

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

For

TRANSPower NEW ZEALAND LIMITED

Prepared by: Steve Woods

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Date audit report completed: 10 March 2019

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EXECUTIVE SUMMARY

Transpower is an MEP and is required to undergo an audit by 10 March 2019, in accordance with clause 1(1) of schedule 10.5.

Five non-compliances were identified during the audit and two recommendations are made. Three of the non-compliances relate to the management and data accuracy of the three ICPs Transpower has responsibility for. There were some minor errors and some late updates. The Code also requires MEPs to compare their records to the registry on a monthly basis. Transpower's registry validation process occurs at a high level and does not include all fields.

There were two issues related to inspections. The inspection reports were not available for Central Park and one inspection was not conducted within the two-month window.

I've made two recommendations to improve processes in relation to the points raised above. I recommend the compliance schedule has additional fields added and that inspection reports are obtained and stored by Transpower, reducing the reliance on ATHs.

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 contains a future risk rating score of 10, which results in an indicative audit frequency of 12 months. I have considered this recommendation along with Transpower's responses and I recommend a next audit frequency of 18 months.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Registry updates	4.10	3 of Schedule 11.4	Late updates for two ICPs	Moderate	Low	2	Identified
Inspection reports	5.1	(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4	Inspection reports not available for two metering installations at Central Park	Moderate	Low	2	Identified
Registry accuracy	6.2	7 (1), (2) and (3) of Schedule 11.4	Some registry errors for all three ICPs	Moderate	Low	2	Cleared
Registry validation	6.3	6 of Schedule 11.4	Registry records not compared to Transpower's records for every field	Weak	Low	3	Identified
Inspections	8.2	46(1) of Schedule 10.7	Inspection conducted early for Berwick	Strong	Low	1	Identified

Future Risk Rating	10
Indicative Audit Frequency	12 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
Inspection reports	5.1	Regarding Clause (1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4	Obtain and store inspection records in the same way that certification records are held.
Certification schedule	7.1	Regarding Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7	Change certification schedule to show the installation certification date, installation expiry date, next inspection due date (including the start and end dates of the two-month window) and inspection completed date.

ISSUES

Subject	Section	Recommendation	Description

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 no exemptions in place,

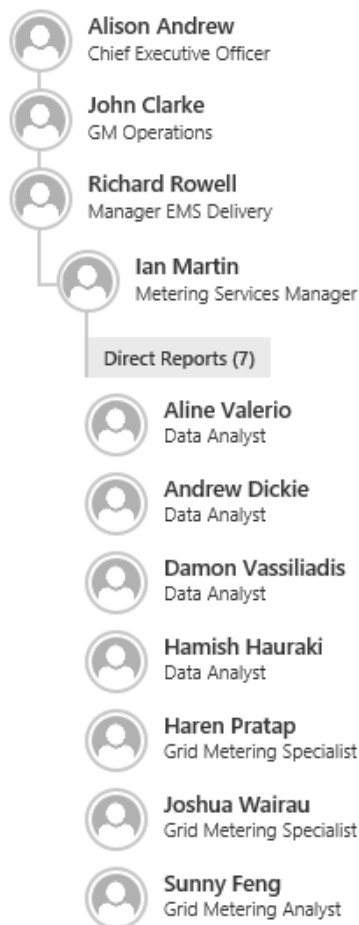
Audit commentary

I checked the Electricity Authority website and I confirm there are no exemptions in place,

1.2. Structure of Organisation

The organisation structure is shown below.

Organization



1.3. Persons involved in this audit

Auditor: Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Transpower personnel assisting in this audit were:

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

Audit observation

I checked whether there were any agents or contractors involved in the performance of functions within the scope of the audit.

Audit commentary

Transpower engages ATHs to conduct certification activities and the ATHs also act as agents for the management of some certification records.

1.5. Hardware and Software

I checked whether there were any systems used in the performance of functions relevant to the scope of the audit.

Transpower has a data and scheduling system used to track the relevant inspection and certification dates. This resides on the server and is backed up in accordance with standard industry protocols.

1.6. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of the audit.

1.7. ICP Data

Transpower is responsible for metering at 190 points of connection and also the ICPs listed in the table below.

