ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT

For

MAINPOWER NEW ZEALAND LIMITED
NZBN: 9429038908514

Prepared by: Rebecca Elliot, Veritek Limited

Date audit commenced: 11 October 2021

Date audit report completed: 2 December 2021

Audit report due date: 12-Dec-21

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EXECUTIVE SUMMARY

This Distributor audit was performed at the request of **MainPower New Zealand Limited (MainPower),** to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

MainPower have good controls in place for most processes. Robust processes and prompt and accurate update of information is treated as a priority. Reporting and management of the reports is strong, data accuracy issues identified are promptly resolved.

Overall, the level of compliance is high, and controls were generally found to be strong. The audit found ten non-compliances and I repeat one recommendation from the last audit. The audit risk rating is 18, and the next audit frequency table indicates that the next audit be due in 12 months. I have considered this in conjunction with MainPower's responses and I recommend that the next audit is in 12 months.

The matters raised are shown in the tables below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1) and 10.6(1)	338 ICPs recorded against the incorrect NSPs and in different balancing areas.	Moderate	Low	2	Cleared
Removal and breakage of seals	2.3	48(1A) and 48(1B) of Schedule 10.7	Mainpower do not re-seal metering equipment after bridging and do not advise the trader.	Moderate	Low	2	Identified
Provision of information on dispute resolution scheme	2.4	11.30A	Call scripts to be developed for use by Call Care.	Moderate	Low	2	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	Clause 7(2) of Schedule 11.1	Late update to "ready" for nine ICPs electrically connected during the audit period.	Strong	Low	1	Identified
Initial electrical connection date population	3.5	7(2A) of Schedule 11.1	57 initial electrical connection dates updated late to the registry.	Moderate	Low	2	Identified
Connection of ICP that is not an NSP	3.6	11.17	Eight ICPs where the trader was not recorded in the registry as having accepted responsibility prior to electrical connection.	Strong	Low	1	Identified
Meter bridging	3.18	10.33C	Mainpower do not advise the trader after bridging the meter.	Moderate	Low	2	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Changes to registry information	4.1	8 Schedule 11.1	205 late pricing updates. 106 late address updates. 16 late status updates. 262 late network updates. 338 late NSP updates. Seven late distributed generation updates.	Moderate	Low	2	Identified
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	338 ICPs with late NSP changes.	Moderate	Low	2	Cleared
Provision of information to registry after the trading of electricity at the ICP commence	4.7	7(3) Schedule 11.1	Two late pricing changes to provide the actual price category code.	Moderate	Low	2	Identified
					Future Risk Rating	**18**	

Future risk rating	0-1	2-5	6-8	9-20	21-29	30+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Action
Distributed Generation	4.6	Monitor the EIEP1 reports to identify ICPs with "I" flow where none is expected and check for any negative values as this may indicate where distributed generation is present without import/export metering installed.	

ISSUES

Subject	Section	Issue	Description
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code (Section 11)

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

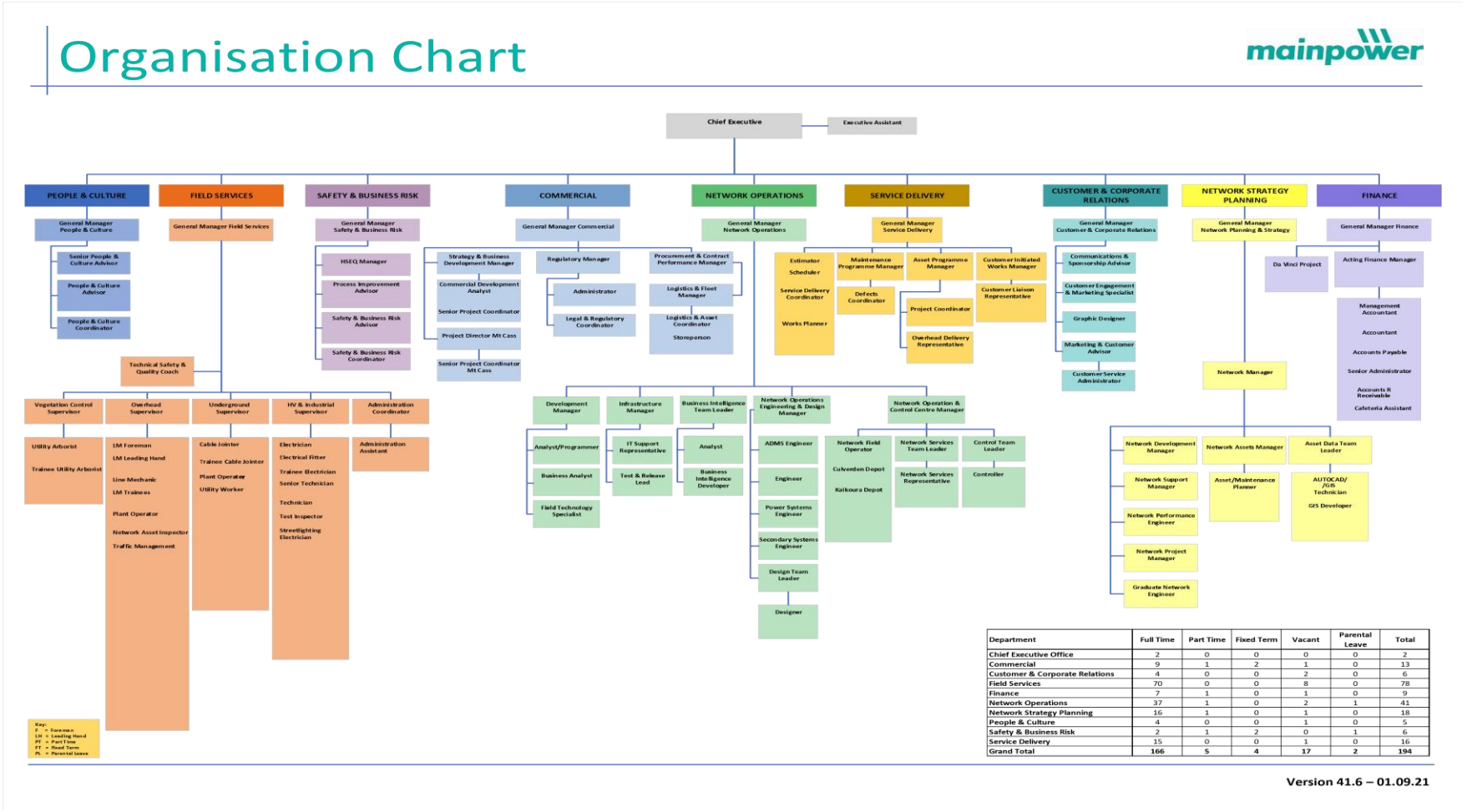
The Authority website was checked to determine whether there are code exemptions in place.

