

ELECTRICITY INDUSTRY PARTICIPATION CODE
RECONCILIATION PARTICIPANT AUDIT REPORT



For

COUNTRY CONNECT SOLAR LTD
TRADING AS SUPERCHARGED ENERGY

Prepared by: Rebecca Elliot

Date audit commenced: 24 August 2018

Date audit report completed: 27 August 2018

Audit report due date: 21-Jun-18

TABLE OF CONTENTS

Executive summary	5
Audit summary	6
Non-compliances	6
Recommendations	7
Issues	8
1. Administrative	9
1.1. Exemptions from Obligations to Comply with Code (Section 11)	9
1.2. Structure of Organisation	9
1.3. Persons involved in this audit	9
1.4. Use of Agents (Clause 15.34)	9
1.5. Hardware and Software	10
1.6. Breaches or Breach Allegations	10
1.7. ICP Data	10
1.8. Authorisation Received	11
1.9. Scope of Audit	11
1.10. Summary of previous audit	12
1.11. Audit Requirement (Clause 15.37A)	12
1.12. Requirement for certification (Clause 2A of schedule 15.1)	13
2. Operational Infrastructure	15
2.1. Relevant information (Clause 10.6, 11.2, 15.2)	15
2.2. Provision of information (Clause 15.35)	17
2.3. Data transmission (Clause 20 Schedule 15.2)	18
2.4. Audit trails (Clause 21 Schedule 15.2)	18
2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4) ..	19
2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))	19
2.7. Physical location of metering installations (Clause 10.35(1)&(2))	20
2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)	21
2.9. Connection of an ICP (Clause 10.32)	21
2.10. Temporary Electrical Connection of an ICP (Clause 10.33(1))	22
2.11. Electrical Connection of Point of Connection (Clause 10.33A)	23
2.12. Arrangements for line function services (Clause 11.16)	23
2.13. Arrangements for metering equipment provision (Clause 10.36)	25
3. Maintaining registry information	27
3.1. Obtaining ICP identifiers (Clause 11.3)	27
3.2. Providing registry information (Clause 11.7(2))	28
3.3. Changes to registry information (Clause 10 Schedule 11.1)	28
3.4. Trader responsibility for an ICP (Clause 11.18)	30
3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)	31
3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1)	32
3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)	33
3.8. Management of “active” status (Clause 17 Schedule 11.1)	34
3.9. Management of “inactive” status (Clause 19 Schedule 11.1)	35
3.10. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)	35
4. Performing customer and embedded generator switching	37

4.1.	Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)..	37
4.2.	Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)	38
4.3.	Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)	40
4.4.	Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)	41
4.5.	Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)	42
4.6.	Disputes - standard switch (Clause 7 Schedule 11.3)	43
4.7.	Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)	43
4.8.	Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)	45
4.9.	Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)	46
4.10.	Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)	47
4.11.	Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)	47
4.12.	Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)	48
4.13.	Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)	49
4.14.	Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)	50
4.15.	Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)	50
4.16.	Metering information (Clause 21 Schedule 11.3)	53
4.17.	Switch saving protection (Clause 11.15AA to 11.15AB)	53
5.	Maintenance of unmetered load	55
5.1.	Maintaining shared unmetered load (Clause 11.14)	55
5.2.	Unmetered threshold (Clause 10.14 (2)(b))	56
5.3.	Unmetered threshold exceeded (Clause 10.14 (5))	56
5.4.	Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)	57
6.	Gathering raw meter data	58
6.1.	Electricity conveyed & notification by embedded generators (Clause 10.13, Clause 10.24 and 15.13)	58
6.2.	Responsibility for metering at GIP (Clause 10.26 (6), (7) and (8))	60
6.3.	Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)	61
6.4.	Reporting of defective metering installations (Clause 10.43(2) and (3))	62
6.5.	Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)	62
6.6.	Derivation of meter readings (Clause 3(1), 3(2) and 5 Schedule 15.2)	63
6.7.	NHH meter reading application (Clause 6 Schedule 15.2)	64
6.8.	Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)	64
6.9.	NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)	65
6.10.	NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)	66
6.11.	NHH meter interrogation log (Clause 10 Schedule 15.2)	67
6.12.	HHR data collection (Clause 11(1) Schedule 15.2)	67
6.13.	HHR interrogation data requirement (Clause 11(2) Schedule 15.2)	68
6.14.	HHR interrogation log requirements (Clause 11(3) Schedule 15.2)	68
7.	Storing raw meter data	70
7.1.	Trading period duration (Clause 13 Schedule 15.2)	70
7.2.	Archiving and storage of raw meter data (Clause 18 Schedule 15.2)	70
7.3.	Non-metering information collected / archived (Clause 21(5) Schedule 15.2)	71