ICP	Creation date	POC	Installation type	Category	Certification expiry
0000668502UN559	01/04/99	KIN0331	B	5	06/09/21
0716190003NSC49	01/05/16	GLN0332	G	5	08/07/20
1000541815PC0C6	29/04/13	KIN0112	G	5	28/08/21

1.8. Authorisation Received

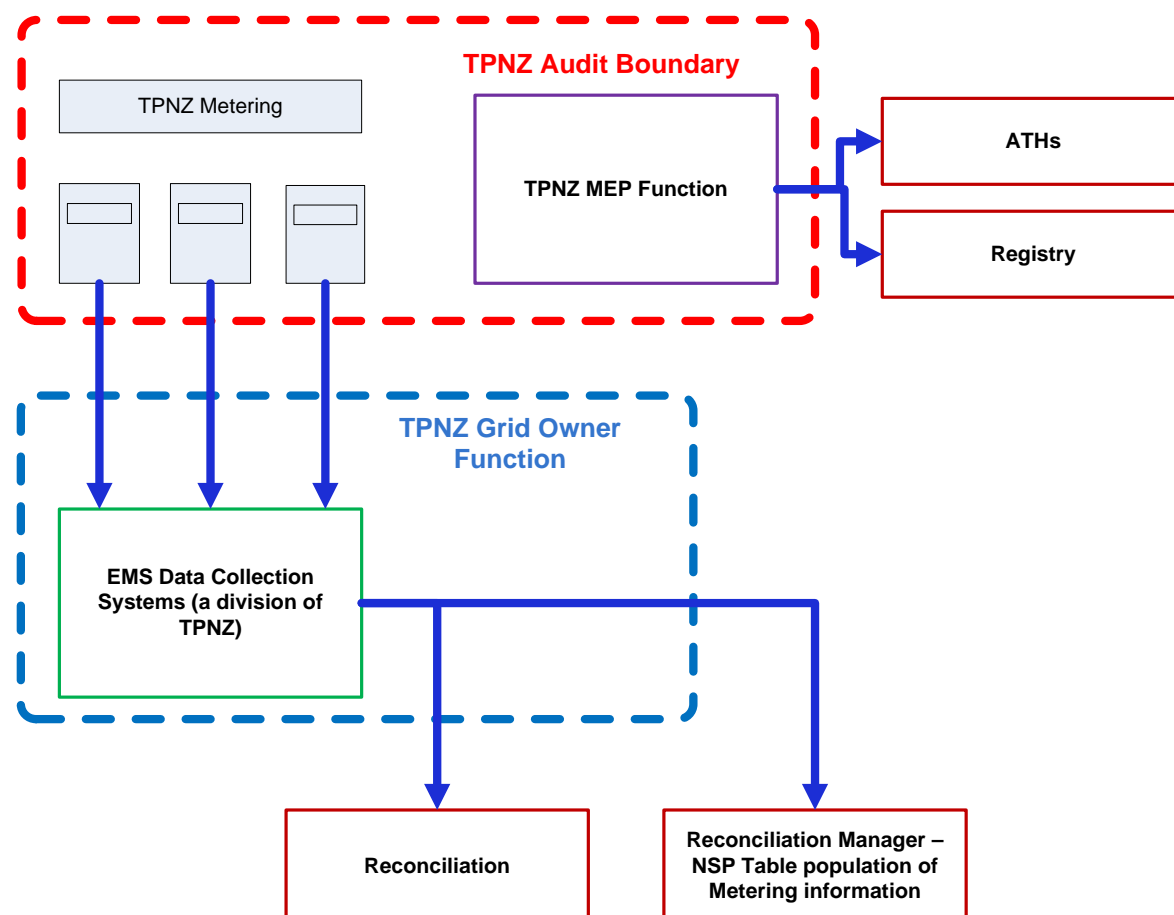
A letter of authorisation was not required.

1.9. Scope of Audit

Transpower is an MEP and is required to undergo an audit by 10 March 2019, in accordance with clause 1(1) of schedule 10.5.

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.



1.10. Summary of previous audit

The previous audit was conducted in February 2017 by Steve Woods of Veritek Limited. No issues were identified.

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	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 the certification records for nine metering installations to ensure the services access interface was correctly recorded.

Audit commentary

The services access interface is now recorded in the metering installation certification report by ATHs, with reference to the design report, which states the location.

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

Transpower 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 NSP mapping table and the registry to ensure the correct MEP code was used.

Audit commentary

Transpower uses the TPNZ code for all MEP functions.

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

Most data communication is via "Transmission Control Protocol, Internet Protocol" (TCP/IP) or secure "Virtual Private Network" (VPN) arrangements. These arrangements were designed in conjunction with a telecommunications provider and compatibility has been addressed. Some standard modems are in use and these are compliant with the relevant standards.