Audit commentary

Review of exemptions on the Authority website confirmed that there are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

MainPower provided their organisational structure:



Department	Full Time	Part Time	Fixed Term	Vacant	Parental Leave	Total
Chief Executive Office	2	0	0	0	0	2
Commercial	9	1	2	1	0	13
Customer & Corporate Relations	4	0	0	2	0	6
Field Services	70	0	0	8	0	78
Finance	7	1	0	1	0	9
Network Operations	37	1	0	2	1	41
Network Strategy Planning	16	1	0	1	0	18
People & Culture	4	0	0	1	0	5
Safety & Business Risk	2	1	2	0	1	6
Service Delivery	15	0	0	1	0	16
Grand Total	166	5	4	17	2	194

1.3. Persons involved in this audit

Auditor:

Name	Company	Role
Rebecca Elliot	Veritek Limited	Lead Auditor
Claire Stanley	Veritek Limited	Supporting Auditor

MainPower Networks personnel assisting in this audit were:

Name	Title
Joel Hung	Commercial Analyst
Leigh Hancock	Commercial Administrator
Sarah Barnes	Regulatory Manager
Cam Mills	Asset Data TL
Tim Ealam	TL Network Services Representative

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

MainPower subcontracts Vircom, Delta and Safepower to conduct some field activities. The management and control areas covered by this audit are conducted by MainPower employees. This matter was discussed during the audit to ensure MainPower understands their responsibilities under this clause.

Audit commentary

MainPower has maintained responsibility for all of their obligations during the audit period.

1.5. Supplier list

MainPower engages Vircom, Delta and Safepower to conduct some field activities.

1.6. Hardware and Software

MainPower uses the Salesforce system (known as MACK internally) to manage processes and data related to the scope of this audit.

Back-ups are carried out in accordance with industry standards.

1.7. Breaches or Breach Allegations

Mainpower has had one breach allegation relevant to the scope of this audit recorded by the Electricity Authority during the audit period. This is detailed below and discussed further in **sections 2.1, 4.1** and **4.2**.

Ref	Breach Description	Clause	Outcome
2103MAIN1	In August and September 2020, the MainPower Network Operations Centre undertook a number of switching operations whereby groups of ICPs were shifted between GXPs. The details of these shifts are set out below and the affected ICPs are set out in the attached spreadsheet. At the time the shifts occurred MainPower was introducing an advanced distribution management system (ADMS) this has affected processes across the business, particularly any processes dealing with connectivity on the network. A structural realignment also took place at this time meaning a number of staff changed reporting lines and responsibilities. On 18 August 2020 204 ICPs were moved from the WPR0331 GXP to ASY0111 GXP. The high voltage shift was updated automatically in the MainPower GIS; however, the low voltage shift required a manual update and this did not happen. The MainPower GIS updates the Customer Information System (MACK) automatically which in turn updates the Electricity Registry. Because the LV shift was not updated, the GXP in MACK and the Electricity Registry for the 204 ICPs was not updated from WAI0331 to ASY0111. On 10 September 2020 117 ICPs were moved from the KAI0111 GXP to SBK0331 GXP. The high voltage shift was updated automatically in the MainPower GIS; however, the low voltage shift required a manual update, and this did not happen. The MainPower GIS updates the Customer Information System (MACK) automatically which in turn updates the Electricity Registry. Because the LV shift was not updated, the GXP in MACK and the Electricity Registry for the 117 ICPs was not updated from KAI0111 to SBK0331.	Part 11 clause 11.2, schedule 11.1 clause 7(1) (b): clause 7(2) and clause 8 (4)	Decline to pursue

Ref	Breach Description	Clause	Outcome
	On 14 September 2020 3 ICPs were moved from the SBK0661 GXP to SBK0331 GXP. The high voltage shift was updated automatically in the MainPower GIS; however, the low voltage shift required a manual update, and this did not happen. The MainPower GIS updates the Customer Information System (MACK) automatically which in turn updates the Electricity Registry. Because the LV shift was not updated, the GXP in MACK and the Electricity Registry for the 3 ICPs was not updated from SBK0661 to SBK0331. In addition, 3 ICPs were transferred from CUL0331 GXP to WPR0331 GXP and 4 ICPs transferred from WPR0661 to WPR0331. The date for these changes is not known. Due to the location of the ICPs in relation to the feeders and the fact that ICPs cannot be physically switched from WPR0661 to WPR0331, we surmise that these may be data corrections however they are included in this notification out of caution. On 22 February 2021 a manual refresh of the LV network in GIS was undertaken. This updated the GXP details in MACK and the Electricity Registry for all the ICPs described above with the exception of 13 ICPs which still showed on the Electricity Registry as connected to the KAI0111 GXP instead of SBK0331 GXP. On 5 March 2021 MainPower staff identified that the GXP for one of the 13 ICPs not updated on 22 February was still showing as connected to KAI0111 on the Electricity Registry rather than SBK0331 as shown on the MainPower GIS and MACK. This prompted a wider investigation leading to the identification of the four breaches described above.		

1.8. ICP and NSP Data

MainPower owns and operates the electricity network in the North Canterbury region.

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

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
MPOW	ASY0111	ASHLEY			ASYAREAMPOWG	G	01-10-16	3,025
MPOW	CUL0331	CULVERDEN			SWCKMPOWG	G	01-08-16	3,568
MPOW	CUL0661	CULVERDEN			SWCKMPOWG	G	01-08-16	2,832
MPOW	KAI0111	KAIAPOI			KAI0111MPOWG	G	01-05-08	11,166
MPOW	SBK0331	SOUTHBROOK			SWCKMPOWG	G	01-05-08	9,429
MPOW	SBK0661	SOUTHBROOK			KAI0111MPOWG	G	01-10-16	6,135
MPOW	WPR0331	WAIPARA			SWCKMPOWG	G	01-08-16	3,528
MPOW	WPR0661	WAIPARA			SWCKMPOWG	G	01-01-16	2,480

MainPower does not own any embedded networks and there are no embedded networks connected.

The following ICP information is from a September 2021 list file:

Status	Number of ICPs 2021	Number of ICPs 2020	Number of ICPs 2019
New (999,0)	27	20	-
Ready (0,0)	70	46	-
Active (2,0)	42,163	40,892	40,080
Distributor (888,0)	7	7	-
Inactive – new connection in progress (1,12)	68	30	47
Inactive – electrically disconnected vacant property (1,4)	744	726	763
Inactive – electrically disconnected remotely by AMI meter (1,7)	82	79	81
Inactive – electrically disconnected at pole fuse (1,8)	12	13	20
Inactive – electrically disconnected due to meter disconnected (1,9)	6	6	6
Inactive – electrically disconnected at meter box fuse (1,10)	-	1	0
Inactive – electrically disconnected at meter box switch (1,11)	-	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	1	7	8
Inactive – reconciled elsewhere (1,5)	-	0	0
Decommissioned (3)	4,218	4,078	3,942