8.	Creating and managing (including validating, estimating, storing, correcting and archiving) volume information.....	72
8.1.	Correction of NHH meter readings (Clause 19(1) Schedule 15.2).....	72
8.2.	Correction of HHR metering information (Clause 19(2) Schedule 15.2).....	72
8.3.	Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)	73
8.4.	Correction of HHR and NHH raw meter data (Clause 22(1) and (2) Schedule 15.2)	73
9.	Estimating and validating volume information.....	75
9.1.	Identification of readings (Clause 3(3) Schedule 15.2).....	75
9.2.	Derivation of volume information (Clause 3(4) Schedule 15.2).....	75
9.3.	Meter data used to derive volume information (Clause 3(5) Schedule 15.2).....	76
9.4.	Half hour estimates (Clause 15 Schedule 15.2).....	76
9.5.	NHH metering information data validation (Clause 16 Schedule 15.2)	77
9.6.	Electronic meter readings and estimated readings (Clause 17 Schedule 15.2)	77
10.	Provision of metering information to the pricing manager in accordance with subpart 4 of Part 13 (clause 15.38(1)(f))	79
10.1.	Generators to provide HHR metering information (Clause 13.136)	79
10.2.	Unoffered & intermittent generation provision of metering information (Clause 13.137).....	79
10.3.	Loss adjustment of HHR metering information (Clause 13.138).....	80
10.4.	Notification of the provision of HHR metering information (Clause 13.140)	80
11.	Provision of submission information for reconciliation.....	82
11.1.	Buying and selling notifications (Clause 15.3).....	82
11.2.	Calculation of ICP days (Clause 15.6)	82
11.3.	Electricity supplied information provision to the reconciliation manager (Clause 15.7).....	83
11.4.	HHR aggregates information provision to the reconciliation manager (Clause 15.8)	85
12.	Submission computation	87
12.1.	Daylight saving adjustment (Clause 15.36)	87
12.2.	Creation of submission information (Clause 15.4).....	87
12.3.	Allocation of submission information (Clause 15.5)	88
12.4.	Grid owner volumes information (Clause 15.9)	89
12.5.	Provision of NSP submission information (Clause 15.10)	90
12.6.	Grid connected generation (Clause 15.11).....	90
12.7.	Accuracy of submission information (Clause 15.12)	91
12.8.	Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2).....	91
12.9.	Reconciliation participants to prepare information (Clause 2 Schedule 15.3)	92
12.10.	Historical estimates and forward estimates (Clause 3 Schedule 15.3).....	93
12.11.	Historical estimate process (Clause 4 and 5 Schedule 15.3)	94
12.12.	Forward estimate process (Clause 6 Schedule 15.3)	96
12.13.	Compulsory meter reading after profile change (Clause 7 Schedule 15.3).....	98
13.	Submission format and timing.....	99
13.1.	Provision of submission information to the RM (Clause 8 Schedule 15.3)	99
13.2.	Reporting resolution (Clause 9 Schedule 15.3)	100
13.3.	Historical estimate reporting to RM (Clause 10 Schedule 15.3)	100
	Conclusion	102
	Participant response	103

EXECUTIVE SUMMARY

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of **Country Connect Solar Ltd trading as Supercharged Energy (Supercharged Energy)**, to support their application for certification in accordance with clause 5 of schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits version 7.1

Supercharged Energy began trading in February 2018 and supplies NHH ICPs only. John Candy Consulting (JCC) provides electricity reconciliation services, and at present registry update services. Supercharged had a resource carrying out this function in house, but when they departed JCC took over this function. Supercharged plan to set up their operation centre in Fiji to service their New Zealand customer base. The staff for this centre are still to be recruited and trained. Once this is complete the registry updating will move back in house. Supercharged Energy advised that customer acquisition has been paused until the back-office operation has been established.

Supercharged Energy are currently trading as a NHH trader but are seeking certification to become a HHR trader (category 1 and 2 only) as part of this audit. JCC will perform these functions on behalf of Supercharged Energy. As advised by email from the Authority, JCC have used another reconciliation participant's audit as an agent audit, as the participant has given their permission to do so and the lead auditor has provided a written statement confirming that the half hour functions that JCC will be undertaking have been assessed for compliance in the audit.

