

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
METERING EQUIPMENT PROVIDER AUDIT REPORT**

For

**ACCUCAL LIMITED**

Prepared by: Brett Piskulic – Veritek Limited

Date audit commenced: 16 March 2020

Date audit report completed: 7 May 2020

Audit report due date: 29-May-20

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## EXECUTIVE SUMMARY

**Accucal Limited (Accucal)** is a Metering Equipment Provider (MEP) and is required to undergo an audit by 29 May 2020, in accordance with clause 16A.17(a).

The audit was carried out remotely using Zoom on April 22<sup>nd</sup>, 2020 due to the nationwide lockdown in response to the COVID-19 pandemic.

The audit found four instances of non-compliance.

A validation process between Accucal's records and the registry has now been implemented, and whilst the process is now in place it was not conducted for every month of the audit period.

The delay of a planned switchgear upgrade at one ICP has led to the expiry of the alternative certification of the metering installation. There were five late registry updates and late provision of a statement of situation.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends an audit frequency of 24 months, which I agree with.

The matters raised are recorded in the tables below.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Changes to registry records	4.10	3 of Schedule 11.4	Five records updated on the registry later than 10 business days.	Strong	Low	1	Identified
Registry validation	6.3	6 of schedule 11.4	Registry validation not conducted for every month of the audit period.	Strong	Low	1	Cleared
Certification of metering installations	7.1	10.38 (a), clause 1 & clause 15 of Schedule 10.7	Certification expired for one metering installation.	Strong	Low	1	Identified
Statement of Situation	9.3	10.46(2)	Statement of situation not provided to affected participant and Authority within 3 business days for one ICP.	Strong	Low	1	Identified
Future Risk Rating						4	
Indicative Audit Frequency						24 months	

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	Recommendation	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

I checked the Electricity Authority website, and I confirm there are four exemptions in place.

#### Audit commentary

Accucal had four exemptions in place during the audit period, all to allow the use of subtractive metering. The exemptions are listed below with the ICPs.

Exemption 246: 0009805800AL991, expires 30/06/2025.

Exemption 207: 0008201110WM5F5, expired 31/12/2019.

Exemption 202: 0000880392WEA92, expires 31/12/2022.

Exemption 187: 0000032431HR99C, expires 31/12/2023.

### 1.2. Structure of Organisation

Russell Mann is the MEP Manager and has several metering technicians in the organisation. Russell is the main contact for compliance issues.

### 1.3. Persons involved in this audit

Auditor:

Brett Piskulic

**Veritek Limited**

**Electricity Authority Approved Auditor**

Accucal personnel assisting in this audit were:

Name	Title
Russell Mann	Technical Manager

#### 1.4. Use of Agents (Clause 10.3)

##### Code reference

Clause 10.3

##### Code related audit information

*A participant who uses a contractor*

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

##### Audit observation

Accucal does not use contractors to perform MEP responsibilities.

##### Audit commentary

Accucal does not use contractors to perform MEP responsibilities.

#### 1.5. Hardware and Software

Accucal MEP data is held in a spreadsheet. Data is stored on two servers in its Hamilton office, there are also servers in Christchurch and Auckland which are synced to the Hamilton server. Backups of all data are also written to a separate hard drive on all four servers.

#### 1.6. Breaches or Breach Allegations

Accucal confirmed there were no breach allegations related to the scope of this audit.

#### 1.7. ICP Data

Metering Category	Number of ICPs
1	3
2	4
3	13
4	21
5	49

#### 1.8. Authorisation Received

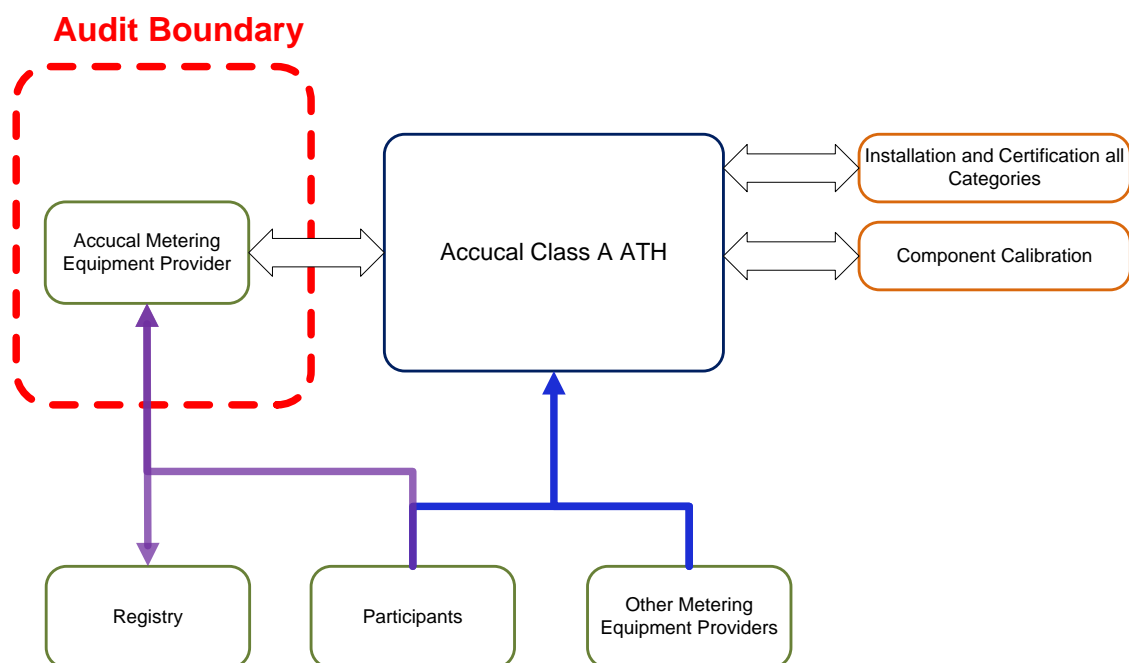
A letter of authorisation was not required or requested.



## 1.9. Scope of Audit

This audit was conducted in accordance with the Guideline for Metering Equipment Provider Audits V2.2, which was published by the Electricity Authority.

The boundaries of this audit are shown below for greater clarity.



Accucal is the MEP for a small number of higher category metering installations and they are also the ATH.

### 1.10. Summary of previous audit

The previous audit was conducted in November 2018 by Steve Woods of Veritek Limited. The table below shows the status of the issues raised.

### Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Registry notification of metering records	3.2	2 of Schedule 11.4	Late registry update for one ICP.	Cleared
Changes to registry records	4.10	3 of Schedule 11.4	Four records updated on the registry later than 10 business days.	Still existing
Response to switch notification	6.1	1(1) of Schedule 11.4	One late acceptance.	Cleared
Accuracy of Registry records	6.2	7(1) of schedule 11.4	One incorrect certification date.	Cleared
Registry validation	6.3	6 of schedule 11.4	Registry validation not conducted for every month of the audit period.	Cleared

### Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Status
			Nil	

## 2. OPERATIONAL INFRASTRUCTURE

### 2.1. MEP responsibility for services access interface (Clause 10.9(2))

#### Code reference

*Clause 10.9(2)*

#### Code related audit information

*The MEP is responsible for providing and maintaining the services access interface.*

#### Audit observation

I checked certification records for 10 metering installations in relation to recording of the services access interface.

#### Audit commentary

The services access interface was recorded correctly for all 10 examples.

#### Audit outcome

Compliant

### 2.2. Dispute Resolution (Clause 10.50(1) to (3))

#### Code reference

*Clause 10.50(1) to (3)*

#### Code related audit information

*Participants must in good faith use its best endeavours to resolve any disputes related to Part 10 of the Code.*

*Disputes that are unable to be resolved may be referred to the Authority for determination.*

*Complaints that are not resolved by the parties or the Authority may be referred to the Rulings Panel by the Authority or participant.*

#### Audit observation

I checked whether any disputes had been dealt with during the audit period.

#### Audit commentary

Accucal has not been required to resolve any disputes in accordance with this clause.

#### Audit outcome

Compliant

### 2.3. MEP Identifier (Clause 7(1) of Schedule 10.6)

#### Code reference

*Clause 7(1) of Schedule 10.6*

#### Code related audit information

*The MEP must ensure it has a unique participant identifier and must use this participant identifier (if required) to correctly identify its information.*

#### Audit observation

I checked the registry data to ensure the correct MEP identifier was used.

#### Audit commentary

Accucal uses the ACCM identifier in all cases.

#### Audit outcome

Compliant

### 2.4. Communication Equipment Compatibility (Clause 40 Schedule 10.7)

#### Code reference

*Clause 40 Schedule 10.7*

#### Code related audit information

*The MEP must ensure that the use of its communication equipment complies with the compatibility and connection requirements of any communication network operator the MEP has equipment connected to.*

#### Audit observation

I checked that the ATH has a process to check the relevant type test certificates to ensure compliance with this clause.

