (4) of Part 11)

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

There is no shared unmetered load on any of the Distributor's networks that TEG is registry contractor for, and none is planned to be created. TEG does not provide services in relation to shared unmetered load.

Audit Commentary

N/A

7.2 Changes to Shared Unmetered Load (Clause 11.14(5) of Part 11)

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

There is no shared unmetered load on any of the Distributor's networks that TEG is registry contractor for and none is planned to be created. TEG does not provide services in relation to shared unmetered load therefore there are no changes, and this was not assessed as part of this audit.

Audit Commentary

N/A.

8. Creation of Loss Factors

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

TEG does not calculate loss factors. These are provided by the network owner. Therefore, this was not assessed as part of this audit.

Audit Commentary

N/A

9. Conclusions

This report examines the processes and controls that TEG has in place for the registry functions it carries out. TEG is the contractor for 11 Distributors. The list and event detail reports for six of these networks were checked as part of this audit. All of these will be examined and the outcomes recorded in the relevant Distributor's report. This will include any non-compliances found.

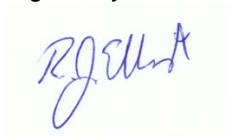
TEG has made improvements to the processes in place to manage the activities it undertakes for Distributors. They have refined the activity log to include the source of each action taken. The checks of the activity log have found all but a small handful of events not logged. From October 2016, TEG now runs an access based query tool every third day to highlight any changes made to an ICP for which it is the registry contractor for. This enables TEG to proactively manage any changes that need to be made to the registry. This has improved accuracy overall, and no duplicate addresses were found.

I make two recommendations, these are detailed below.

Table of Recommendations

Subject	Section	Clause	Description	Remedial Action
Provision of information to the registry	3.3	11.7	Record all changes when creating new ICPs in the activity log.	Investigating
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1)	Monitor NSP supply point table to ensure that NSP meter certifications are kept current.	No action

Signed by:

A handwritten signature in blue ink, appearing to read 'R. Elliot', is placed over a light green rectangular background.

Rebecca Elliot - Veritek Limited
Electricity Authority Approved Auditor

10. TEG Response

We would like to thank the auditor for the positive interaction with TEG. I see the audits as an excellent opportunity for someone to look at my systems from another perspective and respect the views raised.