

ELECTRICITY INDUSTRY PARTICIPATION CODE
RECONCILIATION PARTICIPANT AUDIT REPORT



For



CONTACT ENERGY LIMITED
CTCS MATERIAL CHANGE AUDIT

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EXECUTIVE SUMMARY

Contact Energy Limited (Contact) intends to begin trading at HHR ICPs using its new CTCS code.

Simply Energy Limited (Simply Energy) will act as an agent for switching, registry, and electricity supplied and reconciliation processes. It is anticipated that 62 HHR ICPs will initially be supplied with meter categories 1, 2, 3 and 4.

AMS will provide HHR data to **EMS** as a HHR data collection agent for all these ICPs. As the customer base grows, other approved agents may provide HHR data to EMS including EDM. EMS will validate the HHR data and create any permanent estimates and corrections which are required, and supply validated HHR data including permanent estimates and corrections to Simply Energy in EIEP3 format. Simply Energy will load these validated volumes into Datahub and produce reconciliation submissions.

At a later stage some category 1 and 2 AMI meters settled as HHR may be supplied. MEPs will provide NHH AMI data for ICPs with meter category 1 or 2 directly to Simply Energy. Meter category 1 and 2 ICPs will only be switched to CTCS and changed to HHR once there is a reliable source of HHR data. Meter category 1 and 2 ICPs will be changed back to NHH and switched to another code if there are issues with data provision.

Clause 8(1) of Schedule 15.1 requires that if a reconciliation participant intends to make a “material” change to any certified facilities, processes or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of Simply Energy so that it can be supplied to the Electricity Authority to satisfy the requirements of Clause 8(1).

The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits V7.2. The test system and test results were examined to determine compliance of the file preparation processes.

Audit findings

The audit found one technical non-compliance because the HHR aggregates file will contain submission information in accordance with the functional specification, not electricity supplied information.

Recommendations were raised in five report sections relating to temporary estimates. Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR data will be loaded into Datahub for the missing trading periods, which will result in the affected ICP and its volumes being omitted from the HHR volumes, HHR aggregates, and ICP days submissions for all missing trading periods. This is likely to cause future non-compliance with:

- the volume derivation requirements,
- the HHR estimate accuracy requirements, and
- the submission accuracy requirements for HHR aggregates, HHR volumes, and ICP days.

Three minor recommendations were made in relation to monitoring ICPs at new and ready statuses, AN file content and CS file content.

The next audit date is determined by the Authority. I recommend the current next audit date of 30/10/2020 is retained because this material change audit did not examine NHH processes, or processes where Simply Energy is not acting as an agent to Contact.

The matters raised are shown in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
HHR aggregates information provision to the reconciliation manager	11.4	15.8	Aggregates file contains submission information.	Strong	Low	1	Identified
Future Risk Rating						1	

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

RECOMMENDATIONS

Subject	Section	Description	Recommendation
ICPs at new or ready status for 24 months	3.10	Monitoring of new and ready ICPs	I recommend Simply Energy run a registry list six monthly with: Status: 000 or 999 Proposed trader: CTCS End date: the day the report is run and compare the results to the ICPs Simply Energy expects to be at "new" or "ready" status. Any ICPs which appear to have been assigned in error can then be checked with the distributor.
Losing trader response to switch request and event dates - standard switch	4.2	AN response code hierarchy	Consider adding the MU (unmetered supply) and OC (occupied premises) codes to the AN code hierarchy to ensure that AA (accept and acknowledge) is only used when no other codes are applicable.
Losing trader must provide final information - standard switch	4.3	CS estimated daily kWh	Consider reviewing the estimated daily consumption calculation to ensure compliance with the registry functional specification.

Subject	Section	Description	Recommendation
Derivation of volume information	9.2	Derivation of volume information where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 3(4) Schedule 15.2 which requires volumes to be derived from actual, permanent estimate or estimate data.
Half hour estimates	9.4	Creation of temporary estimates where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15 Schedule 15.2 which requires participants to provide a best estimate of consumption for submission where actual data is not available. Reasonable endeavours should be used to ensure any estimates are within $\pm 10\%$ of the actual data if it later becomes available.
Calculation of ICP days	11.2	Calculation of ICP days where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15.6 because ICPs with missing volume data will be excluded from the ICP days submissions for any affected trading periods.
HHR aggregates information provision to the reconciliation manager	11.4	Calculation of HHR volumes and aggregates where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15.8 because ICPs with missing volume data will be excluded from the HHR volumes and HHR aggregates submissions for any affected trading periods.
Accuracy of submission information	12.7	Accuracy of submission where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15.12 because ICPs with missing volume data will be excluded from the HHR volumes, HHR aggregates and ICP days submissions for any affected trading periods.

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

The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

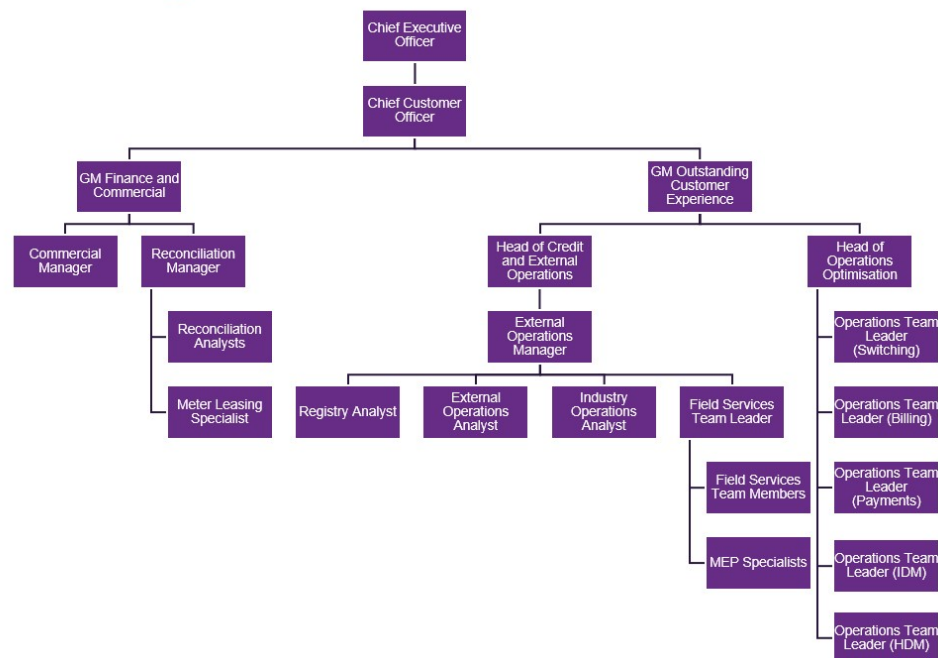
Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Contact Energy provided a copy of their organisational structure.

Contact Organisational Diagram



1.3. Persons involved in this audit

Auditor:

Name	Company
Tara Gannon	Veritek Limited

Simply Energy personnel assisting in this audit were:

Name	Title
Stephen Kemp	Market Operations Manager

Other personnel assisting in this audit were:

Name	Title
Nick Appleby	Solution Support Specialist, EDM

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

Use of agents was discussed.

Audit commentary

Contact Energy will use a number of agents in relation to the functions covered by the scope of this audit as discussed in **section 1.9**.

- Simply Energy will act as an agent for switching, registry processes, as billed submissions and reconciliation submissions.
- AMS will gather HHR metering data.
- EMS will gather and validate HHR metering data, and produce permanent estimates and corrections.