This audit found 13 non-compliances and makes one recommendation. The non-compliances found were largely because of rapid customer growth without enough resource to manage the onboarding of these customers and a lack of robust processes to ensure all the requirements are met. Reconciliation is occurring in a compliant manner as JCC is receiving the meter reading data directly and producing the submission files.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance found during this audit. The table below provides some guidance on this matter and contains a future risk rating score of 39, which results in an indicative audit frequency of 12 months. I have considered this in conjunction with Supercharged Energy's responses and the audit findings and I recommend that the next audit be within six months of this audit. I recommend a shorter audit period than the future risk rating indicates due to number of processes still to be developed or refined as identified in the audit. I note that a material change audit should be undertaken to assess the compliance of the Fiji operation before the registry management services pass from JCC back to Supercharged Energy.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Audit Requirement	1.11	15.37A	Audit report completed late.	Weak	Low	3	Identified
Requirement for certification	1.12	2A of schedule 15.1	Trading without certification.	Weak	Low	3	Identified
Relevant information	2.1	10.6, 11.2, 15.2	12 ICPs with incorrect profiles are recorded on the registry for ICPs with distributed generation.	Moderate	Low	2	Identified
Arrangements for line function services	2.12	11.16	Trading on networks prior to having an arrangement in place.	None	Low	5	Identified
Changes to registry	3.3	10 Schedule 11.1	Three late MEP nominations.	Moderate	Low	2	Identified
ANZSIC codes	3.6	9 (1(k) of Schedule 11.1	Three incorrect ANZSIC codes.	None	Low	5	Identified
Inform registry of switch request for ICPs - standard switch	4.1	2 Schedule 11.3	Switching initiated for 166 ICPs where an arrangement had not been entered into and not all preconditions met.	Weak	Low	3	Identified
Losing trader response to switch request and event dates - standard switch	4.2	3 and 4 Schedule 11.3	One incorrect AN response code was applied.	Moderate	Low	2	Identified
Gaining trader informs registry of switch request - switch move	4.7	9 Schedule 11.3	One ICP switched in with no arrangement in place with the customer and no evidence the	Weak	Low	3	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			wrong property being requested.				
Withdrawal of switch requests	4.15	17 and 18 Schedule 11.3	One switch withdrawal incorrectly rejected. Incorrect withdrawal code sent for one ICP. One late NW request issued. Four late AW responses sent.	Weak	Low	3	Identified
Electricity conveyed & notification by embedded generators	6.1	15.13	Distributed generation for ICP 0000289650TE1FB should be gifted.	Moderate	Low	2	Identified
Electricity supplied information provision to the reconciliation manager	11.3	15.7	Network billing information incorrectly being submitted as billed information when this should be from the financial system.	None	Low	5	Investigating
Historic estimate process	12.11	4 and 5 Schedule 15.3	One HE scenario calculated incorrectly.	Strong	Low	1	Identified
Future Risk Rating						39	

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	Remedial action
Relevant information	2.1	Registry validation be part of the scope for the Zoho system interface to the registry.	Identified

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

Current code exemptions were reviewed on the Electricity Authority website.

Audit commentary

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

1.2. Structure of Organisation

Supercharged provided a copy of their organisational structure.

1.3. Persons involved in this audit

Auditors:

Name	Company	Role
Rebecca Elliot	Veritek	Director

Personnel assisting in this audit were:

Name	Title
Richard Homewood	Managing Director, Supercharged Energy
John Candy	John Candy Consulting

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 with Supercharged Energy.

Audit commentary

Supercharged Energy uses JCC to complete NHH reconciliation submissions and at present registry update services. They plan to use JCC for half hour submissions when these commence. Wells is used for all manually read ICPs. They are identified in **section 1.9**.

FCLM provide AMI data as an MEP and are subject to a separate audit regime.

1.5. Hardware and Software

Zoho is used for the customer management system (CRM). This is a cloud-based service so is continually backed up. This does not have any interface to the registry.

Updates to the registry are manually carried out by JCC for switching and registry management.

Reconciliation processes are completed by JCC, acting as an agent using an access database. This is backed up to both one drive and dropbox.

Customer billing is carried out using Engage go.

1.6. Breaches or Breach Allegations

Supercharged Energy have had one alleged breach recorded relevant to the scope of this audit since they commenced trading in February 2018. This relates to Supercharged switching in a consumer on the Powerco network before have an arrangement in place with them to trade on this network. This is currently being investigated and is expected to go to the October 2018 compliance committee meeting. Arrangements for line function services are discussed further in **section 2.12**.

1.7. ICP Data

The active ICPs from the list file are summarised by meter category in the table below.

Metering Category	(2018)
1	156
2	6
3	-
4	-
5	-
9	-

Status	Number of ICPs (2018)
Active (2,0)	162
Inactive – new connection in progress (1,12)	-
Inactive – electrically disconnected vacant property (1,4)	1
Inactive – electrically disconnected remotely by AMI meter (1,7)	-
Inactive – electrically disconnected at pole fuse (1,8)	-
Inactive – electrically disconnected due to meter disconnected (1,9)	-
Inactive – electrically disconnected at meter box fuse (1,10)	-
Inactive – electrically disconnected at meter box switch (1,11)	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-
Inactive – reconciled elsewhere (1,5)	-
Decommissioned (3)	1

1.8. Authorisation Received

Supercharged Energy provided an email of authorisation for information collected in relation to this audit.

1.9. Scope of Audit

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of Supercharged Energy, to support their application for certification in accordance with clause 5 of schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits V7.1.

The audit was carried out at Supercharged Energy's premises in Muriwai on the 23rd & 24th August 2018.

The table below shows the tasks under clause 15.38 of part 15 for which Supercharged Energy requires certification. This table also lists those agents and MEPs who assist with these tasks.