1.9. Authorisation Received

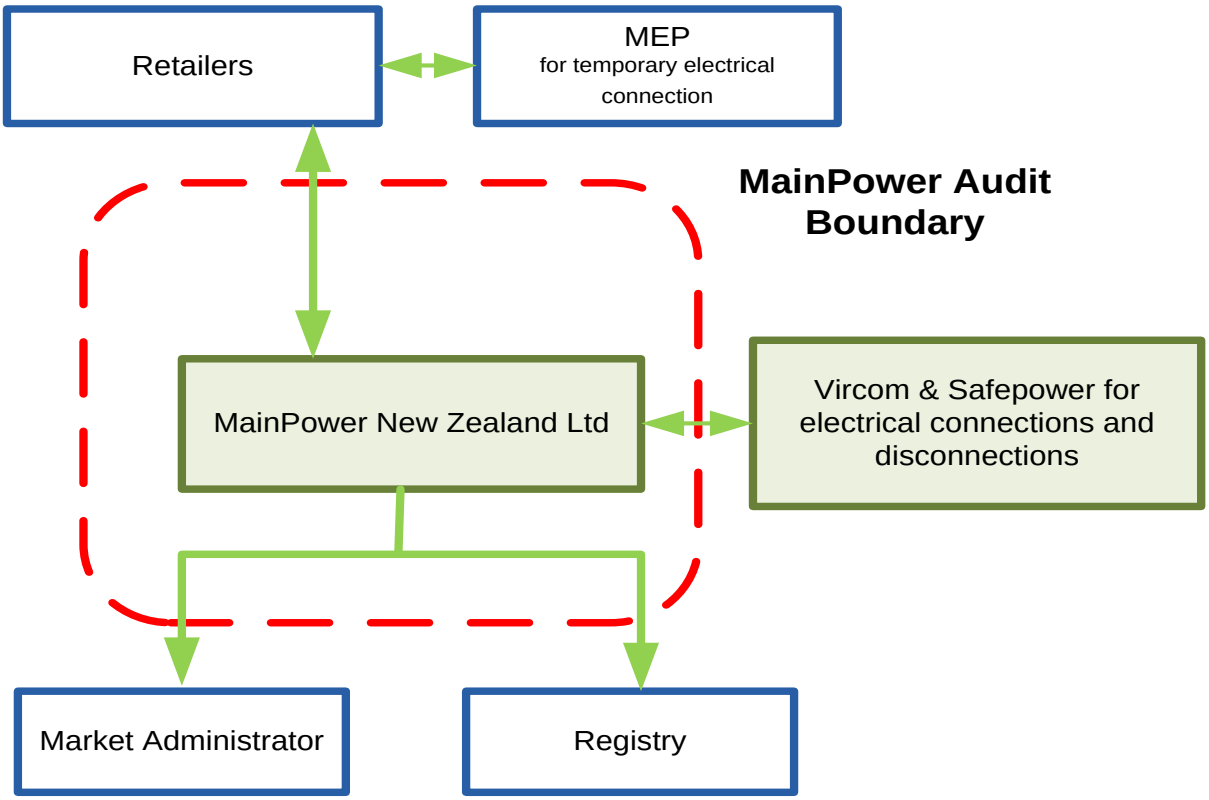
An authorisation letter was provided.

1.10. Scope of Audit

This Distributor audit was performed at the request of MainPower, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

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

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



All activities covered by this audit are conducted at MainPower's head office in Rangiora.

1.11. Summary of previous audit

MainPower provided a copy of their previous audit, conducted in June 2020 by Rebecca Elliot of Veritek. The audit found 12 non-compliances and made six recommendations. The current status of these matters is detailed in the table below.

Table of non-compliance

Subject	Section	Clause	Non-compliance	Status
Provision of information	2.1	11.2(1)	All practicable steps not taken to ensure information accuracy, as recorded in sections 4.4, 4.6 and 4.8.	Cleared
Distributors must create ICPs	3.1	11.4	ICP identifier not created for streetlights connected to ASY0111 for Hurunui DC.	Cleared
Ready updates	3.4	7(2) of Schedule 11.1	Late update to Ready for five ICPs electrically connected during the audit period.	Still existing for different ICPs
Initial electrical connection date population	3.5	7(2A) of Schedule 11.1	60 initial electrical connection dates updated late to the registry.	Still existing for different ICPs
Connection of ICP that is not an NSP	3.6	11.17	Four ICPs where the trader not recorded in the registry as having accepted responsibility prior to electrical connection.	Still existing for different ICPs
Monitoring of New and Ready	3.14	15 Schedule 11.1	Five ICPs not monitored during the audit period.	Cleared
Changes to registry information	4.1	8 Schedule 11.1	Some late registry updates.	Still existing for different ICPs
Notice of NSP	4.2	7(1),(4) and (5) Schedule 11.1	Incorrect GXP recorded for one ICP.	Cleared
ICP location address	4.4	2 Schedule 11.1	1,555 ICPs with addresses that are not readily locatable.	Cleared
Registry accuracy	4.6	7(1) (o) & (p) Schedule 11.1	Two DG discrepancies. Two IECD discrepancies.	Still existing for different ICPs

Subject	Section	Clause	Non-compliance	Status
Provision of information to registry after the trading of electricity at the ICP commence	4.7	7(3) Schedule 11.1	Six late pricing changes to provide the actual price category code.	Still existing for different ICPs
GPS coordinates	4.8	7(8) & (9) Schedule 11.1	WSG GPS coordinates populated to the registry rather than the expected NZTM format.	Cleared

Recommendations

Subject	Section	Description	Status
New and Ready checks	3.14	Include details of new and ready checks in MACK to ensure better visibility.	Cleared
Electrical connection of a point of connection	3.16	Put in place a connection process for streetlights to ensure that a trader has accepted responsibility for these prior to electrical connection.	Cleared
ICP location address	4.4	Replace lot number with street number where possible.	On-going
Registry accuracy	4.6	COC details to be used to update the database of the installed distributed generation.	On-going
		Monitor EIEP files to ensure DG records are accurately populated.	Still existing
		Liaise with trader to confirm the correct unmetered load details for the three ICPs where the loads vary.	Cleared
Management of "Decommissioned" status	4.11	Make the "ready for decommissioning" status update visible in MACK to remove the manual checks of the registry to find this.	On-going
Shared unmetered load	7.1	Populate the shared ICP list field for child ICPs with the parent ICP identifier.	Cleared

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

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

The registry list file as of 31 August 2021, and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined to confirm compliance.

Audit commentary

MainPower has robust validation processes in place. Registry notification files are checked daily, and the audit compliance reporting is used to check for discrepancies.

As detailed in **section 4.1**, 336 ICPs were recorded on the registry with the incorrect NSP. This was due to LV ICPs not being updated when the feeder and GXP were changed. Mainpower identified the issue and corrected the affected ICPs causing them to be backdated. MainPower reported a self-breach when this was identified. This was investigated and the breach was closed "Decline to pursue". This is detailed in **section 1.7.** A system change has been put in place to ensure when a feeder is reset everything downstream of the LV network is also updated. This will have affected reconciliation as the NSPs affected are not in the same balancing areas. The error was found and corrected within the 14-month revision cycle and therefore any impacts will be washed out through this process. This is recorded as a non-compliance in below and in **section 4.6.**

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 08-Apr-20 To: 30-Aug-21	338 ICPs recorded against the incorrect NSPs and in different balancing areas. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement cannot be assessed, the issue has been corrected. The potential impact has been assessed as low as this will wash out through the revision cycle.

Actions taken to resolve the issue	Completion date	Remedial action status
ICPs were corrected when breach identified	22/03/2021	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
GIS system has been updated to automate all changes made at GXP level to ensure that all ICPs are updated	22/03/2021	

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

MainPower's data management processes were examined. The registry list file as of 31 August 2021, and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined to confirm compliance.

Audit commentary

As noted above MainPower have robust processes and procedures in place to ensure they provide correct and accurate information. Registry notification files are checked daily, and the audit compliance reporting is used to check for discrepancies. Any discrepancies found are investigated and updated as required.

Audit outcome

Compliant

2.3. Removal or breakage of seals (Clause 48(1A) and 48(1B) of Schedule 10.7)

Code reference

Clause 48(1A) and 48(1B) of Schedule 10.7

Code related audit information

If the distributor provides a load control signal to a load control switch in the metering installation, the distributor can remove or break a seal without authorisation from the MEP to bridge or unbridge the load control device or load control switch – as long as the load control switch does not control a time block meter channel.