NHH AMI data will be provided by MEPS.

1.5. Hardware and Software

Simply Energy

Meter reading and volume data is imported into AXOS Datahub, which is used to validate the volumes and produce HHR submissions. Validated readings are transferred to the AXOS billing engine for billing and as billed reporting. Salesforce is used for the management of ICP and customer information.

The systems for the collection and management of submission information are described in the agents' audit reports.

Backup is cloud based, and password protection is in place to prevent unauthorised access to data.

AMS and EMS

AMS and EMS' systems are discussed in their agent audit reports.

1.6. Breaches or Breach Allegations

There are no breach allegations relevant to this audit.

1.7. ICP Data

No ICPs are currently supplied by Contact's CTCS code. It is anticipated that 62 commercial and industrial HHR ICPs will initially be supplied. At a later stage some category 1 and 2 meters settled as HHR may also be supplied.

1.8. Authorisation Received

Simply Energy provided all information requested directly.

1.9. Scope of Audit

Clause 8(1) of Schedule 15.1 requires that if a reconciliation participant intends to make a "material" change to any certified facilities, processes or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of Simply Energy so that it can be supplied to the Electricity Authority to satisfy the requirements of Clause 8(1). The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits V7.2.

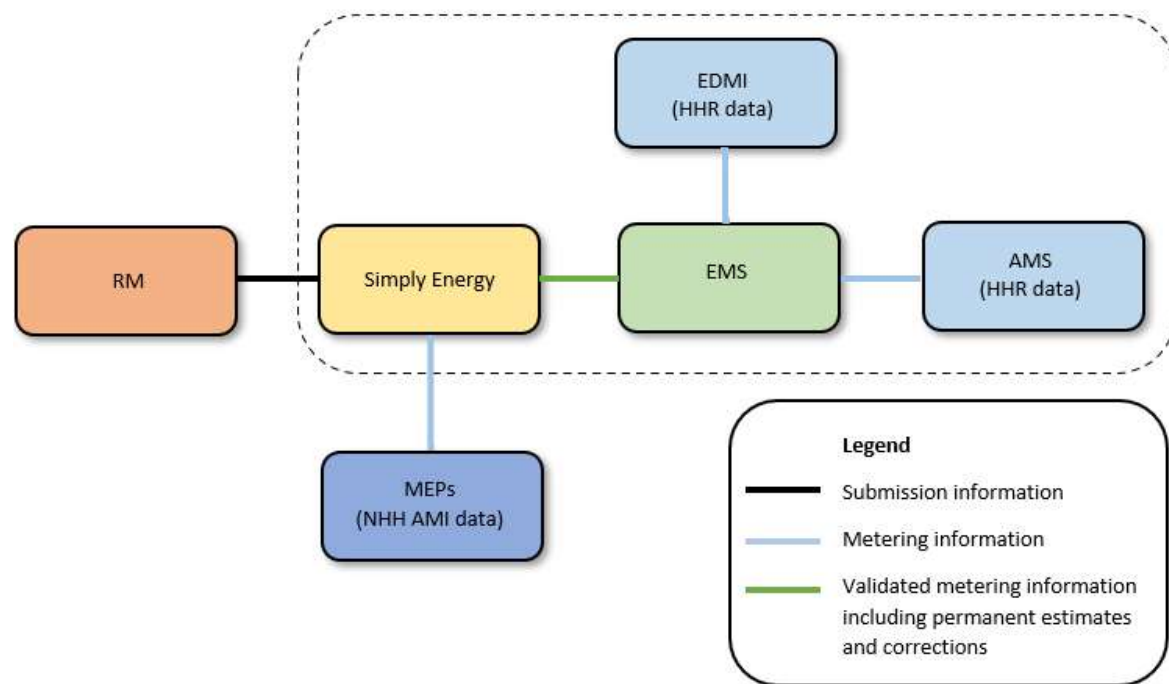
Contact intends to begin trading at HHR ICPs using its new CTCS code.

Simply Energy will act as an agent for switching, registry, and electricity supplied and reconciliation processes. It is anticipated that 62 HHR ICPs will initially be supplied with meter categories 1, 2, 3 and 4.

AMS will provide HHR data to EMS as a HHR data collection agent for HHR ICPs. As the customer base grows, other approved agents may provide HHR data to EMS including EDMI. EMS will validate the HHR data and create any permanent estimates and corrections which are required, and supply validated HHR data including estimates and corrections to Simply Energy in EIEP3 format. Simply Energy will load these validated volumes into Datahub and produce reconciliation submissions.

At a later stage some category 1 and 2 AMI meters settled as HHR may be supplied. MEPs will provide NHH AMI data for ICPs with meter category 1 or 2 directly to Simply Energy. Meter category 1 and 2 ICPs will only be switched to CTCS and changed to HHR once there is a reliable source of HHR data. Meter category 1 and 2 ICPs will be changed back to NHH and switched to another code if there are issues with data provision.

The scope of the audit is shown in the diagram below:



The table below shows the tasks under clause 15.38 of part 15 for which Simply Energy requires certification.

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Agents Involved in Performance of Tasks	MEPs
(a) - Maintaining registry information and performing customer and embedded generator switching	Simply Energy	
(b) – Gathering and storing raw meter data	AMS – HHR data collection EMS – HHR data collection EDMI – HHR data collection	AMS Arc Innovations (Arc) Metrix Smartco The Lines Company (FCLM) WEL Networks
(c)(i) - Creation and management of HHR volume information	Simply Energy EMS – HHR validation, permanent estimation, and correction	
(c)(ii) - Creation and management of NHH volume information		

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Agents Involved in Performance of Tasks	MEPs
(d)(i) - Calculation of ICP days & delivery of a report under clause 15.6	Simply Energy	
(d)(ii) - delivery of electricity supplied information under clause 15.7	Simply Energy	
(e) - Provision of submission information for reconciliation	Simply Energy	

The functions conducted by Simply Energy were audited at their premises in Wellington on 22 and 23 July 2019 as part of the Simply Energy audit and Contact Energy's CTCX material change audit. AMS, EDMl and EMS' HHR agent audit reports will be submitted with this report.

The MEPs provide AMI data as MEPs not agents, and the MEPs are subject to their own audit regime.

1.10. Summary of previous audit

This is the first audit for Contact's CTCX code.

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:

- *complete and accurate*
- *not misleading or deceptive*
- *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

I examined the additional validation steps required for the management of HHR ICPs.

Audit commentary

HHR registry data will be validated as part of Simply Energy's existing validation processes.

Before becoming a CTCS HHR ICP, Simply Energy requires the following conditions to be met:

1. the meter category must be HHR certified, and
2. HHR data must be consistently received.

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

Processes to provide information were reviewed and observed throughout the audit.

Audit commentary

This area is discussed in a number of sections in this report and compliance is confirmed.

Audit outcome

Compliant

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

HHR information will be received from EMS and MEPs via SFTP. A SQL job will collect the files and upload them into Datahub and the Datawarehouse.

Audit commentary

Testing documentation was provided confirming that the process to import HHR data was successfully tested for both HHR and HHR AMI metering information.

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

A complete audit trail was checked for all data gathering, validation and processing functions.

Audit commentary

Simply Energy systems

A complete audit trail was viewed for all data gathering, validation and processing functions during Simply Energy's audit on 22 and 23 July 2019. The logs of these activities include the activity identifier, date and time and an operator identifier. I confirmed the original data is retained during the estimation and correction processes. Once actual data is loaded, it cannot be deleted.