#### Audit commentary

Accucal ensures all communication equipment is appropriately certified with the relevant telecommunications standards. This is recorded in type test certificates and other approval documents.

#### Audit outcome

Compliant

### 2.5. Participants to Provide Accurate Information (Clause 11.2 and Clause 10.6)

#### Code reference

*Clause 11.2 and Clause 10.6*

#### Code related audit information

*The MEP must take all practicable steps to ensure that information that the MEP is required to provide to any person under Parts 10 and 11 is complete and accurate, not misleading or deceptive and not likely to mislead or deceive.*

*If the MEP becomes aware that in providing information under Parts 10 and 11, the MEP has not complied with that obligation, the MEP must, as soon as practicable, provide such further information as is necessary to ensure that the MEP does comply.*

#### Audit observation

The content of this audit report was reviewed to determine whether all practicable steps had been taken to provide accurate information.

#### Audit commentary

The content of this audit report indicates that Accucal has taken all practicable steps to ensure that information is complete and accurate.

#### Audit outcome

Compliant

### 3. PROCESS FOR A CHANGE OF MEP

#### 3.1. Payment of Costs to Losing MEP (Clause 10.22)

##### Code reference

*Clause 10.22*

##### Code related audit information

*The MEP for a metering installation may change only if the responsible participant enters into an arrangement with another person to become the MEP for the metering installation, and if certain notification requirements are met (in relation to the registry and the reconciliation manager).*

*The gaining MEP must pay the losing MEP a proportion of the costs within 20 business days of assuming responsibility.*

*The costs are those directly and solely attributable to the certification and calibration tests of the metering installation or its components from the date of switch until the end of the current certification period.*

##### Audit observation

I checked if Accucal had sent or received any invoices.

##### Audit commentary

Accucal has not sent or received any invoices in relation to this clause during the audit period.

##### Audit outcome

Not applicable

#### 3.2. Registry Notification of Metering Records (Clause 2 of Schedule 11.4)

##### Code reference

*Clause 2 of Schedule 11.4*

##### Code related audit information

*The gaining MEP must advise the registry of the registry metering records for the metering installation within 15 days of becoming the MEP for the metering installation.*

##### Audit observation

I checked the audit compliance report for the period 06/03/19 to 06/03/20 for all records where Accucal became the MEP to evaluate the timeliness of updates.

##### Audit commentary

All updates were within 15 business days.

##### Audit outcome

Compliant

### 3.3. Provision of Metering Records to Gaining MEP (Clause 5 of Schedule 10.6)

#### Code reference

*Clause 5 of Schedule 10.6*

#### Code related audit information

*During an MEP switch, a gaining MEP may request access to the losing MEP's metering records.*

*On receipt of a request from the gaining MEP, the losing MEP has 10 business days to provide the gaining MEP with the metering records or the facilities to enable the gaining MEP to access the metering records.*

*The losing MEP must ensure that the metering records are only received by the gaining MEP or its contractor, the security of the metering records is maintained, and only the specific metering records required for the purposes of the gaining MEP exercising its rights and performing its obligations are provided.*

#### Audit observation

I checked with Accucal to confirm whether there had been any requests from other MEPs.

#### Audit commentary

This has not occurred, and no examples are available to examine.

#### Audit outcome

Compliant

### 3.4. Termination of MEP Responsibility (Clause 10.23)

#### Code reference

*Clause 10.23*

#### Code related audit information

*Even if the MEP ceases to be responsible for an installation, the MEP must either comply with its continuing obligations; or before its continuing obligations terminate, enter into an arrangement with a participant to assume those obligations.*

*The MEP is responsible if it:*

- *is identified in the registry as the primary metering contact or*
- *is the participant who owns the meter for the POC or to the grid or*
- *has accepted responsibility under clause 1(1)(a)(ii) of schedule 11.4 or*
- *has contracted with a participant responsible for providing the metering installation.*

*MEPs obligations come into effect on the date recorded in the registry as being the date on which the metering installation equipment is installed or, for an NSP the effective date set out in the NSP table on the Authority's website.*

*An MEPs obligations terminate only when;*

- *the ICP changes under clause 10.22(1)(a);*
- *the NSP changes under clause 10.22(1)(b), in which case the MEPs obligations terminate from the date on which the gaining MEP assumes responsibility,*
- *the metering installation is no longer required for the purposes of Part 15; or*
- *the load associated with an ICP is converted to be used solely for unmetered load.*

**Audit observation**

I checked the event detail report for examples of metering installations which Accucal has ceased to be responsible for.

**Audit commentary**

There were no examples found in the event detail report. Accucal confirmed that they keep all records indefinitely, this was confirmed by checking that the records were still available for ICP 1001138685UN253, which was decommissioned in 2016.

**Audit outcome**

Compliant

## 4. INSTALLATION AND MODIFICATION OF METERING INSTALLATIONS

### 4.1. Design Reports for Metering Installations (Clause 2 of Schedule 10.7)

#### Code reference

*Clause 2 of Schedule 10.7*

#### Code related audit information

*The MEP must obtain a design report for each proposed new metering installation or a modification to an existing metering installation, before it installs the new metering installation or before the modification commences.*

*Clause 2(2) and (3)—The design report must be prepared by a person with the appropriate level of skills, expertise, experience and qualifications and must include a schematic drawing, details of the configuration scheme that programmable metering components are to include, confirmation that the configuration scheme has been approved by an approved test laboratory, maximum interrogation cycle, any compensation factor arrangements, method of certification required, and name and signature of the person who prepared the report and the date it was signed.*

*Clause 2(4)—The MEP must provide the design report to the certifying ATH before the ATH installs or modifies the metering installation (or a metering component in the metering installation).*

#### Audit observation

I checked Accucal's standard design reports to confirm compliance.

#### Audit commentary

Accucal is an ATH and an MEP, therefore there are no examples of provision of design reports to other parties. I checked the Accucal design reports and I confirmed that they contained all of the points listed above and they were prepared by a person with the appropriate level of skills, expertise, experience and qualifications.

#### Audit outcome

Compliant

### 4.2. Contracting with ATH (Clause 9 of Schedule 10.6)

#### Code reference

*Clause 9 of Schedule 10.6*

#### Code related audit information

*The MEP must, when contracting with an ATH in relation to the certification of a metering installation, ensure that the ATH has the appropriate scope of approval for the required certification activities.*

#### Audit observation

I confirmed that Accucal is also an ATH and they haven't used any other ATHs during the audit period.

#### Audit commentary

I confirmed that Accucal is also an ATH and they haven't used any other ATHs during the audit period. Accucal has an appropriate and current scope of approval.

#### Audit outcome

Compliant



#### 4.3. Metering Installation Design & Accuracy (Clause 4(1) of Schedule 10.7)

##### Code reference

*Clause 4(1) of Schedule 10.7*

##### Code related audit information

*The MEP must ensure:*

- *that the sum of the measured error and uncertainty does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of the metering installation*
- *the design of the metering installation (including data storage device and interrogation system) will ensure the sum of the measured error and the smallest possible increment of the energy value of the raw meter data does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of installation*
- *the metering installation complies with the design report and the requirements of Part 10.*

##### Audit observation

I checked the processes used by Accucal to ensure compliance with the design and with the error thresholds stipulated in Table 1. I also checked the certification records for 10 metering installations.

##### Audit commentary

Accucal has their own calculator for recording error and uncertainty results. This calculator uses meter class accuracy and has results over a load range of 5% to 120% at different power factors. This approach is conservative and takes into account forecast load by including multiple load points. The system used by Accucal has been approved by IANZ during the ISO 17025 audit; therefore, I have confirmed compliance in this report. The calculator includes consideration of temperature and temperature is recorded as part of the certification tests.

With regard to the design of the installation (including data storage device and interrogation system), Accucal ensures the sum of the measured error and the smallest possible increment of the energy value of the raw meter data does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of installation. There are no components installed where “coarse” rounding is in place for the data, or where meters with a low pulse rate are connected to separate data storage devices.

Accucal ensures the metering installation complies with the requirements of Part 10 and the design reports were referenced in the 10 certification records checked.

##### Audit outcome

Compliant

#### 4.4. Subtractive Metering (Clause 4(2)(a) of Schedule 10.7)

##### Code reference

*Clause 4(2)(a) of Schedule 10.7*

##### Code related audit information

*For metering installations for ICPs that are not also NSPs, the MEP must ensure that the metering installation does not use subtraction to determine submission information used for the purposes of Part 15.*

##### Audit observation

I asked Accucal to confirm whether subtraction was used for any metering installations where they were the MEP.

#### Audit commentary

Accucal had four ICPs with subtractive metering during the audit period. Exemptions were in place for these as recorded in **section 1.1**. The metering installation at ICP 0008201110WM5F5 was recertified on 27/06/2019, prior to the expiry of the exemption and subtraction is no longer used.