If the distributor removes or breaks a seal in this way, it must:

- *ensure personal are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code*
- *replace the seal with its own seal*
- *have a process for tracing the new seal to the personnel*
- *notify the metering equipment provider and trader*

Audit observation

The PR-255 file was examined to determine if there were examples of load control switches on the MainPower Network. The management of removal and breakage of seals was discussed.

Audit commentary

Mainpower may remove or break a seal to bridge load control switches after hours as a result of direct contact from a customer. Mainpower advise the MEP who will in turn advise the retailer to arrange a job to complete the unbridging and resealing work. Five examples of these types of jobs were identified during the audit. It was identified that Mainpower do not reseal the metering equipment and they do not advise the trader that the seal has been broken.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.3 With: From: 08-Apr-20 To: 30-Aug-21	Mainpower do not re-seal metering equipment after bridging and they do not advise the trader. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
MainPower staff no longer hold MEP authorization or capability to reseal. We advise MEPs of broken seals. We will resume advising traders as well.	06/12/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Network Operation Centre staff instructed to advise retailer of broken seals.	06/12/21	

2.4. Provision of information on dispute resolution scheme (Clause 11.30A)

Code reference

Clause 11.30A

Code related audit information

A distributor must provide clear and prominent information about Utilities Disputes:

- *on their website*
- *when responding to queries from consumers*
- *in directed outbound communications to consumers about electricity services and bills.*

If there are a series of related communications between the distributor and consumer, the distributor needs to provide this information in at least one communication in that series.

Audit observation

The Disputes Resolution information was examined for MainPower to determine compliance. The MainPower website and correspondence to consumers provided by MainPower was examined.

Audit commentary

All of these provided clear and prominent information about Utilities Disputes for the consumer, including contact details and links to the Utilities Disputes website. The MainPower website provides the Utilities Dispute information clearly on the Compliments and Concerns page.

The MainPower IVR provides information regarding Utilities Disputes for all incoming calls.

Call Care take inbound calls from consumers for MainPower after hours. The Utilities dispute service is not currently included in these calls. MainPower plan to review this with Call Care so that the Utilities Disputes information is provided.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.4 With: 11.30A From: 01-Apr-20 To: 31-Aug-21	Call scripts to be developed for use by Call Care to include the Utilities Dispute information. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because MainPower provide Utility Dispute information for all the internal customer facing channels, processes have not been established with their after-hours call centre provider. The audit risk rating is assessed as low as this being provided for all but one customer facing channel.

Actions taken to resolve the issue	Completion date	Remedial action status
Customers calling MainPower after hours listen to the utilities disputes automated message, which contains information about making complaints and refers them to the website before being put through to call care.	01/04/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Customers calling MainPower after hours listen to the utilities disputes automated message, which contains information about making complaints and refers them to the website before being put through to call care.	01/04/21	

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process was examined in detail and is described in **section 3.2**. 20 new connection applications of the 1,421 created since April 2020 were sampled using diverse characteristic methodology from the point of application through to when the ICP was created.

Audit commentary

The process in place is robust and has good controls in place. The sample checked in **section 3.2** below confirms this.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

As recorded in **section 3.1**, I checked the records for 20 ICPs created during the audit period to confirm compliance with this clause.

Audit commentary

The new connections process was reviewed and is set out below:

1. An application for a connection is made on the MainPower website by the customer or the customer's agent. The application requires a retailer to be nominated.
2. The New Connections team check the application to ensure all the required information has been provided and identify the ICP and GXP for the application.
3. The Network Services team process and approve the application. The ICP is created in the registry at "new" status and the nominated trader is emailed. If there is no point of supply a new power supply request is made.

4. The nominated trader must provide an acceptance to MainPower before the ICP is made "ready" on the registry.
5. Approval is sent to the livening agent, and they will liaise and schedule a time with the with the electrician for livening.

The records for 20 ICPs covering across MainPower's network were examined and confirmed all were requested by the electrician or customer.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

A sample of 20 new connection applications of the 1,421 created during the audit period were checked from the point of application through to when the ICP was created, to confirm the process and controls worked in practice.

Audit commentary

Registry population is automated, the file includes all relevant fields. Registry response information is checked to ensure the information is successfully sent. All ICPs had the required information populated as required by this clause. The accuracy of this information is detailed in **section 4.6**.

Compliance is confirmed for clause 11.7 because all required information is populated in the registry.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined to determine the timeliness of the provision of ICP information for new connections.

Audit commentary

The process for updating the registry is automated for all fields, and the update occurs on an iterative process throughout the day. 1,421 ICPs were created during the audit period. The registry was populated later than the first active date for nine ICPs. The nine late updates were reviewed and found:

- four ICPs were for unmetered Chorus cabinets that had been connected prior to the ICP being created. The correct process had not been followed, the trader was updating the information for the ICP,
- two ICPs were livened prior to the trader acceptance, the technicians have been reminded they can only connect on receipt of livening documents from MainPower,
- one ICP was created for a new GXP and back dated for unmetered streetlight lights, this was identified in the last audit,
- one ICP where the proposed trader was missed when the ICP was changed from "new" to "ready", this was due to human error, and
- one TOU ICP was connected prior to the trader acceptance being received, this was then backdated.

Overall, the processes in place are robust. The nine late updates to registry are recorded as non-compliance below.

Audit outcome

Non-compliant

<table>
<tr><th>Non-compliance</th><th colspan="3">Description</th></tr>
<tr><td>Audit Ref: 3.4
With: Clause 7(2) of Schedule 11.1

From: 01-Apr-20
To: 31-Aug-21</td><td colspan="3">Late update to "ready" for nine ICPs electrically connected during the audit period.
Potential impact: Low
Actual impact: Low
Audit history: Twice previously
Controls: Strong
Breach risk rating: 1</td></tr>
<tr><th>Audit risk rating</th><th colspan="3">Rationale for audit risk rating</th></tr>
<tr><td>Low</td><td colspan="3">The controls are rated as strong as they will eliminate risk to an acceptable level.
The audit risk rating is low as this affected a very small number of new connections with all being resolved within 13 days, one was back dated for unmetered streetlights.</td></tr>
<tr><th colspan="2">Actions taken to resolve the issue</th><th>Completion date</th><th>Remedial action status</th></tr>
<tr><td colspan="2">These nine occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.</td><td>06/12/21</td><td rowspan="3">Identified</td></tr>
<tr><th colspan="2">Preventative actions taken to ensure no further issues will occur</th><th>Completion date</th></tr>
<tr><td colspan="2">These nine occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.</td><td>06/12/21</td></tr>
</table>

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The new connection process for populating all required registry fields was examined. The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined to determine the timeliness of the provision of the initial electrical connection date. A diverse characteristics sample of ten late updates were examined.

Audit commentary

The process for updating the registry is automated for all fields, and the update occurs on an iterative process throughout the day.

There were 710 initial electrical connection date updates in the event detail report. The audit compliance report identified 57 (8.0%) late updates. The sample of nine late updates examined found:

- For one ICP it cannot be determined why this was updated on the registry in error; the IECD has since been removed,
- one TOU ICP was connected prior to the trader acceptance being received, this was then backdated,
- two were late due to the MainPower office being closed for Christmas/New Year,
- two were due to an IT issue which was fixed to prevent further occurrences, and
- three were the result of late paperwork from the livening agent.