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Agents Involved in Performance of Tasks	MEPs Providing AMI data
(a) - Maintaining registry information and performing customer and embedded generator switching	JCC	
(b) – Gathering and storing raw meter data	Wells	FCLM
(c)(iii) - Creation and management of volume information	JCC	
(d) – Calculation of ICP days	JCC	
(da) - delivery of electricity supplied information under clause 15.7	JCC	
(db) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	JCC	
(e) – Provision of submission information for reconciliation	JCC	

1.10. Summary of previous audit

This is Supercharged Energy's first audit completed by Veritek.

1.11. Audit Requirement (Clause 15.37A)

Code reference

Clause 15.37A

Code related audit information

Each reconciliation participant and each dispatchable load purchaser must arrange to be audited regularly in accordance with Part 16A in respect of the reconciliation participant's or dispatchable load purchaser's obligations under this Part.

Audit observation

The Supercharged Energy reconciliation participant audit was due to be submitted to the authority by 21 June 2018 for certification to be approved by 21 August 2018. The site audit was completed on 23 & 24 August 2018. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 1.11 With: 15.37A From: 21-Jun-18 To: 24-Aug-18	Audit report completed late. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The audit risk rating is low as the number of ICPs traded by Supercharged is small therefore any impact to the market will be small.		
Actions taken to resolve the issue		Completion date	Remedial action status
We conducted our participant audit 23 rd & 24 th of August		23/8/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will conduct future audits well in advance of the due date		31/8/18	

1.12. Requirement for certification (Clause 2A of schedule 15.1)

Code reference

Clause 2A of schedule 15.1

Code related audit information

Despite clause 15.38(1), a **reconciliation participant** that is required to obtain **certification** under clause 15.38 must obtain **certification** no later than —

(a) in the case of a **reconciliation participant** that is recorded in the **registry** as being responsible for fewer than 100 **ICPs** of the kind described in subclause (2), 12 months after the **reconciliation participant** first performs a function specified in clause 15.38(1); or

(b) in every other case, the later of—

(i) 6 months after the date on which the **reconciliation participant** first performs a function specified in clause 15.38(1); or

(ii) the date on which the **reconciliation participant** is recorded in the **registry** as being responsible for 100 or more **ICPs** of the kind described in subclause (2).

Audit observation

Supercharged Energy have not obtained certification prior to being responsible for 100 ICPs in the registry.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 1.12 With: 2A of schedule 15.1 From: 21-Aug-18 To: present	Trading without certification. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The audit risk rating is low as the number of ICPs traded by Supercharged is small therefore any impact to the market will be small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Paused customer acquisition and organised audit for certification		31/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Book audit in advance		31/8/2018	

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

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

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

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

Audit

The process to find and correct incorrect information was examined. The registry validation process was examined in detail in relation to the achievement of this requirement. The registry list file as at 31 July 2018 was examined to identify any registry discrepancies and confirm that all information was correct and not misleading.

Audit commentary

JCC runs registry validation reporting on a regular basis to identify any changes that have occurred in the registry and to make sure that all the information required for submission is correct and accurate. This includes such checks as changes to unmetered loads, where distributed generation is indicated by the Distributor but none is recorded by Supercharged (this is unlikely as Supercharged are offering solar installations as customers switch in).

Supercharged plan to develop the Zoho CRM system to interface directly to the registry. This development will require a material change audit prior to go live and I recommend that registry validation reporting is included in the scope of this development.

Description	Recommendation	Audited party comment	Remedial action
Relevant information	Registry validation be part of the scope for the Zoho system interface to the registry.	We acknowledge the requirement for system validation	Identified

The list file was analysed, and I found the following:

Issue	2018 Qty	Comments
Active with blank ANZSIC codes	-	Compliant
Active with ANZSIC "T999" not stated	-	Compliant
Active with ANZSIC "T994" don't know	-	Compliant
Active with ANZSIC "T998" response outside of scope"	-	Compliant

Issue	2018 Qty	Comments
Active with incorrect UML load	-	No standard unmetered load is supplied.
Active with No MEP recorded or nominated and UML= "N"	-	Compliant
Active with shared unmetered load incorrect	-	ICP 0006093744RN6ED has shared unmetered load, and my recalculation based on the distributor information was within 0.02 kWh of Supercharged Energy's calculation.
Active ICPs with Distributor unmetered load populated but retail unmetered load is blank and UML flag = N	-	Compliant
Incorrect profile	12	All ICPs have RPS profile recorded on the registry. 12 ICPs have generation metering and are expected to have PV1 profile as well as RPS. This is discussed further in section 6.1 .
Active date variance with Initial Electrical Connection Date	-	No ICPs were made active during the audit period, and no new connections were completed.
Active Category 9 and UML "N"	-	Compliant
Incorrect status or status dates	-	Compliant

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 27-Jul-18 To: 17-Aug-18	12 ICPs with incorrect profiles are recorded on the registry for ICPs with distributed generation. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as these were missed due to human error but were identified through BAU processes and corrected by the time of the site audit. The audit risk rating is low as only a small number of ICPs were affected and reconciliation submissions are correct in relation to the affected ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Procedures updated to update profiles when meter change happens		22/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		22/8/2018	

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.