#### Audit outcome

Compliant

### 4.5. HHR Metering (Clause 4(2)(b) of Schedule 10.7)

#### Code reference

*Clause 4(2)(b) of Schedule 10.7*

#### Code related audit information

*For metering installations for ICPs that are not also NSPs, the MEP must ensure that all category 3 or higher metering installations must be half-hour metering installations.*

#### Audit observation

I checked the audit compliance report to confirm compliance with this requirement.

#### Audit commentary

I checked the audit compliance report and I confirm compliance with this requirement.

#### Audit outcome

Compliant

### 4.6. NSP Metering (Clause 4(3) of Schedule 10.7)

#### Code reference

*Clause 4(3) of Schedule 10.7*

#### Code related audit information

*The MEP must ensure that the metering installation for each NSP that is not connected to the grid does not use subtraction to determine submission information used for the purposes of Part 15 and is a half-hour metering installation.*

#### Audit observation

I checked if Accucal is responsible for any NSP metering.

#### Audit commentary

Accucal is the MEP for one Embedded Network with NSP metering. I checked and confirm that subtraction is not used to determine submission information.

#### Audit outcome

Compliant

#### 4.7. Responsibility for Metering Installations (Clause 10.26(10))

##### Code reference

*Clause 10.26(10)*

##### Code related audit information

*The MEP must ensure that each point of connection to the grid for which there is a metering installation that it is responsible for has a half hour metering installation.*

##### Audit observation

I checked if Accucal is responsible for any GXP metering by reviewing the NSP Mapping Table.

##### Audit commentary

Accucal is recorded as the MEP for 15 points of connection but they believe they are the MEP for only 13. Points of connection HWA1101 and HWA1102 have ACCM recorded as the MEP but Accucal does not believe they are the MEP. Neither of these records have a certification expiry date populated by KIWI, although both are certified.

Metering installations at the other 13 points of connection are certified and the certification expiry dates are recorded in the NSP Table.

##### Audit outcome

Compliant

#### 4.8. Suitability of Metering Installations (Clause 4(4) of Schedule 10.7)

##### Code reference

*Clause 4(4) of Schedule 10.7*

##### Code related audit information

*The MEP must, for each metering installation for which it is responsible, ensure that it is appropriate having regard to the physical and electrical characteristics of the POC.*

##### Audit observation

I asked Accucal to provide details of how they ensure the suitability of metering installations.

##### Audit commentary

Accucal has appropriate practices and documentation to ensure compliance with this requirement. The completed compliance check sheets include an Electrical Safety Certificate which confirms that the prescribed electrical work completed meets the requirements of regulation 74A of the Electricity Safety Regulations. Accucal has not identified any installations with inappropriate physical or electrical characteristics.

##### Audit outcome

Compliant

#### 4.9. Installation & Modification of Metering Installations (Clauses 10.34(2), (2A) and (3))

##### Code reference

*Clauses 10.34(2), (2A) and (3)*

##### Code related audit information

*If a metering installation is proposed to be installed or modified at a POC, other than a POC to the grid, the MEP must consult with and use its best endeavours, to agree with the distributor and the trader for that POC, before the design is finalised, on the metering installations:*

- *required functionality*
- *terms of use*
- *required interface format*
- *integration of the ripple receiver and the meter*
- *functionality for controllable load.*

*Each participant involved in the consultations must use its best endeavours to reach agreement and act reasonably and in good faith.*

##### Audit observation

I checked whether appropriate consultation had occurred.

##### Audit commentary

There were no design changes during the audit period. Accucal has previously provided copies of the design reports to all relevant distributors and traders in order to achieve compliance with this requirement.

##### Audit outcome

Compliant

#### 4.10. Changes to Registry Records (Clause 3 of Schedule 11.4)

##### Code reference

*Clause 3 of Schedule 11.4*

##### Code related audit information

*The MEP must advise the registry of the registry metering records or any change to the registry metering records for a metering installation for which it is responsible, no later than 10 business days following:*

- a) *the electrical connection of an ICP that is not also an NSP*
- b) *any subsequent change in any matter covered by the metering records.*

##### Audit observation

I checked the audit compliance report for the period 06/03/19 to 06/03/20 to evaluate the timeliness of registry updates.

##### Audit commentary

The audit compliance report identified that the registry was updated on 36 occasions, two updates were late due to processing issues.

There were six new connections and one was updated late. The late update was due to late nomination by the trader.

Accucal advised that there were also two ICPs where the registry had not been updated following recertification in November 2019, these have now been updated.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4  From: 06-Mar-19 To: 06-Mar-20	Five records updated on the registry later than 10 business days.  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	I have recorded the controls as strong in this area because Accucal has checks in place to identify and resolve discrepancies and the number of late updates was low.  The impact on participants, customers or settlement could be minor where a tariff change may be required; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
AccuCal’s MEP role is still very small and has only had one person able to carry out Registry updates, hence the occasions where this was late. One of our team is now getting involved and will be able to do the updates and therefore we will be better placed to do these on time.		Able to do updates by 1 <sup>st</sup> June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Part of our continual improvement around Registry Monthly Checks will result in us being able to send a file to the Registry for updates instead of doing them manually. This will greatly improve our compliance in this area.		Aiming to have this ability by 1 <sup>st</sup> Nov 2020.	

#### 4.11. Metering Infrastructure (Clause 10.39(1))

##### Code reference

Clause 10.39(1)

##### Code related audit information

The MEP must ensure that for each metering installation:

- an appropriately designed metering infrastructure is in place
- each metering component is compatible with, and will not interfere with any other component in the installation

- collectively, all metering components integrate to provide a functioning system
- each metering installation is correctly and accurately integrated within the associated metering infrastructure.

#### **Audit observation**

Accucal has addressed compatibility but does not manage a data collection system that would be considered “metering infrastructure”.

#### **Audit commentary**

Accucal has addressed compatibility but does not manage a data collection system that would be considered “metering infrastructure”.

#### **Audit outcome**

Compliant

### **4.12. Responsibility for Metering at ICP (Clause 11.18B(3))**

#### **Code reference**

Clause 10.23A

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

*If a metering installation at an ICP is to be decommissioned, but the ICP is not being decommissioned, the metering equipment provider that is responsible for decommissioning the metering installation must—*

*(a) if the metering equipment provider is responsible for interrogating the metering installation—*

*(i) arrange for a final interrogation to take place before the metering installation is decommissioned; and*

*(ii) provide the raw meter data from the interrogation to the trader that is recorded in the registry as being responsible for the ICP; or*

*(b) if another participant is responsible for interrogating the metering installation, advise the other participant not less than three business days before the decommissioning—*

*(i) of the date and time of the decommissioning; and*

*(ii) that the participant must carry out a final interrogation.*

*(2) To avoid doubt, if a metering installation at an ICP is to be decommissioned because the ICP is being decommissioned—*

*(a) the metering equipment provider is not responsible for arranging a final interrogation of the metering installation; and*

*(b) the trader that is recorded in the registry as being responsible for the ICP must arrange for a final interrogation of the metering installation under clause 11.18(3).*

#### **Audit observation**

I checked whether Accucal was the MEP at any decommissioned metering installations and whether notification had been provided to relevant traders.

#### **Audit commentary**

There were no examples of decommissioned metering installations where the ICP was not also decommissioned.

#### **Audit outcome**

Compliant

#### 4.13. Measuring Transformer Burden and Compensation Requirements (Clause 31(4) and (5) of Schedule 10.7)

##### Code reference

*Clause 31(4) and (5) of Schedule 10.7*

##### Code related audit information

*The MEP must, before approving the addition of, or change to, the burden or compensation factor of a measuring transformer in a metering installation, consult with the ATH who certified the metering installation.*

*If the MEP approves the addition of, or change to, the burden or compensation factor, it must ensure the metering installation is recertified by an ATH before the addition or change becomes effective.*

##### Audit observation

I asked Accucal whether they had approved any burden changes during the audit period.

##### Audit commentary

There were no examples of burden changes where Accucal is the MEP. Accucal is the MEP and ATH, so the requirements of this clause will be met with existing processes.

##### Audit outcome

Compliant

#### 4.14. Changes to Software ROM or Firmware (Clause 39(1) and 39(2) of Schedule 10.7)

##### Code reference

*Clause 39(1) and 39(2) of Schedule 10.7*

##### Code related audit information

*The MEP must, if it proposes to change the software, ROM or firmware of a data storage device installed in a metering installation, ensure that, before the change is carried out, an approved test laboratory:*

- *tests and confirms that the integrity of the measurement and logging of the data storage device would be unaffected*
- *documents the methodology and conditions necessary to implement the change*
- *advises the ATH that certified the metering installation of any change that might affect the accuracy of the data storage device.*

*The MEP must, when implementing a change to the software, ROM or firmware of a data storage device installed in a metering installation:*

- *carry out the change in accordance with the methodology and conditions identified by the approved test laboratory under clause 39(1)(b)*
- *keep a list of the data storage devices that were changed*
- *update the metering records for each installation affected with the details of the change and the methodology used.*

##### Audit observation

I checked if there any examples of changes in accordance with these clauses.

