

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**

For

ELECTRA (ELEC)
(COMPANY #579974)

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EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Electra (ELEC) to encompass the Authority's request for annual audits, as required in clause 11.10 of Schedule 11 of the Electricity Industry Participation Code 2010, to assure compliance with the Code. The relevant rules audited are as required by the Guidelines for Distributor Audits V7.2, issued by the Electricity Authority.

At the time of this audit Electra had 46,860 ICPs (active and inactive), it created 611 new ICPs during the audit period.

The audit identified 8 non-compliances, two of them were cleared. Overall Electra's compliance has improved. There is still some historical information missing, but Electra is working on it. The main issue is the missing Initial Electrical Liveness Date (IELD) for ICPs lived prior 2021.

To improve its compliance Electra has taken the following steps:

- Electra staff have designed the "dashboard" to monitor compliance with the Code over the past 24 hours. The dashboard is focussing on liveness dates, distributed generation, decommissioning's and ICP's that have been left in a ready status for too long. Once per week a manual check of the compliance report is carried out, followed by filling out an Audit compliance spreadsheet that keeps track of non-compliances. It allows Electra staff to proactively generate a job in the service desk as soon as a non-compliance arises. This will allow for a full audit trail of all non-compliances.
- The company has designed and is in the process of implementing a Survey123 app for liveness dates. It will allow Electra to be notified as soon as a liveness agent has electrically connected a property – it will have a significant impact on how quickly this information can be uploaded to the registry. The next step is to include an ICP decommissioning date.
- A new electronic form for the application of an ICP is being implemented. At the time of finalising this report, it was through final testing. Currently, retailers know what information is required and they provide this in a free form email. It will assure consistency of the information.

We would like to give credit to Electra staff for their proactive approach to address non-compliance issues. The review of the Audit Compliance Report clearly shows that the new monitoring regime has significantly reduced the number of late updates related to activities since April 2021.

An accurate registry is Electra's key objective. The correction of historic information discrepancies has the unfortunate consequential effect of generating some non-compliance because changes are being made outside of required timelines (clause 8 of Schedule 11.1).

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 12 which results in an indicative audit frequency of 12 months. We suggest that the Authority considers a longer audit period to give the company sufficient time to fully implement the new systems and processes, which should result in a higher level of compliance.

We thank Electra's staff for their full and complete cooperation in this audit. Any request for information or clarification was answered in a timely manner and supporting evidence was provided.

The audit period is 01/10/2020 to 30/09/2021.

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)	Inaccurate or missing information related to distributed generation, IECD, addresses, addresses recorded in the registry	Moderate	Low	2	Identified
Requirements to correct errors	2.2	11.2(2)	Incorrect or missing historical information in the registry across a number of areas.	Moderate	Low	2	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	9 ICPs did not have information loaded prior to electricity being traded at the ICP	Strong	Low	1	Cleared
Timeliness of provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	92 ICPs (16.3%) electrically connected during the audit period did not have IECD populated in the registry at all. 70 ICPs (6.9%) had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event	Moderate	Low	2	Identified
Management of status "New"	3.13	13 of Schedule 11.1	For 9 ICPs the status "NEW" was incorrectly managed	Strong	Low	1	Cleared
Changes to registry information	4.1	8 of Schedule 11.1	Registry event updates backdated more than three business days (mostly prior April 2021)	Moderate	Low	2	Identified
ICP location address	4.4	2 of Schedule 11.1	For 34 ICPs the address descriptions do not allow ICPs to be readily located	Strong	Low	1	Identified
Distributor to provide ICP information	4.6	7(1) of Schedule 11.1	15 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 6 UML ICPs information recorded by Electra but retailers do not submit volumes to RM	Moderate	Low	2	Identified

			IECD - No IECD for 90 ICPs in this audit period and no IECD for 447 historical ICPs Effective Date in the registry for DG installation (sample of 16 ICPs) is not representative of the date of CoC				
Future Risk Rating							12

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

RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

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.

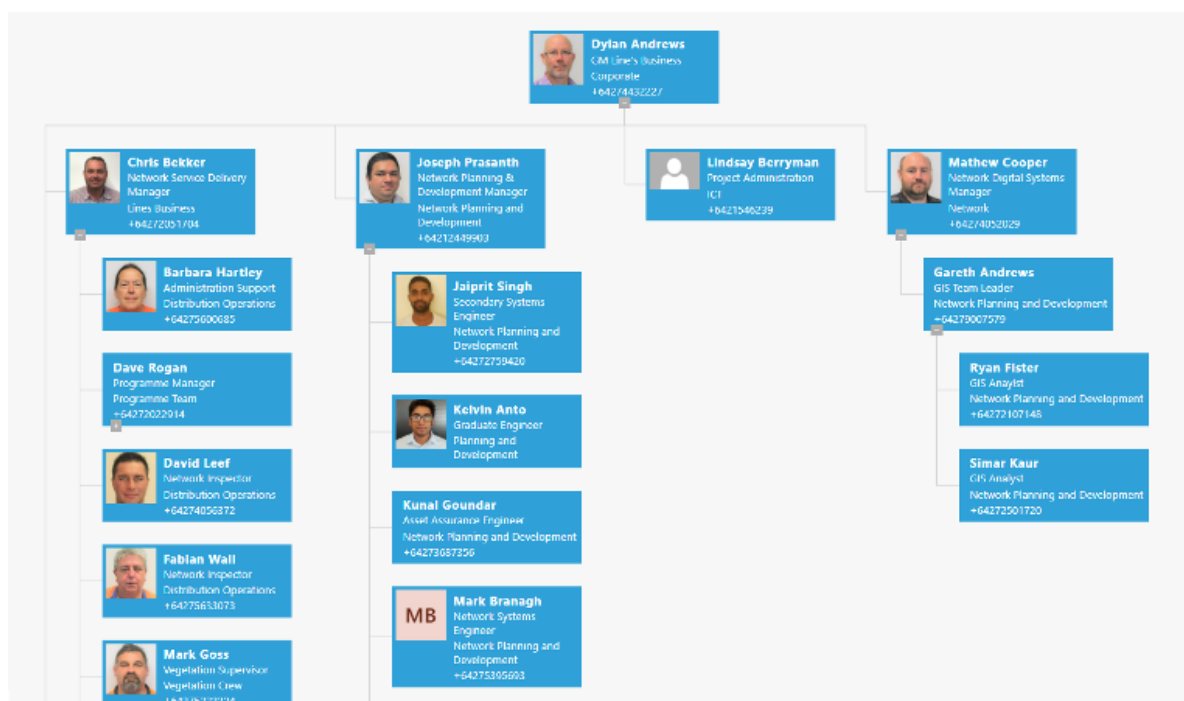
Audit observation

This was discussed with Electra and it was confirmed that there are no exemptions in place which are relevant to the scope of this audit.

Audit commentary

We checked the Electricity Authority website and confirm that there are no exemptions in place.

1.2. Structure of Organisation



1.3. Persons involved in this audit

Name	Title	Company
Gareth Andrews	GIS Team Leader	Electra
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates Ltd

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

- remains responsible for the contractors 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

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

Audit commentary

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

1.5. Supplier list

WindMil software is provided by Milsoft Utility Solutions.

1.6. Hardware and Software

WindMil is used to store information about network configurations and the location of ICPs. Electra uses ESB (Enterprise Service Bus) to move data from Milsoft to the registry. It is a set of rules and principles for integrating numerous applications together over a bus-like infrastructure.

1.7. Breaches or Breach Allegations

No breaches or alleged breaches were recorded.

