

ELECTRICITY INDUSTRY PARTICIPATION CODE  
RECONCILIATION PARTICIPANT AUDIT REPORT

For

NGAWHA GENERATION LIMITED (NGAG)  
(COMPANY #823831)

Prepared by: Ewa Glowacka of TEG & Associates

Date audit commenced: 31 March 2022

Date audit report completed: 8 April 2022

Audit report due date: 30-Apr-22

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## EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Ngawha Generation Limited (NGAG) to support their application for certification, in accordance with clause 2A of Schedule 15.1 of The Code 2010. The relevant clause audited is as required by the Guidelines for Reconciliation Participants Audits V 7.2 issued by the Electricity Authority.

NGAG is currently certified as a half hour reconciliation generation participant responsible for 2 embedded generators. The company has no plans to trade any ICPs in the future. This audit covers those 2 generation ICPs only.

Ngawha Generation Limited (NGAG) is an embedded generator for ICP 0000003490TE5AE. This is a 25MW geothermal plant, embedded in the Top Energy network, which has been in operation for many years with reconciliation completed by Trustpower. In November 2020 NGAG commissioned a new 31.5MW embedded geothermal plant (0000010061TEFFC) which provides generation of 56.5MW.

EMS is contracted to fulfil all relevant requirements set out in clause 15.38 of the Code, in accordance with the Code requirements. AMS remotely reads two meters and passes the data to EMS to calculate and submit volumes to the reconciliation manager

NGAG provided a copy of the Data Service Agreement with EMS, which we reviewed. To assess NGAG compliance we reviewed the EMS audit report dated 14/06/2021 and AMS audit report dated 4/06/2021 and relevant registry files.

The audit period was 01/10/2020 to 28/02/2022.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 1 which results in an indicative audit frequency of 24 months as per clause 7 of Schedule 15.2 of the Code.

We thank Ngawha Generation Limited for their full and complete cooperation in this audit.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Provision of information	2.2	15.2	Incorrect information provided for March 2021 R3	Strong	Low	1	Cleared
HHR aggregates information provision to the reconciliation manager	11.4	15.8	HHRAGGR files do not contain electricity supplied information	Strong	Low	1	Not required. The Code change required a line up with RN file specification. Breach risk rating excluded from total
Future Risk Rating						1	

Future risk rating	0-1	2-3	4-15	16-40	41-55	56+
Indicative audit frequency	36 months	24 months	18 months	12months	6 months	3 months

### RECOMMENDATIONS

Subject	Section	Description	Recommendation
			Nil

### ISSUES

Subject	Section	Description	Issue
			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.

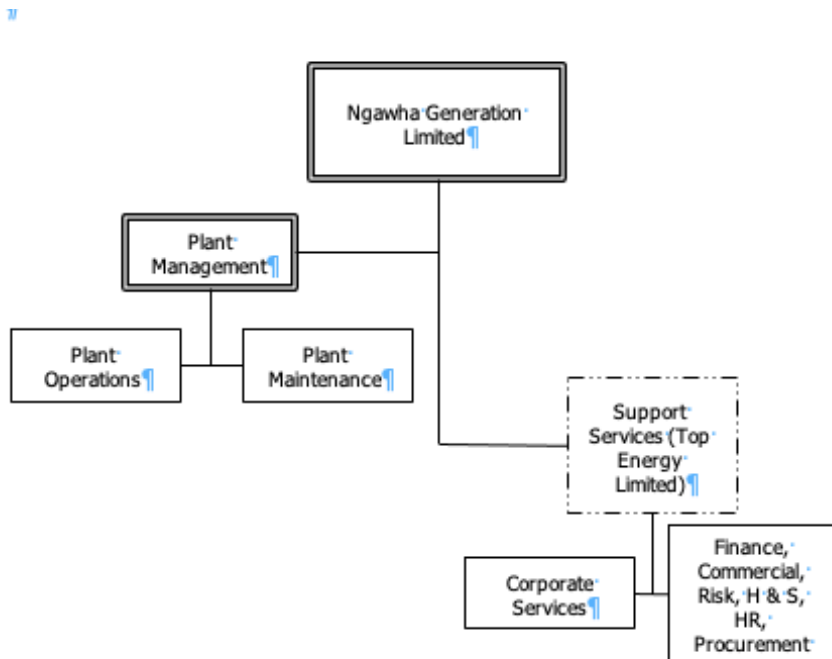
#### Audit observation

NGAG does not have any exemptions granted to exempt them from compliance with all or any of the clauses.

#### Audit commentary

NGAG did not apply for any exemptions. We checked the Electricity Authority website and confirmed that there are no exemptions in place.

### 1.2. Structure of Organisation



### 1.3. Persons involved in this audit

Name	Title	Company
Simon Bocock	Commercial and Pricing Manager	Top Energy Group
Sunny Feng	Data Analyst	EMS
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates Ltd

### 1.4. Use of Agents (Clause 15.34)



## Code reference

Clause 15.34

## Code related audit information

A reconciliation participant who uses an agent

- remains responsible for the contractor's fulfilment of the participant's Code obligations
- cannot assert that it is not responsible or liable for the obligation due to something the agent has or has not done

## Audit observation

EMS is contracted to fulfil all relevant requirements set out in clause 15.38 of the Code.

## Audit commentary

A copy of the most recent EMS audit dated 14/06/2021 was used to determine compliance. Additionally we requested from EMS a copy of raw metering data and compared with files submitted to the reconciliation manager.

## 1.5. Hardware and Software

The EMS agent report dated 14/06/21 describes in detail hardware and software that assist with, or are used in, the audited processes.

NGAG uses a set of spreadsheets to compare reconciled volumes with their records.

## 1.6. Breaches or Breach Allegations

On 24 June 2021, the reconciliation manager reported to EA that Ngawha Generation Limited (Ngawha) had breached clause 15.2(1) of the Electricity Industry Participation Code 2010 (Code). File reference 2106NGAG1.

*The reconciliation manager alleges that on 18 June 2021 Ngawha failed to deliver accurate information in their AV-090 (HHR submission file) for March 2021 R3 washup. The reconciliation manager alleged Ngawha changed the loss code on which the volume of NSP KOE1101-TOPE was submitted, but did not zero out this volume under previous revisions on the incorrect loss code.*

On 23 August 2021, the Electricity Authority considered the breach of clause 15.2(1) of the Electricity Industry Participation Code 2010 by Ngawha Generation Limited on 18 June 2021. The Authority decided to take no further action on the breach under regulation 11(1)(c) of the Electricity Industry (Enforcement) Regulations 2010.

The reasons for the Authority's decision were:

- there was no market impact
- Ngawha has taken steps to prevent recurrence.

## 1.7. ICP Data

Metering Category	(01/02/2022)	(09/2020)	(date)
1	0	0	
2	0	0	

3	0	0	
4	0	0	
5	2	1	
9	0	0	

Status	Number of ICPs (01/02/2022)	Number of ICPs (09/2020)	Number of ICPs (date)
Active (2,0)	2	1	
Inactive – new connection in progress (1,12)	0	1	
Inactive – electrically disconnected vacant property (1,4)	0	0	
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	
Inactive – electrically disconnected at pole fuse (1,8)	0	0	
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	
Inactive – electrically disconnected at meter box switch (1,11)	0	0	
Inactive – electrically disconnected ready for decommissioning (1,6)	0	0	
Inactive – reconciled elsewhere (1,5)	0	0	
Decommissioned (3)	0	0	

### 1.8. Authorisation Received

An authorisation letter was received.

### 1.9. Scope of Audit

This reconciliation participant audit was performed at the request of NGAG to support their application for certification. The audit was conducted on 31 March 2022 over video call.

The table below shows the tasks under clause 15.38 of part 15 for which certification is required.

<b>Tasks Requiring Certification Under Clause 15.38(1) of Part 15</b>	<b>Relevant to audit</b>	<b>Agents Involved in Performance of Tasks</b>
(a) - Maintaining registry information and performing customer and embedded generator switching	✓	EMS
(b) – Gathering and storing raw meter data	✓	EMS
(c)(i) - Creation and management of HHR volume information	✓	EMS
(d)(i) – Calculation and delivery of ICP days under clause 15.6	✓	EMS
(d)(ii) - delivery of electricity supplied information under clause 15.7	✓	EMS
(d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	EMS
(e) – Provision of submission information for reconciliation	✓	EMS

#### 1.10. Summary of previous audit

The previous audit was conducted by Ewa Glowacka of TEG & Associates in October 2020. No non-compliances were identified.

## 2. OPERATIONAL INFRASTRUCTURE

### 2.1. Relevant information (Clause 10.6, 11.2, 15.2)

#### Code reference

Clause 10.6, 11.2, 15.2

#### Code related audit information

*A participant must take all practicable steps to ensure that information that the participant is required to provide is:*

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

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

#### Audit observation

The LIS file and submission files were reviewed. The process to find and correct incorrect information was examined.

#### Audit commentary

The company has taken all practicable steps to ensure that information provided to others is complete and accurate.

Submission volumes provided to the RM are correct, volumes for import and export are accounted for, which is most important from the market point of view.

EMS provides a copy of submission files to NGAG before they are uploaded to the RM portal. The NGAG generation team compare the volumes information with metering information recorded by check meters. If the validation process reveals any incomplete, inaccurate, or misleading information a correction will be processed.

There were no examples of metering data corrections during the audit period. As described in **section 2.2**, EMS, on behalf of NGAG, had to resubmit AV-090 (HHR submission file) for March 2021 R3 washup.

#### Audit outcome

Compliant

### 2.2. Provision of information (Clause 15.35)

#### Code reference

Clause 15.35

#### Code related audit information

*If an obligation exists to provide information in accordance with Part 15, a participant must deliver that information to the required person within the timeframe specified in the Code, or, in the absence of any such timeframe, within any timeframe notified by the Authority. Such information must be delivered in the format determined from time to time by the Authority.*

#### Audit observation

EMS submits volume information for generation to the reconciliation manager.

### Audit commentary

NGAG provided July'20 and January 2022 data to the reconciliation manager on behalf of NGAG. The data was provided in the format determined by the Authority in the timeframe specified by the Code.

In **section 1.6**, we noted that the reconciliation manager reported to EA that Ngawha Generation Limited (Ngawha) had breached clause 15.2(1) of the Electricity Industry Participation Code 2010 (Code). File reference 2106NGAG1.

*The reconciliation manager alleges that on 18 June 2021 Ngawha failed to deliver accurate information in their AV-090 (HHR submission file) for March 2021 R3 washup. The reconciliation manager alleged Ngawha changed the loss code on which the volume of NSP KOE1101-TOPE was submitted, but did not zero out this volume under previous revisions on the incorrect loss code.*

On 23 August 2021, the Electricity Authority considered the breach of clause 15.2(1) of the Electricity Industry Participation Code 2010 by Ngawha Generation Limited on 18 June 2021. The Authority decided to take no further action on the breach under regulation 11(1)(c) of the Electricity Industry (Enforcement) Regulations 2010.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.2 With: 15.2(1)  From: 18-Jun-21 To: 18-Jun-21	Incorrect information provided for March 2021 R3, which was corrected on the day of notification  Potential impact: Medium  Actual impact: None  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as strong. NGAG use the approved agent EMS to meet its reconciliation obligations under the Code. It was a human error. The actual impact of the inaccurate information was nil. This was due to the error being fixed on the day of notification from the Reconciliation Manager which enabled the RM to publish R3 revisions results on time for that month. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
When the issue was raised by Reconciliation Manager EMS were immediately contacted by Ngawha and the issue resolved that day. This enabled the RM to publish R3 revisions results on time for that month so there was no impact.		18 June 2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Required EMS to complete an incident report including root cause and corrective action to be taken by EMS to ensure it does not occur again.	30 June 2021	
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### 2.3. Data transmission (Clause 20 Schedule 15.2)

#### Code reference

Clause 20 Schedule 15.2

#### Code related audit information

*Transmissions and transfers of data related to metering information between reconciliation participants or their agents, for the purposes of the Code, must be carried out electronically using systems that ensure the security and integrity of the data transmitted and received.*

#### Audit observation

EMS acts as the agent for NGAG with the transmission of data to the reconciliation manager being carried out electronically using the RM portal.