Alleged breaches during the audit period were reviewed.

Audit commentary

Processes to provide information are compliant.

No breaches for late provision of submission information were recorded.

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

I reviewed the method to send and receive meter reading information. Data is transferred to JCC on behalf of Supercharged Energy via SFTP. MEP and Wells data transmission processes were reviewed as part of the MEP and Wells audits.

Audit commentary

The data transfer method was confirmed to be compliant as part of the FCLM MEP audit and the Wells audit.

To confirm the data transmission process, I traced a diverse sample of readings for six ICPs from the source files to the reconciliation submissions produced by JCC. The sample included reads for FCLM and Wells.

All reads and volumes checked were consistent with the source file 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 (clause 21(4)(c)).*

Audit observation

A complete audit trail was checked for all data gathering, validation and processing functions. I reviewed audit trails for a small sample of events.

Audit commentary

A complete audit trail was viewed for all data gathering, validation and processing functions. The logs of these activities for include the activity identifier, date and time and an 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 Supercharged Energy's terms and conditions.

Audit commentary

Supercharged Energy's terms and conditions include consent to access for authorised parties for the duration of the contract.

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 Supercharged Energy's terms and conditions.

Audit commentary

Supercharged Energy's terms and conditions include 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:

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

Audit observation

The physical meter location point is not specifically mentioned in the terms and conditions, but the existing practices in the electrical industry achieve compliance.

Review of a registry list as at 31 July 2018 confirmed that Supercharged Energy do not supply any ICPs with metering category 3 or above.

Audit commentary

Supercharged Energy only supplies ICPs with metering categories 1 and 2, and does not deal with any installations with loss compensation.

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 Supercharged Energy's terms and conditions.

Audit commentary

Supercharged Energy'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 discussed.

The registry list as at 31 July 2018 and event detail report from February 2018 to July 2018 were examined to determine whether any new connections were completed during the audit period.

Audit commentary

Supercharged Energy has not had any new connections. Supercharged Energy stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

Review of the registry list and event detail report confirmed that Supercharged Energy has not completed any new connections during the audit period.

Audit outcome

Compliant

2.10. Temporary Electrical Connection of an ICP (Clause 10.33(1))

Code reference

Clause 10.33(1)

Code related audit information

A reconciliation participant may temporarily electrically connect a point of connection, or authorise an MEP to temporarily electrically connect a point of connection, only if:

- *they are recorded in the registry as being responsible for the ICP; and*
- *one or more certified metering installations are in place at the ICP in accordance with Part 10; and*
- *for an ICP that has not previously been electrically connected, the network owner has given written approval.*

Audit observation

The new connection process was discussed.

The registry list as at 31 July 2018 and event detail report from February 2018 to July 2018 were examined to determine whether any new connections were completed during the audit period.

Audit commentary

Supercharged Energy has not had any new connections. Supercharged Energy stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

Review of the registry list and event detail report confirmed that Supercharged Energy has not completed any new connections during the audit period.

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:

- they are recorded in the registry as being responsible for the ICP; and*
- one or more certified metering installations are in place at the ICP in accordance with Part 10; and*
- for an ICP that has not previously been electrically connected, the network owner has given written approval.*

Audit observation

The new connection and reconnection processes were discussed.

The registry list as at 31 July 2018 and event detail report from February 2018 to July 2018 were examined to determine whether any new connections or reconnections were completed during the audit period.

Audit commentary

Review of the registry list and event detail report confirmed that Supercharged Energy has not completed any new connections or reconnections during the audit period.

The reconnection process was examined. Supercharged Energy understands their obligations in relation to clause 10.33A. All ICPs that switch in require a meter change therefore it is unlikely that ICPs will be being reconnected with uncertified metering.

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.

The registry list as at 31 July 2018 was reviewed to confirm the networks that Supercharged Energy ICPs are connected to.

Audit commentary

Supercharged Energy did not have arrangements in place with all the networks on which they trade ICPs. Powerco have alleged a breach in relation to this which is under investigation and will be reviewed by the compliance committee at the October 2018 committee meeting. I reviewed arrangements for all the networks and the results are shown in the table below. The receipt of an invoice from the distributor is deemed to be an “arrangement”.

Network	Arrangement in place
ALPE	not in place
COUP	not in place
EASH	UoSA in place
HAWK	Invoice rec'd
LINE	UoSA in place
NPOW	UoSA in place
ORON	UoSA in place
POCO	not in place
TASM	not in place
TOPE	UoSA in place
UNET	Invoice rec'd
VECT	Invoice rec'd
WAIK	Invoice rec'd
WAIP	UoSA in place
ALPE	not in place

Supercharged have stopped all acquisition and have stated that they will ensure that an arrangement is in place with any future networks they wish to trade on. Agreements are in progress with those networks that do not currently have an arrangement in place.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.12 With: 11.16 From: 23-Feb-18 To: 31-Jul-18	Trading on networks prior to having an arrangement in place. Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as none as Supercharged were unaware that they were trading on networks where they had no arrangement and were not checking this prior to switching customers in. The audit risk rating is low as the number of ICPs traded by Supercharged is small therefore any impact to the market will be small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Customers switched in prior to UoSA were bordering other networks that we had existing agreements with. We were not aware that these customers were not on those networks until after the switch.		28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have established UoSA with relevant networks. We have set up a procedure to always check the network code before a switch is initiated		28/8/2029	

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 examined, and controls were checked.