1.8. ICP and NSP Data

The table below shows NSPs located on the Electra network and the number of active ICPs.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
ELEC	MHO0331	Mangahao			MHO0331ELECGN	GN	1/05/11	17,567
ELEC	PRM0331	Paraparaumu			PRM0331ELECGN	GN	1/05/08	28,376

Status	Number of ICPs (14/10/21)	Number of ICPs (2020)	Number of ICPs (10/19)	Number of ICPs (05/19)
New (999,0)	0	0	1	17
Ready (0,0)	24	16	32	56
Active (2,0)	45,493	45,536	45,167	45,009
Distributor (888,0)	4	1	0	0
Inactive – new connection in progress (1,12)	32	23	35	25

Inactive – electrically disconnected vacant property (1,4)	688	728	771	734
Inactive – electrically disconnected remotely by AMI meter (1,7)	130	124	126	118
Inactive – electrically disconnected at pole fuse (1,8)	14	11	9	4
Inactive – electrically disconnected due to meter disconnected (1,9)	18	12	13	10
Inactive – electrically disconnected at meter box fuse (1,10)	5	6	3	3
Inactive – electrically disconnected at meter box switch (1,11)	1	1	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	1	11	302	406
Inactive – reconciled elsewhere (1,5)	0	0	0	0
Decommissioned (3)	2,870	2,741	2,365	2,201

1.9. Authorisation Received

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

1.10. Scope of Audit

This Distributor audit was performed at the request of Electra to encompass the Authority's request for annual audits, as required in clause 11.10 of Schedule 11 of the Electricity Industry Participation Code 2010, to assure compliance with the Code. The audit was carried out remotely on 26 October 2021 due to the Auckland lockdown.

The audit covers the following processes under clause 16A.23 Part 16A performed by Electra

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

1.11. Summary of previous audit

Electra provided a copy of their previous audit report, conducted by Allan Borcoski of Borcoski Energy Services Ltd in November 2020. This found 7 non-compliances. The current status of these has been updated below:

Subject	Section	Clause	Non Compliance	Comment
Requirement to provide complete and accurate information	2.1	11.2(1)	Some information in the registry inaccurate and requires correction or is not populated at all	Still exist
Requirement to correct errors	2.2	11.2(2)	A backlog of historical incorrect data identified in the Registry. When corrected in some cases it is identified late and results in backdating transactions in the registry. The IECD not input to Registry for 43% of new ICPs	Still exist
Timeliness of provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Initial Electrical Connection Date (IECD) is late for 25% of new ICPs.	Still exist
Changes to registry information	4.1	8 of Schedule 11.1	A number of registry information updates were greater than 3 business days from the event date.	Still exist
ICP location address	4.4	2 of Schedule 11.1	For 363 ICPs the address descriptions do not allow ICPs to be readily located	Still exist
Distributor to provide ICP information to the registry manager	4.6	7(1)(m)(o)(p) of Schedule 11.1	Incorrect or missing information in the registry for distributed generation and IECD	Still exist
Management of Price Category codes	4.12	Clause 23 Schedule 11.1	New price category codes were entered into the registry tables 12 days less than the 2 months required by the code	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

The Audit Compliance Report for the audit period, the EDA file, LIS, PR255 dated 14/10/2021 were checked. We discussed with Electra staff what processes were in place to ensure accurate information was provided to the registry.

Audit commentary

The table below shows a summary of our findings:

Section	Registry Discrepancy
2.2	Some Registry information has been missing or incorrect for some time: No IECD in the registry but "Active" <ul style="list-style-type: none">• 518 ICPs Distributed Generation Incorrect Installation Type <ul style="list-style-type: none">• 42 ICPs
3.5	IECD Input to the registry later than 10 business days <ul style="list-style-type: none">• 70 (6.9%) late updates were related to ICPs electrically connected during the audit period.• 946 (93.1%) late updates were historical updates.
4.1	Registry information not updated within 3 business days: <ul style="list-style-type: none">• Address 18.63%• Network 6.29 %• Pricing 6.8%• Decommissioning 18.63%• Distributed generation 23.50%
4.4	Addresses that could not be easily located <ul style="list-style-type: none">• 34 ICPs
4.6	Distributors to Provide ICP Information to the registry No IECD in Registry But Active <ul style="list-style-type: none">• 90 ICPs in this audit period• 447 ICPs (historical) Distributed generation <ul style="list-style-type: none">• 4 ICPs – incorrect Installation Type• 39 ICPs where the trader's profile indicates generation is present, but the Distributor's fields show load only.

	<ul style="list-style-type: none"> Effective Date in the registry for DG installation (sample of 16 ICPs) is not representative of the date of CoC. The Event Date is the same the Input Date (date when the registry was updated) <p>UML</p> <ul style="list-style-type: none"> 15 ICPs for which traders submit volumes to RM but Electra does not have any information recorded in the registry. 6 ICPs has information recorded by Electra but retailers do not submit volumes to RM
4.11	<ul style="list-style-type: none"> Effective Date in the registry, of decommissioning an ICP (sample of 8 ICPs), is not representative of the date of physical removal of the electrical installation associated with the ICP. The Event Date is the same the Input Date (date when the registry was updated)

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 01-Oct-20 To: 30-Sep-21	Inaccurate or missing information related to distributed generation, IECD, addresses, addresses recorded in the registry Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as moderate as exception tools are in place and appear to be effective. Historical information cleaning is occurring slowly. The day-to-day information is good. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra have established a continual improvement process to resolve historic issues. Processes, procedures, and tools have been developed and progress is being made as resource availability allows.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Electra have implemented a dedicated Service Desk solution to manage Registry related queries. This service desk solution ensures that communications are tracked and logged, processes are followed and emphasises adherence to SLA's</p> <p>As well Electra have implemented automated solutions to process registry reports and files. Discrepancies result in a request being automatically raised in the service desk for the team's attention.</p> <p>Significant improvement has been made but progress is slow due to small team size with conflicting priorities.</p> <p>We are confident that the increased systemisation and maturity in process will result in the resolution of this observation</p>	October 2022	
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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

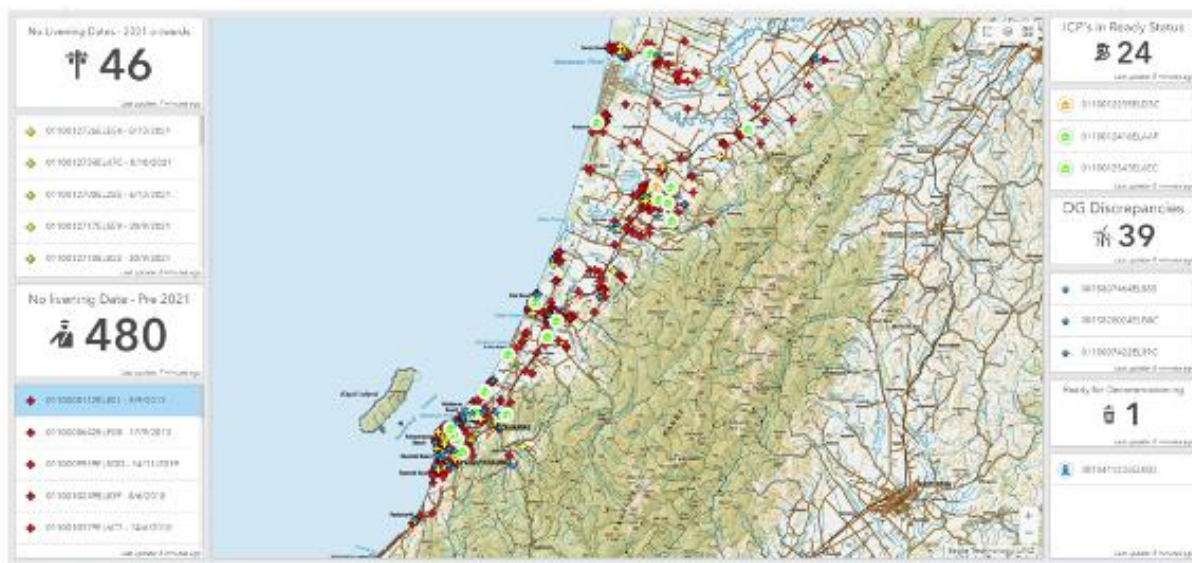
If the participant becomes aware that in providing information under this Part, the participant has not complied with that obligation, the participant must, as soon as practicable, provide such further information as is necessary to ensure that the participant does comply.

Audit observation

The Audit Compliance Report for the audit period, the EDA file and LIS file dated 14/10/2021 were checked. We discussed with Electra staff what processes were in place to identify incorrect information in their systems and the registry, and the process to correct that data as soon as practicable.