#### Audit commentary

Before any data is submitted to the reconciliation manager it is first provided by SFTP link to NGAG for approval.

The EMS audit report was reviewed, and compliance was confirmed with the above clause.

#### Audit outcome

Compliant

### 2.4. Audit trails (Clause 21 Schedule 15.2)

#### Code reference

Clause 21 Schedule 15.2

#### Code related audit information

*Each reconciliation participant must ensure that a complete audit trail exists for all data gathering, validation, and processing functions of the reconciliation participant.*

*The audit trail must include details of information:*

- *provided to and received from the registry manager*
- *provided to and received from the reconciliation manager*
- *provided and received from other reconciliation participants and their agents.*

*The audit trail must cover all archived data in accordance with clause 18.*

*The logs of communications and processing activities must form part of the audit trail, including if automated processes are in operation.*

*Logs must be printed and filed as hard copy or maintained as data files in a secure form, along with other archived information.*

*The logs must include (at a minimum) the following:*

- *an activity identifier (clause 21(4)(a))*

- *the date and time of the activity (clause 21(4)(b))*
- *the operator identifier for the person who performed the activity (clause 21(4)(c)).*

#### **Audit observation**

EMS act as the agent on behalf of NGAG. We reviewed the EMS audit report.

#### **Audit commentary**

The EMS audit confirmed that a complete audit trail was viewed for all data gathering, validation and processing functions. The log of these activities include the activity identifier, date and time and operator identifier. During the audit, trails for a small sample were reviewed where estimation or corrections had occurred. The samples reviewed, during the EMS audit, were related to other EMS clients. EMS did not conduct any corrections and estimation for NGAG.

#### **Audit outcome**

Compliant

### **2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)**

#### **Code reference**

*Clause 10.4*

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

*If a participant must obtain a consumer's consent, approval, or authorisation, the participant must ensure it:*

- *extends to the full term of the arrangement*
- *covers any participants who may need to rely on that consent.*

#### **Audit observation**

NGAG does not have any customers. The company is responsible for generation ICPs only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))**

#### **Code reference**

*Clause 10.7(2),(4),(5) and (6)*

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

*The responsible reconciliation participant must, if requested, arrange access for the metering installation to the following parties:*

- *the Authority*
- *an ATH*
- *an auditor*
- *an MEP*
- *a gaining metering equipment provider.*

*The trader must use its best endeavours to provide access:*

- *in accordance with any agreements in place*
- *in a manner and timeframe which is appropriate in the circumstances.*

*If the trader has a consumer, the trader must obtain authorisation from the customer for access to the metering installation, otherwise it must arrange access to the metering installation.*

*The reconciliation participant must provide any necessary facilities, codes, keys or other means to enable the party to obtain access to the metering installation by the most practicable means.*

#### **Audit observation**

NGAG has not received a request for access to metering installations under this clause during this audit period.

#### **Audit commentary**

NGAG advises it would use its best endeavours to provide physical access to a metering installation to subject to health and safety requirements.

#### **Audit outcome**

Compliant

## **2.7. Physical location of metering installations (Clause 10.35(1)&(2))**

#### **Code reference**

*Clause 10.35(1)&(2)*

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

*A reconciliation participant responsible for ensuring there is a category 1 metering installation or category 2 metering installation must ensure that the metering installation is located as physically close to a point of connection as practical in the circumstances.*

*A reconciliation participant responsible for ensuring there is a category 3 or higher metering installation must:*

- a) if practical in the circumstances, ensure that the metering installation is located at a point of connection; or*
- b) if it is not practical in the circumstances to locate the metering installation at the point of connection, calculate the quantity of electricity conveyed through the point of connection using a loss compensation process approved by the certifying ATH.*

#### **Audit observation**

All metering is located at the point of connection within substations.

#### **Audit commentary**

AMS reads these meters and passes the data to EMS. EMS is not required to apply any loss compensation factors, as per their audit report.

#### **Audit outcome**

Compliant

## **2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)**

#### **Code reference**



## Clause 11.15B

### Code related audit information

A trader must at all times ensure that the terms of each contract between a customer and a trader permit:

- the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and
- the terms of the assigned contract to be amended on such an assignment to—
- the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or
- such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and
- the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and
- the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and
- the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).

The terms specified in subclause (1) must be expressed to be for the benefit of the Authority for the purposes of the Contracts (Privacy) Act 1982, and not be able to be amended without the consent of the Authority (clause 11.15B(2)).

### Audit observation

NGAG does not have any customers. The company is responsible for generation ICPs only.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 2.9. Connection of an ICP (Clause 10.32)

### Code reference

Clause 10.32

### Code related audit information

A reconciliation participant must only request the connection of a point of connection if they:

- accept responsibility for their obligations in Parts 10, 11 and 15 for the point of connection; and
- have an arrangement with an MEP to provide 1 or more metering installations for the point of connection.

### Audit observation

NGAG does not have any customers and is responsible for 2 generation ICPs only.

### Audit commentary

NGAG are aware of their obligations under this clause and will connect any future generation according to industry and Code requirements.

#### **Audit outcome**

Compliant

### **2.10. Temporary Electrical Connection of an ICP (Clause 10.33)**

#### **Code reference**

*Clause 10.33(1)*

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

*A trader may temporarily electrically connect a point of connection, or authorise a MEP to temporarily electrically connect a point of connection, only if:*

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
  - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*
  - o *if the ICP has metered load, 1 or more certified metering installations are in place*
  - o *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG are aware of their obligations under this clause and will connect any future generation according to industry and Code requirements.

#### **Audit outcome**

Compliant

### **2.11. Electrical Connection of Point of Connection (Clause 10.33A)**

#### **Code reference**

*Clause 10.33A(1)*

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

*A reconciliation participant may electrically connect or authorise the electrical connection of a point of connection only if:*

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
  - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*

- *if the ICP has metered load, 1 or more certified metering installations are in place*
- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the electrical connection.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG are aware of their obligations under this clause and will connect any future generation according to industry and Code requirements.

#### **Audit outcome**

Compliant

### 2.12. Arrangements for line function services (Clause 11.16)

#### **Code reference**

*Clause 11.16*

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

*Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must ensure that it, or its customer, has made any necessary arrangements for the provision of line function services in relation to the relevant ICP*

*Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must have entered into an arrangement with an MEP for each metering installation at the ICP.*

#### **Audit observation**

NGAG is an embedded generator which is part of the Top Energy Group. We sighted the Use of System Agreement between Distribution Generation Ngawha and Top Energy.

#### **Audit commentary**

Compliance confirmed by the sighting of the relevant document.

#### **Audit outcome**

Compliant

### 2.13. Arrangements for metering equipment provision (Clause 10.36)

#### **Code reference**

*Clause 10.36*

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

*A reconciliation participant must ensure it has an arrangement with the relevant MEP prior to accepting responsibility for an installation.*

#### **Audit observation**

The LIS file dated 01/02/2022 was examined.

#### **Audit commentary**

NGAG are responsible for 2 generation ICPs only.

Checks confirm AccuCal and AMCI are the MEPs for both generation metering installations. An appropriate arrangement is in place.

#### **Audit outcome**

Compliant

### **2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5))**

#### **Code reference**

*Clause 10.33B*

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

*If a trader connects an ICP it is in the process of switching and the switch does not proceed or is withdrawn the trader must:*

- *restore the disconnection, including removing any bypass and disconnecting using the same method the losing trader used*
- *reimburse the losing trader for any direct costs incurred*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **2.15. Electrical disconnection of ICPs (Clause 10.33B)**

#### **Code reference**

*Clause 10.33B*

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

*Unless the trader is recorded in the registry or is meeting its obligation under 10.33A(5) it must not disconnect or electrically disconnect the ICP, or authorise the metering equipment provider to disconnect or electrically disconnect the ICP.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7)**

#### **Code reference**

*Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7*

### Code related audit information

A trader can remove or break a seal without authorisation from the MEP to:

- reset a load control switch, bridge or unbridged a load control switch – if the load control switch does not control a time block meter channel
- electrically connect load or generation, of the load or generation has been disconnected at the meter
- electrically disconnect load or generation, if the trader has exhausted all other appropriate methods of electrical disconnection
- bridge the meter

A trader that removes or breaks a seal in this way must:

- ensure personnel are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code
- replace the seal with its own seal
- have a process for tracing the new seal to the personnel
- update the registry (if the profile code has changed)
- notify the metering equipment provider

### Audit observation

This was discussed with NGAG Staff. NGAG is responsible for 2 generation ICPs only.

### Audit commentary

NGAG Staff stated that during the audit period no seals were broken relating to this Code requirement.

### Audit outcome

Compliant

## 2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2)

### Code reference

Clause 10.33C and 2A of Schedule 15.2

### Code related audit information

A trader, or a distributor or MEP which has been authorised by the trader, may only electrically connect an ICP in a way that bypasses a meter that is in place (“bridging”) if, despite best endeavours:

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

If the trader bridges a meter, the trader must:

- determine the quantity of electricity conveyed through the ICP for the period of time the meter was bridged
- submit that estimated quantity of electricity to the reconciliation manager
- within 1 business day of being advised that the meter is bridged, notify the MEP that they are required to reinstate the meter so that all electricity flows through a certified metering installation.

The trader must determine meter readings as follows:

- *by substituting data from an installed check meter or data storage device*
- *if a check meter or data storage device is not installed, by using half hour data from another period where the trader considers the pattern of consumption is materially similar to the period during which the meter was bridged*
- *if half hour data is not available, a non half hour estimated reading that the trader considers is the best estimate during the bridging period must be used.*

#### **Audit observation**

This was discussed with NGAG Staff. NGAG is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG Staff stated that during the audit period no “bridging” took place relating to this Code requirement.

#### **Audit outcome**

Compliant

### 2.18. Use of ICP identifiers on invoices (Clause 11.30)

#### **Code reference**

*Clause 11.30*

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

*Each trader must ensure the relevant ICP identifier is printed on every invoice or document relating to the sale of electricity.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

*Clause 11.30A*

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

*A retailer must provide clear and prominent information about Utilities Disputes:*

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

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

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

### **Audit outcome**

Not applicable

## **2.20. Provision of information on electricity plan comparison site (Clause 11.30B)**

### **Code reference**

*Clause 11.30B*

### **Code related audit information**

*A retailer that trades at an ICP recorded on the registry must provide clear and prominent information about Powerswitch:*

- *on their website*
- *in outbound communications to residential consumers about price and service changes*
- *to residential consumers on an annual basis*
- *in directed outbound communications about the consumer's bill.*

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

### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only.

### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

### **Audit outcome**

Not applicable

### 3. MAINTAINING REGISTRY INFORMATION

#### 3.1. Obtaining ICP identifiers (Clause 11.3)

##### Code reference

*Clause 11.3*

##### Code related audit information

*The following participants must, before assuming responsibility for certain points of connection on a local network or embedded network, obtain an ICP identifier for the point of connection:*

- a) a trader who has agreed to purchase electricity from an embedded generator or sell electricity to a consumer*
- b) an embedded generator who sells electricity directly to the clearing manager*
- c) a direct purchaser connected to a local network or an embedded network*
- d) an embedded network owner in relation to a point of connection on an embedded network that is settled by differencing*
- e) a network owner in relation to a shared unmeasured load point of connection to the network owner's network*
- f) a network owner in relation to a point of connection between the network owner's network and an embedded network.*

*ICP identifiers must be obtained for points of connection at which any of the following occur:*

- a consumer purchases electricity from a trader 11.3(3)(a)*
- a trader purchases electricity from an embedded generator 11.3(3)(b)*
- a direct purchaser purchases electricity from the clearing manager 11.3(3)(c)*
- an embedded generator sells electricity directly to the clearing manager 11.3(3)(d)*
- a network is settled by differencing 11.3(3)(e)*
- there is a distributor status ICP on the parent network point of connection of an embedded network or at the point of connection of shared unmeasured load. 11.3(3)(f)*

##### Audit observation

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS file dated 01/02/2022 were reviewed for the audit period.

##### Audit commentary

NGAG did not connect any ICP customers during the audit period and do not intend to in the future.

NGAG are aware of their obligations under this clause and will connect any future generation equipment according to industry and Code requirements.

##### Audit outcome

Compliant

#### 3.2. Providing registry information (Clause 11.7(2))

##### Code reference

*Clause 11.7(2)*

##### Code related audit information

*Each trader must provide information to the registry manager about each ICP at which it trades electricity in accordance with Schedule 11.1.*



### Audit observation

The EDA and LIS files were reviewed for the audit period. EMS and NGAG systems and processes were checked. Discussed with TOPE/NGAG staff.

### Audit commentary

All information for the 2 ICPs was correctly recorded in the registry.

### Audit outcome

Compliant

## 3.3. Changes to registry information (Clause 10 Schedule 11.1)

### Code reference

*Clause 10 Schedule 11.1*

### Code related audit information

*If information provided by a trader to the registry manager about an ICP changes, the trader must provide written notice to the registry manager of the change no later than 5 business days after the change.*

### Audit observation

The LIS, EDA and the registry files for the audit period were reviewed.

### Audit commentary

There was one change to registry information in the audit period. It was the change of the status of ICPs 0000010061TEFFC from “inactive- new connection in progress” to “active”.

Any changes to the registry information are done by EMS at NGAG’s request, using their processes. Compliance is recorded based on a discussion with the company and a review of documents related to changes to registry information.

### Audit outcome

Compliant

## 3.4. Trader responsibility for an ICP (Clause 11.18)

### Code reference

*Clause 11.18*

### Code related audit information

*A trader becomes responsible for an ICP when the trader is recorded in the registry as being responsible for the ICP.*

*A trader ceases to be responsible for an ICP if:*

- *another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or*
- *the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).*
- *if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):*
  - o *arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and*

- *advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).*

*A trader who is responsible for an ICP (excluding UML) must ensure that an MEP is recorded in the registry for that ICP (clause 11.18(4)).*

*A trader must not trade at an ICP (excluding UML) unless an MEP is recorded in the registry for that ICP (clause 11.18(5)).*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period.

NGAG is fully aware of their responsibilities. Their status is as a generator not a trader. The company has no plans to trade any ICPs in the future.

#### **Audit commentary**

NGAG fully understand that as soon as they are recorded in the registry as accepting responsibility, the responsibility will cease only when an ICP switches out to another trader and its four-letter code is recorded in the registry.

NGAG did not connect any ICP customers or UML during the audit period and do not intend to in the future.

Checks confirm AccuCal and AMCI are the MEPs correctly recorded in the registry for NGAG ICPs.

There are no ICPs with the status “decommissioned”. NGAG Staff state that they are aware of the obligations of this Code requirement.

#### **Audit outcome**

Compliant

### **3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)**

#### **Code reference**

*Clause 9 Schedule 11.1*

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

*Each trader must provide the following information to the registry manager for each ICP for which it is recorded in the registry as having responsibility:*

- the participant identifier of the trader, as approved by the Authority (clause 9(1)(a))*
- the profile code for each profile at that ICP, as approved by the Authority (clause 9(1)(b))*
- the metering equipment provider for each category 1 metering or higher (clause 9(1)(c))*
- the type of submission information the trader will provide to the RM for the ICP (clause 9(1)(ea))*
- if a settlement type of UNM is assigned to that ICP, either:*
  - the code ENG if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*
  - in all other cases, the daily average kWh of unmetered load at the ICP (clause 9(1)(f)(ii)).*
  - the type and capacity of any unmetered load at each ICP (clause 9(1)(g))*
  - the status of the ICP, as defined in clauses 12 to 20 (clause 9(1)(j))*
  - except if the ICP exists for the purposes of reconciling an embedded network or the ICP has distributor status, the trader must provide the relevant business classification code applicable to the customer (clause 9(1)(k)).*

*The trader must provide information specified in (a) to (j) above within 5 business days of trading (clause 9(2)).*

*The trader must provide information specified in 9(1)(k) no later than 20 business days of trading (clause 9(3))*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period and discussed with TOPE/NGAG staff.

#### **Audit commentary**

NGAG did not connect any ICP customers or UML during the audit period and do not intend to in the future.

Checks confirm that all information recorded in the registry is correct.

#### **Audit outcome**

Compliant

### **3.6. ANZSIC codes (Clause 9 (1)(k) of Schedule 11.1)**

#### **Code reference**

*Clause 9 (1)(k) of Schedule 11.1*

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

*Traders are responsible to populate the relevant ANZSIC code for all ICPs for which they are responsible.*

#### **Audit observation**

The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

ICP 0000003490TE5AE and 0000010061TEFFC have the correct ANZSIC code assigned.

#### **Audit outcome**

Compliant

### **3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)**

#### **Code reference**

*Clause 9(1)(f) of Schedule 11.1*

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

*if a settlement type of UNM is assigned to that ICP, the trader must populate:*

*the code ENG - if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*

*the daily average kWh of unmetered load at the ICP - in all other cases (clause 9(1)(f)(ii)).*

#### **Audit observation**

The registry files were reviewed. Policy was discussed with NGAG staff

#### **Audit commentary**

It is not the intention of NGAG to take on unmetered ICPs. NGAG is certified as a generator. We consider this clause to be not applicable.

#### **Audit outcome**

Not applicable

### **3.8. Management of “active” status (Clause 17 Schedule 11.1)**

#### **Code reference**

*Clause 17 Schedule 11.1*

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

*The ICP status of “active” is managed by the relevant trader and indicates that:*

- *the associated electrical installations are electrically connected (clause 17(1)(a))*
- *the trader must provide information related to the ICP in accordance with Part 15, to the reconciliation manager for the purpose of compiling reconciliation information (clause 17(1)(b)).*

*Before an ICP is given the “active” status, the trader must ensure that:*

- *the ICP has only 1 customer, embedded generator, or direct purchaser (clause 17(2)(a))*
- *the electricity consumed is quantified by a metering installation or a method of calculation approved by the Authority (clause 17(2)(b)).*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

NGAG was responsible for two ICPs during the audit period. Both ICPs are assigned to embedded generators. At the time of this audit both ICPs had the “Active” status assigned.

#### **Audit outcome**

Compliant

### **3.9. Management of “inactive” status (Clause 19 Schedule 11.1)**

#### **Code reference**

*Clause 19 Schedule 11.1*

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

*The ICP status of “inactive” must be managed by the relevant trader and indicates that:*

- *electricity cannot flow at that ICP (clause 19(a)); or*
- *submission information related to the ICP is not required by the reconciliation manager for the purpose of compiling reconciliation information (clause 19(b)).*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

During the audit period ICP 0000010061TEFFC had the status “inactive – new connection in progress”, which was changed to “Active” on 23/11/2020.

In the future the status of generators will be updated in the event the site is shut down for any reason. NGAG commented that it would be a rather unlikely event. The company understands their obligations.

#### **Audit outcome**

Compliant

### 3.10. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)

#### **Code reference**

*Clause 15 Schedule 11.1*

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

*If an ICP has had the status of "New" or "Ready" for 24 calendar months or more, the distributor must ask the trader whether it should continue to have that status, and must decommission the ICP if the trader advises the ICP should not continue to have that status.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

NGAG does not trade new connections. It is certified as a generator and, as such, has not received any notification from traders in relation to this clause.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

## 4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

### 4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)

#### Code reference

Clause 2 Schedule 11.3

#### Code related audit information

*The standard switch process applies where a trader and a customer or embedded generator enters into an arrangement in which the trader commences trading electricity with the customer or embedded generator at a non-half hour or unmetered ICP at which another trader supplies electricity, or the trader assumes responsibility for such an ICP.*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of a switch no later than 2 business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and 1 or more profile codes associated with that ICP.*

#### Audit observation

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### Audit commentary

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)

#### Code reference

Clauses 3 and 4 Schedule 11.3

#### Code related audit information

*Within 3 business days after receiving notice of a switch from the registry manager, the losing trader must establish a proposed event date. The event date must be no more than 10 business days after the date of receipt of such notification, and in any 12 month period, at least 50% of the event dates must be no more than 5 business days after the date of notification. The losing trader must then:*

- *provide acknowledgement of the switch request by (clause 3(a) of Schedule 11.3):*
- *providing the proposed event date to the registry manager and a valid switch response code (clause 3(a)(i) and (ii) of Schedule 11.3); or*
- *providing a request for withdrawal of the switch in accordance with clause 17 (clause 3(c) of Schedule 11.3).*

*When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice from the registry manager under clause 22(a) the losing trader had been responsible for less than 2 months.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)**

#### **Code reference**

*Clause 5 Schedule 11.3*

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

*If the losing trader provides information to the registry manager in accordance with clause 3(a) of Schedule 11.3 with the required information, no later than 5 business days after the event date, the losing trader must complete the switch by:*

- *providing event date to the registry manager (clause 5(a)); and*
- *provide to the gaining trader a switch event meter reading as at the event date, for each meter or data storage device that is recorded in the registry with accumulator of C and a settlement indicator of Y (clause 5(b)); and*
- *if a switch event meter reading is not a validated reading, provide the date of the last meter reading (clause 5(c)).*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)**

#### **Code reference**

*Clause 6(1) and 6A Schedule 11.3*

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

The losing trader and the gaining trader must both use the same switch event meter reading as determined by the following procedure:

- if the switch event meter reading provided by the losing trader differs by less than 200 kWh from a value established by the gaining trader, the gaining trader must use the losing trader's validated meter reading or permanent estimate (clause 6(a)); or
- the gaining trader may dispute the switch meter reading if the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more. (clause 6(b)).

If the gaining trader disputes a switch meter reading because the switch event meter reading provided by the losing trader differs by 200 kWh or more, the gaining trader must, within 4 calendar months of the registry manager giving the gaining trader written notice of having received information about the switch completion, provide to the losing trader a changed switch event meter reading supported by 2 validated meter readings.

- the losing trader can choose not to accept the reading, however must advise the gaining trader no later than 5 business days after receiving the switch event meter reading from the gaining trader (clause 6A(a)); or
- if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 6A(b)).