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 main information that is provided is certification dates, which are then passed on to the reconciliation manager and registry. I checked the accuracy of these dates for 22 metering installations.

Audit commentary

Certification expiry dates were correct for all 22 installations.

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 whether any MEP switches had occurred.

Audit commentary

Transpower has not become the MEP for any existing points of connection.

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 whether any MEP switches had occurred.

Audit commentary

Most Transpower metering is not on the registry; therefore, this clause will seldom apply. Transpower is the MEP for metering at three ICPs but switching has not occurred for any of these.

Audit outcome

Not applicable

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 whether any requests had been received.

Audit commentary

There have not been any requests under this clause.

Audit outcome

Not applicable

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

Transpower has ceased to be responsible for some metering installations. A check was conducted to ensure records were still available.

Audit commentary

The records are still available.

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 the design reports for 17 points of connection, including four new or modified ones and including all three ICPs.

Audit commentary

Design reports are prepared by ATHs or consultants for Transpower. The reports include all of the requirements noted above.

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 which ATH(s) had been used during the audit period, in order to check the Authority's website for scope of approval.

Audit commentary

Transpower uses Electrix and Broadsppectrum as ATHs and they each have a current and appropriate 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 design reports for 17 metering installations to confirm compliance.

Audit commentary

Transpower has a handover process from ATHs and this process involves a check of metering accuracy and design compliance.

With regard to the design of the installation (including data storage device and interrogation system), Transpower 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. Data is recorded to three decimal places.

Transpower ensures the metering installation complies with the design report and the requirements of Part 10 by requiring the ATH to confirm the installations match the design, or by requiring updates to be provided if the installation does not match the design.

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

Transpower is responsible for metering installations at three ICPs. I checked whether subtraction was used.

Audit commentary

Transpower does not use subtraction for any metering installations at ICPs.

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

Transpower is responsible for metering installations at three ICPs. I checked whether they were HHR.

Audit commentary

All metering installations are HHR as required by this clause.

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 the NSP table to confirm whether Transpower was the MEP for any NSP metering.

Audit commentary

Transpower is not the MEP for any NSP metering not connected to the grid, or interconnection point metering.

Audit outcome

Not applicable

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 the NSP table for any grid metering where Transpower is the MEP and checked the certification records to ensure HHR metering was present.

Audit commentary

Transpower is the MEP for grid metering and these installations are HHR.

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 checked the certification records for 17 installations to confirm the accommodation was recorded as appropriate.

Audit commentary

Transpower's metering installations are all installed in appropriate accommodation.

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 installation's:

- *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

Transpower is the MEP for three non-grid connected ICPs. There have not been any design changes during the audit period.

Audit commentary

Transpower has metering installations at ICPs but these have not been modified during the audit period. Although these metering installations have ICPs, they could still be considered points of connection to the grid and therefore this clause would not apply.

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

Transpower has responsibility for metering installations at three ICPs. Some changes were made to registry records as a result of recertification. I checked all updates.

Audit commentary

All initial updates occurred within 10 business days; however, there were late corrections for two ICPs.

ICP 0716190003NSC49 was updated in November backdated to July and ICP 1000541815PC0C6 was updated on 19/11/18 backdated to 10/10/18.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jul-18 To: 23-Feb-19	Late updates for two ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
When the registry errors were identified they were corrected.		5/3/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Transpower will keep a validated copy of the registry data for its 3 ICP and compare the monthly download against this copy		29/3/2019	

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

The design reports confirm that each metering component is compatible and will integrate with the data collection system.

Audit commentary

The design reports confirm that each metering component is compatible and will integrate with the data collection system.

Audit outcome

Compliant

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

Code reference

Clause 11.18B(3)

Code related audit information

If an ICP is to be decommissioned, the MEP who is responsible for each metering installation for the ICP must:

- *advise the trader no later than 3 business days prior to decommissioning that the trader must, as part of the decommissioning, carry out a final interrogation; or*
- *if the MEP is responsible for the interrogation of the metering installation, arrange for a final interrogation to take place.*

Audit observation

No ICPs have been decommissioned during the audit period.

Audit commentary

No ICPs have been decommissioned during the audit period.

Audit outcome

Not applicable

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

This matter was discussed to identify any situations where burden changes could occur without re-certification.