Audit commentary

Electra designed the dashboard, shown below, to monitor compliance with the Code over the past 24 hours. The dashboard is focussing on liveness dates, distributed generation, decommissioning's and ICP's that have been left in a ready status for too long.



The data displayed for each dashboard section comes from different reports

The left-hand side of the dashboard refers to

- No living dates – Pre 2021 – *Daily compliance report, sheet AC020Dist12*
- No Living date – 2021 onwards - *Daily compliance report, sheet AC020Dist12*

The right-hand side of the dashboard refers to

- ICPs in ready status – *Daily LIS file, Filtered by ICP status '0' (Ready)*
- DG Discrepancies - *Daily compliance report, sheet AC020Dist14*
- Ready for decommissioning - *Daily LIS file, Filtered by ICP status '1' (Inactive), ICP status reason '6' (electronically disconnected and ready for decommissioning)*

No Initial Electrical Living Date (IECD) but ICP is “Active”

Data is split into two sections, pre and post 2021. The reason for the split is to treat the pre 2021 missing living dates as a problem that needs resolving. They will be historical updates.

An accurate registry is Electra’s key objective. This will lead to areas of a term consequential non-compliance because those changes are being made outside of required timelines (clause 8 of Schedule 11.1).

To identify missing IECD prior 2021 Electra will take the following steps, which were agreed to during a meeting with the Authority

1. Where a living agent is known– check date with them first
 - a. No living agent, check with the retailer that applied for ICP.
2. Incorrect living agent go back to applying retailer
 - a. If non-Electra approved, then record retailer and living agent, add IECD
 - b. If Electra approved, add IECD
3. Check access to the network at asset for ICP
4. Ask retailer for any proposed living date, or if they have any record of when the ICP was commissioned or the living documents.
5. Go to MEP, they may not communicate
6. Last case scenario uses Active date

To identify missing IECD 2021 onwards

- The 'no livening dates 2021 onwards' will continually monitor the ICPs that are being made active on Electra's network by the retailer, but are yet to have livening date assigned to them by Electra or an approved contractor.
- If an ICP stays as live on the network for 4 working days; a job is generated and start a process to chase and ascertain the livening date.

ICPs on the network in "Ready" status

The top right-hand side of the dashboard is where the ICPs in "Ready" status are displayed, these are ICPs that Electra have created but are yet to be picked up by the retailer.

- 0-6 months, green (No action required);
- 6-12 months, Amber (Create a job under the ICP and ask the retailer if still needed);
- 12 months plus, Red (Chase the retailer to decommission).

DG discrepancies

Second down on the right-hand side indicates the distributed generation on our network where Electra have no records of DG being installed. The data for this comes from the Audit Compliance Report and happens when the retailer uses certain profiles but the ICP has an installation type of "L".

Electra will set up a process and task that will involve checking their records followed by requesting any missing information from the retailer.

Ready for decommissioning

At the bottom of the righthand side column are the ICPs with the status "Inactive -ready to be decommissioned" assigned by retailers. For Electra to decommission an ICP they need to receive confirmation from a retailer that an ICP is disconnected from the network and left electrically safe. Electra will request the retailer to confirm the aforementioned.

Every Tuesday a weekly manual check of the compliance report is carried out, filling out an Audit compliance spreadsheet that keeps track of non-compliances. This verifies that the ICP monitoring dashboard is working and allows them to address any arising issues. An extract from the spreadsheet is shown below, in the bracket we show relevant sections of the audit report.

Date	IECD populated later than 10 days (section 3.5)	Duplicate addresses (section 4.4)	No IECD (section 3.5)	Distributor NHH generation discrepancies (section 4.1)
1/06/21	8	627	575	86
8/06/21	6	557	570	86
15/06/21	3	387	574	87
22/06/21	9	255	579	87
29/06/21	12	151	573	87
6/07/21	830	78	574	91
13/07/21	1	57	584	80
15/07/21	0	57	577	66
20/07/21	8	47	570	55
27/07/21	2	47	573	55
3/08/21	3	34	577	60
10/08/21	12	31	564	59
17/08/21	14	31	546	59

24/08/21	1	31	551	60
31/08/21	10	31	543	59
7/09/21	1	33	540	60
14/09/21	0	33	550	61
21/09/21	1	33	551	64
28/09/21	3	33	544	52
5/10/21	3	35	551	52
12/10/21	7	34	543	36
19/10/21	1	34	543	36
26/10/21	27	34	536	39
2/11/21	0	34	513	40
9/11/21	4	34	518	42

The table shows a steady decrease of non-compliant ICPs in each section. The number of ICPs not readily locatable (duplicate addresses) decreased from 627 to 34. The number of ICPs for which the profile used by retailers indicates DG, but the ICP has an installation type of 'L', has halved over 5 months.

A lot of work has been done to address missing IECD for "Active" ICPs. It is a long process but the methodology used by Electra is correct. Electra have created a Survey123 app for livening dates. This will allow them to be notified as soon as a livening agent has lived a property and will increase the accuracy of the IECD for newly connected installations. At the time of writing this report Electra had started using this app.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.2 With: 11.2(2) From: 01-Oct-20 To: 30-Sep-21	Incorrect or missing historical information in the registry across a number of areas. Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating
Low	Controls recorded as moderate as exception tools that are in place appear to be effective. Historical information cleaning is occurring slowly. The day-to-day information is good. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.
Actions taken to resolve the issue	
Completion date	Remedial action status

As noted above, Electra have established a continual improvement process to resolve historic issues. Processes, procedures, and tools have been developed and progress is being made as resource availability allows. We have reached a solution with the Authority for IECD and are actively progressing with this.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Electra is in the process of developing a New Connection Request digital application. The application will enforce requesters to supply all data as required in the code. The requestor will be required to indicate an Electra Approved Livening Agent. The solution will send a notification to the Livening Agent advising them that they have been nominated by the requestor. A confirmation/return notification will also be sent to the requestor which will include the information they have submitted, and an advisory to that a notification has been sent to their indicated Livening Agent.</p> <p>The auditor has noted in the discussion thread “<i>Electra will set up a process and task that will involve checking their records followed by requesting any missing information from the retailer</i>”. A process already exists whereby when discrepancies are identified via our automated processes (where billing profile suggests DG but our records indicate an L code, no generation capacity, or fuel type etc), a request in our service desk is generated to address.</p>	<p>March 2022</p> <p>Completed</p>	

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 unbridged 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 personnel 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

This is a new clause that came into force on 01/02/2021. It was discussed during the audit.

Audit commentary

Electra is not involved, this is not a course of their normal business. None occurred in audit period.

Audit outcome

Compliant

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

This is a new clause that came into force on 01/02/2021. It was discussed during the audit.

Audit commentary

Details of the dispute resolution scheme are on the website and any public facing emails contain a link. The call centre (Customer Service) also has a script they follow advising of the customers of the utilities dispute process.



Call us for help on

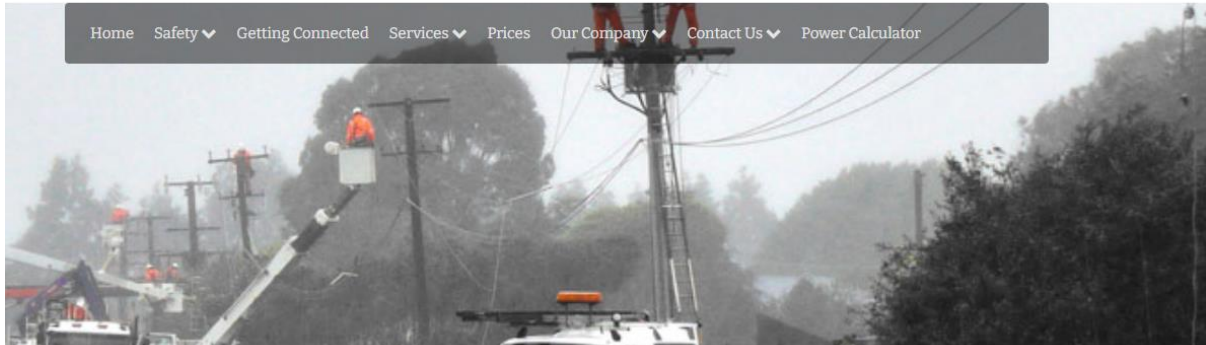
0800 lostpower or 0800 567 876

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Complaints Process

As a customer of Electra you have the right to expect quality service and support at all times. If you have a complaint or problem, including land issues, we want to know so that we can fix it. All our staff are committed to treating complaints seriously and reaching resolutions as quickly and fairly as possible.