MainPower have remined the field contractors to improve the return of paperwork. The late updates are recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 02-Apr-20 To: 31-Aug-21	57 initial electrical connection dates updated late to the registry. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time, most initial electrical connection dates were populated on time. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.

Actions taken to resolve the issue	Completion date	Remedial action status
Majority of late updates is due to livening agents not responding within required timeframes. We have spoken with livening agents and will continue to monitor and take further action as required.	06/12/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Majority of late updates is due to livening agents not responding within required timeframes. We have spoken with livening agents and will continue to monitor and take further action as required	06/12/21	

3.6. Connection of ICP that is not an NSP (Clause 11.17)

Code reference

Clause 11.17

Code related audit information

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

The distributor must not connect an ICP (except for an ICP across which unmetered load is shared) unless a trader is recorded in the registry as accepting responsibility for the ICP.

In respect of ICPs across which unmetered load is shared, the distributor must not connect an ICP unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load, and all traders that are responsible for an ICP on the shared unmetered load have been advised.

Audit observation

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

The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined to determine the timeliness of the provision of ICP information for new connections.

Audit commentary

The new connection process requires applications to be approved by traders. On receipt of an email confirming approval from the trader, the proposed trader is recorded by MainPower.

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

Eight new connections did not have a trader recorded in the registry as accepting responsibility prior to electrical connection:

ICP	First Active Status	Trader populated
0000702169MP0A2	8/07/2021	27/07/2021
0000701452MPE6B	25/09/2020	29/09/2020
0000701085MP2E2	17/09/2020	29/09/2020
0000700738MP1A9	10/06/2020	12/06/2020
0000701106MP26C	8/04/2020	14/04/2020
0000701108MP1F7	8/04/2020	14/04/2020
0000701107MPE29	8/04/2020	14/04/2020
0000701105MPEAC	8/04/2020	14/04/2020

This is recorded as non-compliance below.

This clause requires that a distributor must not connect an ICP across which unmetered load is shared unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load. MainPower does not allow or intend to allow any new shared unmetered load connections. There has been no new shared unmetered load added during the audit period. Shared unmetered load is discussed further in **section 7**.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.6 With: Clause 11.17 From: 01-Apr-20 To: 31-Aug-21	Eight ICPs where the trader was not recorded in the registry as having accepted responsibility prior to electrical connection. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as strong as they will eliminate risk to an acceptable level. The audit risk rating is low as most of the late updates were made within five days of being electrically connected.

Actions taken to resolve the issue	Completion date	Remedial action status
These eight occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.	06/12/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
These eight occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.	06/12/21	

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

Code reference

Clause 10.31

Code related audit information

A distributor must not connect an ICP that is not an NSP unless requested to do so by the trader trading at the ICP, or if there is only shared unmetered load at the ICP and each trader has been advised.

Audit observation

The new connection process was examined in **section 3.2**. The combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined.

Audit commentary

The new connection process allows applications for new connections to be submitted by customers or their agents. Trader acceptance is confirmed during the application process.

As discussed in **section 3.2**, MainPower has a step in the new connections process to ensure a trader accepts responsibility and is recorded in the registry. There are no ICPs without a proposed trader recorded in the registry.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

- *advising all traders would impose a material cost on the distributor, and*
- *in the distributor's reasonable opinion, the advice would not result in any material benefit to any of the traders.*

Audit observation

The new connection process was examined in **section 3.2**. The registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined.

Audit commentary

MainPower's processes are robust in relation to this clause as an ICP will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP.

No requests from MEP's have been received to temporarily electrically connect an ICP.

The audit compliance report found two ICPs where the meter certification date was earlier than the initial electrical connection date. I examined the paperwork for ICP 0000393665MP365, and it appears the MEP has populated an incorrect meter certification date of 12 July 2020. All other indications show that this was connected and certified on 17 July 2020.

ICP 0000701697MPECC was temporarily livened by the contractor to commission and certify the ICP. The contractor did not request permission from Mainpower to provide approval for the temporary electrical connection.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

The distributor that initiates the connection under Part 11 and connects the NSP must, within 5 business days of connecting the NSP that is not a point of connection to the grid, advise the reconciliation manager of the following in the prescribed form:

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30A and 10.30B)

Code reference

Clause 10.30A and 10.30B

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.*

A distributor may only electrically connect an NSP if:

- *each distributor connected to the NSP agrees*
- *the trader responsible for delivery of submission information has requested the electrical connection*
- *the metering installations for the NSP are certified and operational metering*

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

yyyyyyyyyyxxccc where:

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

Audit observation

The process for the creation of ICPs was examined.

Audit commentary

The process for the creation of ICPs was examined, and all ICPs are created in the appropriate format. The sample checked confirmed compliance.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The list file was examined to confirm all active ICPs have a single loss category code.

Audit commentary

The loss category code is known and assigned at the time of the ICP creation. Each active ICP only has a single loss category, which clearly identifies the relevant loss factor. On occasion a unique loss factor is required and applied e.g., Kate Valley.

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

The ICP creation process was reviewed. The registry list for 31 August 2021 was examined to determine compliance.

Audit commentary

MainPower creates ICPs at the "new" status and changes the status to "ready" once the relevant retailer has agreed to accept responsibility for the ICP. The "new" status is correctly used.

Examination of the list file found 27 ICPs at the "new" status. There were no ICPs at "new" with initial electrical connection dates populated. The monitoring of ICPs at this status is discussed in **section 3.14**.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

The combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined to identify any ICPs that had been at "new" and "ready" for more than 24 months.

Audit commentary

There are two ICPs that have been at "ready" for longer than 24 months, these were examined and found:

- one ICP has since been decommissioned as it is no longer required, and
- one ICP is still required, awaiting the nominated trader to accept the ICP.

These are monitored using the registry compliance audit report.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The list file was examined to identify relevant ICPs.

Audit commentary

There are no ICPs with a generation capacity greater than 10MW. There is one ICP with an individual loss category, but it is rated at 2MW.

Audit outcome

Compliant

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

Code reference

Code reference

Clause 10.33A(4)

Code related audit information

No participant may electrically connect a point of connection or authorise the electrical connection of a point of connection, other than a reconciliation participant.

Audit observation

Processes were examined for the connection of ICPs and NSPs.

Audit commentary

MainPower will only connect a point of connection if requested by the trader responsible in the registry. MainPower provide an approval to liven to the livening Agent who is acting on behalf of MainPower.

Audit outcome

Compliant

3.17. Electrical disconnection of a point of connection (Clause 10.30C and 10.31C)

Code reference

Clause 10.30C and 10.31C

Code related audit information

A distributor can only disconnect, or electrically disconnect an ICP on its network:

- *if empowered to do so by legislation (including the Code)*
- *under its contract with the trader for that ICP or NSP*
- *under its contract with the consumer for that ICP*

Audit observation

Processes were examined for the disconnection of ICPs and NSPs.

Audit commentary

MainPower understand their responsibilities in relation to this clause. They only conduct electrical disconnection for safety, and they only conduct disconnection where ICPs are to be decommissioned.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

A distributor may only electrically connect an ICP in a way that bypasses a meter that is in place ("bridging") if the distributor has been authorised by the responsible trader.