AMS, EDMl and EMS systems

Compliance is recorded in AMS and EMS' audit reports.

EDMI's agent audit recorded that their audit trails did not record the operator identifier for the person who completed the activity; operator identifiers correspond to a user group not an individual. This non-compliance has been cleared, each user now has their own operator identifier.

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

I reviewed Contact's current terms and conditions.

Audit commentary

Contact's terms and conditions include arrangements for meter access and shutdowns and these clauses extend to Contact's agents and are mirrored in agreements with MEPs.

Audit outcome

Compliant

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

I reviewed Contact's current terms and conditions and discussed compliance with these clauses.

Audit commentary

Contact's contract with their customers includes consent to access for authorised parties for the duration of the contract.

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:

- if practical in the circumstances, ensure that the metering installation is located at a point of connection; or*
- 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

Contact's existing processes to manage ICPs with error and loss compensation will apply.

Audit commentary

There will be no changes in this area. No error or loss compensation arrangements are expected for ICPs supplied by CTCS.

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

I reviewed Contact's current terms and conditions.

Audit commentary

Contact's terms and conditions contain the appropriate clauses to achieve compliance with this requirement.

Audit outcome

Compliant

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

The new connection process was examined in detail to evaluate the strength of controls during Simply Energy's audit on 22 and 23 July 2019. The new connection job template was viewed.

Audit commentary

Simply Energy will manage new connections as an agent, using the same processes as the existing trader codes that they manage. The processes were reviewed and observed during Simply Energy's audit.

The new connection process is compliant and contains a step for Simply Energy to accept responsibility. I checked 17 new connections for existing trader codes managed by Simply Energy, and in all cases, Simply Energy had accepted responsibility. Responsibility is accepted for each individual ICP, and there are no blanket responsibility acceptances in place.

Simply Energy is notified that a new connection is required by the customer or an embedded network. The notification is normally via email. Simply Energy adds the ICP to a workflow and raises a job for the new connection to be completed. The workflow is monitored to ensure that the job is completed, and Simply Energy's system and the registry are updated.

Simply Energy's new connection process requires an MEP to be selected. If FCLM will be the MEP, Simply Energy completes the nomination when the ICP is moved to "inactive new connection in progress status". For other MEPs, Simply Energy will claim the ICP with "active" status and nominates the MEP as soon as paperwork is received.

The new connection job template states that certification is required and requests a load bank be taken if the site is not connected. Staff monitor this and contact the MEP if certification is not received promptly.

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 reconciliation participant 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:*
- *the reconciliation participant is recorded in the registry as the trader responsible for the ICP*
- *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 temporary electrical connection.*

Audit observation

The new connection process was examined in detail to evaluate the strength of controls during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

If a temporary electrical connection is required, Simply Energy will ensure that the ICP is claimed so that they are recorded as responsible for the ICP in the registry.

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:*
- the reconciliation participant is recorded in the registry as the trader responsible for the ICP*
- 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 temporary electrical connection.*

Audit observation

The new connection and reconnection processes were examined in detail to evaluate the strength of controls during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Active ICPs without metering

Simply Energy requires all active ICPs to have metering or unmetered load details recorded. All ICPs initially supplied are expected to be metered, apart from two residual load ICPs.

New connections

Simply Energy's new connection job template states that certification is required and requests a load bank be taken if the site is not connected. Staff monitor this and contact the MEP if certification is not received promptly.

Reconnections

Where an uncertified meter requires reconnection, Simply Energy attempts to arrange a meter replacement or recertification at the time of reconnection.

Bridged meters

Simply Energy does not intend to bridge meters to reconnect.

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

The process to ensure an arrangement is in place before trading commences on a network was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Networks must be recorded in Salesforce before ICPs can be assigned to them.

During Contact Energy's reconciliation participant audit, they demonstrated the existence of either a UoSA or other trading arrangement for all relevant networks.

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 process to ensure an arrangement is in place with the metering equipment provider before an ICP can be created or switched in was checked during Simply Energy's audit on 22 and 23 July 2019.

Arrangements with MEPs were discussed with Contact.

Audit commentary

MEPs must be recorded in Salesforce before ICPs can be assigned to them.

During Contact Energy's reconciliation participant audit, they demonstrated the existence of either a MEP agreement or other trading arrangement for all relevant MEPs.

Audit outcome

Compliant

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 unmetered 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 unmetered load 11.3(3)(f).*

Audit observation

The new connections process was examined in detail during Simply Energy's audit on 22 and 23 July 2019, to confirm compliance with the requirement to obtain ICP identifiers for points of connection to local or embedded networks.

Audit commentary

This requirement is well understood and managed by Simply Energy. The process is detailed in **section 2.9**.

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 new connection, MEP nomination, and switching processes were examined in detail during Simply Energy's audit on 22 and 23 July 2019.

This clause links directly to **sections 3.3** and **3.5** below.

Audit commentary

The new connection process is detailed in **sections 2.9**. The process in place ensures that trader information is populated as required by this clause.

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 process to manage status updates, MEP nominations, and trader updates was reviewed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Status updates, MEP nominations, and trader updates will be processed manually on the registry.

Simply Energy is aware of the requirement to ensure that status and trader updates are processed within five business days of the event date and intends to process updates on time.

- Status updates will be processed as soon as possible after the contractor provides confirmation of the reconnection or disconnection.
- Trader updates will be processed as soon as possible after the values for each attribute are confirmed.
- MEP nominations are intended to be processed when a service order is raised for the MEP.

Simply Energy's processes are compliant, and the timeliness and accuracy of registry updates for CTCS will be checked during the first audit after go-live.

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*
 - o *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

Retailers responsibility to nominate and record the MEP in the registry

The new connection process was reviewed during Simply Energy's audit on 22 and 23 July 2019.

ICP decommissioning

The process for the decommissioning of ICPs was examined during Simply Energy's audit on 22 and 23 July 2019. A diverse sample of ten decommissioned ICPs for existing trader codes managed by Simply Energy were checked to prove the process and confirm the controls in place.

Audit commentary

Retailers responsibility to nominate and record the MEP in the registry

MEP nominations will be processed as required and rejected MEP nominations will be monitored and acted upon. All ICPs will be required to have metering or unmetered load details recorded.

ICP decommissioning

ICPs that are vacant and active, or inactive will be maintained in Simply Energy's systems.

When an ICP is decommissioned, an attempt will be made to read the meter at the time of removal. If this is not possible then the last actual meter reading will be used. Simply Energy will also advise the MEP responsible that a site is to be decommissioned, and usually request the meter is removed.

A diverse sample of ten decommissioned ICPs for existing trader codes managed by Simply Energy were checked. If the ICP was metered, the MEP was notified, and a final reading was attempted.

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:

- a) the participant identifier of the trader, as approved by the Authority (clause 9(1)(a))*
- b) the profile code for each profile at that ICP, as approved by the Authority (clause 9(1)(b))*
- c) the metering equipment provider for each category 1 metering or higher (clause 9(1)(c))*
- d) the type of submission information the trader will provide to the RM for the ICP (clause 9(1)(ea))*
- e) 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 five 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

The new connection process was examined in detail during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

The new connection process is described in detail in **section 2.9**.

Status updates, MEP nominations, and trader updates will be processed manually on the registry. Simply Energy is aware of the requirement to ensure that status and trader updates are processed within five business days of the event date and intends to process updates on time.