#### **Audit commentary**

No changes occurred during the audit period. Accucal advised that any changes would lead to recertification of the metering installations affected.

#### **Audit outcome**

Compliant

### **4.15. Temporary Energisation (Clause 10.28(6))**

#### **Code reference**

*Clause 10.28(6)*

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

*An MEP must not request the temporary energisation of a new POC unless authorised to do so by the reconciliation participant responsible for that POC and has an arrangement with that reconciliation participant to provide metering services.*

#### **Audit observation**

I checked if there were any examples of temporary energisation for the purposes of testing.

#### **Audit commentary**

Accucal does not conduct temporary livening, all metering installations are certified at the time of livening.

#### **Audit outcome**

Not applicable



## 5. METERING RECORDS

### 5.1. Accurate and Complete Records (Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4)

#### Code reference

*Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4*

#### Code related audit information

*The MEP must, for each metering installation for which it is responsible, keep accurate and complete records of the attributes set out in Table 1 of Schedule 11.4. These include:*

- a) the certification expiry date of each metering component in the metering installation*
- b) all equipment used in relation to the metering installation, including serial numbers and details of the equipment's manufacturer*
- c) the manufacturer's or (if different) most recent test certificate for each metering component in the metering installation*
- d) the metering installation category and any metering installations certified at a lower category*
- e) all certification reports and calibration reports showing dates tested, tests carried out, and test results for all metering components in the metering installation*
- f) the contractor who installed each metering component in the metering installation*
- g) the certification sticker, or equivalent details, for each metering component that is certified under Schedule 10.8 in the metering installation:*
- h) any variations or use of the 'alternate certification' process*
- i) seal identification information*
- j) any applicable compensation factors*
- k) the owner of each metering component within the metering installation*
- l) any applications installed within each metering component*
- m) the signed inspection report confirming that the metering installation complies with the requirements of Part 10.*

#### Audit observation

I checked certification records for 10 metering installations to evaluate compliance with this clause. I also checked all five inspection reports for the audit period.

#### Audit commentary

All certification records were complete and accurate, and the inspection process did not identify any information related issues.

#### Audit outcome

Compliant

### 5.2. Inspection Reports (Clause 4(2) of Schedule 10.6)

#### Code reference

*Clause 4(2) of Schedule 10.6*

#### Code related audit information

*The MEP must, within 10 business days of receiving a request from a participant for a signed inspection report prepared under clause 44 of Schedule 10.7, make a copy of the report available to the participant.*

#### **Audit observation**

I asked Accucal whether any requests had been made for copies of inspection reports.

#### **Audit commentary**

Accucal has not been requested to supply any inspection reports, but these are available and can be supplied on request.

#### **Audit outcome**

Compliant

### **5.3. Retention of Metering Records (Clause 4(3) of Schedule 10.6)**

#### **Code reference**

*Clause 4(3) of Schedule 10.6*

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

*The MEP must keep metering installation records for 48 months after any metering component is removed, or any metering installation is decommissioned.*

#### **Audit observation**

I checked old metering records to confirm compliance.

#### **Audit commentary**

Accucal keeps records indefinitely. I confirmed this by checking some records more than four years old.

#### **Audit outcome**

Compliant

### **5.4. Provision of Records to ATH (Clause 6 Schedule 10.6)**

#### **Code reference**

*Clause 6 Schedule 10.6*

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

*If the MEP contracts with an ATH to recertify a metering installation and the ATH did not previously certify the metering installation, the MEP must provide the ATH with a copy of all relevant metering records not later than 10 business days after the contract comes into effect.*

#### **Audit observation**

Accucal will comply with this requirement as it arises. There are no current examples where this has occurred.

#### **Audit commentary**

Accucal will comply with this requirement as it arises. There are no current examples where this has occurred.

#### **Audit outcome**

Not applicable

## 6. MAINTENANCE OF REGISTRY INFORMATION

### 6.1. MEP Response to Switch Notification (Clause 1(1) of Schedule 11.4)

#### Code reference

*Clause 1(1) of Schedule 11.4*

#### Code related audit information

*Within 10 business days of being advised by the registry that it is the gaining MEP for the metering installation for the ICP, the MEP must enter into an arrangement with the trader and advise the registry it accepts responsibility for the ICP and of the proposed date on which it will assume responsibility.*

#### Audit observation

I checked the switch breach history detail report to confirm whether all responses were within 10 business days.

#### Audit commentary

There were no late acceptances identified in the audit period.

#### Audit outcome

Compliant

### 6.2. Provision of Registry Information (Clause 7 (1), (2) and (3) of Schedule 11.4)

#### Code reference

*Clause 7 (1), (2) and (3) of Schedule 11.4*

#### Code related audit information

*The MEP must provide the information indicated as being 'required' in Table 1 of clause 7 of Schedule 11.4 to the registry, in the prescribed form for each metering installation for which the MEP is responsible.*

*From 1 April 2015, a MEP is required to ensure that all the registry metering records of its category 1 metering installations are complete, accurate, not misleading or deceptive, and not likely to mislead or deceive.*

*The information the MEP provides to the registry must derive from the metering equipment provider's records or the metering records contained within the current trader's system.*

#### Audit observation

I checked the audit compliance report and the list file to identify discrepancies.

#### Audit commentary

Analysis of the audit compliance report and list file identified no discrepancies.

#### Audit outcome

Compliant

### 6.3. Correction of Errors in Registry (Clause 6 of Schedule 11.4)

#### Code reference

*Clause 6 of Schedule 11.4*

#### Code related audit information

*By 0900 hours on the 13th business day of each reconciliation period, the MEP must obtain from the registry:*

- *a list of ICPs for the metering installations the MEP is responsible for*
- *the registry metering records for each ICP on that list.*

*No later than five business days following collection of data from the registry, the MEP must compare the information obtained from the registry with the MEP's own records.*

*Within five business days of becoming aware of any discrepancy between the MEP's records and the information obtained from the registry, the MEP must correct the records that are in error and advise the registry of any necessary changes to the registry metering records.*

#### Audit observation

I conducted a walkthrough of the validation processes to confirm compliance. I checked Accucal's process to identify and update errors.

#### Audit commentary

This clause is quite specific and prescriptive in that it requires a complete metering record comparison to be undertaken. Accucal has developed a spreadsheet tool to enable a complete validation of registry records. The validation process was implemented in April 2020 and I have reviewed the latest discrepancy report. The report identified some minor discrepancies with component serial numbers at five ICPs. Accucal has updated the registry with the correct details within five business days.

I have recorded non-compliance as the validation process had not been performed for every month of the audit period.

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4  From: 01-Jun-17 To: 31-Mar-20	Registry validation not conducted for every month of the audit period.  Potential impact: Low  Actual impact: Low  Audit history: Twice  Controls: Strong  Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	The controls are recorded as strong because Accucal has now implemented a validation process.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
First full check has been completed on 1 <sup>st</sup> May 2020. Leading up to this some testing identified some minor issues with the registry records, some relating to compensation factors and most relating to minor serial number discrepancies. The registry has been updated and no issues were found on 1 <sup>st</sup> May.	1 <sup>st</sup> May 2020	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Registry Check reminder is in both Russell Mann's and Nathan Forsyth's calendars every month with Nathan tasked to complete the check.	1 <sup>st</sup> May 2020	

#### 6.4. Cancellation of Certification (Clause 20 of Schedule 10.7)

##### Code reference

*Clause 20 of Schedule 10.7*

##### Code related audit information

*The certification of a metering installation is automatically cancelled on the date on which one of the following events takes place:*

- the metering installation is modified otherwise than under sub clause 19(3) or 19(6)*
- the metering installation is classed as outside the applicable accuracy tolerances set out in Table 1 of Schedule 10.1, defective or not fit for purpose under this Part or any audit*
- an ATH advises the metering equipment provider responsible for the metering installation of a reference standard or working standard used to certify the metering installation not being compliant with this Part at the time it was used to certify the metering installation, or the failure of a group of meters in the statistical sampling recertification process for the metering installation, or the failure of a certification test for the metering installation*
- the manufacturer of a metering component in the metering installation determines that the metering component does not comply with the standards to which the metering component was tested*
- an inspection of the metering installation, that is required under this Part, is not carried out in accordance with the relevant clauses of this Part*
- if the metering installation has been determined to be a lower category under clause 6 and the maximum current conveyed through the metering installation at any time exceeds the current rating of its metering installation category as set out in Table 1 of Schedule 10.1*
- the metering installation is certified under clause 14 and sufficient load is available for full certification testing and has not been retested under clause 14(4)*
- a control device in the metering installation certification is, and remains for a period of at least 10 business days, bridged out under clause 35(1)*
- the metering equipment provider responsible for the metering installation is advised by an ATH under clause 48(6)(b) that a seal has been removed or broken and the accuracy and continued integrity of the metering installation has been affected.*

*A metering equipment provider must, within 10 business days of becoming aware that one of the events above has occurred in relation to a metering installation for which it is responsible, update the metering installation's certification expiry date in the registry.*

##### Audit observation

I checked for examples of all of the points listed above, and checked whether certification had been cancelled, and whether the registry had been updated within 10 business days.