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)**

#### **Code reference**

Clause 6(2) and (3) Schedule 11.3

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

If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry: and

- the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b));
- the gaining trader within 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading.

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**



NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.6. Disputes - standard switch (Clause 7 Schedule 11.3)**

#### **Code reference**

*Clause 7 Schedule 11.3*

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

*A losing trader or gaining trader may give written notice to the other that it disputes a switch event meter reading provided under clauses 1 to 6. Such a dispute must be resolved in accordance with clause 15.29 (with all necessary amendments).*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)**

#### **Code reference**

*Clause 9 Schedule 11.3*

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

*The switch move process applies where a gaining trader has an arrangement with a customer or embedded generator to trade electricity at an ICP using non half-hour metering or an unmetered ICP, or to assume responsibility for such an ICP, and no other trader has an agreement to trade electricity at that ICP, this is referred to as a switch move and the following provisions apply:*

*If the "uninvited direct sale agreement" applies, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*In the event of a switch move, the gaining trader must advise the registry manager of a switch and the proposed event date no later than 2 business days after the arrangement comes into effect.*

*In its advice to the registry manager the gaining trader must include:*

- *a proposed event date (clause 9(2)(a)); and*
- *that the switch type is "MI" (clause 9(2)(b)); and*

- one or more profile codes of a profile at the ICP. (clause 9(2)(c))

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)**

#### **Code reference**

*Clause 10(1) Schedule 11.3*

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

*10(1) Within 5 business days after receiving notice of a switch move request from the registry manager—*

- *10(1)(a) If the losing trader accepts the event date proposed by the gaining trader, the losing trader must complete the switch by providing to the registry manager:*
  - o *confirmation of the switch event date; and*
  - o *a valid switch response code; and*
  - o *final information as required under clause 11; or*
- *10(1)(b) If the losing trader does not accept the event date proposed by the gaining trader, the losing trader must acknowledge the switch request to the registry manager and determine a different event date that—*
  - o *is not earlier than the gaining trader's proposed event date, and*
  - o *is no later than 10 business days after the date the losing trader receives notice; or*
- *10(1)(c) request that the switch be withdrawn in accordance with clause 17.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)**

#### **Code reference**

*Clause 10(2) Schedule 11.3*

### Code related audit information

*If the losing trader determines a different date, then within 10 business days of receiving notice the losing trader must also complete the switch by providing to the registry manager as described in subclause (1)(a):*

- *the event date proposed by the losing trader; and*
- *a valid switch response code; and*
- *final information as required under clause 1.*

### Audit observation

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

### Audit commentary

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)

### Code reference

*Clause 11 Schedule 11.3*

### Code related audit information

*The losing trader must provide final information to the registry manager for the purposes of clause 10(1)(a)(ii), including—*

- *the event date (clause 11(a)); and*
- *a switch event meter reading as at the event date for each meter or data storage device that is recorded in the registry with an accumulator type of C and a settlement indicator of Y (clause 11(b)); and*
- *if the switch event meter reading is not a validated meter reading, the date of the last meter reading of the meter or storage device. (clause (11(c)).*

### Audit observation

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

### Audit commentary

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 4.11. Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)

## Code reference

Clause 12 Schedule 11.3

## Code related audit information

The gaining trader may use the switch event meter reading supplied by the losing trader or may, at its own cost, obtain its own switch event meter reading. If the gaining trader elects to use this new switch event meter reading, the gaining trader must advise the losing trader of the switch event meter reading and the actual event date to which it refers as follows:

- if the switch meter reading established by the gaining trader differs by less than 200 kWh from that provided by the losing trader, both traders must use the switch event meter reading provided by the gaining trader (clause 12(2)(a)); or
- if the switch event meter reading provided by the losing trader differs by 200 kWh or more from a value established by the gaining trader, the gaining trader may dispute the switch meter reading. In this case, the gaining trader, within 4 calendar months of the date the registry manager gives the gaining trader written notice of having received information about the switch completion, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by 2 validated meter readings and the losing trader must either (clause 12(2)(b) and clause 12(3)):
- advise the gaining trader if it does not accept the switch event meter reading and the losing trader and the gaining trader must resolve the dispute in accordance with the disputes procedure in clause 15.29 (with all necessary amendments) (clause 12(3)(a)); or
- if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 12(3)(b)).

12(2A) If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry,

- the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 12(2A)(b));
- the gaining trader no later than 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading. (clause 12(2B)).

## Audit observation

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

## Audit commentary

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

## Audit outcome

Non-compliant

## 4.12. Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)

### Code reference

Clause 14 Schedule 11.3

### Code related audit information

*The gaining trader switch process applies when a trader has an arrangement with a customer or embedded generator to trade electricity at an ICP at which the losing trader trades electricity with the customer or embedded generator, and one of the following applies at the ICP:*

- *the gaining trader will trade electricity through a half hour metering installation that is a category 3 or higher metering installation; or*
- *the gaining trader will trade electricity through a non-AMI half hour metering installation and the losing trader trades electricity through a non-AMI non half hour metering installation; or*
- *the gaining trader will trade electricity through a non-AMI non half hour metering installation and the losing trader trades electricity through a non-AMI half hour metering installation*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of the switch and expected event date no later than 3 business days after the arrangement comes into effect.*

*14(2) The gaining trader must include in its advice to the registry manager:*

- a) a proposed event date; and*
- b) that the switch type is HH.*

*14(3) The proposed event date must be a date that is after the date on which the gaining trader advises the registry manager, unless clause 14(4) applies.*

*14(4) The proposed event date is a date before the date on which the gaining trader advised the registry manager, if:*

*14(4)(a) – the proposed event date is in the same month as the date on which the gaining trader advised the registry manager; or*

*14(4)(b) – the proposed event date is no more than 90 days before the date on which the gaining trader advises the registry manager and this date is agreed between the losing and gaining traders.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.13. Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)**

#### **Code reference**

*Clause 15 Schedule 11.3*

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

*Within 3 business days after the losing trader is informed about the switch by the registry manager, the losing trader must:*

*15(a) - provide to the registry manager a valid switch response code as approved by the Authority; or*

*15(b) - provide a request for withdrawal of the switch in accordance with clause 17.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.14. Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)**

#### **Code reference**

*Clause 16 Schedule 11.3*

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

*The gaining trader must complete the switch no later than 3 business days, after receiving the valid switch response code, by advising the registry manager of the event date.*

*If the ICP is being electrically disconnected, or if metering equipment is being removed, the gaining trader must either-*

*16(a)- give the losing trader or MEP for the ICP an opportunity to interrogate the metering installation immediately before the ICP is electrically disconnected or the metering equipment is removed; or*

*16(b)- carry out an interrogation and, no later than 5 business days after the metering installation is electrically disconnected or removed, advise the losing trader of the results and metering component numbers for each data channel in the metering installation.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.15. Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)**

## Code reference

*Clauses 17 and 18 Schedule 11.3*

## Code related audit information

*A losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 2 calendar months after the event date of the switch.*

*If a trader requests the withdrawal of a switch, the following provisions apply:*

- *for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):*
  - o *the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and*
  - o *the withdrawal advisory code published by the Authority. (clause 18(c)(ii))*
- *within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal. (clause 18(d))*
- *on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c). All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request. (clause 18(e))*
- *if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16. (clause 18(f))*

## Audit observation

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

## Audit commentary

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

## Audit outcome

Not applicable

## 4.16. Metering information (Clause 21 Schedule 11.3)

### Code reference

*Clause 21 Schedule 11.3*

### Code related audit information

*For an interrogation or validated meter reading or permanent estimate carried out in accordance with Schedule 11.3:*

*21(a)- the trader who carries out the interrogation, switch event meter reading must ensure that the interrogation is as accurate as possible, or that the switch event meter reading is fair and reasonable.*

*21(b) and (c) - the cost of every interrogation or switch event meter reading carried out in accordance with clauses 5(b) or 11(b) or (c) must be met by the losing trader. The costs in every other case must be met by the gaining trader.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **4.17. Switch protection (Clause 11.15AA to 11.15AB)**

#### **Code reference**

*Clause 11.15AA to 11.15AC*

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

*A losing retailer (including any party acting on behalf of the retailer) must not initiate contact to save or win back any customer who is switching away or has switched away for 180 days from the date of the switch.*

*The losing retailer may contact the customer for certain administrative reasons and may make a counteroffer only if the customer initiated contact with the losing retailer and invited the losing retailer to make a counteroffer.*

*The losing retailer must not use the customer contact details to enable any other retailer (other than the gaining retailer) to contact the customer.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG does not have any retail customers and is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG staff stated that NGAG did not switch any ICPs during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable



## 5. MAINTENANCE OF UNMETERED LOAD

### 5.1. Maintaining shared unmetered load (Clause 11.14)

#### Code reference

Clause 11.14

#### Code related audit information

The trader must adhere to the process for maintaining shared unmetered load as outlined in clause 11.14:

*11.14(2) - The distributor must give written notice to the traders responsible for the ICPs across which the unmetered load is shared, of the ICP identifiers of the ICPs.*

*11.14(3) - A trader who receives such a notification from a distributor must give written notice to the distributor if it wishes to add or omit any ICP from the ICPs across which unmetered load is to be shared.*

*11.14(4) - A distributor who receives such a notification of changes from the trader under (3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared.*

*11.14(5) - If a distributor becomes aware of any change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change as soon as practicable after that change or decommissioning.*

*11.14(6) - Each trader who receives such a notification must, as soon as practicable after receiving the notification, adjust the unmetered load information for each ICP in the list for which it is responsible to ensure that the entire shared unmetered load is shared equally across each ICP.*

*11.14(7) - A trader must take responsibility for shared unmetered load assigned to an ICP for which the trader becomes responsible as a result of a switch in accordance with Part 11.*

*11.14(8) - A trader must not relinquish responsibility for shared unmetered load assigned to an ICP if there would then be no ICPs left across which that load could be shared.*

*11.14(9) - A trader can change the status of an ICP across which the unmetered load is shared to inactive status, as referred to in clause 19 of Schedule 11.1. In that case, the trader is not required to give written notice to the distributor of the change. The amount of electricity attributable to that ICP becomes UFE.*

#### Audit observation

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

#### Audit commentary

NGAG did not switch any ICP customers or UML during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 5.2. Unmetered threshold (Clause 10.14 (2)(b))

### Code reference

Clause 10.14 (2)(b)

### Code related audit information

The reconciliation participant must ensure that unmetered load does not exceed 3,000 kWh per annum, or 6,000 kWh per annum if the load is predictable and of a type approved and published by the Authority.

### Audit observation

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

### Audit commentary

NGAG did not switch any ICP customers or UML during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 5.3. Unmetered threshold exceeded (Clause 10.14 (5))

### Code reference

Clause 10.14 (5)

### Code related audit information

If the unmetered load limit is exceeded the retailer must:

- within 20 business days, commence corrective measure to ensure it complies with Part 10
- within 20 business days of commencing the corrective measure, complete the corrective measures
- no later than 10 business days after it becomes aware of the limit having been exceeded, advise each participant who is or would be expected to be affected of:
  - o the date the limit was calculated or estimated to have been exceeded
  - o the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.