Audit commentary

Current transformers only have metering equipment connected. Some voltage transformers have other equipment connected and this equipment is included in the certification process, including the sealing information. No changes have occurred in accordance with this clause during the audit period.

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 asked Transpower whether any relevant changes had occurred during the audit period.

Audit commentary

No changes have occurred during the audit period. Any changes would be conducted by ATHs in their laboratory in accordance with these clauses.

Audit outcome

Compliant

4.15. Temporary Energization (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 asked Transpower whether temporary energisation had occurred for any metering installations.

Audit commentary

Temporary energisation has not occurred for any metering installations during the audit period.

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 the certification records for 17 metering installations and the inspection reports for 15 metering installations to confirm compliance.

Audit commentary

The inspection reports to the two metering installations at Central Park were not able to be provided. All other information was available. Transpower relies on the ATHs to manage inspection records. I recommend Transpower holds these records in the same way they hold certification records.

Recommendation	Description	Audited party comment	Remedial action
Regarding Clause (1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4	Obtain and store inspection records in the same way that certification records are held.	Transpower agrees. Up until now Transpower has been able to relay on the ATH to hold copies of some records. Transpower will now hold its own copy of inspection records.	Identified

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.1 With: Clause (1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4 From: 01-Jan-18 To: 08-Mar-19	Inspection reports not available for two metering installations at Central Park Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
On becoming aware of the missing inspection reports Transpower has requested that the ATH revisit the site and complete an inspection and recertify the site.		15/3/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Transpower will hold its own copy of inspection reports and cross check against work schedules.		29/3/2019	

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 Transpower whether any requests had been made for copies of inspection reports.

Audit commentary

Transpower 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 some metering records from 2013 to confirm compliance.

Audit commentary

Transpower keeps records indefinitely and the availability of the 2013 records confirms compliance.

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

Transpower has provided information to ATH's in the past and this may occur in future. There are no current examples to examine.

Audit commentary

Transpower has provided information to ATH's in the past and this may occur in future. There are no current examples to examine.

Audit outcome

Compliant

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

Transpower has not become the gaining MEP for any metering installations.

Audit commentary

Transpower has not become the gaining MEP for any metering installations.

Audit outcome

Not applicable

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 traders system.

Audit observation

I checked the registry records for all three ICPs Transpower is responsible for.

Audit commentary

A small number of errors were found.

ICP 0000668502UN559 has an incorrect certification date, 17/10/18 instead of 12/10/18 and all settlement indicators are "N".

ICP 0716190003NSC49 has all settlement indicators set to "N".

ICP 1000541815PCOC6 has an incorrect certification date, 17/10/18 instead of 10/10/18.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Jul-18 To: 23-Feb-19	Some registry errors for all three ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
When the registry errors were identified they were corrected.		5/3/2019	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Transpower will keep a validated copy of the registry data for its 3 ICP and compare the monthly download against this copy		29/3/2019	

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

Transpower does not have an independent source of registry fields.

Audit commentary

Transpower's metering data is held at a high level and validation does not occur for every metering field. This does not achieve compliance with the requirement to compare registry records against Transpower's own records.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Jan-17 To: 23-Feb-19	Registry records not compared to Transpower's records for every field. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	Transpower does not have a process to compare the registry records against their own records for every field. The impact on settlement and participants is minor so I have recorded the audit risk rating as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Transpower will keep a validated copy of the registry data for its 3 ICP		10/3/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Transpower revise its monthly process to compare all fields in the monthly download against the validated copy		22/3/2019	

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*
- d) 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*
 - e) 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*
 - f) 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*
 - g) 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)*
 - h) 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)*
 - i) 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 point "e)" by reviewing 15 inspection reports. I checked the remaining points through interview to determine whether any of the points above had occurred. I also checked a sample of 17 certification records.

Audit commentary

The inspection reports for two metering installations at Central Park could not be located. This is recorded as non-compliance in Section 5.1. The inspection for Berwick appears to have been conducted outside the inspection window. The installation was certified on 16/03/17 when the VT was calibrated, but it seems an earlier certification date of 29/06/16 was used to calculate the inspection period. The inspection was conducted on 06/12/17 which would have been compliant if the certification date was 29/06/16. Transpower is still compliant with this clause because they have 10 business days to cancel the certification. Non-compliance is recorded in Section 8.2.

No other examples of certification cancellation were found.

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 Transpower 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 Transpower 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 checked the NSP table, Transpower's certification schedule and the records for 17 metering installations.

Audit commentary

The NSP table and the registry record that all installations have current certification.