Here are the ways you can go about letting us know:

Step 1: Talk to us

A quick chat with a staff member at Electra is often all that is required to resolve your concern. Call us on 0800 Electra (0800 353 2872) between 8am - 5pm weekdays and ask to speak with our General Manager - Lines Business. He will take personal responsibility for ensuring your complaint is thoroughly investigated and resolved as quickly and fairly as possible. We endeavour to resolve all formal complaints within a period of 20 days and we do not charge for this service.

Step 2: Utilities Disputes Limited

We sincerely hope that your complaint has been resolved by this stage. If not, you can contact Utilities Disputes on 0800 22 33 40 or go to www.utilitiesdisputes.co.nz Utilities Disputes is a free and independent service for resolving complaints about utilities providers.

Electra is a member of the Utilities Disputes Scheme including land complaints.



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The example of an email is shown below:

Baden Berry
Customer Relationship Manager

0275352006



Electra is a member of the Utilities Disputes Scheme.

Utilities Disputes is a free and independent service for resolving complaints about utilities providers, and can be contacted on 0800 22 33 40 or go to www.utilitiesdisputes.co.nz



Audit outcome
Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPS (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA file were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Electra does not have a prescribed form for applying for a new connection. It is in the process of being designed. At the time of finalising this report it was almost finished. Currently, retailers know what information is required and they provide this in a free form email. Electra monitors the email inbox and usually begins the connection approval and ICP creation the same day. Electra checks the proposed connection in the GIS system to confirm the physical location address and to check that the network assets and capacity are available. If no work is required on the network to connect the new ICP and the trader has provided all the information required, then the application is approved. Electra runs an Access database which creates ICP identifiers in batches of 100. These are copied into a spreadsheet called "New ICPs to issue". The new application is recorded in this spreadsheet against the next valid ICP identifier with information such as customer name, address, retailer, and the request date.

The ICP chosen from the spreadsheet is loaded into WindMil along with the other information required to be uploaded to the registry. The retailer is notified by email. The retailer will then engage an Electra approved contractor to make the connection to the network.

If additional work is required for a new connection, then the customer, via the retailer, is asked to contact an Electra approved contractor to prepare a quote for the work to be completed. Once the customer agrees and pays a deposit for the work to go ahead, the connection is approved and the ICP is created and issued as per the standard process.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

The distributor, within 3 business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.

Audit observation

The Audit Compliance Report, LIS and EDA file were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new ICP connections to the network. The application is recorded in a spreadsheet along with ICP information such as customer name, address, retailer and request date. WindMil is populated with the information which is uploaded to the registry. The trader provides all the information Electra requires to assign a new ICP.

20 ICPs were randomly selected from ICPs created during the audit period. There were no issues found and many ICP requests were responded to on the same day they were received. If ICPs can't be created within 3 business days, a trader is notified. There were no issues found.

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

The Audit Compliance Report, LIS and EDA file were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new ICP connections to the network. The application is recorded in a spreadsheet along with ICP information such as customer name, address, retailer and request date. WindMil is populated with the information which is uploaded to the registry. The trader provides all the information Electra requires to assign a new ICP. WindMil uploads ICP information to the registry, daily, at 7pm. The registry assigns the "ready" status.

20 new ICPs were randomly selected and data checked both in WindMil and the registry and no issues were found.

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 Audit Compliance Report, LIS and EDA file were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

WindMil is populated with the information required to establish a new ICP. This information is provided by the trader. Every day at 7pm, WindMil uploads new ICP information to the registry which assigns the "Ready" status.

20 new ICPs were randomly selected and the data was checked. No issues were found.

The review of the Audit Compliance Report resulted in the identification of 9 ICPs (0.01% of 611 new ICPs created in the audit period) which were loaded with the status of "New", updated to "Ready", but later the status was changed by Electra system to the status "New". ICPs with the status "New" can't be claimed in the registry by a trader. The table below shows the ICPs in question.

ICP	ICP creation date	Status Ready input date	Status Active Event Date	Business Days
0110012154ELD8A	06/11/2020	11/01/2021	01/12/2020	-25
0110012172EL150	19/11/2020	04/02/2021	15/12/2020	-32
0110012233ELCB3	16/12/2020	23/03/2021	13/01/2021	-47
0110012234EL179	21/01/2021	23/03/2021	27/01/2021	-38
0110012149EL87C	04/11/2020	30/03/2021	01/02/2021	-40
0110012278EL0C2	01/02/2021	30/03/2021	18/02/2021	-28
0110012149EL87C	04/11/2020	30/03/2021	01/02/2021	-40
0110012281ELE84	01/02/2021	19/04/2021	17/02/2021	-41
0110012304ELF85	14/02/2021	30/04/2021	26/02/2021	-42

This was discussed, in detail, with Electra during the audit. It was caused by the incorrect entry of a retailer code in WindMil which has highlighted a lack of checks in place at the time.

In April, the company implemented two monitoring/validation steps whereby they are alerted by a retailer if there is an incorrect ICP status in the registry. The two monitoring steps are as follows;

- When an ICP is entered into WindMil, the correctness of the 4-letter retailer code is checked.
- There is now in place a system of monitoring acknowledgement files from the registry. If a file is rejected ESB sends an alert email which results in checking the error code provided by the registry.

Since the new process was introduced this April, there were no new ICPs where the status was incorrectly updated in the registry. This provides confidence that the controls put in place 5 months ago are working correctly.

The Audit Compliance Report noted ICP 0110012610EL127 where information was not loaded prior to electricity being traded at the ICP. In fact the ICP was not in the registry when the installation was electrically connected. It was discussed with Electra; it is a complicated case. Electra's description is below.

"35 Middlesex Street (0110012610EL127) ran into an issue where the old properties, decommissioned ICP number 0010402280EL98F was written on the meter. This caused an issue when the Livening agent came around and photographed the meter for their livening documentation.

We messaged Contact to try and figure out why the wrong ICP was written on the meter, they came back to us stating “Yes we made an error on this one. We now have the new ICP 0110012610EL127 and will get the paperwork corrected for the new BTS on the correct ICP.”

The other issue that arose from this ICP was that it became ready in the registry with a date of 16/07/2021, but Contact wanted to claim the ICP on the 6/07/2021.”

Electra rejected Contact request to backdate the ICP to 06/07/2021 as they only received an application for the property on the 16/07/2021 which they approved and issued the application that day. The ICP history recorded in the registry shows that the ICP was uploaded on 19/07/2021 and on 11/08/2021, Contact made it “Active” backdating to 16/07/2021. The installation was certified on 06/07/2021.

We concluded that Electra action was compliant.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: 7(2) of Schedule 11.1 From: 04-Nov-20 To: 30-Apr-21	9 ICPs did not have information loaded prior to electricity being traded at the ICP Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. New monitoring precludes loading an ICP with the status “New”, it needs to be evaluated during next audit. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This issue has now been resolved.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New monitoring process has shown this issue should not occur in the future.			

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

In total, 1,017 ICPs had their IECD populated later than 10 business days.

- 70 (6.9%) late updates were related to ICPs electrically connected during the audit period. The date range was 11 to 221 BD. It is a lower percentage than in the previous audit which was 24.9% but the date range is greater.
- 946 (93.1%) late updates were historical updates. Date range was 11 to 1949 BD. The number of late updates is higher than during the last audit (31) which is due to the clean-up project conducted by Electra whereby they are updating historically missing data.

1,841 ICPs had their status changed to “Active” after 29/08/13. For 537 (29.1%) ICPs the Initial Electrical Connection Date was blank. Of concern is that 562 ICPs were electrically connected during this audit period, of which, 92 ICPs (16.3%) did not have an IECD populated in the registry at all.