- Status updates will be processed as soon as possible after the contractor provides confirmation of the reconnection/disconnection details and date.
- Trader updates will be processed as soon as possible after the values for each attribute are confirmed.
- MEP nominations are intended to be processed when a service order is raised for the MEP.

Simply Energy's processes are compliant, and timeliness and accuracy of registry updates for CTCS will be checked during the first audit after go-live.

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 process to capture and manage ANZSIC codes was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

ANZSIC codes are checked on switch in, and T99 series ANZSIC codes are identified and corrected as part of Simply Energy's existing validation processes.

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 process to manage unmetered load was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

It is not anticipated that any ICPs with unmetered load will be supplied.

Any new unmetered load or changes to existing unmetered load are identified and corrected as part of Simply Energy's existing validation processes.

Audit outcome

Compliant

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

The process to manage ICPs at “active” status was examined during Simply Energy’s audit on 22 and 23 July 2019. The new connection process was examined in detail and is discussed in **section 2.9**, and the timeliness of status updates to “active” is discussed in **sections 3.3** and **3.5**.

Audit commentary

Simply Energy will manage “active” statuses as an agent, using the same processes as the existing trader codes that they manage. The processes were reviewed and observed during Simply Energy’s audit.

Simply Energy will change the status of an ICP to “active” once confirmation has been received from a contractor. The status will be updated on the registry using the web interface.

Before being given an “active” status the trader is required to ensure that the ICP has only one customer, embedded generator, or direct purchaser; and that the electricity consumed is quantified by a metering installation(s) or other Authority approved method of calculation. Salesforce will not allow more than one party per ICP nor will it allow an ICP to become “active” without either a meter or a dummy meter (for unmetered load).

Simply Energy’s processes are compliant, and the accuracy of registry updates for CTCS will be checked during the first audit after go-live.

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

The process to manage ICPs at “inactive” status was examined during Simply Energy’s audit on 22 and 23 July 2019.

Audit commentary

Simply Energy will manage “inactive” statuses as an agent, using the same processes as the existing trader codes that they manage. The processes were reviewed and observed during Simply Energy’s audit.

Simply Energy will change the status of an ICP to “inactive” once confirmation has been received from a contractor. The status will be updated on the registry using the web interface.

Simply Energy's processes are compliant, and the accuracy of registry updates for CTCS will be checked during the first audit after go-live.

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

Whilst this is a Distributor's code obligation, I checked the processes to manage any queries received from Distributors in relation to ICPs at the "new" or "ready" status for more than 24 months, and monitor all ICPs at "new" or "ready" status during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

New connections are monitored on the Salesforce dashboard for each trader code. Workflows are used to manage the new connections process. Open jobs are monitored, and the registry is updated as soon as paperwork is received. Late paperwork is followed up.

Simply Energy had not received any recent emails from distributors requesting information on ICPs which have been at "new" or "ready" status for more than two years for the trader codes they currently manage. These will be handled on a case by case basis as they are received.

I recommend that Simply Energy periodically runs a registry list to identify ICPs that have been assigned to their codes in error and advises the distributor.

Description	Recommendation	Audited party comment	Remedial action
Monitoring of new and ready ICPs	I recommend Simply Energy run a registry list six monthly with: Status: 000 or 999 Proposed trader: CTCS End date: the day the report is run and compare the results to the ICPs Simply Energy expects to be at "new" or "ready" status. Any ICPs which appear to have been assigned in error can then be checked with the distributor.	Simply Energy is now monitoring these on a monthly basis.	Identified

Audit outcome

Compliant

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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The switch gain process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy's processes are compliant with the requirements of the Section 36M of the Fair Trading Act 1986. NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

Transfer switch type will be applied where a customer is transferring between retailers at an address. This information is collected as part of the customer application process.

The timeliness and accuracy of transfer NTs for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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 three 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 five 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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The AN process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

AN timeliness

The timeliness of AN files will be monitored using the switch breach report.

AN content

The process to determine AN codes is automated. AD (advanced metering) is applied if an AMI meter is present, and AA (accept and acknowledge) is applied if AMI metering is not present. The CO (contracted customer) and MP (metering is pre-paid) codes do not apply for Simply Energy's existing codes. I recommend Simply Energy review the hierarchy and add the MU (unmetered supply) and OC (occupied premises) codes, so that they are applied in preference to AA to ensure future compliance.

Description	Recommendation	Audited party comment	Remedial action
AN response code hierarchy	Consider adding the MU (unmetered supply) and OC (occupied premises) codes to the AN code hierarchy to ensure that AA (accept and acknowledge) is only used when no other codes are applicable.	This is under review at present.	Investigating

Simply Energy intends to apply the gaining trader's requested date and ensure that all event dates are no more than 10 business days after notification, and at least 50% of event dates are no more than five business days after notification.

The timeliness and accuracy of transfer ANs for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. CS processes were examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

CS timeliness

The timeliness of CS files will be monitored using the Salesforce dashboard and the switch breach report.

CS content

CS files will be created using an ETL (extract, transform, load process) from information contained in Salesforce and Datahub.

Average daily consumption is calculated in Datahub as the consumption between the most recent validated read and the previous validated read, where the previous validated read is at least 21 days before the most recent validated read. If there is insufficient history to calculate the average daily consumption using readings, it will be estimated at 55 kWh per day. These values are noted as Forward Estimate Daily kWh in Sales Force. In the switch loss process this estimated value is manually copied to the Average Daily kWh field for inclusion in the CS file. If left blank, the CS file is populated with average daily consumption of zero.

The registry functional specification requires estimated daily kWh to be based on the average daily consumption for the last read to read period. Where the last read to read period is less than 21 days, the average daily consumption recorded will not be calculated according to the registry functional specification. The Authority's audit update memo on 18/06/19 explained that the average daily consumption calculation may change as part of the switch process review, which is due to be completed in 2020 or 2021. In the meantime, the calculation method could lead to non-compliance and I recommend it is reviewed:

Description	Recommendation	Audited party comment	Remedial action
CS estimated daily kWh	Consider reviewing the estimated daily consumption calculation to ensure compliance with the registry functional specification.	This is under review at present.	Investigating

The timeliness and accuracy of transfer CS files for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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 two validated meter readings.

- *the losing trader can choose not to accept the reading however must advise the gaining trader no later than five 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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The process for the management of read requests was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Timeliness of RR and AC files

Read changes will be tracked using the Salesforce dashboard.

Content of RR and AC files

In cases where CTCS is the gaining trader and they dispute the switch meter reading because the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more, Simply Energy will attempt to negotiate a changed switch meter reading which is supported by validated meter readings.

Advanced meters which have switched in on an estimate reading will be checked against AMI data to determine whether a read change is required. Other read changes will be identified through the read validation processes discussed in **section 9.5**.

Read changes will be processed manually, and Datahub will be manually updated to ensure that it reflects the outcome of the read renegotiation process.

Simply Energy's processes are compliant, and compliance for transfer RR and AC files for CTCS will be assessed during the first audit after go-live.

Audit outcome

Compliant

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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The process for the management of read change requests and acknowledgements where Clause 6(2) and (3) of Schedule 11.3 applies was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy is aware of the requirements of Clause 6(2) and (3) of Schedule 11.3 and has processes in place to ensure compliance.

Simply Energy's processes are compliant, and compliance for CTCS will be assessed during the first audit after go-live.