The registry list as at 31 July 2018 was reviewed to confirm the MEPs for Supercharged Energy ICPs.

Audit commentary

Supercharged Energy have an arrangement with FCLM for MEP services. All ICPs switching in require a meter change if they do not already have an FCLM meter. Supercharged Energy stated that they will pay any invoices received for ICPs with metering provided by other 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 connection process was discussed.

The registry list as at 31 July 2018 and event detail report from February 2018 to July 2018 were examined to determine whether any new connections were completed during the audit period.

Audit commentary

Supercharged Energy has not had any new connections and stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

Review of the registry list and event detail report confirmed that Supercharged Energy has not completed any new connections during the audit period.

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 registry list as at 31 July 2018 and event detail report from February 2018 to July 2018 were examined to determine whether any new connections were completed during the audit period.

Audit commentary

Supercharged Energy has not had any new connections and stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

Review of the registry list and event detail report confirmed that Supercharged Energy has not completed any new connections during the audit period.

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 changes is discussed in **sections 3.8** and **3.9** below.

In this section I have examined the event detail report for February to July 2018 to identify all status and MEP changes during the audit period.

Audit commentary

The event detail report was examined to confirm the registry is notified within five business days when information referred to in clause 9 of schedule 11.1 changes.

Event	Year	Total ICPs	ICPs notified within 5 days	ICPs notified greater than 5 days	Average notification days	Percentage compliant
Status change to inactive – ready for decommissioning (1,6)	2018	1	1	-	4	100%
MEP changes	2018	96	93	3	2	97%
Trader changes <i>Excluding MEP changes and updates on CS completion</i>	2018	9	9	-	1	100%

The three late MEP nominations were investigated and found that these were late as Supercharged Energy were unaware that this action was required on the registry when carrying out meter changes. This step is now detailed in the process documentation and there have been no further instances since 30 May 2018.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 23-May-18 To: 30-May-18	Three late MEP nominations. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as this step is now captured as part of the documented process which staff are expected to follow. The nominations were between three and 36 days late and in all cases were accepted by the MEP.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have set up a procedure to nominate the MEP when carrying out meter changes		28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will follow the procedure detailed above		28/8/2018	

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 MEP in the Registry

The new connection process was discussed and the list file as at 31 July 2018 was examined to identify any active ICPs that do not have an MEP recorded.

The event detail report for February 2018 to July 2018 was examined to identify all MEP nominations during the audit period.

ICP Decommissioning

The process for the decommissioning of ICPs was examined. The list file as at 31 July 2018 and event detail report for February 2018 to July 2018 were examined to identify all decommissioned ICPs.

Audit commentary

Retailers Responsibility to Nominate and Record MEP in the Registry

Review of the registry list confirmed all active ICPs have a valid MEP recorded in the registry.

Supercharged Energy have an arrangement with FCLM for MEP services. All ICPs switching in require a meter change if they do not already have an FCLM meter. Supercharged Energy nominates FCLM when a non FCLM metered ICP switches in.

Supercharged Energy has not had any new connections and they stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

ICP Decommissioning

Review of the registry list and event detail reports confirmed that one ICP was decommissioned during the audit period.

Supercharged Energy is aware of their responsibility to notify the MEP where an ICP is decommissioned, and to obtain a final reading. In this instance the Network notified Supercharged of the ICP decommissioning due to an ICP amalgamation. It was on the Lines Company network and FCLM was the MEP. The meter was read prior to decommissioning.

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

In this section I have examined the event detail report for February 2018 to July 2018 to identify initial information provided to the registry, and the timeliness of any updates.

Audit commentary

Supercharged Energy has not completed any new connections during the audit period and they stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

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. A registry list as at 31 July 2018 was reviewed to check ANZSIC codes were valid.

I checked a diverse sample of 20 active ICPs against Google street view data to confirm the correct ANZSIC code. The sample included 15 ICPs with non-domestic ANZSIC codes and five ICPs with domestic ANZSIC codes.

Audit commentary

Supercharged Energy were unaware that the ANZSIC codes were on the registry and should be checked with the customer to confirm they are correct. They stated they will add this check to the customer onboarding process.