The distributor can then only proceed with bridging the meter if, despite best endeavours:

- *the MEP is unable to remotely electrically connect the ICP*
- *the MEP cannot repair a fault with the meter due to safety concerns*
- *the consumer will likely be without electricity for a period which would cause significant disadvantage to the consumer*

If the distributor bridges a meter, the distributor must notify the responsible trader within 1 business day and include the date of bridging in its advice.

Audit observation

The MainPower process for bridging control devices was examined.

Audit commentary

MainPower may receive a call from a customer after hours, to investigate 'no power'. MainPower will attend the site and may bridge the meter if required. Mainpower advise the MEP who will in turn advise the retailer to arrange a job to complete the unbridging and resealing work.

It was identified that Mainpower do not advise the trader that meter has been bridged.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.18 With: From: 08-Apr-20 To: 30-Aug-21	Mainpower do not advise the trader after bridging the meter. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
MainPower used to advise the retailer but has been changed to advising the MEP, we will advise the Network Operation Centre to advise the retailer going forward.	06/12/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MainPower used to advise the retailer but has been changed to advising the MEP, we will advise the Network Operation Centre to advise the retailer going forward.	06/12/21	

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 13th business day and be backdated to the date the change took effect.

In the case of decommissioning an ICP, notification must be given by the later of 3 business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or 3 business days after the distributor has decommissioned the ICP.

Audit observation

The management of registry updates was reviewed.

The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined. A diverse sample of a minimum of ten (or all if there were less than ten examples) backdated events by event type were reviewed to determine the reasons for the late updates.

Audit commentary

The process for updating the registry is automated for all fields, and the update occurs on an iterative process throughout the day.

The table below details the quantity and compliance of registry updates.

Update	Date	Late	% Compliant	Average Days
Address	2020	143	100%	-
	2021	106	99.29%	0.34
Price Codes	2020	231	60.00%	
	2021	205	98.20%	15
Status	2020	62	67.00%	18
	2021	16	91.04%	2.03
Network (excl. New Connection & Distributed Generation)	2020	1	N/A	N/A
	2021	5	99.98%	N/A
Distributed Generation	2020	36	64.00%	22.38
	2021	7	91.36%	43.67
NSP changes	2020	1	N/A	N/A
	2021	338	N/A	N/A

Address events

99.92% were made on time with an average time to update the registry of one day. There were 106 late address updates. The sample of ten checked found that nine were the result of late information being provided by the contractor. One late update was due to an incorrect connection type being installed, then corrected, the address was not changed, 'TEMP SUPPLY' was added to the address.

Network events

The network events evaluated excluded those relating to the population of the initial electrical connection dates (discussed in **section 3.5**), NSP changes (discussed below) and the initial network events relating to the creation of ICPs.

The network event compliance report was examined and recorded 262 late network updates. This was reviewed and found only five genuine late updates. These were examined and found that the five late updates were due to an IT update to MACK which triggered an update to the registry incorrectly. The issue that created this has been corrected and is unlikely to be repeated.

Distributed Generation

The distributed generation process is described in **section 4.6**. 91.36% of all distributed generation network updates were made on time with an average time to update the registry of 43.67 days. There were seven late distributed generation updates. These were examined and found that six were due to an IT update to MACK which triggered an update to the registry incorrectly. The issue that created this has been corrected and is unlikely to be repeated. One ICP was the result of late notification of the DG, the retailer followed up with MainPower and it was backdated to the requested date.

NSP Changes

336 ICPs were recorded on the registry with the incorrect NSP. This was due to LV ICPs not being updated when the feeder and GXP were changed. Mainpower identified the issue and corrected the affected ICPs causing them to be backdated. This is recorded as non-compliance below. Mainpower alleged a self-breach in relation to this, which is detailed in **section 1.7**. A system change has been put in place to ensure when a feeder is reset everything downstream of the LV network is also updated. This will have affected reconciliation as the NSPs affected are not in the same balancing areas. The error was found and corrected within the 14-month revision cycle and therefore any impacts will be washed out through this process. This is recorded as a non-compliance in **sections 2.1** and **4.6.** The backdating of the NSP change is recorded as non-compliance below.

Pricing events

10,488 pricing updates were identified. 205 of these were updated more than three business days after the event. Ten updates were examined and found:

- one was a correction to the pricing that was allocated,
- one was not actioned when a staff member was away,
- one was to update a place holder tariff that was updated when the permanent supply was connected, and
- seven were due to late information from the field which related to new connections and are recorded as non-compliance in **section 4.7**.

Decommissioning Status Events

The decommissioning process is discussed in **section 4.11**.

The combined audit compliance reporting found 16 late status updates. A typical sample of ten were examined and found:

- one was late as a result of a correction where customer was issued two ICP's in error - one ICP was decommissioned when this was identified,
- one was a correction resulting from the last audit,
- one was due to late paperwork,
- three were late due to missed notification, and
- four were delayed due to the Christmas/New Year shutdown.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Apr-19 To: 31-Aug-21	205 late pricing updates. 106 late address updates. 16 late status updates. five late network updates. 338 late NSP updates. Seven late distributed generation updates. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as moderate because are sufficient to ensure that the registry is updated within three business days most of the time and the NSP changes process has been corrected. The audit risk rating is assessed to be low as the volume of late updates is low.

Actions taken to resolve the issue	Completion date	Remedial action status
Refer comments on 2.3, 2.4, 3.4, 3.5, 3.6 Process changes have been made to address NSP for ICP, and DG. Livening agents have been reminded of their obligations and to be monitored.	06/12/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Refer comments on 2.3, 2.4, 3.4, 3.5, 3.6 Process changes have been made to address NSP for ICP, and DG. Livening agents have been reminded of their obligations and to be monitored.	06/12/21	

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

Code reference

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

Code related audit information

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

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

Audit observation

The process to determine the correct NSP was examined. The audit compliance reporting identified 10 active ICPs where 10% or fewer ICPs on a street have a different NSP and there are fewer than three ICPs with a different NSP. All were examined to determine if the correct NSP has been assigned.

Audit commentary

New connections are checked against surrounding ICPs and there is a check of the transformer to ensure the correct POC is used. Mainpower have reporting in place to identify any discrepancies.

The audit compliance reporting identified ten ICPs with potentially the incorrect POC assigned. These were examined and found all were correctly mapped.

As detailed in **sections 2.1** and **4.1**, 336 ICPs were recorded on the registry with the incorrect NSP. This was due to LV ICPs not being updated when the feeder and GXP were changed. Mainpower identified the issue and corrected the affected ICPs. They alleged a self-breach, which is detailed in **section 1.7**. A system change has been put in place to ensure when a feeder is reset everything downstream of the LV network is also updated. This will have affected reconciliation as the NSPs affected are not in the same balancing areas. The error was found within the 14-month revision cycle and therefore any impacts will be washed out through this process. This is recorded as a non-compliance in **sections 2.1** and **4.6.**

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

The management of customer queries was examined.

Audit commentary

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

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The process to determine correct and unique addresses was examined.

The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were examined.

Audit commentary

The physical address is requested as part of the new connection process, and these are checked in GIS as part of the new connection process. MainPower record GPS co-ordinates as part of this process.

The last audit found that the GPS co-ordinates had been changed from the NZTM format to the WSG format. This created duplicate addresses due to format difference. This has been fixed during the audit period and the audit compliance report did not report any ICPs with duplicate addresses.