Audit outcome

Compliant

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

Switching will be completed by Simply Energy as an agent. Processes to manage disputes were discussed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy intends to resolve any disputed reads through the RR process where possible.

Audit outcome

Compliant

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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The switch gain process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy's processes are compliant with the requirements of the Section 36M of the Fair Trading Act 1986. NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

Switch move will be applied where a new customer is moving into an address. This information is collected as part of the customer application process.

Simply Energy's processes are compliant, and the timeliness and accuracy of switch move NTs for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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 five 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:*
 - *confirmation of the switch event date; and*
 - *a valid switch response code; and*
 - *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—*
 - *is not earlier than the gaining trader's proposed event date, and*
 - *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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The AN and CS process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

AN and CS timeliness

The timeliness of AN and CS files will be monitored using the switch breach report.

AN content

As discussed in **section 4.2**, the process to determine AN codes has been automated, and I recommend Simply Energy review the hierarchy and add the MU (unmetered supply) and OC (occupied premises) codes.

Simply Energy intends to apply the gaining trader's requested date and ensure that all event dates are no more than 10 business days after notification and are not before the gaining trader's requested date.

Simply Energy's processes are compliant, and the timeliness and accuracy of switch move AN and CS files for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The switch completion process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy intends to complete switches as required by this clause.

Simply Energy's processes are compliant, and the timeliness and accuracy of switch completion for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. CS processes were examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

CS files will be created using an ETL (extract, transform, load process) from information contained in Salesforce and Datahub.

As discussed in **section 4.3**, average daily consumption is calculated in Datahub as the consumption between the most recent validated read and the previous validated read, where the previous validated read is at least 21 days before the most recent validated read. If there is insufficient history to calculate the average daily consumption using readings, it will be estimated at 55 kWh per day.

The timeliness and accuracy of switch move CS files for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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 four 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 five 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

Category 1 or 2 meters with HHR metering may be supplied by CTCS.

Switching will be completed by Simply Energy as an agent. The process for the management of read requests was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Timeliness of RR and AC files

Read changes will be tracked using the Salesforce dashboard.

Content of RR and AC files

In cases where CTCS is the gaining trader and they dispute the switch meter reading because the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more, Simply Energy will attempt to negotiate a changed switch meter reading which is supported by validated meter readings.

Advanced meters which have switched in on an estimate reading will be checked against AMI data to determine whether a read change is required. Other read changes will be identified through the read validation processes discussed in **section 9.5**.

Read changes will be processed manually, and Datahub will be manually updated to ensure that it reflects the outcome of the read renegotiation process.

Simply Energy's processes are compliant, and compliance for switch move RR and AC files for CTCS will be assessed during the first audit after go-live.

Audit outcome

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

Switching will be completed by Simply Energy as an agent. The switch gain process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy's processes are compliant with the requirements of the Section 36M of the Fair Trading Act 1986. NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

HH switch type will be applied for ICPs with metering category 3 or above.

Simply Energy's processes are compliant, and the timeliness and accuracy of HH NTs for CTCs will be checked during the first audit after go-live.

Audit outcome

Compliant

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 three 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

Switching will be completed by Simply Energy as an agent. The AN process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

AN timeliness

The timeliness of AN files will be monitored using the switch breach report.

AN content

The process to determine AN codes is automated, as described in **section 4.2**.

Simply Energy's processes are compliant, and the timeliness and accuracy of HH ANs for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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

Switching will be completed by Simply Energy as an agent. CS processes were examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

CS timeliness

The timeliness of CS files will be monitored using the Salesforce dashboard and the switch breach report.

CS content

CS files will be created using an ETL (extract, transform, load process) from information contained in Sales Force. The content of 14 HH CS files for existing trader codes managed by Simply Energy was checked and confirmed to be correct.

The timeliness and accuracy of HH CS files for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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 two 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)):*
 - *the participant identifier of the trader making the withdrawal request (clause 18(c)(i));*
 - *and*
 - *the withdrawal advisory code published by the Authority. (clause 18(c)(ii))*
- *within five 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 two 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

Switching will be completed by Simply Energy as an agent. The switch withdrawal process was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

NW and AW timeliness

NWs are issued as soon as possible after Simply Energy has confirmed that a withdrawal is required.

AWs will be tracked using the Salesforce dashboard.

NW and AW content

NWs and AWs will be created manually, and withdrawal and response codes will be applied based on the best information available. The content of 30 NW files for existing trader codes managed by Simply Energy were checked and confirmed to be correct. A sample of 11 AW rejections for existing trader codes managed by Simply Energy were checked and confirmed to be validly rejected.

The timeliness and accuracy of NWs and AWs for CTCS will be checked during the first audit after go-live.

Audit outcome

Compliant

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

The meter reading process in relation to meter reads for switching purposes was examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

The meter readings used in the switching process will be validated meter readings or permanent estimates.

CTCS's policy regarding the management of meter reading expenses is compliant.

Audit outcome

Compliant

4.17. Switch saving protection (Clause 11.15AA to 11.15AB)

Code reference

Clause 11.15AA to 11.15AB

Code related audit information

A trader that buys electricity from the clearing manager may elect to have a switch saving protection by giving notice to the Authority in writing.

If a protected trader enters into an arrangement with a customer of another trader (the losing trader), or a trader enters into an arrangement with a customer of a protected trader, to commence trading electricity with the customer, the losing trader must not, by any means, initiate contact with the customer to attempt to persuade the customer to terminate the arrangement during the period from the receipt of the NT to the event date of the switch including by:

11.15AB(4)(a)- making a counter offer to the customer; or

11.15AB(4)(b)- offering an enticement to the customer.

Audit observation

CTCS is not expected to be switch save protected.

Win-back processes were examined to determine whether they are compliant.

Audit commentary

Contact will complete any win-backs and will exclude all switch save protected traders from win-back processes until after the switch is completed.

Audit outcome

Compliant

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

The process to identify and monitor unmetered load was discussed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Any new unmetered load will be identified through Simply Energy's existing validation checks.

Audit outcome

Compliant

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

The process to identify all active ICPs with unmetered load over 3,000 kWh per annum was discussed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy is aware of the unmetered load threshold and will install metering where an ICP breaches or is likely to breach the threshold.

Audit outcome

Compliant

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:*
 - *the date the limit was calculated or estimated to have been exceeded*
 - *the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.*

Audit observation

The process to identify all active ICPs with unmetered load over 3,000 kWh per annum was discussed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy is aware of the unmetered load threshold and will install metering where an ICP breaches or is likely to breach the threshold.

Audit outcome

Compliant

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

Processes for distributed unmetered load were discussed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy is aware of the requirements for DUML, including tracking of load changes as discussed in the Authority's memo dated 18/06/19. DUML is not intended to be supplied by the CTCS code.

Audit outcome

Compliant

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 one, 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

Processes to ensure metering is installed and unmetered load is quantified, management of distributed generation, and processes for bridged meters were examined during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Metering installations installed

Simply Energy's new connection process includes a check that metering is installed before energisation occurs, and that any unmetered load is quantified. Subtraction is not used to determine submission information.

Generation

A monthly report will be run to check ICPs with an installation type of B or G. The ICPs will be checked to determine whether generation is present, compliant metering is installed, and profiles are correct.

Bridged meters

Bridging of meters is against Simply Energy's policies.

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 three months for the grid owner to review and comment on the design*
- *respond within three 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 NSP table was reviewed to confirm whether CTCS is responsible for any GIPs.