#### Audit commentary

There were no examples of issues leading to cancellation of certification.

There was one installation certified with insufficient load, Accucal confirmed that monitoring had been conducted.

All inspections were conducted during the required inspection window.

There were no examples of certification of measuring transformers being certified with burden lower than the lowest test point.

#### Audit outcome

Compliant

### 6.5. Registry Metering Records (Clause 11.8A)

#### Code reference

*Clause 11.8A*

#### Code related audit information

*The MEP must provide the registry with the required metering information for each metering installation the MEP is responsible for and update the registry metering records in accordance with Schedule 11.4.*

#### Audit observation

This clause refers to schedule 11.4 which is discussed in **section 6.2**, apart from the requirement to provide information in the “prescribed form”. I checked for examples of Accucal not using the prescribed form.

#### Audit commentary

This clause refers to schedule 11.4 which is discussed in **section 6.2**, apart from the requirement to provide information in the “prescribed form”. I checked for examples of Accucal not using the prescribed form and did not find any exceptions.

#### Audit outcome

Compliant

## 7. CERTIFICATION OF METERING INSTALLATIONS

### 7.1. Certification and Maintenance (Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7)

#### Code reference

*Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7*

#### Code related audit information

*The MEP must obtain and maintain certification for all installations and metering components for which it is responsible. The MEP must ensure it:*

- performs regular maintenance, battery replacement, repair/replacement of components of the metering installations*
- updates the metering records at the time of the maintenance*
- has a recertification programme that will ensure that all installations are recertified prior to expiry.*

#### Audit observation

I conducted the following checks to identify metering installations with expired, cancelled or late certification:

- the audit compliance report was checked to identify ICPs with expired certification,
- the new connections process was checked by using the event detail report, PR255 and the list file to identify ICPs where the certification was not conducted within five business days of energisation.

#### Audit commentary

At the time of the audit there was one installation with expired certification, ICP 1000024020BP627. Due to an inability to access the measuring transformers this metering installation had alternative certification which expired on 19/01/2020. It was expected that the customer would have completed a planned upgrade of the switchgear on site prior to the certification expiry date. The upgrade was delayed but is still planned to take place.

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7  From: 19-Jan-20 To: 17-Mar-20	Certification expired for one metering installation.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong as Accucal has a good process for monitoring certification expiry dates and has taken reasonable steps to arrange to recertify.</p> <p>The impact on settlement is recorded as low because it is unlikely that the recent expiry of the certification will lead to of failure or inaccuracy of the metering installation. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The latest update from the site is that they have CAPEX approval for the switchboard upgrade and this is scheduled for late 2021, when their next outage is to be. It is extremely unlikely that this back-up supply will be used before then. Not much we can do other than to either self-breach or apply for an exemption. The customer does not want us to incur any costs at this stage as the supply is not in use, so have stated they don't want us to apply for an exemption, and the retailer has been advised of this and has not commented.</p>		<p>Checked with the customer on 7<sup>th</sup> May 2020 and job still on track for late 2021.</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>I don't believe there are any controls required.</p>		<p>7<sup>th</sup> May 2020</p>	

## 7.2. Certification Tests (Clause 10.38(b) and clause 9 of Schedule 10.6)

### Code reference

*Clause 10.38(b) and clause 9 of Schedule 10.6*

### Code related audit information

*For each metering component and metering installation an MEP is responsible for, the MEP must ensure that:*

- *an ATH performs the appropriate certification and recertification tests*
- *the ATH has the appropriate scope of approval to certify and recertify the metering installation.*

### Audit observation

I checked the certification records for 10 metering installations to confirm compliance.

### Audit commentary

Accucal is the MEP and ATH which ensures the appropriate approval is complied with. I checked 10 metering installation records to confirm the appropriate tests were conducted. The certification records contain fields which detail the tests that are completed.

### Audit outcome

Compliant

## 7.3. Active and Reactive Capability (Clause 10.37(1) and 10.37(2)(a))

### Code reference



Clause 10.37(1) and 10.37(2)(a)

#### Code related audit information

*For any category 2 or higher half-hour metering installation that is certified after 29 August 2013, the MEP must ensure that the installation has active and reactive measuring and recording capability.*

*Consumption only installations that is a category 3 metering installation or above must measure and separately record:*

- a) import active energy*
- b) import reactive energy*
- c) export reactive energy.*

*Consumption only installations that are a category 2 metering installation must measure and separately record import active energy.*

*All other installations must measure and separately record:*

- a) import active energy*
- b) export active energy*
- c) import reactive energy*
- d) export reactive energy.*

*All grid connected POCs with metering installations which are certified after 29 August 2013 should measure and separately record:*

- a) import active energy*
- b) export active energy*
- c) import reactive energy*
- d) export reactive energy.*

#### Audit observation

All relevant metering is compliant with this clause.

#### Audit commentary

All relevant metering is compliant with this clause.

#### Audit outcome

Compliant

### 7.4. Local Service Metering (Clause 10.37(2)(b))

#### Code reference

Clause 10.37(2)(b)

#### Code related audit information

*The accuracy of each local service metering installation in grid substations must be within the tolerances set out in Table 1 of Schedule 10.1.*

#### Audit observation

This clause relates to Transpower as an MEP.

#### Audit commentary

This clause relates to Transpower as an MEP.

#### Audit outcome

Not applicable

#### 7.5. Measuring Transformer Burden (Clause 30(1) and 31(2) of Schedule 10.7)

##### Code reference

*Clause 30(1) and 31(2) of Schedule 10.7*

##### Code related audit information

*The MEP must not permit a measuring transformer to be connected to equipment used for a purpose other than metering, unless it is not practical for the equipment to have a separate measuring transformer.*

*The MEP must ensure that a change to, or addition of, a measuring transformer burden or a compensation factor related to a measuring transformer is carried out only by:*

- a) the ATH who most recently certified the metering installation*
- b) for a POC to the grid, by a suitably qualified person approved by both the MEP and the ATH who most recently certified the metering installation.*

##### Audit observation

I asked Accucal if there were any examples of burden changes or the addition of non-metering equipment being connected to metering CTs.

##### Audit commentary

Some installations certified by the Accucal ATH have other equipment connected to the same VT. I checked an example where the VT was also used for protection equipment. The design report and certification records include all relevant details and calculations in relation to non-metering equipment connected. The certification report contains a field which records if any other equipment is connected to the CTs or VTs. See extract from certification report below:

Wiring and Connection Details		
Item	Details	Comments
CT secondary earth point location	CT Terminals in Meter Cubicle	
CT dedicated to metering	Yes	
VT secondary earth point location	VT Secondary Link	
VT dedicated to metering	Shared with Protection	

##### Audit outcome

Compliant

#### 7.6. Certification as a Lower Category (Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7)

##### Code reference

*Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7*

##### Code related audit information

*A category 2 or higher metering installation may be certified by an ATH at a lower category than would be indicated solely on the primary rating of the current if the MEP, based on historical metering data, reasonably believes that:*

- the maximum current will at all times during the intended certification period be lower than the current setting of the protection device for the category for which the metering installation is certified, or is required to be certified by the Code; or*
- the metering installation will use less than 0.5 GWh in any 12-month period.*

*If a metering installation is categorised under clause 6(1)(b), the ATH may, if it considers appropriate, and, at the MEP's request, determine the metering installation's category according to the metering installation's expected maximum current.*

*If a meter is certified in this manner:*

- *the MEP must, each month, obtain a report from the participant interrogating the metering installation, which details the maximum current from raw meter data from the metering installation by either calculation from the kVA by trading period, if available, or from a maximum current indicator if fitted in the metering installation conveyed through the point of connection for the prior month; and*
- *if the MEP does not receive a report, or the report demonstrates that the maximum current conveyed through the POC was higher than permitted for the metering installation category it is certified for, then the certification for the metering installation is automatically cancelled.*

#### **Audit observation**

I checked the audit compliance report and the list file to identify any ICPs for examples where the CT ratio was above the threshold to confirm that protection was appropriate or that monitoring was in place.

#### **Audit commentary**

Accucal is not the MEP for any installations certified as a lower category.