IECD recorded by Electra, but ICP not have yet “Active” status in the registry

The Audit Compliance report identified 3 ICPs. We checked all of them in the registry. All of them had the status “Active”. For ICP 0110012702EL20B we noted the discrepancy between IECD (12/10/21) and the status of “Active” assigned by GENE (08/10/21). Electra provided paperwork from the livening agent showing the Initial Electrical Connection Date was 12/10/21. Electra comment was that it happens often that a trader uses the date of metering installation instead of IECD as the date of “Active “ status. On the Electra network, meter installation and livening mostly did not occur on the same day.

The following table shows ICPs where the IECD is different to that of the first active date and/or the meter certification date;

ICP	Metering Installation Certification Date	IECD	Status Event Date	Elapsed Days IECD and Status Event Date	Comment
0110012383EL705	07/05/2021	09/04/2021	07/05/2021	28	Electra IECD is correct, paperwork was sighted
0110012443ELFE8	23/04/2021	19/04/2021	23/04/2021	4	IECD was corrected to 27/04/21, paperwork was sighted
0110012431ELA30	19/04/2021	14/04/2021	19/04/2021	5	IECD was corrected to 03/05/21, paperwork was sighted
0110012149EL87C	29/01/2021	31/01/2021	01/02/2021	1	IECD was corrected to 01/02/21, problem developed after WindMil upgrade, using incorrect date format
0110012233ELCB3	13/07/2021	12/01/2021	13/01/2021	1	IECD was corrected to 13/01/21, problem developed after WindMil upgrade, using incorrect date format
0110012359EL8D6	26/03/2021	29/03/2021	29/03/2021	0	Correct, meter installed before livening
0110012358EL493	26/03/2021	29/03/2021	29/03/2021	0	Correct, meter installed before livening
0110012278EL0C2	17/02/2021	18/02/2021	18/02/2021	0	Correct, meter installed before livening
0110012352EL602	18/03/2021	22/03/2021	22/03/2021	0	Correct, meter installed before livening
0110012172EL150	11/12/2020	15/12/2020	15/12/2020	0	Correct, meter installed before livening
0110012204EL681	17/12/2020	16/12/2020	17/12/2020	1	IECD was corrected to 17/12/20, problem developed after WindMil upgrade, using incorrect date format
0110012227EL714	23/12/2020	22/12/2020	23/12/2020	1	IECD was corrected to 23/12/20, problem developed after WindMil upgrade, using incorrect date format
0110012211EL163	17/12/2020	16/12/2020	17/12/2020	1	IECD was corrected to 17/12/20, problem developed after WindMil upgrade, using incorrect date format
0110012151EL0C5	16/12/2020	15/12/2020	16/12/2020	1	IECD was corrected to 16/12/20, problem developed after WindMil upgrade, using incorrect date format
0110012122EL958	20/11/2020	23/11/2020	23/11/2020	0	Correct, meter installed before livening

0110012114ELF2F	10/11/2020	11/11/2020	11/11/2020	0	Correct, meter installed before livening
0110012108EL69C	09/11/2020	10/11/2020	10/11/2020	0	Correct, meter installed before livening

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Sep-21</p>	<p>92 ICPs (16.3%) electrically connected during the audit period did not have IECD populated in the registry at all</p> <p>70 ICPs (6.9%) had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate. The new process of weekly monitoring the Audit Compliance Report helps to decrease number of late updates and not having IECD recorded at all. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra have been focussing on establishing automated reports and monitoring in place to prevent these issues. It is unfortunate that this small percentage have shown that, despite the significant improvement, more work needs to be done.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our new monitoring processes will assist to prevent future occurrences. There will always be some discrepancies due to some retailers using install dates rather than livening dates. To address this, we are developing a suite of digital solutions to optimise processes including onsite digital communications from livening agents and enhanced retailer communications.</p> <p>We have made corrections where they are an error made by us and investigate issues with traders and livening agents.</p>			

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The Audit Compliance Report, LIS and EDA file were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new connections and ICPs. This process ensures the proposed retailer is recorded in the registry at the time of the initial upload of an ICP to the registry. The daily file is created in WindMil and uploaded to the registry at 7pm from WindMil.

The ICP sample records checked in the registry indicated that the process was followed.

Audit outcome

Compliant

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Shared unmetered load is not allowed to be connected onto the Electra network.

Traders apply to Electra for new connections and ICPs. This request always provides Electra with the request to connect the ICP to the network. Once the connection to the network is approved by Electra it issues the ICP to the trader permitting to engage one of Electra's approved and authorised contractors to connect and electrically connect the ICP onto the network.

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 documents were reviewed and discussed with Electra staff.

Audit commentary

Electra Staff state there have not been any requests to temporarily electrically connect any installation during this audit period. Electra staff are aware of the Code requirements in this area.

It was previously noted that ICPs are not electrically connected to the network by Electra staff. Traders arrange the connection of ICPs to the network using approved Electra contractors who are authorised by Electra to carry out work on their network. Traders issue the job requests to the Electra authorised contractors to connect and electrically connect ICP.

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 in the registry was examined. It was discussed with Electra staff.

Audit commentary

One new embedded NSP TCC0011 was created by an embedded network owner TENCO on the Electra network on 01/06/2021 with its own balancing area TCC0011TENCE.

Audit outcome

Compliant

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

Code reference

Clause 10.30A 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 in the registry was examined. It was discussed with Electra staff.

Audit commentary

Electra staff state there have not been any requests to temporarily electrically connect a NSP that is not a point of connection to the grid during this audit period.

One new embedded NSP TCC0011 was created by an embedded network owner TENCO on the Electra network on 01/06/2021 with its own balancing area, TCC0011TENCE.

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

An MS Access database tool is used to create a unique sequential number combined with the distributor code "EL" to create each ICP Identifier on the Electra network. It was verified that the tool creates ICPs with the correct format. The MS Access database creates ICP identifiers in batches of 100. These are

copied to the spreadsheet called “New ICPs to issue”, which is where traders requests for new ICPs are recorded.

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

A loss category code is assigned to an ICP when it is first generated in WindMil along with the information required to be uploaded to the registry. Files are uploaded to the registry, with the new ICP information, on a daily basis where the registry assigns the status of “READY”.

20 new ICPs were randomly selected and data checked both in WindMil and the registry, and no issues were found.

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Retailers apply to Electra for new ICP connections to the network. The retailer provides all the information Electra requires to create an ICP so once that information is processed the new ICP is uploaded to the registry. The registry assigns the status of “READY”. Electra does not use the “NEW” status in the registry.

The review of the Audit Compliance Report resulted in the identification of 9 ICPs (0.01% of 611 new ICPs created in the audit period) which were loaded with the status of “New”. These were then updated to “Ready” but later on the status was changed by Electra’s system to the status “New”. ICPs with the status “New” can’t be claimed in the registry by a trader. Electra was contacted by traders who originally requested these ICPs, thereby alerting Electra to the problem, and it was corrected. The table below shows the ICPs in question.

ICP	ICP creation date	Status Ready input date	Status Active Event Date	Business Days
0110012154ELD8A	06/11/2020	11/01/2021	01/12/2020	-25
0110012172EL150	19/11/2020	04/02/2021	15/12/2020	-32
0110012233ELCB3	16/12/2020	23/03/2021	13/01/2021	-47
0110012234EL179	21/01/2021	23/03/2021	27/01/2021	-38
0110012149EL87C	04/11/2020	30/03/2021	01/02/2021	-40
0110012278EL0C2	01/02/2021	30/03/2021	18/02/2021	-28
0110012149EL87C	04/11/2020	30/03/2021	01/02/2021	-40
0110012281ELE84	01/02/2021	19/04/2021	17/02/2021	-41
0110012304ELF85	14/02/2021	30/04/2021	26/02/2021	-42

Most of these ICPs were created in November 2011 and a few at the beginning of this year. It was discussed with Electra during the audit. Their comment was:

“We noticed back around March time that we had ICPs that were being loaded to the registry with incorrect retailer codes in our system (usually the result of being mistyped). Our system had no checks in place for this and so would load the ICP without a retailer, this meant that the ICPs were pushed up to the registry as ‘New’ status instead of the ‘Ready’ status. The problems this caused are briefly explained below: The original ESB only pushed up the retailer code the first time we uploaded a new ICP to the registry, therefore if we made a mistake the retailer code would not go up to the registry, or if we made a change before the ICP became active the retailer code got stripped out of the registry.