A check of the list file identified 809 active ICPs that had no street number or property name, all have GPS co-ordinates that makes them readily locatable. MainPower advised these will be cleansed and additional information added to the address as time and resource allows.

41 ICPs were identified with a lot number. MainPower advised they have a process to update lot numbers with accurate addresses when the ICP goes from Temporary to Permanent supply. They are also cleansed occasionally by follow-up with the Council to get complete address details.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

I checked MainPower's "Network Connection Standards" to assess compliance.

Audit commentary

Section 2.3.6 of the Network Connection Standard contains the following statement:

"Connection for entry to and exit from the Network shall incorporate a means of disconnection of the User Network by MainPower."

MainPower confirmed there has been no change to the policy. In addition, the new connection notification forms have fields for "tail connection type" and capacity, which would alert to any shared service mains without individual isolation.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)*
- *the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)*
- *the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)*
- *the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)*
- *the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):*
  - *a) the unique loss category code assigned to the ICP*
  - *b) the ICP identifier of the ICP*
  - *c) the NSP identifier of the NSP to which the ICP is connected*
  - *d) the plant name of the embedded generating station*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)*
- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):*
  - *a) a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity*
  - *b) a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period*
  - *c) if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-*

    (i) no capacity value recorded in the registry field for the chargeable capacity; and

    (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded

d) *if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-*

(i) the annual capacity value recorded in the registry field for the chargeable capacity; and

(ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded

e) *the actual chargeable capacity of the ICP in any other case*

- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1)*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)*
- *the status of the ICP (Clause 7(1)(k) of Schedule 11.1)*
- *designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)*
- *if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):*
  a) *the nameplate capacity of the generator; and*
  b) *the fuel type,*
- *the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).*

Audit observation

The management of registry information was reviewed. The registry list for 31 August 2021 and the audit compliance report for the audit period from 1 April 2020 to 31 August 2021 were reviewed to determine compliance. A sample using typical characteristics of data discrepancies were checked.

Audit commentary

The process for updating the registry is automated for all fields, and the update occurs on an iterative process throughout the day.

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

NSP

As detailed in **sections 2.1** and **4.1**, 336 ICPs were recorded on the registry with the incorrect NSP. This was due to LV ICPs not being updated when the feeder and GXP were changed. Mainpower identified the issue and corrected the affected ICPs. They alleged a self-breach, which is detailed in **section 1.7**. A system change has been put in place to ensure when a feeder is reset everything downstream of the LV network is also updated. This will have affected reconciliation as the NSPs affected are not in the same balancing areas. The error was found within the 14-month revision cycle and therefore any impacts will be washed out through this process. MainPower were unable to determine the reason for late update of

the remaining two ICPs, however reporting is now in place to identify that an update is due/overdue. This is recorded as a non-compliance in below and in **section 2.1.**

Distributed Generation

MainPower requires an application from any customers wanting to connect distributed generation. Once they are installed, the commercial administrator is advised, and the database is updated based on the application details.

The audit compliance reporting identified 45 ICPs where the trader's profile indicates distributed generation is present and the distributor has none.

A sample of ten ICPs were examined, and it was confirmed that distributor is waiting on the COC details for nine ICP's, and one ICP was confirmed that the generation was not connected. MainPower has requested that the trader update the profile on the registry for this ICP. MainPower will follow-up to obtain the paperwork for the ICPs where the trader has indicated that there is installed generation.

I have repeated the recommendation from the last audit to monitor the EIEP1 reports to identify any generation on ICPs where none is expected or any with negative values which can also indicate generation on a site with no import export metering.

Recommendation	Description	Audited party comment	Remedial action
Distributed Generation	Monitor the EIEP1 reports to identify ICPs with "I" flow where none is expected and check for any negative values as this may indicate where distributed generation is present without import/export metering installed.	This change was implemented but due to an organisation restructure it has been overlooked. We have re-implemented this process from December 2021.	Identified

The timeliness of distributed generation updates is detailed in **section 4.1**.

Initial Electrical Connection date

The audit compliance report found all ICPs had an initial electrical connection date recorded.

I also checked the accuracy of IECDs and found six ICPs where the IECD was different to either the active or certification dates. Livening paperwork was provided, and the initial electrical connection dates were confirmed to be correct.

MainPower encourage the metering providers and the livening agents to co-ordinate the work to ensure the metering is installed and the site is livened on the same day.

Unmetered Load

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

New unmetered load connections are not encouraged but if connected MainPower require the applicant to provide the unmetered load details as part of the application form. There have been nine new unmetered load connections made during the audit period for Telecom cabinets. All were recorded correctly.

I checked that the unmetered load values matched for the 201 active ICPs where both the MainPower and the trader have values recorded and found all matched with the exception of three ICPs. These were checked and found MainPower's load was correct, and the trader's unmetered load values was incorrect

for all three ICPs. MainPower contacted the trader who corrected their information on the registry during the audit.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.6 With: 7(1) Schedule 11.1 From: 01-Apr-20 To: 31-Aug-21	338 ICPs with late NSP changes. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement cannot be assessed, the issue has been corrected. The potential impact has been assessed as low as this will wash out through the revision cycle.

Actions taken to resolve the issue	Completion date	Remedial action status
ICPs were corrected when breach identified	22/03/2021	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
GIS system has been updated to automate all changes made at GXP level to ensure that all ICPs are updated	22/03/2021	

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

The management of registry information was reviewed. The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were reviewed to determine compliance.

Audit commentary

The price code is populated when the ICP is made "ready" with what is expected to be the correct price category code and chargeable capacity if applicable. The audit compliance report found two ICPs where the pricing was late. These were examined and found one was a TOU ICP that was connected prior to the trader acceptance being received, this was then backdated. The other was a new unmetered streetlight ICP that was created for existing streetlights that were moved to an existing NSP, which had previously never had unmetered streetlights connected.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.7 With: Clause 7(3) Schedule 11.1 From: 01-Apr-19 To: 31-Aug-21	Two late pricing changes to provide the actual price category code. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is recorded as low as the number of ICPs affected is small.

Actions taken to resolve the issue	Completion date	Remedial action status
Our usual practice is to not backdate; however, we will backdate a change in price category where the process has not been followed either by MainPower or another party and it is considered to be in the best interest of the customer	06/12/21	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Our usual practice is to not backdate; however, we will backdate a change in price category where the process has not been followed either by MainPower or another party and it is considered to be in the best interest of the customer	06/12/21	

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

I checked the list file for ICPs with GPS co-ordinates.

Audit commentary

GPS co-ordinates are recorded. The GPS coordinates format issue recorded in the last audit has been resolved. I checked the GPS coordinates for 50 Lamps and confirmed these to be correct.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were reviewed to determine compliance.

Audit commentary

The status of "ready" is used once the ICP is ready for connection. The new connection process has a step to confirm the trader has taken responsibility. All ICPs only have one price category code.

The registry list showed 70 ICPs currently at "ready" status, two have been at "ready" status for more than two years. This is discussed further in **section 3.14**.

All of the "ready" ICPs have a single price category code and a trader is recorded.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

The registry list was reviewed to identify ICPs at "distributor" status.

Audit commentary

There are seven "SI" ICPs, and they all have the shared unmetered load details recorded correctly.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The ICP decommissioning process was examined by a walk through.

The registry list for 31 August 2021 and the combined registry compliance audit reports covering the period from 1 April 2020 to 31 August 2021 were reviewed to identify ICPs at the "decommissioned" or "ready for decommissioning" status.