#### **Audit outcome**

Compliant

### **7.7. Insufficient Load for Certification Tests (Clauses 14(3) and (4) of Schedule 10.7)**

#### **Code reference**

*Clauses 14(3) and (4) of Schedule 10.7*

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

*If there is insufficient electricity conveyed through a POC to allow the ATH to complete a prevailing load test for a metering installation that is being certified as a half hour meter and the ATH certifies the metering installation the MEP must:*

- *obtain and monitor raw meter data from the metering installation at least once each calendar month to determine if load during the month is sufficient for a prevailing load test to be completed:*
- *if there is sufficient load, arrange for an ATH to complete the tests (within 20 business days).*

#### **Audit observation**

I checked if there were any examples of Insufficient load certifications.

#### **Audit commentary**

I checked an example where insufficient load certification was conducted on 5<sup>th</sup> July 2019 at ICP 0000007433NT337. Sufficient load was identified within the first month and the ATH returned to site and completed the testing on 30<sup>th</sup> July 2019.

The metering installation at ICP 0007690552WA881 was certified with insufficient load in December 2019. Accucal confirmed that monitoring has occurred for each month since certification and the load is not yet sufficient to complete testing.

#### **Audit outcome**

Compliant

## 7.8. Insufficient Load for Certification – Cancellation of Certification (Clause 14(6) of Schedule 10.7)

### Code reference

*Clause 14(6) of Schedule 10.7*

### Code related audit information

*If the tests conducted under clause 14(4) of Schedule 10.7 demonstrate that the metering installation is not within the relevant maximum permitted error:*

- *the metering installation certification is automatically revoked:*
- *the certifying ATH must advise the MEP of the cancellation within one business day:*
- *the MEP must follow the procedure for handling faulty metering installations (clause 10.43 - 10.48).*

### Audit observation

I checked if there were any examples of Insufficient load certifications.

### Audit commentary

I checked an example where insufficient load certification was conducted on 5<sup>th</sup> July 2019 at ICP 0000007433NT337. Sufficient load was identified within the first month and the ATH returned to site and completed the testing on 30<sup>th</sup> July 2019. In this case the metering installation was within the relevant maximum permitted error.

I confirmed that Accucal understands the requirement to cancel certification if the tests conducted under clause 14(4) of Schedule 10.7 demonstrate that the metering installation is not within the relevant maximum permitted error.

### Audit outcome

Compliant

## 7.9. Alternative Certification Requirements (Clauses 32(2), (3) and (4) of Schedule 10.7)

### Code reference

*Clauses 32(2), (3) and (4) of Schedule 10.7*

### Code related audit information

*If an ATH cannot comply with the requirements to certify a metering installation due to measuring transformer access issues, and therefore certifies the metering installation in accordance with clause 32(1) of Schedule 10.7, the MEP must:*

- *advise the market administrator, by no later than 10 business days after the date of certification of the metering installation, of the details in clause 32(2)(a) of Schedule 10.7*
- *respond, within five business days, to any requests from the market administrator for additional information*
- *ensure that all of the details are recorded in the metering installation certification report*
- *take all steps to ensure that the metering installation is certified before the certification expiry date.*

*If the market administrator determines the ATH could have obtained access the metering installation is deemed to be defective and the MEP must follow the process of handling faults metering installations in clauses 10.43 to 10.48.*

### Audit observation

I checked the registry records to confirm whether alternative certification had been applied.

#### Audit commentary

Alternative certification has been applied to the metering installation at ICP 1001300642LC696. Accucal provided a copy of the certification report and notification to the market administrator. The notification was provided to the market administrator within five business days.

#### Audit outcome

Compliant

### 7.10. Timekeeping Requirements (Clause 23 of Schedule 10.7)

#### Code reference

*Clause 23 of Schedule 10.7*

#### Code related audit information

*If a time keeping device that is not remotely monitored and corrected controls the switching of a meter register in a metering installation, the MEP must ensure that the time keeping device:*

- a) has a time keeping error of not greater than an average of 2 seconds per day over a period of 12 months*
- b) is monitored and corrected at least once every 12 months.*

#### Audit observation

I asked Accucal whether there were any metering installations with timeclocks.

#### Audit commentary

Accucal confirmed there are no metering installations with timeclocks.

#### Audit outcome

Not applicable

### 7.11. Control Device Bridged Out (Clause 35 of Schedule 10.7)

#### Code reference

*Clause 35 of Schedule 10.7*

#### Code related audit information

*The participant must, within 10 business days of bridging out a control device or becoming aware of a control device being bridged out, notify the following parties:*

- the relevant reconciliation participant*
- the relevant metering equipment provider.*

*If the control device is used for reconciliation, the metering installation is considered defective in accordance with 10.43.*

#### Audit observation

I checked the process for the management of bridged control devices, and I checked whether any notifications were required to other parties.

#### Audit commentary

Accucal does not have any control devices.

#### Audit outcome

Not applicable

#### 7.12. Control Device Reliability Requirements (Clause 34(5) of Schedule 10.7)

##### Code reference

*Clause 34(5) of Schedule 10.7*

##### Code related audit information

*If the MEP is advised by an ATH that the likelihood of a control device not receiving signals would affect the accuracy or completeness of the information for the purposes of Part 15, the MEP must, within three business days inform the following parties of the ATH's determination (including all relevant details):*

- a) the reconciliation participant for the POC for the metering installation*
- b) the control signal provider.*

##### Audit observation

I checked the steps Accucal had taken to identify regions with signal propagation issues.

##### Audit commentary

Accucal does not have any control devices.

##### Audit outcome

Not applicable

#### 7.13. Statistical Sampling (Clauses 16(1) and (5) of Schedule 10.7)

##### Code reference

*Clauses 16(1) and (5) of Schedule 10.7*

##### Code related audit information

*The MEP may arrange for an ATH to recertify a group of category 1 metering installations for which the MEP is responsible using a statistical sampling process.*

*The MEP must update the registry in accordance with Part 11 on the advice of an ATH as to whether the group meets the recertification requirements.*

##### Audit observation

I checked whether statistical sampling had occurred during the audit period.

##### Audit commentary

Accucal has not conducted any statistical sampling during the audit period.

##### Audit outcome

Not applicable

#### 7.14. Compensation Factors (Clause 24(3) of Schedule 10.7)

##### Code reference

*Clause 24(3) of Schedule 10.7*

##### Code related audit information

*If a compensation factor must be applied to a metering installation that is an NSP, the MEP must advise the reconciliation participant responsible for the metering installation of the compensation factor within 10 days of certification of the installation.*

*In all other cases the MEP must advise the registry of the compensation factor.*

#### **Audit observation**

I checked the records for 9 Category 2 and above metering installations to confirm that compensation factors were correctly recorded on the registry. I also checked an example of a non-standard compensation factor identified by the audit compliance report.

#### **Audit commentary**

Compensation factors have been updated accurately on the registry. I confirmed this by checking the records for nine ICPs. Accucal confirmed that the non-standard compensation factor identified by the audit compliance report was correct.

#### **Audit outcome**

Compliant

### **7.15. Metering Installations Incorporating a Meter (Clause 26(1) of Schedule 10.7)**

#### **Code reference**

*Clause 26(1) of Schedule 10.7*

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

*The MEP must ensure that each meter in a metering installation it is responsible for is certified.*

#### **Audit observation**

I checked the certification records for 10 metering installations to confirm compliance.

#### **Audit commentary**

Meters were certified for all 10 installations.

#### **Audit outcome**

Compliant

### **7.16. Metering Installations Incorporating a Measuring Transformer (Clause 28(1) of Schedule 10.7)**

#### **Code reference**

*Clause 28(1) of Schedule 10.7*

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

*The MEP must ensure that each measuring transformer in a metering installation it is responsible for is certified.*

#### **Audit observation**

I checked the certification records for nine metering installations to confirm compliance.

#### **Audit commentary**

Measuring transformers were certified for all nine installations.

#### **Audit outcome**

Compliant

#### 7.17. Metering Installations Incorporating a Data Storage Device (Clause 36(1) of Schedule 10.7)

##### Code reference

*Clause 36(1) of Schedule 10.7*

##### Code related audit information

*The MEP must ensure that each data storage device in a metering installation it is responsible for is certified.*

##### Audit observation

I checked the certification records for 10 metering installations to confirm compliance.

##### Audit commentary

The 10 certification records that I checked confirmed that data storage devices are being correctly certified.

##### Audit outcome

Compliant

#### 7.18. Notification of ATH Approval (Clause 7 (3) Schedule 10.3)

##### Code reference

*Clause 7 (3) Schedule 10.3*

##### Code related audit information

*If the MEP is notified by the Authority that an ATH's approval has expired, been cancelled or been revised, the MEP must treat all metering installations certified by the ATH during the period where the ATH was not approved to perform the activities as being defective and follow the procedures set out in 10.43 to 10.48.*

##### Audit observation

I checked the ATH register to confirm compliance.