Audit commentary

Examination of the NSP table found CTCS is not responsible for any GIPs.

Audit outcome

Not applicable

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

Processes to ensure that ICPs with profiles requiring certified control devices have appropriate certification were reviewed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy will manage application of profiles requiring certification of control devices as an agent, using the same processes as the existing trader codes that they manage. The processes were reviewed and observed during Simply Energy's audit.

Processes are in place to ensure ICPs meet the certification requirements for their profile. I checked all ICPs with profiles requiring control device certification for existing trader codes managed by Simply Energy and found compliance.

CTCS is initially expected to use the HHR profile, which does not require certification of control devices.

Audit outcome

Compliant

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

Processes relating to defective metering were examined during Simply Energy's audit on 22 and 23 July 2019. EMS' agent audit report was reviewed.

Audit commentary

Defective meters will be identified through the meter reading validation process, or from information provided by the meter reader, agent, the MEP, or the customer. Upon identifying a possible defective meter, a field services job will be raised to investigate and resolve the defect and a consumption correction is processed if necessary.

Simply Energy and EMS' validation processes were reviewed in **sections 9.5** and **9.6**, and found to be sufficient to detect potential defective meters.

Corrections are discussed in **sections 8.1** and **8.2**.

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

The data collection process was examined in **section 2.3**.

Data collection and clock synchronisation processes were reviewed as part of the agent and MEP audits. Agents and MEPs are to advise Simply Energy of clock synchronisation discrepancies and adjustments.

Audit commentary

Information used to determine volume information is provided to Simply Energy by MEPs and agents, and compliance has been demonstrated by AMS and EMS.

Non-compliance was recorded in EDMl's agent audit relating to manual downloads for FCLM meters read using MV90, because meter event logs were not obtained and checks for time differences were not conducted. This non-compliance has been cleared. FCLM now provide meter event files for manual downloads, which include any time differences.

Notifications of clock synchronisation events will be reviewed and actioned by Simply Energy.

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: obtain the meter register

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

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

Audit observation

CTCS will not supply NHH ICPs. All ICPs will have HHR metering and be read by the MEP or a HHR data collection agent.

Audit commentary

CTCS will not supply NHH ICPs.

Audit outcome

Not applicable

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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 four months, for which consumption information is required to be reported into the reconciliation process. A validated meter reading is obtained at least once every four 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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

HHR information will be received from AMS, EDM I and EMS as agents.

Audit commentary

Compliance is recorded in the AMS, EDM I and EMS agent audit reports.

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

HHR information will be received from AMS, EDM I and EMS as agents.

Audit commentary

Compliance is recorded in the AMS, EDM I and EMS agent audit reports.

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

HHR information will be received from AMS, EDM I and EMS as agents.

Audit commentary

Compliance is recorded in the AMS, EDM I and EMS agent audit reports.

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 $\pm 0.1\%$ (± 2 seconds).

Audit observation

MEPs and agents are responsible for trading period duration.

HHR information will be received from AMS, EDM I and EMS as agents. HHR AMI data will be received from the MEPs.

Audit commentary

Compliance is recorded in the agent and MEP audit reports.

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

Processes to archive and store raw meter data were reviewed during the agent and MEP audits. I checked that meter readings cannot be modified without an audit trail and viewed archived meter reading data.

Processes for archiving and storage were reviewed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

The agents and MEPs are compliant with these clauses.

When this data reaches Simply Energy's systems, the level of security is also robust and unauthorised personnel cannot access raw meter data. I checked that data is retained by Simply Energy for at least 48 months, by viewing raw meter data for 2013 and 2014 for existing trader codes.

Compliance with clause 18(3) of schedule 15.2 was examined, which requires that "...meter readings cannot be modified without an audit trail being created." Readings cannot be modified without an audit trail being created.

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

CTCS will not deal with any non-metering information.

Audit commentary

CTCS will not deal with any non-metering information.

If non-metering information is required in the future, it will be collected and archived in accordance with this clause.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

I conducted a walkthrough of the process to determine compliance, and viewed test results. AMS, EDM I and EMS' agent audit reports were reviewed.

Audit commentary

AMS will provide HHR data to EMS. AMS confirmed in writing that they will check for missing data:

- where data is temporarily missing due to a communications fault, AMS will reattempt to retrieve the information,
- if data cannot be retrieved, AMS will deliver the data that they have available, and estimates will be required for the missing data, and
- data gaps during meter changes will be filled with zeros by AMS, and estimates will be required for any zero or understated intervals.

EDMI will provide HHR data to EMS. They confirmed in writing that they will not provide estimated data.

EMS will validate the HHR data received from AMS and EDM I, and create permanent estimates and corrections as required. EMS' correction and estimation processes were reviewed during their agent audit and found to be compliant. Only missing or incorrect data will be adjusted, not actual data. Corrections and estimates will be identified by trading period.

EMS confirmed that they will create permanent estimates where volumes are missing during meter replacements, or they believe that data will be unable to be recovered at a future date. In all other instances, EMS will create permanent estimates only where they are requested by Simply Energy. EMS will provide exception reports advising Simply Energy where trading period data is "undefined" or missing.

Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR data will be loaded into Datahub for the missing trading periods, which will result in the affected ICP and its volumes being omitted from the HHR volumes, HHR aggregates, and ICP days submissions for all missing trading periods. This is likely to cause future non-compliance with:

- the volume derivation requirements discussed in **section 9.2**,
- the HHR estimate accuracy requirements discussed in **section 9.4**, and
- and the submission accuracy requirements discussed in **sections 11.2, 11.4, and 12.7**.

EMS will supply validated HHR data including permanent estimates and corrections to Simply Energy in EIEP3 format. EMS confirmed that the EIEP3 files are normally only produced where data is available for all expected trading periods and ICPs, but the files can be run manually where some data is missing.

Simply Energy will load these validated volumes into Datahub and produce reconciliation submissions. Simply Energy provided test results for the data replacement process, which confirmed that replacement data is used to create reconciliation submissions.

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

Contact's existing processes to manage ICPs with error and loss compensation will apply.

Audit commentary

There will be no changes in this area. No error or loss compensation arrangements are expected for ICPs supplied by CTCS.

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

Corrections are discussed in **section 8.2**, which confirmed that raw meter data is not overwritten as part of the correction process. Audit trails are discussed in **section 2.4**.

Raw meter data retention for MEPs and agents was reviewed as part of their own audits.

Audit commentary

Compliance with this clause has been demonstrated by the MEPs and agents.

Audit trails are compliant with the requirements of this clause.

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

Processes to identify readings were reviewed during Simply Energy's audit on 22 and 23 July 2019, and EMS' agent audit report was reviewed.

Audit commentary

Readings will be clearly identified as required by this clause.

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

I conducted a walk-through of the processes from data provision to submission.

Audit commentary

Volume information is based on validated actual or permanent estimate data. Simply Energy does not intend to use temporary estimates, and no volume information is produced where data is temporarily missing.

Recommendation	Description	Audited party comment	Remedial action
Derivation of volume information where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 3(4) Schedule 15.2 which requires volumes to be derived from actual, permanent estimate or estimate data.	This will be looked at in the next few months as we look at a more permanent solution.	Investigating

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

I conducted a walk-through of the processes from data provision to submission.

Audit commentary

Data is only rounded at the time of preparation of submission files.

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

I conducted a walkthrough of the process to determine compliance, and viewed test results. EMS' agent audit report was reviewed.