Audit commentary

A work order is produced for all decommissioning requests. Once the fieldwork is complete, and the work order is returned confirming the ICP is decommissioned, this is updated in MACK and subsequently updates the registry. MainPower also monitor ICPs that have been inactive for a long period and check with the trader if the ICP is still required or can be decommissioned.

A sample of five ICPs were examined and confirmed that the correct decommissioning date was recorded, or the first available date where previous registry events prevented decommissioning on the physical decommissioning date.

Examination of the list file found one ICP at "ready for decommissioning" status. This has since been decommissioned. The timeliness of decommissioning updates is discussed in **section 4.1**.

Audit outcome

Compliant

4.12. Maintenance of price category codes (Clause 23 Schedule 11.1)

Code reference

Clause 23 Schedule 11.1

Code related audit information

The distributor must keep up to date the table in the registry of the price category codes that may be assigned to ICPs on each distributor's network by entering in the table any new price category codes.

Each entry must specify the date on which each price category code takes effect, which must not be earlier than two months after the date the code is entered in the table.

A price category code takes effect on the specified date.

Audit observation

I checked the Price Category Code table on the registry to confirm compliance.

Audit commentary

No price category codes were created or changed during the audit period.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

5.1. Updating table of loss category codes (Clause 21 Schedule 11.1)

Code reference

Clause 21 Schedule 11.1

Code related audit information

The distributor must keep the registry up to date with the loss category codes that may be assigned to ICPs on the distributor's network.

The distributor must specify the date on which each loss category code takes effect.

A loss category code takes effect on the specified date.

Audit observation

The loss category code table on the registry was examined.

Audit commentary

No new loss factors have been created during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

Each loss category code must have a maximum of two loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.

If the distributor wishes to replace an existing loss factor on the table in the registry, the distributor must enter the replaced loss factor on the table in the registry.

Audit observation

The loss category code table on the registry was examined.

Audit commentary

No loss factors were changed during the audit period.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

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

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

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

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower has not created or decommissioned any NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower has not created or decommissioned any NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

No balancing area changes have occurred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower has not created or decommissioned any NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

No balancing area changes have occurred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

No ICPs have become NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

No ICP transfers have occurred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower's NSPs are all grid connected.

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:*
- *the reconciliation participant for the NSP (Clause 10.25(2)(b)); and*
- *no later than 5 business days after the date of certification of each metering installation, advise the reconciliation manager of*
  a) the MEP for the NSP (Clause 10.25(2)(c)(i)); and
  b) the NSP of the certification expiry date (Clause 10.25(2)(c)(ii)).

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower does not have any responsibility for NSP metering.

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

at least one months' notification is required before the acquisition (Clause 29(2) of Schedule 11.1).

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

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower has not acquired any networks.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

MainPower is not responsible for embedded network gate meters; compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

MainPower is not responsible for embedded network gate meters; compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The NSP supply point table was reviewed.

Audit commentary

MainPower has not initiated the transfer of any ICPs during the audit period; compliance was not assessed.

Audit outcome

Not applicable

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit observation

The list file contains eight shared unmetered load ICPs, which were all checked for accuracy.

Audit commentary

In the last audit it was reported the "child" ICPs do not have any reference to the parent ICP, this has now been resolved.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

There were no changes during the audit period.

Audit commentary

There were no changes during the audit period.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

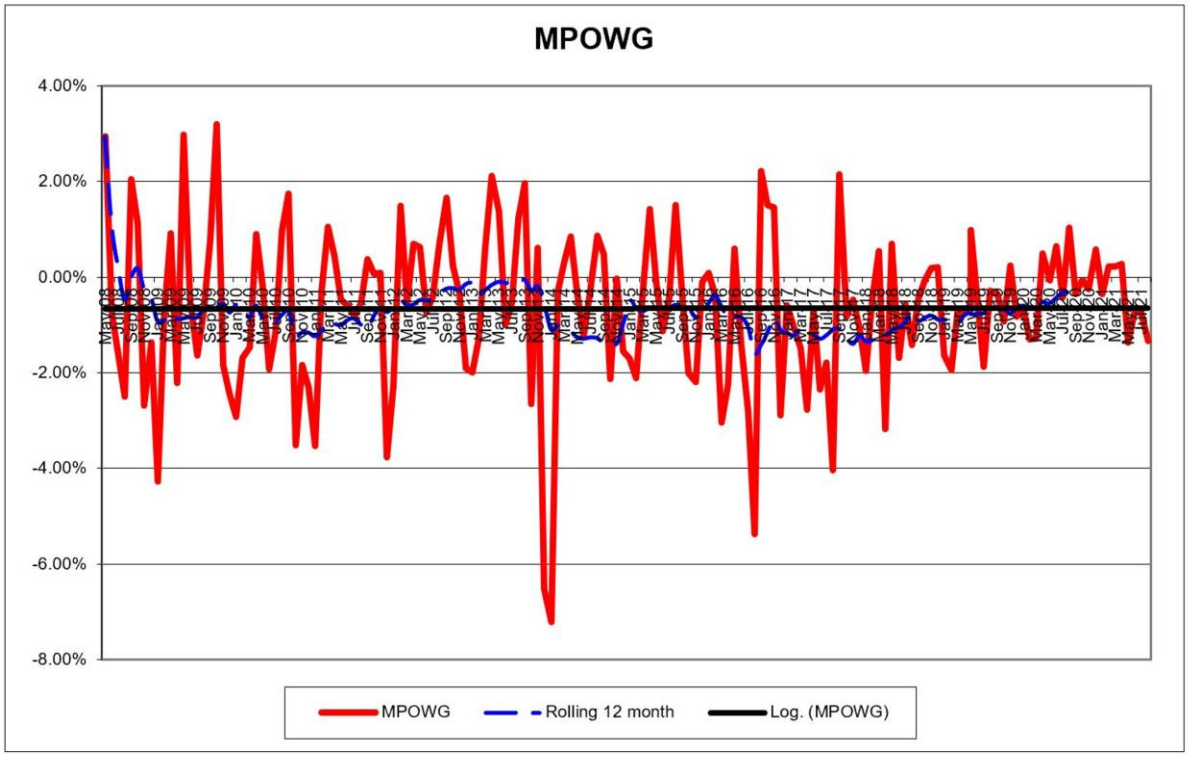
MainPower conducts an annual review of loss factors. I checked the results of the most recent review.

Audit commentary

MainPower monitors reconciliation losses for each financial year. Losses are tracked by reviewing monthly reconciliation results provided by the reconciliation manager.

Loss factor reviews are completed annually and follow the EA's guidelines, and are submitted to the EA.

EA Networks losses are tracking within the accepted +/-1% threshold.



Audit outcome

Compliant

CONCLUSION

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

MainPower have good controls in place for most processes. Robust processes and prompt and accurate update of information is treated as a priority. Reporting and management of the reports is strong, data accuracy issues identified are promptly resolved.

Overall, the level of compliance is high, and controls were generally found to be strong. The audit found ten non-compliances and I repeat one recommendation from the last audit. The audit risk rating is 18, and the next audit frequency table indicates that the next audit be due in 12 months. I have considered this in conjunction with MainPower's responses and I recommend that the next audit is in 12 months.

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PARTICIPANT RESPONSE

MainPower has reviewed this report and their comments are contained within the report.