### Audit observation

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

### Audit commentary

NGAG did not switch any ICP customers or UML during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)

### **Code reference**

*Clause 11 Schedule 15.3, Clause 15.37B*

### **Code related audit information**

*An up-to-date database must be maintained for each type of distributed unmetered load for which the retailer is responsible. The information in the database must be maintained in a manner that the resulting submission information meets the accuracy requirements of clause 15.2.*

*A separate audit is required for distributed unmetered load data bases.*

*The database must satisfy the requirements of Schedule 15.5 with regard to the methodology for deriving submission information.*

### **Audit observation**

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

### **Audit commentary**

NGAG did not switch any ICP customers or UML during the audit period and do not intend to in the future.

This clause is not applicable. Compliance was not assessed.

### **Audit outcome**

Not applicable

## 6. GATHERING RAW METER DATA

### 6.1. Electricity conveyed & notification by embedded generators(Clause 10.13, Clause 10.24 and 15.13)

#### Code reference

*Clause 10.13, Clause 10.24 and Clause 15.13*

#### Code related audit information

*A participant must use the quantity of electricity measured by a metering installation as the raw meter data for the quantity of electricity conveyed through the point of connection.*

*This does not apply if data is estimated or gifted in the case of embedded generation under clause 15.13.*

*A trader must, for each electrically connected ICP that is not also an NSP, and for which it is recorded in the registry as being responsible, ensure that:*

- *there is 1 or more metering installations*
- *all electricity conveyed is quantified in accordance with the Code*
- *it does not use subtraction to determine submission information for the purposes of Part 15.*

*An embedded generator must give notification to the reconciliation manager for an embedded generating station, if the intention is that the embedded generator will not be receiving payment from the clearing manager or any other person through the point of connection to which the notification relates.*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period.

#### Audit commentary

NGAG is responsible for 2 HHR ICPs (generation). NGAG does not use subtraction to determine submission information. The company uses the quantity of electricity measured by HHR metering installations.

Checks confirm AccuCal and AMCI are the MEPs for all NGAG ICPs.

EMS are the agent for NGAG for the collection of raw meter data, calculation of submission data and the transmission of data to the reconciliation and pricing manager.

#### Audit outcome

Compliant

### 6.2. Responsibility for metering at GIP(Clause 10.26 (6), (7) and (8))

#### Code reference

*Clause 10.26 (6), (7) and (8)*

#### Code related audit information

*For each proposed metering installation or change to a metering installation that is a connection to the grid, the participant, must:*

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least 3 months for the grid owner to review and comment on the design*

- *respond within 3 business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

*The participant responsible for the metering installation must:*

- *advise the reconciliation manager of the certification expiry date not later than 10 business days after certification of the metering installation*
- *become the MEP or contract with a person to be the MEP*
- *advise the reconciliation manager of the MEP identifier no later than 20 days after entering into a contract or assuming responsibility to be the MEP.*

#### **Audit observation**

The network supply point table was reviewed, and it was discussed with NGAG.

#### **Audit commentary**

NGAG does not have a connection to the grid. This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Non-compliant

### **6.3. Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)**

#### **Code reference**

*Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3*

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

*The reconciliation participant must advise the metering equipment provider if a control device is used to control load or switch meter registers.*

*The reconciliation participant must ensure the control device is certified prior to using it for reconciliation purposes.*

#### **Audit observation**

This was discussed with NGAG Staff. The registry was also checked. NGAG is responsible for 2 generation ICPs only.

#### **Audit commentary**

NGAG trades ICPs using the HHR profile for reconciliation purposes. This profile does not require a switch of meter registers.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **6.4. Reporting of defective metering installations (Clause 10.43(2) and (3))**

#### **Code reference**

*Clause 10.43(2) and (3)*

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

*If a participant becomes aware of an event or circumstance that lead it to believe a metering installation could be inaccurate, defective, or not fit for purpose they must:*

- *advise the MEP*
- *include in the advice all relevant details.*

#### **Audit observation**

EMS is an agent for NGAG to manage two ICPs. During the audit we reviewed the agreement between NGAG and EMS.

#### **Audit commentary**

According to the agreement EMS will check all validation data for errors and anomalies. NGAG will be advised, in writing, of any potential or actual errors and anomalies.

Reconciliation files are always sent by EMS to NGAG for approval before submitting. NGAG compares volumes with volumes recorded by check meters. If any inaccuracies are noted EMS will be advised.

NGAG advised that there were no events or circumstances which lead them to believe that any NGAG metering installations were defective during the period covered by this audit.

#### **Audit outcome**

Compliant

### **6.5. Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)**

#### **Code reference**

*Clause 2 Schedule 15.2*

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

*Only a certified reconciliation participant may collect raw meter data, unless only the MEP can interrogate the meter, or the MEP has an arrangement which prevents the reconciliation participant from electronically interrogating the meter:*

*2(2) - The reconciliation participant must collect raw meter data used to determine volume information from the services interface or the metering installation or from the MEP.*

*2(3) - The reconciliation participant must ensure the interrogation cycle is such that it does not exceed the maximum interrogation cycle in the registry .*

*2(4) - The reconciliation participant must interrogate the meter at least once every maximum interrogation cycle.*

*2(5) - When electronically interrogating the meter the participant must:*

- a) ensure the system is to within +/- 5 seconds of NZST or NZDST*
- b) compare the meter time to the system time*
- c) determine the time error of the metering installation*
- d) if the error is less than the maximum permitted error, correct the meter's clock*
- e) if the time error is greater than the maximum permitted error then:*
  - i) correct the metering installation's clock*
  - ii) compare the metering installation's time with the system time*
  - iii) correct any affected raw meter data.*
- f) download the event log.*

*2(6) – The interrogation systems must record:*

- *the time*

- *the date*
- *the extent of any change made to the meter clock.*

#### **Audit observation**

AMS, as the agent for NGAG, collects raw meter data.

#### **Audit commentary**

The AMS audit report identified no non-compliance related to the above clause.

#### **Audit outcome**

Compliant

### **6.6. Derivation of meter readings (Clause 3(1), 3(2) and 5 Schedule 15.2)**

#### **Code reference**

*Clause 3(1), 3(2) and 5 Schedule 15.2*

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

*All meter readings must in accordance with the participants certified processes and procedures and using its certified facilities be sourced directly from raw meter data and, if appropriate, be derived and calculated from financial records.*

*All validated meter readings must be derived from meter readings.*

*A meter reading provided by a consumer may be used as a validated meter reading only if another set of validated meter readings not provided by the consumer are used during the validation process.*

*During the manual interrogation of each NHH metering installation the reconciliation participant must:*

- a) obtain the meter register*
- b) ensure seals are present and intact*
- c) check for phase failure (if supported by the meter)*
- d) check for signs of tampering and damage*
- e) check for electrically unsafe situations.*

*If the relevant parts of the metering installation are visible and it is safe to do so.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

NGAG is not responsible for NHH installations.

NGAG trades ICPs using the HHR profile for reconciliation purposes. All HHR installations are read by AMS remotely.

The EMS audit report, dated 14 June 2021, identified no non-compliance related to the above clause.

#### **Audit outcome**

Compliant

### **6.7. NHH meter reading application (Clause 6 Schedule 15.2)**

#### **Code reference**

Clause 6 Schedule 15.2

#### Code related audit information

*For NHH switch event meter reads, for the gaining trader the reading applies from 0000 hours on the day of the relevant event date and for the losing trader at 2400 hours at the end of the day before the relevant event date.*

*In all other cases, All NHH readings apply from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation.*

#### Audit observation

NGAG does not have any customers and is responsible for 2 generation ICPs (HHR) only.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 6.8. Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)

#### Code reference

*Clause 7(1) and (2) Schedule 15.2*

#### Code related audit information

*Each reconciliation participant must ensure that a validated meter reading is obtained in respect of every meter register for every non half hour metered ICP for which the participant is responsible, at least once during the period of supply to the ICP by the reconciliation participant, and used to create volume information.*

*This may be a validated meter reading at the time the ICP is switched to, or from, the reconciliation participant.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 7(1).*

#### Audit observation

NGAG does not have any customers and is responsible for 2 generation ICPs (HHR) only.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 6.9. NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)

#### Code reference

*Clause 8(1) and (2) Schedule 15.2*

#### Code related audit information



*At least once every 12 months, each reconciliation participant must obtain a validated meter reading for every meter register for non half hour metered ICPs, at which the reconciliation participant trades continuously for each 12 month period.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 8(1).*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs (HHR) only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **6.10. NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)**

#### **Code reference**

*Clause 9(1) and (2) Schedule 15.2*

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

*In relation to each NSP, each reconciliation participant must ensure that for each NHH ICP at which the reconciliation participant trades continuously for each 4 months, for which consumption information is required to be reported into the reconciliation process. A validated meter reading is obtained at least once every 4 months for 90% of the non half hour metered ICPs.*

*A report is to be sent to the Authority providing the percentage, in relation to each NSP, for which consumption information has been collected no later than 20 business days after the end of each month.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 9(1).*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs (HHR) only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **6.11. NHH meter interrogation log (Clause 10 Schedule 15.2)**

#### **Code reference**

*Clause 10 Schedule 15.2*

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

*The following information must be logged as the result of each interrogation of the NHH metering:*

*10(a) - the means to establish the identity of the individual meter reader*

*10(b) - the ICP identifier of the ICP, and the meter and register identification*

*10(c) - the method being used for the interrogation and the device ID of equipment being used for interrogation of the meter.*

*10(d) - the date and time of the meter interrogation.*

#### **Audit observation**

NGAG does not have any customers and is responsible for 2 generation ICPs (HHR) only.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### 6.12. HHR data collection (Clause 11(1) Schedule 15.2)

#### **Code reference**

*Clause 11(1) Schedule 15.2*

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

*Raw meter data from all electronically interrogated metering installations must be obtained via the services access interface.*

*This may be carried out by a portable device or remotely.*

#### **Audit observation**

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

NGAG trades ICPs using the HHR profile for reconciliation purposes.

AMS is the agent for NGAG for the collection of raw meter data. Meters are read remotely. EMS is responsible for the calculation of submission data and the transmission of data to the reconciliation manager.

The AMS audit report, dated 4 June 2021, identified no non-compliance related to the above clause.

#### **Audit outcome**

Compliant

### 6.13. HHR interrogation data requirement (Clause 11(2) Schedule 15.2)

#### **Code reference**

*Clause 11(2) Schedule 15.2*

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

*The following information is collected during each interrogation:*

*11(2)(a) - the unique identifier of the data storage device*

*11(2)(b) - the time from the data storage device at the commencement of the download unless the time is within specification and the interrogation log automatically records the time of interrogation*

11(2)(c) - the metering information, which represents the quantity of electricity conveyed at the point of connection, including the date and time stamp or index marker for each half hour period. This may be limited to the metering information accumulated since the last interrogation

11(2)(d) - the event log, which may be limited to the events information accumulated since the last interrogation

11(2)(e) - an interrogation log generated by the interrogation software to record details of all interrogations.

The interrogation log must be examined by the reconciliation participant responsible for collecting the data and appropriate action must be taken if problems are apparent or an automated software function flags exceptions.

#### **Audit observation**

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

NGAG trades ICPs using the HHR profile for reconciliation purposes.

AMS is the agent for NGAG for the collection of raw meter data. Meters are read remotely. EMS is responsible for the calculation of submission data and the transmission of data to the manager.