Audit commentary

AMS will provide HHR data to EMS. AMS confirmed in writing that they will check for missing data:

- where data is temporarily missing due to a communications fault, AMS will reattempt to retrieve the information,
- if data cannot be retrieved, AMS will deliver the data that they have available, and estimates will be required for the missing data, and
- data gaps during meter changes will be filled with zeros by AMS, and estimates will be required for any zero or understated intervals.

EDMI will provide HHR data to EMS. They confirmed in writing that they will not provide estimated data.

EMS will validate the HHR data received from AMS and EDMI, and create permanent estimates and corrections as required. EMS' correction and estimation processes were reviewed during their agent audit and found to be compliant. Only missing or incorrect data will be adjusted, not actual data. Corrections and estimates will be identified by trading period.

EMS confirmed that they will create permanent estimates where volumes are missing during meter replacements, or they believe that data will be unable to be recovered at a future date. In all other instances, EMS will create permanent estimates only where they are requested by Simply Energy. EMS will provide exception reports advising Simply Energy where trading period data is "undefined" or missing.

Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR data will be loaded into Datahub for the missing periods, which will result in the affected ICP and its volumes being omitted from the HHR volumes, HHR aggregates, and ICP days submissions for all missing periods. By not producing estimates where data is temporarily missing, it is unlikely that Simply Energy will meet the requirement to use reasonable endeavours to ensure that any estimates are within $\pm 10\%$ of the actual data.

Recommendation	Description	Audited party comment	Remedial action
Creation of temporary estimates where validated actual or permanent estimate data is not provided by EMS.	<p>Not entering temporary estimates is likely to cause non-compliance with Clause 15 Schedule 15.2 which requires participants to provide a best estimate of consumption for submission where actual data is not available.</p> <p>Reasonable endeavours should be used to ensure any estimates are within $\pm 10\%$ of the actual data if it later becomes available.</p>	This will be looked at in the next few months as we look at a more permanent solution.	Investigating

EMS will supply validated HHR data including permanent estimates and corrections to Simply Energy in EIEP3 format. EMS confirmed that the EIEP3 files are normally only produced where data is available for all expected trading periods and ICPs, but the files can be run manually where some data is missing.

Simply Energy will load these validated volumes into Datahub and produce reconciliation submissions. Simply Energy provided test results confirming the data replacement process, which confirmed that replacement data is used to create reconciliation submissions.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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 zero 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 meter and data storage device event list. Any event that could have affected the integrity of metering data must be investigated.

Audit observation

HHR

HHR validation will be conducted by EMS for HHR ICPs. AMS, EDM I and EMS' HHR agent reports were reviewed.

HHR AMI

HHR AMI data validation will be conducted by Simply Energy. I walked through Simply Energy's validation process.

Audit commentary

HHR

EMS will validate the HHR data received from AMS and EDM, and create any permanent estimates and corrections which are required. EMS and AMS' validation processes were reviewed during their agent audits and found to be compliant.

Non-compliance was recorded in EDM's agent audit relating to manual downloads for FCLM meters read using MV90, because meter event logs were not obtained and checks for time differences were not conducted. This non-compliance has been cleared. FCLM now provide meter event files for manual downloads, which include any time differences. The files are manually reviewed by EDM agents.

EMS will supply validated HHR data including permanent estimates and corrections to Simply Energy in EIEP3 format.

After import into Datahub additional validation will be conducted by Simply Energy, including a check for unexpected zero volumes in submission files, and a comparison between billed and submission volumes using PowerQuery.

HHR AMI

For HHR AMI ICPs Simply Energy carries out the same billing validation as used for NHH ICPs. This includes high and low consumption to achieve compliance with 17(4)(d). Reporting is in place for missing data. Files with incorrect dates or times will be identified at the time of loading and two identical files cannot be loaded.

Event reports will be reviewed and actioned by Simply Energy.

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

The NSP table on the registry was reviewed.

Audit commentary

CTCS is not responsible for any NSPs. No information is provided to the grid owner in accordance with this clause.

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

The NSP table on the registry was reviewed.

Audit commentary

CTCS is not responsible for any NSPs. No information is provided to the grid owner in accordance with this clause.

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

The NSP table on the registry was reviewed.

Audit commentary

CTCS is not responsible for any NSPs. No information is provided to the grid owner in accordance with this clause.

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

The NSP table on the registry was reviewed.

Audit commentary

CTCS is not responsible for any NSPs. No information is provided to the grid owner in accordance with this clause.

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

Processes to create buying and selling notifications and trading notifications were reviewed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

Simply Energy do not routinely create trading notifications. CTCS is expected to use the HHR profile, which does not require trading notifications.

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 calculation of ICP days was demonstrated in the test system.

Audit commentary

The ICP days calculation is correct.

Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR

data will be loaded into Datahub for the missing periods, which will result in the affected ICP and its volumes being omitted from the ICP days submissions for all missing periods.

Recommendation	Description	Audited party comment	Remedial action
Calculation of ICP days where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15.6 because ICPs with missing volume data will be excluded from the ICP days submissions for any affected trading periods.	This will be looked at in the next few months as we look at a more permanent solution.	Investigating

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

The process for the calculation of electricity supplied was examined during Simply Energy's audit on 22 and 23 July 2019, by checking AV120 and GR130 files for existing trader codes managed by Simply Energy.

Audit commentary

Electricity supplied calculation

Electricity supplied calculations are conducted by Simply Energy. Review of 15 NSPs for existing trader codes managed by Simply Energy confirmed that AV120 submission data was calculated correctly and consistent with invoice information.

Electricity supplied versus submission information

GR130 reports for January 2017 onwards for existing trader codes managed by Simply Energy were reviewed to confirm whether the relationship between billed and submitted data appears reasonable. Simply Energy's own analysis of billed versus submitted data was also reviewed. No issues with the electricity supplied submissions were identified.

Audit outcome

Compliant

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

I conducted a walkthrough of the HHR aggregates file preparation and compared an example to the HHR vols and ICP days files.

Audit commentary

Simply Energy will prepare a HHR Aggregates file at ICP level based on submission information. This was demonstrated in the test system, including confirmation that the file format was correct and a sample of volumes matched to the raw meter data.

Clause 15.8 states that the aggregates file should contain electricity supplied information rather than submission information and electricity supplied information is defined as shown below:

electricity supplied means, for any particular period, the information relating to the quantities of **electricity** supplied by **retailers** across **points of connection to consumers**, sourced directly from the **retailer's** financial records, including quantities—

- (a) that are metered or unmetered; and
- (b) supplied through normal **customer** supply and billing arrangements; and
- (c) supplied under sponsorship arrangements; and
- (d) supplied under any other arrangement

This differs from the Reconciliation Manager Functional Specification. In Section 3 of the Reconciliation Manager Functional Specification, HHR Aggregates information is described as: “...*HHR submission information that is aggregated per ICP for the whole month (not half-hourly)*”, which suggests an intention that this information should be sourced from submission information not electricity supplied information, which is covered by clause 15.7.

Type of information that is submission information	Description	Source	Classification in this document
information	electricity supplied information.		supplied
Monthly half-hour ICP aggregates	This is equivalent to the HHR submission information that is aggregated per ICP for the whole month (not half-hourly).	Purchasers (excluding direct consumers)	Monthly half-hour ICP aggregates

Data from the aggregates file is used to support other reporting by the Reconciliation Manager and will be of little value if it is based on Electricity Supplied data rather than submission data. Electricity Supplied data has a one month offset and invoicing is not required to occur within any specific timeframes.