Transpower has a schedule showing the next due date for certification and inspection work. This schedule appears to be working as intended, however I recommend this is changed to show the installation certification date, installation expiry date, next inspection due date (including the start and end dates of the two-month window) and inspection completed date. This will provide better compliance visibility.

Recommendation	Description	Audited party comment	Remedial action
Regarding Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7	Change certification schedule to show the installation certification date, installation expiry date, next inspection due date (including the start and end dates of the two-month window) and inspection completed date.	Transpower will review its record keeping and find an appropriate way to record the date of the most recent certification along with the existing expiry dates. This will make it easier to validate the inspection window.	Identified

Audit outcome

Compliant

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 17 metering installations to confirm compliance.

Audit commentary

I confirm the appropriate tests are conducted and the results are recorded.

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

I checked the certification records for 17 metering installations to confirm compliance.

Audit commentary

Certification records confirmed compliance 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 and these meters are certified as normal in accordance with Table 1.

Audit commentary

This clause relates to Transpower as an MEP and these meters are certified as normal in accordance with Table 1.

Audit outcome

Compliant

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 checked the certification records for 17 metering installations and conducted a walk-through of the process.

Audit commentary

Current transformers only have metering equipment connected. Some voltage transformers have other equipment connected and this equipment is included in the certification process, including the sealing information.

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

Transpower has not approved the certification of any metering installations as a lower category.

Audit commentary

Transpower has not approved the certification of any metering installations as a lower category.

Audit outcome

Not applicable

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 whether certification had occurred under this clause.

Audit commentary

Certification occurred under this clause for Aviemore G3. The period was only 14 days and did not span a month, therefore monitoring was not required.

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 1 business day:*
- *the MEP must follow the procedure for handling faulty metering installations (clause 10.43 - 10.48).*

Audit observation

I examined all available examples.

Audit commentary

Transpower provided a schedule showing all installations certified under this clause. The demand is measured, and the results are provided to the ATHs to enable them to conduct testing when appropriate. There were no examples where the load had reached the threshold and certification had not been conducted.

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 5 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 whether alternative certification has been applied.

Audit commentary

Alternative certification has been applied to the metering installation at Otahuhu due to the presence of asbestos. The documentation, including notification, is compliant.

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

Transpower does not have any metering installations with time clocks.

Audit commentary

Transpower does not have any metering installations with time clocks.

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

Transpower does not have any control devices.

Audit commentary

Transpower 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 3 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

Transpower does not have any control devices.

Audit commentary

Transpower 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

Transpower does not have any category 1 metering installations.

Audit commentary

Transpower does not have any category 1 metering installations.

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

Transpower does not have any metering installations with external compensation factors.

Audit commentary

Transpower does not have any metering installations with external compensation factors.

Audit outcome

Not applicable

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 records for 17 metering installations to confirm compliance.

Audit commentary

Meters were certified in all cases.

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 records for 17 metering installations to confirm compliance.

Audit commentary

Measuring transformers were certified in all cases.

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 records for 17 metering installations to confirm compliance.

Audit commentary

Data storage devices were certified in all cases.

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 approval for Broadspectrum and Electrix.

Audit commentary

Both are approved.

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

Transpower does not have any category 1 metering installations.

Audit commentary

Transpower does not have any category 1 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 2 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

Transpower does not have any category 1 metering installations.

Audit commentary

Transpower does not have any category 1 metering installations.

Audit outcome

Not applicable

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 records for 15 metering installations.

Audit commentary

The inspection reports for two metering installations at Central Park could not be located. This is recorded as non-compliance in Section 5.1. The inspection for Berwick appears to have been conducted outside the inspection window. The installation was certified on 16/03/17 when the VT was calibrated, but it seems an earlier certification date of 29/06/16 was used to calculate the inspection period. The inspection was conducted on 06/12/17 which would have been compliant if the certification date was 29/06/16.

All other inspections were conducted within the two-month window.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 16-Aug-18 To: 08-Mar-19	Inspection conducted early for Berwick 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 they mitigate risk to an acceptable level. The impact is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status

On becoming aware of the issue with the inspection date Transpower has requested that the ATH revisit the site and complete an inspection and recertify the site.	TBC	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Transpower will review its record keeping and find an appropriate way to record the date of the most recent certification along with the existing expiry dates. This will make it easier to validate the inspection window.	29/3/2019	

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 process for confirming the accuracy of records.