The AMS audit report, dated 4 June 2021, identified no non-compliance related to the above clause

#### **Audit outcome**

Compliant

### **6.14. HHR interrogation log requirements (Clause 11(3) Schedule 15.2)**

#### **Code reference**

Clause 11(3) Schedule 15.2

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

The interrogation log forms part of the interrogation audit trail and, as a minimum, must contain the following information:

11(3)(a)- the date of interrogation

11(3)(b)- the time of commencement of interrogation

11(3)(c)- the operator identification (if available)

11(3)(d)- the unique identifier of the meter or data storage device

11(3)(e)- the clock errors outside the range specified in Table 1 of clause 2

11(3)(f)- the method of interrogation

11(3)(g)- the identifier of the reading device used for interrogation (if applicable).

#### **Audit observation**

NGAG is responsible for 2 generation ICPs (HHR) only. The EDA and LIS files and the registry were reviewed for the audit period.

#### **Audit commentary**

NGAG trades ICPs using the HHR profile for reconciliation purposes.

AMS is the agent for NGAG for the collection of raw meter data. Meters are read remotely. EMS is responsible for the calculation of submission data and the transmission of data to the manager.

The AMS audit report, dated 4 June 2021, identified no non-compliance related to the above clause

**Audit outcome**

Compliant

## 7. STORING RAW METER DATA

### 7.1. Trading period duration (Clause 13 Schedule 15.2)

#### Code reference

*Clause 13 Schedule 15.2*

#### Code related audit information

*The trading period duration, normally 30 minutes, must be within  $\pm 0.1\%$  ( $\pm 2$  seconds).*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The EMS and AMS audit reports were reviewed.

#### Audit commentary

The AMS audit report outlines the process to ensure that the trading period duration is accurate. It states that the trading period duration, normally 30 minutes, is kept within  $\pm 10$  seconds. It is managed through the clock synchronisation process. AMS synchronises MV90 against an internet time source at 15-minute intervals, and prior to any interrogation cycle. During interrogation, a comparison occurs between data logger and MV90 clocks.

#### Audit outcome

Compliant

### 7.2. Archiving and storage of raw meter data (Clause 18 Schedule 15.2)

#### Code reference

*Clause 18 Schedule 15.2*

#### Code related audit information

*A reconciliation participant who is responsible for interrogating a metering installation must archive all raw meter data and any changes to the raw meter data for at least 48 months, in accordance with clause 8(6) of Schedule 10.6.*

*Procedures must be in place to ensure that raw meter data cannot be accessed by unauthorised personnel.*

*Meter readings cannot be modified without an audit trail being created.*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The EMS and AMS audit reports were reviewed.

#### Audit commentary

All data is archived, in accordance with this clause, for a period of more than 48 months. This was confirmed by viewing raw meter data from a prior period during the AMS audit.

Audit trails are created if meter data is modified in the EMS system. EMS confirmed that no data was modified.

#### Audit outcome

Compliant

### 7.3. Non metering information collected / archived (Clause 21(5) Schedule 15.2)

**Code reference**

*Clause 21(5) Schedule 15.2*

**Code related audit information**

*All relevant non-metering information, such as external control equipment operation logs, used in the determination of profile data must be collected, and archived in accordance with clause 18.*

**Audit observation**

NGAG is responsible for 2 generation ICPs only. The EMS and AMS audit reports were reviewed.

**Audit commentary**

EMS does not use non-metering information to determine profile data on behalf of NGAG.

**Audit outcome**

Compliant

## 8. CREATING AND MANAGING (INCLUDING VALIDATING, ESTIMATING, STORING, CORRECTING AND ARCHIVING) VOLUME INFORMATION

### 8.1. Correction of NHH meter readings (Clause 19(1) Schedule 15.2)

#### Code reference

Clause 19(1) Schedule 15.2

#### Code related audit information

*If a reconciliation participant detects errors while validating non-half hour meter readings, the reconciliation participant must:*

*19(1)(a) - confirm the original meter reading by carrying out another meter reading*

*19(1)(b) - replace the original meter reading the second meter reading (even if the second meter reading is at a different date)*

*19(1A) if a reconciliation participant detects errors while validating non half hour meter readings, but the reconciliation participant cannot confirm the original meter reading or replace it with a meter reading from another interrogation, the reconciliation participant must:*

- *substitute the original meter reading with an estimated reading that is marked as an estimate; and*
- *subsequently replace the estimated reading in accordance with clause 4(2)*

#### Audit observation

NGAG is an embedded generator responsible for two HHR ICPs.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 8.2. Correction of HHR metering information (Clause 19(2) Schedule 15.2)

#### Code reference

Clause 19(2) Schedule 15.2

#### Code related audit information

*If a reconciliation participant detects errors while validating half hour meter readings, the reconciliation participant must correct the meter readings as follows:*

*19(2)(a) - if the relevant metering installation has a check meter or data storage device, substitute the original meter reading with data from the check meter or data storage device; or*

*19(2)(b) - if the relevant metering installation does not have a check meter or data storage device, substitute the original meter reading with data from another period provided:*

- (i) *The total of all substituted intervals matches the total consumption recorded on a meter, if available; and*
- (ii) *The reconciliation participant considers the pattern of consumption to be materially similar to the period in error*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The EMS audit report, dated 14 June 2021, was reviewed.

#### Audit commentary

The agreement between EMS and NGAG states that EMS is required to notify them whenever a problem occurs with the collection or validation of data or data submissions.

In the situation described below EMS did not correct metering data, they resubmitted volumes under a different loss code.

EMS resubmitted volumes for 202103 R3 for ICP 0000010061TEFFC. The volume was resubmitted under a different loss code without the previous submission being zeroed out first. EMS created the incident report which was reviewed during the audit. The incident is described below:

*“In June EMS made a backdated change to the loss factors applied to ICP 0000010061TEFFC. This change included creating new NSP datasets for the new loss code (these datasets are used in the building of the HHRVOLS submission file).*

*While the Ngawha generation remain split over the old and new loss codes all the load transferred to the new code. This meant the old NSP load dataset had no contributing ICPs. The EMS data management system is designed to detect this condition and will use a default value of zero.*

*During the configuration change an error was made that resulted in the NSP dataset for the old loss code being made inactive. This meant the dataset, containing zeros, was not included in the submission file.*

*In June EMS prepared an R3 revision file for the Ngawha that included revised data for March. When processing the data, the RM notice there was an unusual increase in the HHR X flow data for R3 under NGAG and advised EMS. The issue was investigated, and it was discovered the initial submission for the old loss code was not being replaced with zero data. EMS took immediate steps to deliver the revised NGAG HHRVOLS file to RM.”*

After the investigation EMS changed the setup processes for managing NSP datasets with back dated changes to components like Loss code, dedicated flag, POC, reconciliation type.

#### Audit outcome

Compliant

### 8.3. Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)

#### Code reference

Clause 19(3) Schedule 15.2

#### Code related audit information

*A reconciliation participant may use error compensation and loss compensation as part of the process of determining accurate data. Whichever methodology is used, the reconciliation participant must document the compensation process and comply with audit trail requirements set out in the Code.*

#### Audit observation

Error and loss compensation was discussed during the audit. We reviewed the agreement between NGAG and EMS. It was discussed with NGAG staff.

#### Audit commentary



We checked the certification of records provided by NGAG and confirm that no error or loss compensation has been applied to data. EMS also confirmed that no error or loss compensation has been applied to submission data.

#### **Audit outcome**

Compliant

### **8.4. Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)**

#### **Code reference**

*Clause 19(4) and (5) Schedule 15.2*

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

*In correcting a meter reading in accordance with clause 19, the raw meter data must not be overwritten. If the raw meter data and the meter readings are the same, an automatic secure backup of the affected data must be made and archived by the processing or data correction application.*

*If data is corrected or altered, a journal must be generated and archived with the raw meter data file. The journal must contain the following:*

*19(5)(a)- the date of the correction or alteration*

*19(5)(b)- the time of the correction or alteration*

*19(5)(c)- the operator identifier for the person within the reconciliation participant who made the correction or alteration*

*19(5)(d)- the half-hour metering data or the non half hour metering data corrected or altered, and the total difference in volume of such corrected or altered data*

*19(5)(e)- the technique used to arrive at the corrected data*

*19(5)(f)- the reason for the correction or alteration.*

#### **Audit observation**

NGAG is responsible for 2 generation ICPs only (HHR). The EMS audit report, dated 14 June 2021, was reviewed. It was discussed with NGAG staff.

#### **Audit commentary**

#### **Audit commentary**

The EMS audit report was reviewed. According to the report raw meter data is not overwritten in any situation. In **section 8.2**, we described how EMS had to resubmit volumes 202103 R3 for ICP 0000010061TEFFC due to incorrect loss code. The metering data was not effected by resubmission.

#### **Audit outcome**

Compliant

## 9. ESTIMATING AND VALIDATING VOLUME INFORMATION

### 9.1. Identification of readings (Clause 3(3) Schedule 15.2)

#### Code reference

*Clause 3(3) Schedule 15.2*

#### Code related audit information

*All estimated readings and permanent estimates must be clearly identified as an estimate at source and in any exchange of metering data or volume information between participants.*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The EMS audit report was reviewed.

#### Audit commentary

According to the EMS audit report all estimated data is correctly identified at trading period level. EMS stated no data was estimated for any NGAG installations.

#### Audit outcome

Compliant

### 9.2. Derivation of volume information (Clause 3(4) Schedule 15.2)

#### Code reference

*Clause 3(4) Schedule 15.2*

#### Code related audit information

*Volume information must be directly derived, in accordance with Schedule 15.2, from:*

*3(4)(a) - validated meter readings*

*3(4)(b) - estimated readings*

*3(4)(c) - permanent estimates.*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. HHR volume submission and meter reading data files were checked. The EMS audit was reviewed.

#### Audit commentary

NGAG trades ICPs using the HHR profile for reconciliation purposes.

EMS are the agents for NGAG for the collection of raw meter data, calculation of submission data (volume information) and the transmission of data to the reconciliation. All HHR installations are read electronically and remotely by EMS. There is no manual data collection.

The EMS audit report confirmed all volume data was sourced from validated or estimated data.

#### Audit outcome

Compliant

### 9.3. Meter data used to derive volume information (Clause 3(5) Schedule 15.2)

### Code reference

Clause 3(5) Schedule 15.2

### Code related audit information

*All meter data that is used to derive volume information must not be rounded or truncated from the stored data from the metering installation.*

### Audit observation

NGAG is responsible for 2 generation ICPs only. HHR volume submission and meter reading data files were checked. The EMS audit was reviewed.

### Audit commentary

EMS are the agents for NGAG for the collection of raw meter data, calculation of submission data (volume information) and the transmission of data to the reconciliation and pricing manager. All HHR installations are read electronically and remotely by EMS. There is no manual data collection.

The EMS audit report confirmed the rounding process used if required. Volume data is calculated from raw meter reading data first. Rounding to two decimal places is only applied when creating the volume submission data file.

### Audit outcome

Compliant

## 9.4. Half hour estimates (Clause 15 Schedule 15.2)

### Code reference

Clause 15 Schedule 15.2

### Code related audit information

*If a reconciliation participant is unable to interrogate an electronically interrogated metering installation before the deadline for providing submission information, the submission to the reconciliation manager must be the reconciliation participant's best estimate of the quantity of electricity that was purchased or sold in each trading period during any applicable consumption period for that metering installation.*

*The reconciliation participant must use reasonable endeavours to ensure that estimated submission information is within the percentage specified by the Authority.*

### Audit observation

NGAG is responsible for 2 generation ICPs only. HHR volume submission and meter reading data files were checked. The EMS audit was reviewed.