Review of the registry list found all ICPs had a valid ANZSIC codes provided, however, three were incorrect.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.6 With: 9 (1(k) of Schedule 11.1 From: 13-Mar-18 To: 31-Jul-18	Three incorrect ANZSIC codes. Potential impact: None Actual impact: None Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as none as Supercharged Energy were unaware of ANZSIC codes on the registry. The audit risk rating is low as this has no impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have added to ANZSIC code acquisition into our CRM and this will be obtained prior to a customer switch		Date 28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be following the procedure detailed above		Date 28/8/2028	

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. The list file as at 31 July 2018 was examined to identify any ICPs where:

- Unmetered load is identified by the Distributor, but none is recorded by Supercharged Energy.
- The trader unmetered kWh differs from the distributor's unmetered kWh by 1.0 kWh per day or more, where it was possible to calculate the distributor's unmetered kWh from the distributor's unmetered load details. 1.0 kWh per day was chosen as a sample only; this does not indicate compliance is achieved if an error is found that is less than 1.0 kWh per day.

Audit commentary

Supercharged Energy does not supply any customers with unmetered load. As described in **section 2.1**, this is checked regularly as part of the registry management process undertaken by JCC. Any ICPs with unmetered load will have the unmetered load submitted as part of the reconciliation process as is evident for the ICP with shared unmetered load detailed in **section 5.1**.

Examination of the list file found one ICP with unmetered load details recorded by the Distributor. This related to the original builder's temporary supply and no unmetered load is present. The Distributor's field is incorrect.

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 be 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

New connection and reconnection processes were discussed.

Review of the event detail report for February to July 2018 confirmed that no status changes to active were made during the audit period.

Audit commentary

As discussed in **section 2.9**, Supercharged Energy has not had any new connections and they stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises.

The reconnection process was examined and as discussed in **section 2.11**, it was compliant. No reconnections have occurred since trading commenced.

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 new connection and disconnection processes were discussed.

The event detail report for February to July 2018 was reviewed to identify all status changes to inactive during the period.

Audit commentary

As discussed in **section 2.9**, Supercharged Energy has not had any new connections and they stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises and the use of the “inactive-new connection in progress” status will be determined then.

The disconnection process was reviewed and the process if followed will achieve compliance. One ICP was made “inactive ready for decommissioning” during the audit period. The correct status and dates were applied.

ICP 0005722462RN85D has switched in at the “Inactive-vacant” status. Supercharged have no customer at this address and this ICP has been switched in error. A switch withdrawal was initiated for this site during the site audit.

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 reviewed the intended processes to identify ICPs at “new” or “ready” status for more than 24 months and manage distributor requests relating to “new” or “ready” ICPs.

Audit commentary

As discussed in **section 2.9**, Supercharged Energy has not had any new connections and they stated that a process will be developed in conjunction with Momentous consulting when and if this requirement arises

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 one or more profile codes associated with that ICP.

Audit observation

The switch gain process was examined to determine when Supercharged Energy deem all conditions to be met.

Analysis of the event detail report for February 2018 to July 2018 confirmed that Supercharged Energy requested 359 transfer switches during the audit period. A typical sample of five NTs were checked to ensure that they were requested within two business days of clearing any pre-conditions.

Audit commentary

Supercharged Energy is aware of the requirements of the Fair Trading Act 1986.

It is intended that NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind. The sample checked were sent within two business days of all conditions being met with the exception of one ICP. This ICP was found to be part of an incorrect list of ICPs sent to JCC to switch in. An arrangement had not been entered into with these customers and not all the pre-conditions had been met. The affected ICPs were withdrawn as soon as this error was discovered. This affected 166 ICPs in total.

Supercharged Energy stated that further customer acquisition has been paused until additional resources can be trained to carry out these functions.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 2 Schedule 11.3 From: 05-Jun-18 To: 11-Jun-18	Switching initiated for 166 ICPs where an arrangement had not been entered into and not all preconditions met. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak as the customer onboarding process is still being refined to ensure that the correct ICPs are switched in. The audit risk rating is low as the affected ICPs were withdrawn as soon as the issue was discovered before reconciliation was affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
We now have a strict set of customer requirement validations prior to any switches being undertaken		Date 28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This requirements must be met prior to any switches taking place		Date 28/8/2018	

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 must disregard every event date established by the losing trader for a customer who has been with the losing trader for less than two calendar months (clause 4(2) of Schedule 11.3).

Audit observation

The event detail report for February 2018 to July 2018 was reviewed to:

- identify transfer switch AN files issued by Supercharged Energy during the audit period and determine whether the codes had been correctly applied
- assess compliance with the setting of event dates requirements.

The switch breach history report was examined.

Audit commentary

The switching process was examined in relation to Supercharged Energy as the “losing trader” for a transfer switch.

AN files were issued for three transfer switches. For ICP 0005187362RN7F0, the AA (accept and acknowledge) code was applied, when an advanced meter was present and AD (advanced metering) should have been applied. This is recorded as non-compliance below. The AN response codes for the other two ANs were correct.

For all three ANs, the proposed event date was within five business days of the NT and matches the gaining trader’s proposed date.