##### Audit commentary

Accucal as an ATH has appropriate approval.

##### Audit outcome

Compliant

#### 7.19. Interim Certification (Clause 18 of Schedule 10.7)

##### Code reference

*Clause 18 of Schedule 10.7*

##### Code related audit information

*The MEP must ensure that each interim certified metering installation on 28 August 2013 is certified by no later than 1 April 2015.*

##### Audit observation



I checked the registry records (PR255) to identify any ICPs with interim certification recorded.

**Audit commentary**

Accucal does not have any interim certified metering installations.

**Audit outcome**

Not applicable

## 8. INSPECTION OF METERING INSTALLATIONS

### 8.1. Category 1 Inspections (Clause 45 of Schedule 10.7)

#### Code reference

*Clause 45 of Schedule 10.7*

#### Code related audit information

*The MEP must ensure that category 1 metering installations (other than interim certified metering installations):*

- *have been inspected by an ATH within 120 months from the date of the metering installation's most recent certification or*
- *for each 12-month period, commencing 1 January and ending 31 December, a sample of the category 1 metering installations selected under clause 45(2) of Schedule 10.7 has been inspected by an ATH.*

*Before a sample inspection process can be carried out, the MEP must submit a documented process for selecting the sample to the Electricity Authority, at least two months prior to first date on which the inspections are to be carried out, for approval (and promptly provide any other information the Authority may request).*

*The MEP must not inspect a sample unless the Authority has approved the documented process.*

*The MEP must, for each inspection conducted under clause 45(1)(b), keep records detailing:*

- *any defects identified that have affected the accuracy or integrity of the raw meter data recorded by the metering installation*
- *any discrepancies identified under clause 44(5)(b)*
- *relevant characteristics sufficient to enable reporting of correlations or relationships between inaccuracy and characteristics*
- *the procedure used, and the lists generated, to select the sample under clause 45(2).*

*The MEP must, if it believes a metering installation that has been inspected is or could be inaccurate, defective or not fit for purpose:*

- *comply with clause 10.43*
- *arrange for an ATH to recertify the metering installation if the metering is found to be inaccurate under Table 1 of Schedule 10.1, or defective or not fit for purpose.*

*The MEP must by 1 April in each year, provide the Authority with a report that states whether the MEP has, for the previous 1 January to 31 December period, arranged for an ATH to inspect each category 1 metering installation for which it is responsible under clause 45(1)(a) or 45(1)(b).*

*This report must include the matters specified in clauses 45(8)(a) and (b).*

*If the MEP is advised by the Authority that the tests do not meet the requirements under clause 45(9) of Schedule 10.7, the MEP must select the additional sample under that clause, carry out the required inspections, and report to the Authority, within 40 business days of being advised by the Authority.*

#### Audit observation

Accucal is responsible for three Category 1 metering installations, I checked if any of these installations were due for inspection during the audit period.

#### Audit commentary

Accucal has not been required to complete any Category 1 inspections during the audit period. None of the three Category 1 metering installations are due for inspection until 2025.

#### Audit outcome

Compliant

### 8.2. Category 2 to 5 Inspections (Clause 46(1) of Schedule 10.7)

#### Code reference

*Clause 46(1) of Schedule 10.7*

#### Code related audit information

*The MEP must ensure that each category 2 or higher metering installation is inspected by an ATH at least once within the applicable period. The applicable period begins from the date of the metering installation's most recent certification and extends to:*

- *120 months for Category 2*
- *60 months for Category 3*
- *30 months for Category 4*
- *18 months for Category 5.*

#### Audit observation

I checked the registry information to confirm which ICPs were due for inspection and I then checked the inspection reports for all relevant ICPs.

#### Audit commentary

There were five inspections required to be completed during the audit period. All five inspections were conducted within the allowable window.

#### Audit outcome

Compliant

### 8.3. Inspection Reports (Clause 44(5) of Schedule 10.7)

#### Code reference

*Clause 44(5) of Schedule 10.7*

#### Code related audit information

*The MEP must, within 20 business days of receiving an inspection report from an ATH:*

- *undertake a comparison of the information received with its own records*
- *investigate and correct any discrepancies*
- *update the metering records in the registry.*

#### Audit observation

I checked the inspection process and the results to confirm compliance.

#### Audit commentary

All inspections are conducted by the Accucal ATH. The inspection check-sheet is prepopulated with all of the existing metering information. A comparison is done by the technician on-site and any discrepancies recorded. The registry is updated if any discrepancies are found on return of the check-sheet.

#### Audit outcome

Compliant

#### 8.4. Broken or removed seals (Clause 48(4) and (5) of Schedule 10.7)

##### Code reference

*Clause 48(4) and (5) of Schedule 10.7*

##### Code related audit information

*If the MEP is advised of a broken or removed seal it must use reasonable endeavours to determine*

- a) who removed or broke the seal*
- b) the reason for the removal or breakage*

*and arrange for an ATH to carry out an inspection of the removal or breakage and determine any work required to remedy the removal or breakage.*

*The MEP must make the above arrangements within*

- a) three business days, if the metering installation is category 3 or higher*
- b) 10 business days if the metering installation is category 2*
- c) 20 business days if the metering installation is category 1.*

##### Audit observation

I checked examples of notification of missing seals, which were all as a result of inspection processes or notification by field technicians.

##### Audit commentary

Accucal maintains a master seals register of all seals that have been applied and all seals that have been removed during recertification and inspections. This was checked for accuracy during the audit. No inspections into missing or broken seals have been conducted.

##### Audit outcome

Compliant

## 9. PROCESS FOR HANDLING FAULTY METERING INSTALLATIONS

### 9.1. Investigation of Faulty Metering Installations (Clause 10.43(4) and (5))

#### Code reference

*Clause 10.43(4) and (5)*

#### Code related audit information

*If the MEP is advised or becomes aware that a metering installation may be inaccurate, defective, or not fit for purpose, it must investigate and report on the situation to all affected participants as soon as reasonably practicable after becoming aware of the information, but no later than;*

- a) 20 business days for Category 1,*
- b) 10 business days for Category 2 and*
- c) 5 business days for Category 3 or higher.*

#### Audit observation

I checked whether Accucal had dealt with any faulty metering installations.

#### Audit commentary

An example of a defective category 3 metering installation was identified. Accucal was advised by the customer at ICP 0666002855PC657 that there was an error on the meter display on 16/03/2020. The Accucal ATH went to site on 19/03/2020, replaced the faulty meter and recertified the metering installation. Accucal notified the relevant parties in accordance with the timeframes in the Code.

#### Audit outcome

Compliant

### 9.2. Testing of Faulty Metering Installations (Clause 10.44)

#### Code reference

*Clause 10.44*

#### Code related audit information

*If a report prepared under clause 10.43(4)(c) demonstrates that a metering installation is inaccurate, defective, or not fit for purpose, the MEP must arrange for an ATH to test the metering installation and provide a 'statement of situation'.*

*If the MEP is advised by a participant under clause 10.44(2)(a) that the participant disagrees with the report that demonstrates that the metering installation is accurate, not defective and fit for purpose, the MEP must arrange for an ATH to:*

- a) test the metering installation*
- b) provide the MEP with a statement of situation within five business days of:*
- c) becoming aware that the metering installation may be inaccurate, defective or not fit for purpose; or*
- d) reaching an agreement with the participant.*

*The MEP is responsible for ensuring the ATH carries out testing as soon as practicable and provides a statement of situation.*

#### Audit observation

I checked whether Accucal had dealt with any faulty metering installations.

### Audit commentary

In the case recorded above, appropriate testing and reporting was conducted immediately. The Accucal ATH completed a “metering installation meter fault form”, this records the details of the fault found and the actions taken to resolve the situation. This form satisfies the requirement for provision of a statement of situation.

### Audit outcome

Compliant

## 9.3. Statement of Situation (Clause 10.46(2))

### Code reference

Clause 10.46(2)

### Code related audit information

*Within three business days of receiving the statement from the ATH, the MEP must provide copies of the statement to:*

- *the relevant affected participants*
- *the market administrator (for all category 3 and above metering installations and any category 1 and category 2 metering installations) on request.*

### Audit observation

I checked whether Accucal had dealt with any faulty metering installations.

### Audit commentary

In the case recorded above, Accucal provided the statement of situation to the Trader and the Authority later than the required three business days. The late provision was due to delays in finalising the rebuild of meter data. This is recorded as non-compliance.

### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 9.3 With: Clause 10.46(2)  From: 25-Mar-20 To: 05-Apr-20	Statement of situation not provided to affected participant and Authority within 3 business days for one 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	The controls are recorded as strong because the Accucal process would normally ensure notification is provided in the required timeframe.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
A review of this process will be completed and options to build-in reminders will be looked at.	By 1 <sup>st</sup> May 2021.	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above, will be reviewed internally and options looked at for automated reminders. A new job management package will assist in this area.	On-going.	