### Audit commentary

EMS are the agents for NGAG for the collection of raw meter data, calculation of submission data (volume information) and the transmission of data to the reconciliation. All HHR installations are read electronically and remotely by EMS. There is no manual data collection.

The agreement between EMS and NGAG requires EMS is to notify them if a problem occurs with the collection or validation of meter reading data. NGAG did not receive such notifications from EMS during this audit period. If NGAG requested EMS to correct meter reading data EMS would do so using the process outlined in their audit report.

### Audit outcome

Compliant

## 9.5. NHH metering information data validation (Clause 16 Schedule 15.2)

### Code reference

*Clause 16 Schedule 15.2*

### Code related audit information

*Each validity check of non half hour meter readings and estimated readings must include the following:*

*16(2)(a) - confirmation that the meter reading or estimated reading relates to the correct ICP, meter, and register*

*16(2)(b) - checks for invalid dates and times*

*16(2)(c) - confirmation that the meter reading or estimated reading lies within an acceptable range compared with the expected pattern, previous pattern, or trend*

*16(2)(d) - confirmation that there is no obvious corruption of the data, including unexpected 0 values.*

### Audit observation

NGAG does not trade NHH installations.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 9.6. Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)

### Code reference

*Clause 17 Schedule 15.2*

### Code related audit information

*Each validity check of electronically interrogated meter readings and estimate readings must be at a frequency that will allow a further interrogation of the data storage device before the data is overwritten within the data storage device and before this data can be used for any purpose under the Code.*

*Each validity check of a meter reading obtained by electronic interrogation or an estimated reading must include:*

*17(4)(a) - checks for missing data*

*17(4)(b) - checks for invalid dates and times*

*17(4)(c) - checks of unexpected 0 values*

*17(4)(d) - comparison with expected or previous flow patterns*

*17(4)(e) - comparisons of meter readings with data on any data storage device registers that are available*

*17(4)(f) - a review of the meter and data storage device event log for any event that could have affected the integrity of metering data*

*17(4)(g) – a review of the relevant metering data where there is an event that could have affected the integrity of the metering data*

*If there is an event that could affect the integrity of the metering data (including events reported by MEPs, but excluding where the MEP is responsible for investigating and remediating the event) the reconciliation must investigate and remediate any events.*

*If the event may affect the integrity or operation of the metering installation the reconciliation participant must notify the metering equipment provider.*

#### **Audit observation**

NGAG is responsible for 2 generation ICPs only.

Meters are read by AMS and data is passed to EMS. The EMS and AMS audit reports were reviewed.

#### **Audit commentary**

The process was reviewed during the EMS audit and found compliant.

EMS conducts thorough validation of data by checking for invalid data and time, checking for missing data, checks for unexpected zero values, checks for high and low demand, check meter events.

According to the agreement between NGAG and EMS “in a situation where data fails validation and a logical reason cannot be found the issue is referred to the NGAG for further investigation into possible site-specific reasons for the anomaly”.

Both companies stated that no metering data from any installation, for which they are responsible, failed validation. If this did occur the MEP (AccuCal and AMCI) would be informed and an investigation requested.

#### **Audit outcome**

Compliant

## 10. PROVISION OF METERING INFORMATION TO THE GRID OWNER IN ACCORDANCE WITH SUBPART 4 OF PART 13 (CLAUSE 15.38(1)(F))

### 10.1. Generators to provide HHR metering information (Clause 13.136)

#### Code reference

Clause 13.136

#### Code related audit information

*The generator (and/or embedded generator) must provide to the grid owner connected to the local network in which the embedded generator is located, half hour metering information in accordance with clause 13.138 in relation to generating plant that is subject to a dispatch instruction:*

- *that injects electricity directly into a local network; or*
- *if the meter configuration is such that the electricity flows into a local network without first passing through a grid injection point or grid exit point metering installation.*

#### Audit observation

NGAG is not required to submit information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 10.2. Unoffered & intermittent generation provision of metering information (Clause 13.137)

#### Code reference

Clause 13.137

#### Code related audit information

*Each generator must provide the relevant grid owner half-hour metering information for:*

- *any unoffered generation from a generating station with a point of connection to the grid 13.137(1)(a)*
- *any electricity supplied from an intermittent generating station with a point of connection to the grid. 13.137(1)(b)*

*The generator must provide the relevant grid owner with the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of that generator's volume information. (clause 13.137(2))*

*If such half-hour metering information is not available, the generator must provide the pricing manager and the relevant grid owner a reasonable estimate of such data. (clause 13.137(3))*

#### Audit observation

NGAG is not required to submit information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 10.3. Loss adjustment of HHR metering information (Clause 13.138)

#### Code reference

Clause 13.138

#### Code related audit information

*The generator must provide the information required by clauses 13.136 and 13.137,*

*13.138(1)(a)- adjusted for losses (if any) relative to the grid injection point or, for embedded generators the grid exit point, at which it offered the electricity*

*13.138(1)(b)- in the manner and form that the pricing manager stipulates*

*13.138(1)(c)- by 0500 hours on a trading day for each trading period of the previous trading day.*

*The generator must provide the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of the generator's volume information.*

#### Audit observation

NGAG is not required to submit information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

### 10.4. Notification of the provision of HHR metering information (Clause 13.140)

#### Code reference

Clause 13.140

#### Code related audit information

*If the generator provides half-hourly metering information to a grid owner under clauses 13.136 to 13.138, or 13.138A, it must also, by 0500 hours of that day, advise the relevant grid owner.*

#### Audit observation

NGAG is not required to submit information to the grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

## 11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

### 11.1. Buying and selling notifications (Clause 15.3)

#### Code reference

Clause 15.3

#### Code related audit information

*Unless an embedded generator has given a notification in respect of the point of connection under clause 15.3, a trader must give notice to the reconciliation manager if it is to commence or cease trading electricity at a point of connection using a profile with a profile code other than HHR, RPS, UML, EG1, or PV1 at least five business days before commencing or ceasing trader.*

*The notification must comply with any procedures or requirements specified by the reconciliation manager.*

#### Audit observation

NGAG does not have any customers and is responsible for 2 generation ICPs only. We reviewed the agreement between NGAG and EMS. We reviewed their processes and discussed with NGAG staff.

#### Audit commentary

NGAG only uses the HHR profile for reconciliation submissions.

There are no plans to use any other profile than HHR. All installations are category 5 therefore metering data must be submitted as half-hourly.

#### Audit outcome

Compliant

### 11.2. Calculation of ICP days (Clause 15.6)

#### Code reference

Clause 15.6

#### Code related audit information

*Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of:*

*15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

*The ICP days information must be calculated using the data contained in the retailer or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.*

#### Audit observation

The ICPDAYS reporting is completed by EMS. We reviewed the processes and agreement between NGAG and EMS and discussed with NGAG staff.

#### Audit commentary

NGAG provided the ICPDAYS file for October 2021 and January 2022. The number of days was exactly the same as that which was recorded by the registry.



The ICPDAYS files are not required as NGAG is a generator. The ICPDAYS files are only required for retailers and direct purchasers but EMS submits ICPDAYS on behalf of NGAG.

#### **Audit outcome**

Compliant

### **11.3. Electricity supplied information provision to the reconciliation manager (Clause 15.7)**

#### **Code reference**

*Clause 15.7*

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

*A retailer must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each NSP, aggregated by invoice month, for which it has provided submission information to the reconciliation manager, including revised submission information for that period as non-loss adjusted values in respect of:*

*15.7(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

#### **Audit observation**

Generators are not required to submit BILLED files. These information files are only required for retailers.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **11.4. HHR aggregates information provision to the reconciliation manager (Clause 15.8)**

#### **Code reference**

*Clause 15.8*

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

*A retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each half hourly metered ICP for which it has provided submission information to the reconciliation manager, including:*

*15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

#### **Audit observation**

EMS acts as the NGAG agent providing data to the reconciliation manager. We reviewed the processes and agreement between NGAG and EMS and discussed with NGAG staff.

We reviewed data for October 2021 to January 2022.

### Audit commentary

The HHRAGGR files are not required as NGAG is a generator. The HHRAGGR files are only required for retailers and direct purchasers but EMS submits HHRAGGR on behalf of NGAG.

The HHRAGGR files are prepared at ICP level based on volume information. Clause 15.8 states that the HHRAGGR should contain electricity supplied information rather than submission information. The Reconciliation Manager Functional Specification in section 3, described HHRAGGR as HHR submission information that is aggregated per ICP for the whole month.

There is a misalignment between the Code requirements and RM file specification. It is a problem well known to the Authority and is awaiting a resolution.

### Audit outcome

Non-compliant

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 11.4 With: 15.8 From: 01-Sep-20 To: 28-Feb-22	HHRAGGR files do not contain electricity supplied information  Potential impact: None  Actual impact: None  Audit history: None  Controls: Strong  Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	EMS submits submissions volumes as per the Reconciliation Manager specification.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
None. This is a known issue with the Code that is still to be addressed. Consultation on a change took place in Sept 2019		Unknown	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
None. This is a known issue with the Code that is still to be addressed. Consultation on a change took place in Sept 2019		Unknown	

## 12. SUBMISSION COMPUTATION

### 12.1. Daylight saving adjustment (Clause 15.36)

#### Code reference

Clause 15.36

#### Code related audit information

*The reconciliation participant must provide submission information to the reconciliation manager that is adjusted for NZDT using 1 of the techniques set out in clause 15.36(3) specified by the Authority.*

#### Audit observation

This function is performed by EMS as the agent. We reviewed the EMS audit report.

#### Audit commentary

According to the EMS audit report, the company uses the “trading period run on” technique for daylight saving adjustment. Compliance was confirmed.

#### Audit outcome

Compliant

### 12.2. Creation of submission information (Clause 15.4)

#### Code reference

Clause 15.4

#### Code related audit information

*By 1600 hours on the 4th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all NSPs for which the reconciliation participant is recorded in the registry as having traded electricity during the consumption period immediately before that reconciliation period (in accordance with Schedule 15.3).*

*By 1600 hours on the 13th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all points of connection for which the reconciliation participant is recorded in the registry as having traded electricity during any consumption period being reconciled in accordance with clauses 15.27 and 15.28, and in respect of which it has obtained revised submission information (in accordance with Schedule 15.3).*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The HHRVOLS files and HHRAGGR files were reviewed between October 2021 and January 2022. The EMS audit report, dated 14 June 2021, was reviewed.

#### Audit commentary

Submission files are created by EMS on behalf of NGAG. Every month EMS submitted submission information files to the reconciliation manager.

NGAG provided files for review between October 2021 and January 2022

The EMS audit report outlined the process for creating the submission information files on behalf of NGAG, from the raw meter reading data, to the volumes, aggregates, and ICP days information.

All files were submitted within the timeframe specified by the clause.

#### Audit outcome

Compliant

### 12.3. Allocation of submission information (Clause 15.5)

#### Code reference

Clause 15.5

#### Code related audit information

*In preparing and submitting submission information, the reconciliation participant must allocate volume information for each ICP to the NSP indicated by the data held in the registry for the relevant consumption period at the time the reconciliation participant assembles the submission information. Volume information must be derived in accordance with Schedule 15.2.*

*However, if, in relation to a point of connection at which the reconciliation participant trades electricity, a notification given by an embedded generator under clause 15.13 for an embedded generating station is in force, the reconciliation participant is not required to comply with the above in relation to electricity generated by the embedded generating station.*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. The HHRVOLS files and HHRAGGR files were reviewed between October 2021 and January 2022. The EMS audit report, dated 14 June 2021, was reviewed.