We also pushed the ESB up to the registry at 10pm, this meant that changes were not in sync with the NOT file. At the time, we only found out that ICPs were in ‘new’ status if the retailer contacted us. After being contacted we update the retailer code, we would then manually run the ESB and push the new retailer code up to the registry. The ICP would then appear as ready. However, if the retailer did not pick up the ICP that day, then the NOT file would not align to what we had and would strip the ICP proposed retailer code, returning the ICP to ‘New’.

We had Change request processed on APRIL 12th where we changed the retailer and liveness date logic. Our ESB logic now checks the retailer code is correct and if not notifies us so we can correct the issue with plenty of time to remain compliant. We also have the ESB push to the registry at 7.05 to keep in align with the ‘NOT’ file

The company implemented two monitoring/validation steps to avoid a repetition where they are alerted by a retailer about an incorrect ICP status in the registry. These steps are as follows;

- When an ICP is entered in WindMil the correctness of the 4-letter retailer code is checked.
- There is now a process to monitor acknowledgement files from the registry. If a file is rejected, ESB sends an alert email which results in checking the error code provided by the registry

Since the new process was introduced this April, there have been no new ICPs where the status was incorrectly updated in the registry, which provides confidence that the new validation/monitoring processes are working well.

Non-compliance	Description		
Audit Ref: 3.13 With: 13 of Schedule 11.1 From: 01-Oct-20 To: 30-Sep-21	For 9 ICPs the status “NEW” was incorrectly managed Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. The company monitors the Audit Compliance report weekly to track non-compliances. The new monitoring precludes loading an ICP with the status “New”. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This issue has now been resolved.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New monitoring process has shown this issue should not occur in the future.			

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 Audit Compliance Report and the LIS files were checked.

Audit commentary

The Audit Compliance Report did not record any ICPs in the registry that have remained in the “Ready” status for more than 24 months.

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 LIS file was examined.

Audit commentary

Electra has an embedded generation station of 37 MW capacity on its network. ICP 0110007806EL3CF Mangahao Power Station. It has the unique loss category code assigned (MHO1).

Audit outcome

Compliant

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

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

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Electra creates the ICP on trader request. Traders arrange the electrical connection of ICPs to the Electra network by contractors. The contractors are authorised by Electra to work on their network.

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

This is a new clause that came into force on 01/02/2021. It was discussed during the audit.

Audit commentary

This is dealt with by service delivery at the request of retailers. The actual disconnection request is between a retailer and an approved contractor.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

An 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

This is a new clause that came into force on 01/02/2021. It was discussed during the audit.

Audit commentary

This action is not a course of normal business and has not occurred during this audit period.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

If the change to the NSP identifier is for more than 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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Any changes to ICP information are done in WindMil, which updates the registry every day. The Audit Compliance report was analysed to identify backdated event updates. The summary of late updates is below:

Pricing events

Electra uploaded to the registry 3,269 price changes during the audit period. The Audit Compliance reports found 223 (6.8%) pricing updates were later than 3 BD. Out of 223 late updates 184 (82.5%) updates related to historic correction conducted during this audit period. During this audit period the number of pricing updates was much lower than in the previous audit report (19,775) which were the result of changes to pricing introduced on 01/04/2020.

Most of the changes to ICP price codes are driven by retailers, who quite often ask for them to be backdated. This has the unintended and unfortunate consequence of contributing to Electra non-compliance.

Electra started actively monitoring for EIEP's being received, every 2 hours, so they shouldn't be missing pricing updates and will update within the compliance timeframe. The monitoring of EIEP's should prevent the late update of price code changes.

Decommissioning Status events

According to the Audit Compliance report the percentage of compliance was 81.37% and Average Business Days between the Status Inactive Event Date and the Status Event input date was 6.55 BD. As described in **section 4.11** Electra does not use the date of physical removal of the electrical installation associated with the ICP as the Event Date in the registry. They use the Input Date (date when the registry was updated) as the Event Date. We noted it as non-compliance with clause 11.2 in **section 2.1** of this report.

Network events

According to the Audit Compliance report the percentage of compliance was 93.74% and Average Business Days between Network Event Date and Network Event input date was 21.51 BD. The report lists ICPs where the network fields were changed in the registry later than 3 business days. The average business days records the average business days across all updates.

Distributed generation

According to the Audit Compliance report the percentage of compliance was 76.50 % and Average Business Days between Network Event Date and Network Event input date was 15.83 BD.

All late updates were historical updates. Previously Electra received applications for installations but did not receive details of the installation. This calendar year 171 distributed generations were installed. There have been no late updates since Feb 2021 as new monitoring was introduced.

Another issue in this area is that there are ICPs where the trader's profile indicates generation is present, but the distributor's field show load only. The Audit Compliance report lists 40 ICPs with this situation. This is a problem Electra is currently working through and they have a process in place to capture these as they occur.

In our opinion the report is not quite accurate because it assumes that all traders record PV1 profile in the registry, which is not quite correct because some traders use HHR profile or their system does not allow to use the PV1 profile in the registry.

Address events

According to the Audit Compliance report the percentage of compliance was 97.88 % and Average Business Days between Network Event Date and Network Event input date was 5.54 BD.

Overall compliance with this clause has improved since the last audit. Most of the late updates are related to historic information. The correction of historic information discrepancies has the unfortunate effect of generating some non-compliance. The new monitoring regime has significantly reduced the number of late updates related to activities since April 2021.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Oct-20 To: 30-Sep-21	Registry event updates backdated more than three business days (mostly prior April 2021) Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as moderate because some historical information clean-ups appear to have resulted in late updates. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pricing – the majority were historic corrections. The price changes are driven by retailer requests. We are also aware that a Code change is forthcoming that will also assist to alleviate some noncompliance. Distributed Generation, we have demonstrated no late updates since February 21.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once historic corrections have been made, this accompanied with the new reporting, monitoring and Code change will see a significant improvement in all areas of updating the registry. As noted most backdated events occurred prior to April 2021 before our enhances reports and monitoring were implemented.			

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Electra has two NSPs on its network, PRM0331 and MHO0331. The NSP identifier is uploaded into the registry when ICPs are initially loaded into the registry with the status “Ready”.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

It was discussed with Electra during the audit

Audit commentary

ICPs are requested by retailers, so customers rarely contact Electra directly. Queries from electricians or retailers seeking ICP information or clarification are handled by the call centre initially and more difficult issues are dealt with by the GIS operators who manage the ICPs within Electra.

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

At the time of application, a retailer provides an installation address. Validation of the application includes checking for duplicate addresses. Electra’s ICP lifecycle process reflects that ICPs without accurate location information will not be issued.

However 34 difficult to locate historic addresses were identified as they contain no street number, unit number or property name for guidance. We observed a significant improvement from last audit (365 ICPs). It is still a Work in Progress to update historic information but all new ICPs have correct information. Electra has also started uploading GPS coordinates which will assist in the location of ICPs.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 01-Oct-20 To: 30-Sep-21	For 34 ICPs the address descriptions do not allow ICPs to be readily located Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. The company monitors the Audit Compliance report weekly to track the progress of the historical information clean-up project, significant decrease in ICPs number. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra are pleased with the improvements made in this area. A significant amount of work has gone into resolving address issues.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The remaining address issues are proving to be difficult examples. Work is continuing to investigate these and all should be resolved by the next audit if not before.			

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

This was discussed with Electra during the audit.

Audit commentary

The network connection application process is robust and well documented. The network connection process requires every proposed connection to the network (ICP) to be verified against the GIS to ensure it has a discrete disconnect point and connection to the network prior to an ICP being created.