## 10. ACCESS TO AND PROVISION OF RAW METER DATA AND METERING INSTALLATIONS

### 10.1. Access to Raw Meter Data (Clause 1 of Schedule 10.6)

#### Code reference

*Clause 1 of Schedule 10.6*

#### Code related audit information

*The MEP must give authorised parties access to raw meter data within 10 business days of receiving the authorised party making a request.*

*The MEP must only give access to raw meter data to a trader or person, if that trader or person has entered into a contract to collect, obtain, and use the raw meter data with the end customer.*

*The MEP must provide the following when giving a party access to information:*

- a) the raw meter data; or*
- b) the means (codes, keys etc.) to enable the party to access the raw meter data.*

*The MEP must, when providing raw meter data or access to an authorised person use appropriate procedures to ensure that:*

- the raw meter data is received only by that authorised person or a contractor to the person*
- the security of the raw meter data and the metering installation is maintained*
- access to the raw meter data is limited to only the specific raw meter data under clause 1(7)(c) of Schedule 10.6.*

#### Audit observation

Accucal has not had any requests for access to raw meter data.

#### Audit commentary

Accucal has not had any requests for access to raw meter data.

#### Audit outcome

Not applicable

### 10.2. Restrictions on Use of Raw Meter Data (Clause 2 of Schedule 10.6)

#### Code reference

*Clause 2 of Schedule 10.6*

#### Code related audit information

*The MEP must not give an authorised person access to raw meter data if to do so would breach clause 2(1) of Schedule 10.6.*

#### Audit observation

Accucal has not had any requests for access to raw meter data.

#### Audit commentary

Accucal has not had any requests for access to raw meter data.

#### Audit outcome

Not applicable



### 10.3. Access to Metering Installations (Clause 3(1), (3) and (4) of Schedule 10.6)

#### Code reference

*Clause 3(1), (3) and (4) of Schedule 10.6*

#### Code related audit information

*The MEP must within 10 business days of receiving a request from one of the following parties, arrange physical access to each component in a metering installation:*

- *a relevant reconciliation participant with whom it has an arrangement (other than a trader)*
- *the Authority*
- *an ATH*
- *an auditor*
- *a gaining MEP.*

*This access must include all necessary means to enable the party to access the metering components*

*When providing access the MEP must ensure that the security of the metering installation is maintained and physical access is limited to only the access required for the purposes of the Code, regulations in connection with the party's administration, audit and testing functions.*

#### Audit observation

Access will be provided as required. No requests have been made.

#### Audit commentary

Access will be provided as required. No requests have been made.

#### Audit outcome

Not applicable

### 10.4. Urgent Access to Metering Installations (Clause 3(5) of Schedule 10.6)

#### Code reference

*Clause 3(5) of Schedule 10.6*

#### Code related audit information

*If the party requires urgent physical access to a metering installation, the MEP must use its best endeavours to arrange physical access.*

#### Audit observation

Access will be provided as required. No requests have been made.

#### Audit commentary

Access will be provided as required. No requests have been made.

#### Audit outcome

Not applicable

## 10.5. Electronic Interrogation of Metering Installations (Clause 8 of Schedule 10.6)

### Code reference

*Clause 8 of Schedule 10.6*

### Code related audit information

*When raw meter data can only be obtained from an MEP's back office, the MEP must*

- *ensure that the interrogation cycle does not exceed the maximum interrogation cycle shown in the registry*
- *interrogate the metering installation at least once within each maximum interrogation cycle.*

*When raw meter data can only be obtained from an MEP's back office, the MEP must ensure that the internal clock is accurate, to within  $\pm 5$  seconds of:*

- *New Zealand standard time; or*
- *New Zealand daylight time.*

*When raw meter data can only be obtained from an MEP's back office, the MEP must record in the interrogation and processing system logs, the time, the date, and the extent of any change in the internal clock setting in the metering installation.*

*When raw meter data can only be obtained from an MEP's back office, the MEP must ensure that a data storage device in a metering installation does not exceed the maximum time error set out in Table 1 of clause 8(5) of Schedule 10.6.*

*The MEP must compare the time on the internal clock of the data storage device with the time on the interrogation and processing system clock, calculate and correct (if required by this provision) any time error, and advise the affected reconciliation participant.*

*When raw meter data can only be obtained from an MEP's back office, the MEP must, when interrogating a metering installation, download the event log, check the event log for evidence of malfunctioning or tampering, and if this is detected, carry out the appropriate requirements of Part 10.*

*The MEP must ensure that all raw meter data that can only be obtained from the MEPs back office, that is downloaded as part of an interrogation, and that is used for submitting information for the purpose of Part 15 is archived:*

- *for no less than 48 months after the interrogation date*
- *in a form that cannot be modified without creating an audit trail*
- *in a form that is secure and prevents access by any unauthorised person*

*in a form that is accessible to authorised personnel.*

### Audit observation

Accucal does not conduct electronic data collection as an MEP.

### Audit commentary

Accucal does not conduct electronic data collection as an MEP.

### Audit outcome

Not applicable

## 10.6. Security of Metering Data (Clause 10.15(2))

### Code reference

*Clause 10.15(2)*

### Code related audit information

*The MEP must take reasonable security measures to prevent loss or unauthorised access, use, modification or disclosure of the metering data.*

### Audit observation

Accucal does not conduct electronic data collection as an MEP.

### Audit commentary

Accucal does not conduct electronic data collection as an MEP.

### Audit outcome

Not applicable

## 10.7. Time Errors for Metering Installations (Clause 8(4) of Schedule 10.6)

### Code reference

*Clause 8(4) of Schedule 10.6*

### Code related audit information

*When raw meter data can only be obtained from the MEPs back office, the MEP must ensure that the data storage device it interrogates does not exceed the maximum time error set out in Table 1 of clause 8(5) of Schedule 10.6.*

### Audit observation

Accucal does not conduct electronic data collection as an MEP.

### Audit commentary

Accucal does not conduct electronic data collection as an MEP.

### Audit outcome

Not applicable

## 10.8. Event Logs (Clause 8(7) of Schedule 10.6)

### Code reference

*Clause 8(7) of Schedule 10.6*

### Code related audit information

*When raw meter data can only be obtained from the MEP's back office, the MEP must, when interrogating a metering installation:*

- a) *ensure an interrogation log is generated*
- b) *review the event log and:*
  - i. *take appropriate action*
  - ii. *pass the relevant entries to the reconciliation participant.*
- c) *ensure the log forms part of an audit trail which includes:*
  - i. *the date and*

- ii. *time of the interrogation*
- iii. *operator (where available)*
- iv. *unique ID of the data storage device*
- v. *any clock errors outside specified limits*
- vi. *method of interrogation*
- vii. *identifier of the reading device used (if applicable).*

#### **Audit observation**

Accucal does not conduct electronic data collection as an MEP.

#### **Audit commentary**

Accucal does not conduct electronic data collection as an MEP.

#### **Audit outcome**

Not applicable

### **10.9. Comparison of HHR Data with Register Data (Clause 8(9) of Schedule 10.6)**

#### **Code reference**

*Clause 8(9) of Schedule 10.6*

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

*When raw meter data can only be obtained from the MEP's back office, the MEP must ensure that each electronic interrogation that retrieves half-hour metering information compares the information against the increment of the metering installations accumulating meter registers.*

#### **Audit observation**

Accucal does not conduct electronic data collection as an MEP.

#### **Audit commentary**

Accucal does not conduct electronic data collection as an MEP.

#### **Audit outcome**

Not applicable

### **10.10. Correction of Raw Meter Data (Clause 10.48(2),(3))**

#### **Code reference**

*Clause 10.48(2),(3)*

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

*If the MEP is notified of a question or request for clarification in accordance with clause 10.48(1), the MEP must, within 10 business days:*

- *respond in detail to the questions or requests for clarification*
- *advise the reconciliation participant responsible for providing submission information for the POC of the correction factors to apply and period the factors should apply to.*

#### **Audit observation**

Accucal does not conduct electronic data collection as an MEP.

**Audit commentary**

Accucal does not conduct electronic data collection as an MEP.

**Audit outcome**

Not applicable

## CONCLUSION

The audit found four instances of non-compliance.

A validation process between Accucal's records and the registry has now been implemented, and whilst the process is now in place it was not conducted for every month of the audit period.

The delay of a planned switchgear upgrade at one ICP has led to the expiry of the alternative certification of the metering installation. There were five late registry updates and late provision of a statement of situation.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The future risk rating indicates an audit frequency of 24 months, which I agree with.

## PARTICIPANT RESPONSE

We believe this is a fair outcome and are continuing to improve our processes. This is becoming easier as we slowly grow our MEP business and also as we continue to improve processes with automation of reminders etc.

We appreciated the Auditor's efforts to complete this audit during the Covid19 lockdown and the whole process worked very well.