#### Audit commentary

EMS submits data for two ICPs connected to KOE1101. Compliance confirmed by reviewing submission files.

#### Audit outcome

Compliant

### 12.4. Grid owner volumes information (Clause 15.9)

#### Code reference

Clause 15.9

#### Code related audit information

*The participant (if a grid owner) must deliver to the reconciliation manager for each point of connection for all of its GXPs, the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.9(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.9(b))*

#### Audit observation

NGAG is not a grid owner.

#### Audit commentary

This clause is not applicable. Compliance was not assessed.

#### Audit outcome

Not applicable

## 12.5. Provision of NSP submission information (Clause 15.10)

### Code reference

Clause 15.10

### Code related audit information

*The participant (if a local or embedded network owner) must provide to the reconciliation manager for each NSP for which the participant has given a notification under clause 25(1) Schedule 11.1 (which relates to the creation, decommissioning, and transfer of NSPs) the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.10(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.10(b))*

### Audit observation

NGAG is not an embedded network owner.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 12.6. Grid connected generation (Clause 15.11)

### Code reference

Clause 15.11

### Code related audit information

*The participant (if a grid connected generator) must deliver to the reconciliation manager for each of its points of connection, the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.11(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period. (clause 15.11(b))*

### Audit observation

NGAG is not responsible for a grid connected generator.

### Audit commentary

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 12.7. Accuracy of submission information (Clause 15.12)

### Code reference

Clause 15.12

### Code related audit information

*If the reconciliation participant has submitted information and then subsequently obtained more accurate information, the participant must provide the most accurate information available to the reconciliation manager or participant, as the case may be, at the next available opportunity for submission (in accordance with clauses 15.20A, 15.27, and 15.28).*

#### **Audit observation**

NGAG is responsible for 2 generation ICPs only. The HHRVOLS files and HHRAGGR files were reviewed between October 2021 and January 2022. The EMS audit report, dated 14 June 2021, was reviewed.

#### **Audit commentary**

The process was examined during the EMS audit and compliance was confirmed. NGAG provided a set of reconciliation revision files (including washup) created by EMS to confirm compliance.

#### **Audit outcome**

Compliant

### **12.8. Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)**

#### **Code reference**

*Clause 4 Schedule 15.2*

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

*Only volume information created using validated meter readings, or if such values are unavailable, permanent estimates, has permanence within the reconciliation processes (unless subsequently found to be in error).*

*The relevant reconciliation participant must, at the earliest opportunity, and no later than the month 14 revision cycle, replace volume information created using estimated readings with volume information created using validated meter readings.*

*If, despite having used reasonable endeavours for at least 12 months, a reconciliation participant has been unable to obtain a validated meter reading, the reconciliation participant must replace volume information created using an estimated reading with volume information created using a permanent estimate in place of a validated meter reading.*

#### **Audit observation**

NGAG is not responsible for NHH installations.

#### **Audit commentary**

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

### **12.9. Reconciliation participants to prepare information (Clause 2 Schedule 15.3)**

#### **Code reference**

*Clause 2 Schedule 15.3*

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

*If a reconciliation participant prepares submission information for each NSP for the relevant consumption periods in accordance with the Code, such submission information for each ICP must comprise the following:*

- *half hour volume information for the total metered quantity of electricity for each ICP notified in accordance with clause 11.7(2) for which there is a category 3 or higher metering installation (clause 2(1)(a)) for each ICP about which information is provided under clause 11.7(2) for which there is a category 1 or category 2 metering installation (clause 2(1)(ac) to 2(1)(ae)):*
  - a) *any half hour volume information for the ICP; or*
  - b) *any non half hour volumes information calculated under clauses 4 to 6 (as applicable).*
  - c) *unmetered load quantities for each ICP that has unmetered load associated with it derived from the quantity recorded in the registry against the relevant ICP and the number of days in the period, the distributed unmetered load database, or other sources of relevant information. (clause 2(1)(c))*
- *to create non half hour submission information a reconciliation participant must only use information that is dependent on a control device if (clause 2(2)):*
  - a) *the certification of the control device is recorded in the registry; or*
  - b) *the metering installation in which the control device is location has interim certification.*
- *to create submission information for a point of connection the reconciliation participant must use volume information (clause 2(3))*
- *to calculate volume information the reconciliation participant must apply raw meter data :*
  - a) *for each ICP, the compensation factor that is recorded in the registry (clause 2(4)(a))*
  - b) *for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(4)(b))*

#### **Audit observation**

NGAG is responsible for 2 generation ICPs only. The HHRVOLS files and HHRAGGR files were reviewed between October 2021 and January 2022. The EMS audit report, dated 14 June 2021, was reviewed.

#### **Audit commentary**

EMS are the agents for NGAG for the collection of raw meter data, calculation of submission data (volume information) and the transmission of data to the reconciliation. EMS submits HHRAGGR, ICPDAYS, HHRVOLS and revision files monthly on behalf of NGAG.

The EMS audit report describes the process used to create submission information on behalf of NGAG. The EMS audit report did not identify any non-compliance with this clause.

#### **Audit outcome**

Compliant

### **12.10. Historical estimates and forward estimates (Clause 3 Schedule 15.3)**

#### **Code reference**

*Clause 3 Schedule 15.3*

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

*For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the following techniques to create historical estimates and forward estimates. (clause 3(1))*

*Each estimate that is a forward estimate or a historical estimate must clearly be identified as such. (clause 3(2))*

*If validated meter readings are not available for the purpose of clauses 4 and 5, permanent estimates may be used in place of validated meter readings. (clause 3(3))*

**Audit observation**

NGAG is not responsible for NHH installations.

**Audit commentary**

This clause is not applicable. Compliance was not assessed.

**Audit outcome**

Not applicable

**12.11. Historical estimate process (Clause 4 and 5 Schedule 15.3)**

**Code reference**

*Clause 4 and 5 Schedule 15.3*

**Code related audit information**

*The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historic estimates of volume information for each ICP when the relevant seasonal adjustment shape is available.*

*If a seasonal adjustment shape is not available, the methodology for preparing an historical estimate of volume information for each ICP must be the same as in clause 4, except that the relevant quantities  $kWh_{Px}$  must be prorated as determined by the reconciliation participant using its own methodology or on a flat shape basis using the relevant number of days that are within the consumption period and within the period covered by  $kWh_{Px}$ .*

**Audit observation**

NGAG is not responsible for NHH installations.

**Audit commentary**

This clause is not applicable. Compliance was not assessed.

**Audit outcome**

Not applicable

**12.12. Forward estimate process (Clause 6 Schedule 15.3)**

**Code reference**

*Clause 6 Schedule 15.3*

**Code related audit information**

*Forward estimates may be used only in respect of any period for which an historical estimate cannot be calculated.*

*The methodology used for calculating a forward estimate may be determined by the reconciliation participant, only if it ensures that the accuracy is within the percentage of error specified by the Authority.*

**Audit observation**

NGAG is not responsible for NHH installations.

**Audit commentary**



This clause is not applicable. Compliance was not assessed.

**Audit outcome**

Not applicable

**12.13. Compulsory meter reading after profile change (Clause 7 Schedule 15.3)**

**Code reference**

*Clause 7 Schedule 15.3*

**Code related audit information**

*If the reconciliation participant changes the profile associated with a meter, it must, when determining the volume information for that meter and its respective ICP, use a validated meter reading or permanent estimate on the day on which the profile change is to take effect.*

*The reconciliation participant must use the volume information from that validated meter reading or permanent estimate in calculating the relevant historical estimates of each profile for that meter.*

**Audit observation**

All submissions use the HHR profile.

**Audit commentary**

NGAG does not have plans to change the profile associated with submission files.

**Audit outcome**

Compliant

## 13. SUBMISSION FORMAT AND TIMING

### 13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3)

#### Code reference

*Clause 8 Schedule 15.3*

#### Code related audit information

*For each category 3 of higher metering installation, a reconciliation participant must provide half hour submission information to the reconciliation manager.*

*For each category 1 or category 2 metering installation, a reconciliation participant must provide to the reconciliation manager:*

- Half hour submission information; or*
- Non half hour submission information; or*
- A combination of half hour submission information and non half hour submission information*

*However, a reconciliation participant may instead use a profile if:*

- The reconciliation participant is using a profile approved in accordance with clause Schedule 15.5; and*
- The approved profile allows the reconciliation participant to provide half hour submission information from a non half hour metering installation; and*
- The reconciliation participant provides submission information that complies with the requirements set out in the approved profile.*

*Half hour submission information provided to the reconciliation manager must be aggregated to the following levels:*

- NSP code*
- reconciliation type*
- profile*
- loss category code*
- flow direction*
- dedicated NSP*
- trading period*

*The non half hour submission information that a reconciliation participant submits must be aggregated to the following levels:*

- NSP code*
- reconciliation type*
- profile*
- loss category code*
- flow direction*
- dedicated NSP*
- consumption period or day*

#### Audit observation

NGAG is responsible for 2 generation ICPs only. Submission files were reviewed between August 2021 to January 2022. The EMS audit report, dated 14 June 2021, was reviewed.

#### Audit commentary

EMS is the agent for NGAG for the collection of raw meter data, calculation of submission data (volume information) and the transmission of data to the reconciliation and. EMS submits HHRAGGR, ICPDAYS, HHRVOLS and revision files monthly on behalf of NGAG.

NGAG provided files for review between August 2021 and January 2022. The content was reviewed and found compliant.

The EMS audit report describes the process used to create submission information on behalf of NGAG.

#### **Audit outcome**

Compliant

### **13.2. Reporting resolution (Clause 9 Schedule 15.3)**

#### **Code reference**

*Clause 9 Schedule 15.3*

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

*When reporting submission information, the number of decimal places must be rounded to not more than 2 decimal places.*

*If the unrounded digit to the right of the second decimal place is greater than or equal to 5, the second digit is rounded up, and*

*If the digit to the right of the second decimal place is less than 5, the second digit is unchanged.*

#### **Audit observation**

NGAG is responsible for 2 generation ICPs only. Submission files were reviewed between August 2021 to January 2022. The EMS audit report, dated 14 June 2021, was reviewed.

#### **Audit commentary**

EMS provides HHVOLS and HHRAGGR to the reconciliation manager.

The EMS audit report confirmed that submission information is appropriately rounded to two decimal places.

The compliance was confirmed based on a review of the NGAG reconciliation files and the EMS audit report.

#### **Audit outcome**

Compliant

### **13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)**

#### **Code reference**

*Clause 10 Schedule 15.3*

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

*By 1600 hours on the 13th business day of each reconciliation period the reconciliation participant must report to the reconciliation manager the proportion of historical estimates per NSP contained within its non half hour submission information.*

*The proportion of submission information per NSP that is comprised of historical estimates must (unless exceptional circumstances exist) be:*

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*
- *100% for revised data provided at the month 14 revision. (clause 10(3)(c))*

**Audit observation**

NGAG is an embedded generator which is responsible for two HHR ICPs.

**Audit commentary**

This clause is not applicable. Compliance was not assessed.

**Audit outcome**

Not applicable

## CONCLUSION

### PARTICIPANT RESPONSE

NGAG have reviewed this report and our comments are recorded in the report. We thank Ewa for her constructive and engaged approach to the Audit.