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

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)*
- *the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)*
- *the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)*
- *the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)*
- *the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):*
 - a) *the unique loss category code assigned to the ICP*
 - b) *the ICP identifier of the ICP*
 - c) *the NSP identifier of the NSP to which the ICP is connected*
 - d) *the plant name of the embedded generating station*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)*
- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):*
 - a) *a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity*
 - b) *a blank chargeable capacity if the capacity value can be determined 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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

WindMil is populated with the required information provided by the retailer to establish a new ICP. Files from WindMil update the registry with the new ICP information, daily, and the registry assigns the status “Ready”.

20 new ICPs were randomly selected and data checked. No issues were found with the new ICP information.

The analyses of registry files confirm the accuracy of ICP information uploaded to the registry by Electra. There are some exceptions in the area of UML, Dedicated NSP flag in the registry, distributed generation and Initial Electrical Connection Date (IECD), where it was identified that some information was incorrect. Each type of network information category is analysed in the following separate sections.

Unmetered Load

An examination of the LIS file identified 398 UML ICPs for which Electra recorded information in the “Unmetered load details – distributor” field. 6 ICPs are not recorded as UML by traders. 5 ICPs have “0” kWh recorded by Electra and ICP 0110005695EL5A3 has “EL1580” recorded (no corresponding trader’s entry).

The examination of the LIS file also identified 15 ICPs for which traders submit volume to the RM but Electra does not have any information in the registry.

Distributed Generation

The Audit Compliance report recorded 39 ICPs for which the profile used by traders indicate distributed generation installed, but no installed generation is recorded by Electra.

The review of the LIS file found 4 ICPs (0010324436EL5B2, 0014615072EL5A8, 0014615072EL5A8, and 0110011940EL4C0) the incorrect Installation Type was recorded in the registry. This is a significant decreased since the last audit (74).

A randomly chosen sample of 14 DG ICPs was examined. The results are shown below:

ICP	CoC date	Electra registry Event Date
0110000197ELD04	9/07/21	28/07/21
0110011062EL019	30/07/21	3/08/21
0015846016EL669	5/10/21	5/10/21
0015708464EL29F	19/05/21	26/07/21
0010300176ELD5F	20/07/21	26/07/21
0110008042EL90D	26/07/21	28/07/21
0110009467EL4B6	11/10/21	11/10/21
0110012144EL727	26/05/21	1/06/21
0012499076EL746	12/08/21	13/08/21
0014657619ELA5F	2/07/21	7/07/21
0110009311ELF66	26/07/21	26/07/21
0011207080EL376	13/04/21	14/04/21
0110006258EL3F6	19/05/21	17/05/21
0014657188EL6FF	11/06/21	8/07/21
0110011425EL377	27/05/21	2/06/21
0110003855EL187	24/05/21	31/05/21

The Effective Date in the registry for DG installations is not representative of the date of CoC. The Event Date is the same as the Input Date (date when the registry was updated), which is incorrect. We think it is a fair representation of the process used by Electra. This year Electra received 177 applications for DG, which makes the sample size of ICPs 9% of the population.

A similar issue was identified in **section 4.11** for decommissioned ICPs.

Initial Electrical Connection Date (IECD)

The examination of the Audit Compliance report showed that:

- No IECD for 90 ICPs in this audit period
- No IECD 447 ICPs (historical)

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Sep-21</p>	<ul style="list-style-type: none"> • 15 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 6 UML ICPs information recorded by Electra but retailers do not submit volumes to RM • IECD - No IECD for 90 ICPs in this audit period and no IECD for 447 historical ICPs • Effective Date in the registry for DG installation (sample of 16 ICPs) is not representative of the date of CoC <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple Times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls recorded as moderate as weekly monitoring introduced in June appears to be effective. Historical information clean-up is well advanced. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML, in the cases of 15 ICPs where the retailer submits volume but we have not details, this is because we have not been advised of UML. We will investigate these and all the other anomalies. Clause 7(1)(m) does state if known. We do not therefore consider we are noncompliant for these.</p> <p>DG issue is not disputed and we accept noncompliance. This will be resolved going forward once our digital livening app is implemented.</p>			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Electra will investigate all instances whether we believe we are at fault or if the trader has not supplied correct information.</p>			

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Electra assigns the actual price category code to the ICP at the time an ICP identifier is created and uploaded to the registry. Electra's network charges are not based on chargeable capacity.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. It was discussed with Electra staff.

Audit commentary

Electra had started uploading GPS coordinates to the registry in May 2021. It is an on-going project. The LIS file dated 14/10/21 showed that 4,269 active ICPs (10%) had GPS coordinates recorded. The format used by the company meets the NZTM2000 standard.

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 Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 20 new ICP connection records were checked.

Audit commentary

Once a new ICP connection application has been approved the new ICP will be created in WindMil along with the other information required to be uploaded to the registry via a 7 pm daily file. The ICP is created in the registry with the status of "Ready" and a single Price Category Code.

20 new ICPs were randomly selected and data checked both in WindMil and the registry and no issues were found.

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 LIS files and the Audit Compliance reports were examined. The process was discussed with Electra's staff. Electra's policy is to not accept shared unmetered load.

Audit commentary

Electra has 4 ICPs with the distributor status. 3 ICPs with the "distributor" status were created during the audit period. ICP 0110012507EL543, 0110012508ELA9D, and 0110012509EL6D8 were created on 24/05/2021. These ICPs are related to NSPTCC0011. An embedded network operated by TENCO in Paraparaumu.

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 Audit Compliance Report, LIS and EDA files were checked. The disconnection process documents were reviewed and discussed with Electra staff. A random sample of 8 decommissioned ICP records were checked.

Audit commentary

Once again there has been significant improvement in this area since the previous two audits, there was only one ICP with the status “Inactive - Ready for Decommissioning status compared to 11 ICPs in October 2020 and 302 ICPs in October 2019.

Customers/contractors request ICP decommission via their retailer. Retailers arrange the physical decommission of ICPs using approved Electra contractors that are authorised by Electra to carry out decommission work on the network. Retailers notify Electra with the completion date and other information about the decommission work completed and request the ICP status in the registry be changed to decommissioned.

A random sample of 8 decommissioned ICP records were checked which were provided by Electra staff. We observed that Electra does use a date of physical removal of electrical installation associated with the ICP as the Event Date in the registry. They use the Input Date (date when the registry was updated) as the Event Date. We think it is a fair representation of the process used by Electra. According to the EDA file 63% of decommissioned ICPs use the Input Date as the date of the physical removal of the electrical installation. We noted it as non-compliance with clause 11.2 in **section 2.1** of this report.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

The distributor must keep up to date the table in the registry of the price category codes that may be assigned to ICPs on each distributor's network by entering in the table any new price category codes. Each entry must specify the date on which each price category code takes effect, which must not be earlier than 2 months after the date the code is entered in the table. A price category code takes effect on the specified date.

Audit observation

The Price Code table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Two new price category codes (LGT and SCAP) were uploaded to the registry during the audit period. Effective date is 02/04/2021, the registry was notified on 02/02/2021.

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 Factor table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

No new loss category codes were uploaded to the registry 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 2 loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.

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

Audit observation

The Loss Factor table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Loss factor codes have a single value for all trading periods for a year. There are no seasonal loss factor codes for summer or winter. Electra did not change loss factor codes 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 2 local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.

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

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

The notice provided to the reconciliation manager must be provided no later than 30 days prior to the intended date of creation or decommissioning.

If the intended date of creation or decommissioning changes the distributor must provide an updated notice as soon as possible.

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 mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Based on examination of the NSP mapping table in the registry it was confirmed that no new NSP was created and no NSP was decommissioned since the last audit.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

The request must be made at least 10 business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between 2 local networks. In all other cases, the request must be made at least 1 month before the NSP is electrically connected or the ICP is transferred.

Audit observation

The NSP mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Based on examination of the NSP mapping table in the registry it was confirmed that no new NSP was created and no NSP was decommissioned since the last audit.

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 mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

This was discussed with Electra staff.

Audit commentary

Electra staff confirm that Electra do not own any embedded networks and did not establish any embedded network that they are responsible for since the last audit.

Audit outcome

Not applicable

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Electra has two balancing areas, MHO0331ELECGN and PRM0331ELECGN. There were no changes to balancing areas.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least 1 month before the transfer.

Audit observation

This was discussed with Electra staff.