Whilst the Code clearly states this file should be derived from financial records, I recommend Simply Energy liaises with the Authority regarding a Code change which will allow for the aggregates files used in the industry to remain unchanged.

Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR data will be loaded into Datahub for the missing periods, which will result in the affected ICP and its volumes being omitted from the HHR volumes and HHR aggregates submissions for all missing periods.

Recommendation	Description	Audited party comment	Remedial action
Calculation of HHR volumes and aggregates where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15.8 because ICPs with missing volume data will be excluded from the HHR volumes and HHR aggregates submissions for any affected trading periods.	This will be looked at in the next few months as we look at a more permanent solution.	Investigating

Simply Energy reviews the GR090 ICP missing files, and takes action as required to ensure that ICPs are correctly included or excluded in submission information for its existing codes. CTCS will be added to this process.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 11.4 With: Clause 15.8 of part 15 From: 28-Feb-20 To: 28-Feb-20	Aggregates file contains submission information. Potential impact: None Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because the aggregates file is correct compared to the functional specification. There is no impact on settlement because the aggregates file is only used for reporting, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an issue in the way the code is written which causes each Trader to be in breach. We are taking no action on this at this time.			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	

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 one of the techniques set out in clause 15.36(3) specified by the Authority.

Audit observation

The daylight-saving process was demonstrated. Test EIEP, HHR aggregates and HHR volumes files reviewed for periods where daylight savings began and ended.

Audit commentary

AMS and EDMI will provide daylight savings adjusted date and the daylight-saving adjustment process is compliant.

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

The process to create HHR submissions was demonstrated, along with the revision process.

Audit commentary

HHR submissions were reviewed in **section 11.4**, and data is validated prior to submission as discussed in **section 12.3**.

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

The process to create HHR submissions was demonstrated, along with the revision process.

Audit commentary

Simply Energy reviews the GR090 ICP missing files, and takes action as required to ensure that ICPs are correctly included or excluded in submission information for its existing codes. CTCS will be added to this process.

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

The NSP table was reviewed.

Audit commentary

CTCS is not a grid owner; 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

The NSP table was reviewed.

Audit commentary

CTCS is not a grid connected or embedded network owner; 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

The NSP table was reviewed.

Audit commentary

CTCS is not a grid connected generator; 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

I conducted a walkthrough of the process for the provision of submission information.

Audit commentary

The revision, correction, and permanent estimation processes are compliant. I confirmed that corrections flow through to the relevant submission files.

Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR data will be loaded into Datahub for the missing periods, which will result in the affected ICP and its volumes being omitted from the HHR volumes, HHR aggregates, and ICP days submissions for all missing periods.

Recommendation	Description	Audited party comment	Remedial action
Accuracy of submission where validated actual or permanent estimate data is not provided by EMS.	Not entering temporary estimates is likely to cause non-compliance with Clause 15.12 because ICPs with missing volume data will be excluded from the HHR volumes, HHR aggregates and ICP days submissions for any affected trading periods.	This will be looked at in the next few months as we look at a more permanent solution.	Investigating

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

Processes for permanence of meter readings were discussed during Simply Energy's audit on 22 and 23 July 2019.

Audit commentary

All ICPs will be HHR and it is likely that they will all receive actual readings by revision 14.

Audit outcome

Compliant

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)(b)):*
 - 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 apply to the raw meter data (clause 2(3)):*
 - a) *for each ICP, the compensation factor that is recorded in the registry (clause 2(3)(a))*
 - b) *for each NSP the compensation factor that is recorded in the metering installations most recent certification report. (clause 2(3)(b))*

Audit observation

I conducted a walkthrough of the process for the provision of HHR submission information.

Audit commentary

The system and processes are compliant. Validation will be in place to ensure the accuracy of HHR submission. All ICPs will have a continuous submission type of HHR.

No ICPs are expected to require loss or compensation arrangements, or use profiles that require certification of a control device.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

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

Simply Energy's profile change process was reviewed during their audit on 22 and 23 July 2019. A sample of changes for existing trader codes managed by Simply Energy were checked.

Audit commentary

All CTCS ICPs are expected to continuously have the HHR profile applied.

Simply Energy's profile change process requires an actual reading or permanent estimate on the day of the profile change.

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

The aggregation process will not change. The only change will be the addition of HHR submission files, which were examined during the audit.

Audit commentary

The HHR submission files are compliant. The HHR vols, HHR aggregates, and ICP days files all align.

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 two decimal places.

If the unrounded digit to the right of the second decimal place is greater than or equal to five, the second digit is rounded up, and if the digit to the right of the second decimal place is less than five, the second digit is unchanged.

Audit observation

I reviewed the rounding of data.

Audit commentary

Data is correctly rounded at the time of file preparation to two decimal places.

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

CTCS will not supply NHH ICPs.

Audit commentary

CTCS will not supply NHH ICPs.

Audit outcome

Not applicable

CONCLUSION

Contact intends to begin trading at HHR ICPs using its new CTCS code.

Simply Energy will act as an agent for switching, registry, and electricity supplied and reconciliation processes. It is anticipated that 62 HHR ICPs will initially be supplied with meter categories 1, 2, 3 and 4.

AMS will provide HHR data to EMS as a HHR data collection agent all these ICPs. As the customer base grows, other approved agents may provide HHR data to EMS including EDMl. EMS will validate the HHR data and create any permanent estimates and corrections which are required, and supply validated HHR data including permanent estimates and corrections to Simply Energy in EIEP3 format. Simply Energy will load these validated volumes into Datahub and produce reconciliation submissions.

At a later stage some category 1 and 2 AMI meters settled as HHR may be supplied. MEPs will provide NHH AMI data for ICPs with meter category 1 or 2 directly to Simply Energy. Meter category 1 and 2 ICPs will only be switched to CTCS and changed to HHR once there is a reliable source of HHR data. Meter category 1 and 2 ICPs will be changed back to NHH and switched to another code if there are issues with data provision.

Clause 8(1) of Schedule 15.1 requires that if a reconciliation participant intends to make a “material” change to any certified facilities, processes or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of Simply Energy so that it can be supplied to the Electricity Authority to satisfy the requirements of Clause 8(1).

The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits V7.2. The test system and test results were examined to determine compliance of the file preparation processes.

Audit findings

The audit found one technical non-compliance because the HHR aggregates file will contain submission information in accordance with the functional specification, not electricity supplied information.

Recommendations were raised in five report sections relating to temporary estimates. Simply Energy does not intend to create temporary estimates where data is temporarily missing and expected to be available at a future date, e.g. where there is a meter communications issue. No HHR data will be loaded into Datahub for the missing trading periods, which will result in the affected ICP and its volumes being omitted from the HHR volumes, HHR aggregates, and ICP days submissions for all missing trading periods. This is likely to cause future non-compliance with:

- the volume derivation requirements,
- the HHR estimate accuracy requirements, and
- and the submission accuracy requirements for HHR aggregates, HHR volumes, and ICP days.

Three minor recommendations were made in relation to monitoring ICPs at new and ready statuses, AN file content and CS file content.

The next audit date is determined by the Authority. I recommend the current next audit date of 30/10/2020 is retained because this material change audit did not examine NHH processes, or processes where Simply Energy is not acting as an agent to Contact.

PARTICIPANT RESPONSE

This report has been reviewed by Simply Energy on behalf of Contact, and their comments are contained within its body.