Audit commentary

Inspections are conducted with the previous certification records as the “base data”. If any changes are required (a very rare event) they are made at the time of the inspection. Compliance is confirmed.

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) *3 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 the process for the management of seals.

Audit commentary

Transpower has a process in place for the management of seals and any subsequent investigation and reporting. Broadspectrum maintains a database of seal information. There were no examples of missing or broken seals during the audit period.

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

Three metering installations were identified as faulty during the audit period. I examined the records and timeframes in relation to all three.

Audit commentary

There were faults with the VT changeover relays at three installations at Maungatapere, Penrose and Te Awamutu. SCADA data from separate measuring transformers was used to create estimates. These issues were identified by Transpower and through their validation process, and remedial action was taken immediately. Statements of situation were prepared, and all parties were notified within the 5-day threshold.

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 5 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

Three metering installations were identified as faulty during the audit period. I examined the records and timeframes in relation to all three.

Audit commentary

There were faults with the VT changeover relays at three installations at Maungatapere, Penrose and Te Awamutu. SCADA data from separate measuring transformers was used to create estimates. These issues were identified by Transpower and through their validation process, and remedial action was taken immediately. Statements of situation were prepared, and all parties were notified within the 5-day threshold.

Audit outcome

Compliant

9.3. Statement of Situation (Clause10.46(2))

Code reference

Clause10.46(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

Three metering installations were identified as faulty during the audit period. I examined the records and timeframes in relation to all three.

Audit commentary

There were faults with the VT changeover relays at three installations at Maungatapere, Penrose and Te Awamutu. SCADA data from separate measuring transformers was used to create estimates. These issues were identified by Transpower and through their validation process, and remedial action was taken immediately. Statements of situation were prepared, and all parties were notified within the 5-day threshold.

Audit outcome

Compliant

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

Transpower as an MEP does not control access to raw meter data. Transpower as a participant will consider requests for access to data or components.

Audit commentary

Transpower as an MEP does not control access to raw meter data. Transpower as a participant will consider requests for access to data or components.

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

Transpower as an MEP does not control access to raw meter data. Transpower as a participant will consider requests for access to data or components.

Audit commentary

Transpower as an MEP does not control access to raw meter data. Transpower as a participant will consider requests for access to data or components.

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

Transpower can facilitate physical access as required. No requests have been made.

Audit commentary

Transpower can facilitate physical access as required. No requests have been made.

Audit outcome

Compliant

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

Transpower can facilitate physical access as required. No requests have been made.

Audit commentary

Transpower can facilitate physical access as required. No requests have been made.

Audit outcome

Compliant

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 ± 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

Transpower does not conduct electronic data collection as an MEP.

Audit commentary

Transpower 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

Transpower does not conduct electronic data collection as an MEP.

Audit commentary

Transpower 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

Transpower does not conduct electronic data collection as an MEP.

Audit commentary

Transpower 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

Transpower does not conduct electronic data collection as an MEP.

Audit commentary

Transpower 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

Transpower does not conduct electronic data collection as an MEP.

Audit commentary

Transpower 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

Three metering installations were identified as faulty during the audit period. I examined the records and timeframes in relation to all three.

Audit commentary

There were faults with the VT changeover relays at three installations at Maungatapere, Penrose and Te Awamutu. SCADA data from separate measuring transformers was used to create estimates. These issues were identified by Transpower and through their validation process, and remedial action was taken immediately. Statements of situation were prepared, and all parties were notified within the 5-day threshold.

Questions were not asked about raw meter data because it was retrieved.

Audit outcome

Compliant

CONCLUSION

Five non-compliances were identified during the audit and two recommendations are made. Three of the non-compliances relate to the management and data accuracy of the three ICPs Transpower has responsibility for. There were some minor errors and some late updates. The Code also requires MEPs to compare their records to the registry on a monthly basis. Transpower's registry validation process occurs at a high level and does not include all fields.

There were two issues related to inspections. The inspection reports were not available for Central Park and one inspection was not conducted within the two-month window.

I've made two recommendations to improve processes in relation to the points raised above. I recommend the compliance schedule has additional fields added and that inspection reports are obtained and stored by Transpower, reducing the reliance on ATHs.

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 contains a future risk rating score of 10, which results in an indicative audit frequency of 12 months. I have considered this recommendation along with Transpower's responses and I recommend a next audit frequency of 18 months.

PARTICIPANT RESPONSE

Transpower notes the issues and recommendations in this report and has initiated actions to resolve them.