Audit commentary

During this audit period Electra did not transfer any ICPs that became an NSP for an embedded network.

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 3 business days before the transfer takes effect.

Audit observation

This was discussed with Electra staff.

Audit commentary

Electra staff stated that Electra did not transfer any ICPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

During this audit period Electra did not have any NSPs which they are responsible for that are not connections to the grid.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

6.9. Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2))

Code reference

Clause 10.25(2)

Code related audit information

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

- assume responsibility for being the metering equipment provider (Clause 10.25(2)(a)(i)); or
- contract with a metering equipment provider to be the MEP (Clause 10.25(2)(a)(ii)); and
- no later than 20 business days after identifying the MEP advise the reconciliation manager in the prescribed form of 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

During this audit period Electra did not have any NSPs which they are responsible for that are not connections to the grid.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The Audit Compliance Summary, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

During this audit period, ELEC did not acquire all or part of a new network. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The Audit Compliance Summary, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra does not have any and is not responsible for any embedded network. This clause is not applicable. 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 Audit Compliance Summary, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra does not have any and is not responsible for any embedded network. This clause is not applicable. 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 Audit Compliance Report, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra does not have any and is not responsible for any embedded network. This clause is not applicable. 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 Audit Compliance Report, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra has no shared unmetered load on its network. The company policy is not to allow the installation of shared unmetered load.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra has no shared unmetered load on its network. The company policy is not to allow the installation of shared unmetered load.

This clause does not apply to Electra. Compliance was not assessed.

Audit outcome

Not applicable

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

This was discussed with Electra Staff and the Asset management Plans, Information Disclosure documents and Loss Factor information on the Electra website were reviewed.

Audit commentary

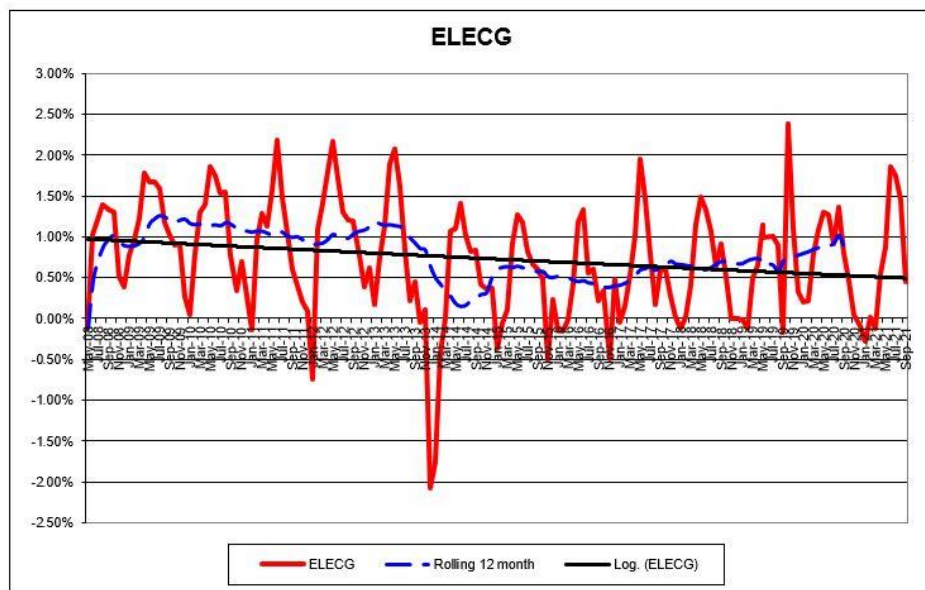
Electra's loss factor calculation methodology is based on the requirements as set out in the Electricity Authority's Guidelines on the Calculation and use of Loss Factors for Reconciliation Purposes. The loss Factors are published on the Electra website along with an outline on how they are calculated. Electra's network losses are published as 7.48% with a loss factor of 1.081, a change from the previous 7.11% and 1.076 respectively. It was confirmed that Electra published the loss factor and network losses on their website (in the pricing schedule).

In 2008 the Authority published "The Guidelines on the calculation and use of loss factors for reconciliation purposes" (draft). According to the Guidelines distributors should review Reconciliation Loss Factors (RFL) every two years or if a 12-month UFE trend is outside $\pm 1\%$.

UFE is defined in the Guidelines as

UFE is calculated from the difference between reported energy injected into a network and the reported energy extracted from the network after it has been adjusted for losses. Conceptually, it is the inevitable difference between distributors' predictions and reported reality (volumes as measured by meters). UFE accounts for the difference between actual and calculated technical losses, and actual and estimated non-technical losses.

The EA provided the UFE graphs for the Electra network which shows that UFE (blue line) is within the $\pm 1\%$ threshold.



Audit outcome
Compliant

CONCLUSION

PARTICIPANT RESPONSE

Following the last audit and an internal restructure, we have spent considerable time and money to consider the non-compliances and determine where and how improvements could be made. As a result, we have developed and implemented a number of technological enhancements including a dynamically updating dashboard, an automatic reporting solution to monitor various areas of Code requirements and a dedicated service desk solution into which inconsistencies are systematically logged prompting further action by the team. These are monitored against established SLA's, investigated by priority, and corrected these as soon as possible.

The audit notes identify that some work still needs to be done, however we are keen to have the significant, demonstrable reduction in noncompliant issues and lack of reoccurrences since the improvements recognised as a deliberate result of the new robust and strong controls we have adopted in addition to the significant employee and contractor resources engaged to address historical corrections.

An example of systematic improvement, as mentioned above, is where Electra have implemented a dedicated Service Desk solution to manage Registry related queries. This service desk solution ensures that communications are tracked and logged and that the processes followed emphasises priority and adherence to SLA's

Additionally, Electra have implemented automated solutions, using the FME solution, to regularly and automatically process registry reports and files. Discrepancies result in a request being automatically raised in the service desk for the team's attention. These requests are automatically assigned the appropriate priority and SLA.

Much like IECD, as a Distributor, Electra is very much at the mercy of third parties where Distributed Generation is concerned.

We enable and encourage customers to notify us of residential DG installations (under 10kW).

On the Electra website is a "Distributed Generation" button.

This button takes the customer to the DG section within which are

- Guides, forms, terms, and conditions around
 - 10kW or less capacity
 - Greater than 10kW
- List of currently approved inverters
- Contact details (phone and Email) if required

DG installations 10kW or need to go through our Planning and Design team.

For small scale solar, or other generation, the onus is on the customer, installer or retailer to advise us. Unless we receive a completed form, the only means by which we can currently and sustainably identify a new DG installation is by the Compliance reports.

To improve our response to DG requests, Electra have developed a workflow in the FME product. This product downloads the Audit Compliance Report daily and processes the data on Sheet AC020Distributor14 (Distributed Generation). For any new ICP's on this sheet, a new request is created in the ServiceDesk solution with appropriate priority and SLA. Our GIS Analysts pick up the request, investigate and update our records, and the registry, once information regarding the DG installation have been obtained. Unfortunately, this doesn't prevent noncompliance events, but it enables us to identify and respond as quickly as possible.

Discrepancies are, likewise, delivered into the Esri ArcGIS Enterprise GIS Dashboard.

In the next release of our FME monitoring workspace, we will be monitoring the DG installations by comparing the Trader Profile with our Installation Type, Generation capacity, Fuel Type and Status (ie. RPS PV1 and RPS EG1 must have Installation Type = B, Generation Capacity > 0, Fuel Type = populated and Status = 2). This is nearing completion and will be launched before the end of the month.

Electra take compliance very seriously as demonstrated through our monumental efforts since the last audit. We do however respectfully dispute a couple of minor points with regards to unmetered load which we did not know about and distributed generation information. We will continue to investigate these.

The risk rating associated with this audit includes a couple of areas that have shown to be resolved and one partially disputed. Our view is that our risk rating is 9, when these points are considered, which would take us into an audit term of 18 months. This audit period unfortunately includes historic corrections and issues prior to new reporting and monitoring being implemented. It would be demoralising to be penalised for these issues when we are demonstrating that we have made vast improvements and have invested heavily in technology to support our people and processes.