The switch breach history report did not contain any late AN files.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 15-Jun-18 To: 15-Jun-18	One incorrect AN response code was applied. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. The impact is low. One of the three AN codes was incorrect. The ICP should have had the AD (advanced metering) code applied, and information confirming the ICPs had advanced metering was available on the registry.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are now aware of the requirement		28/8/2028	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will ensure that all staff are trained on correct switching codes.		Date 28/8/2028	

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 five 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

The event detail report for February 2018 to July 2018 was reviewed to identify CS files issued by Supercharged Energy. One CS file was issued for a transfer switch.

The accuracy of the content of the CS file was confirmed by checking:

- correct identification of meter readings and correct date of last meter reading
- accuracy of meter readings
- accuracy of average daily consumption.

The process to manage the sending of the CS file within five business days of the event date was examined. The switch breach history report was reviewed.

Audit commentary

Supercharged Energy completed one transfer switch loss during the audit period. The ICP switched out effective from the day it switched in, removing Supercharged Energy's period of supply. The CS content matched the incoming CS.

No documented process was provided for this function. This process is carried out by JCC. It is expected that the switching process will be moved in house once additional resources are trained.

The switch breach report recorded one late CS file. The breach was not genuine; a CS was not issued because the switch was withdrawn.

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 four calendar months of the actual event date, 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

The process for the management of read change requests was examined.

The detail report for February 2018 to July 2018 was reviewed to identify all read change requests and acknowledgements during the audit period.

- Supercharged Energy issued four RRs for transfer switches, relating to three ICPs. One was initially rejected by the other retailer and accepted on re-issue with the same readings. The other RRs were accepted.
- No read change requests were issued to Supercharged Energy.

The content of all RR files was checked for accuracy, and I confirmed that the correct reads were used to calculate reconciliation submissions.

The switch breach history report was reviewed to identify late RR and AC files.

Audit commentary

This process is carried out by JCC. It is expected that the switching process will be moved in house once additional resources are trained.

The content of the RR files issued by Supercharged Energy was checked and found to be accurate. All RRs were supported by two validated readings.

The reconciliation submissions reflected the outcome of the RR process.

The switch breach report did not record any late RR or AC files.

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 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.*

Audit observation

The process for the management of read change requests was examined.

The detail report for February 2018 to July 2018 was reviewed to identify read change requests issued and received under Clause 6(2) and (3) Schedule 11.3 and determine compliance.

Audit commentary

Supercharged Energy is currently trading as a NHH trader and did not issue any RRs under Clause 6(2) and (3) Schedule 11.3. JCC carries out the RR process on behalf of Supercharged Energy. It is expected that the switching process will be moved in house once additional resources are trained.

No read change requests were issued to Supercharged Energy.

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

I confirmed with Supercharged Energy whether any disputes have needed to be resolved in accordance with this clause.

Audit commentary

All RRs issued by Supercharged Energy were resolved through the read renegotiation process. No disputes have needed to be resolved in accordance with this clause.

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

The switch gain process was examined to determine when Supercharged Energy deem all conditions to be met.

Analysis of the event detail report for February 2018 to July 2018 confirmed that Supercharged Energy requested four switch moves during the audit period. All four switch move NTs were checked to ensure that they were requested within two business days of clearing any pre-conditions.

Audit commentary

Supercharged Energy is aware of the requirements of the Fair Trading Act 1986.

It is intended that NT files are sent as soon as all pre-conditions are met, and the withdrawal process is used if the customer changes their mind. The NTs checked were sent within two business days of all conditions being met with the exception of one ICP. ICP 0005722462RN85D switched in at the "inactive-vacant" status. Supercharged Energy have no arrangement with a customer at this site and there was no record of this address in the Zoho CRM. A switch withdrawal has been initiated.

Supercharged Energy stated that further customer acquisition has been paused until additional resources can be trained to carry out these functions.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.7 With: 9 Schedule 11.3 From: 23-Jul-18 To: present	One ICP switched in with no arrangement in place with the customer. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as it appears that this ICP has not followed the intended process and Supercharged Energy had no record of this ICP or address in their CRM. The audit risk rating is low as the volume of ICPs is small with only four move switches completed.		
Actions taken to resolve the issue		Completion date	Remedial action status
The above customer had made a switch request however they had not met all criteria for a change to be initiated and so the change was reversed.		28/8/2028	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We now have a very strict onboarding process to ensure no one is switched before all prerequisites are met		Date 28/8/2028	

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

Audit observation

The event detail report for February 2018 to July 2018 was reviewed to:

- identify switch move AN files issued by Supercharged Energy during the audit period and determine whether the codes had been correctly applied
- assess compliance with the setting of event dates requirements.

The switch breach history report was examined.

Audit commentary

The switching process was examined in relation to Supercharged Energy as the “losing trader” for a switch move.

No ANs were issued for switch moves during the audit period.

The switch breach history report did not contain any late AN files.

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, 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

The event detail report for February 2018 to July 2018 was reviewed to:

- identify switch move AN files issued by Supercharged Energy during the audit period and determine whether the codes had been correctly applied
- assess compliance with the setting of event dates requirements.

The switch breach history report was examined.

Audit commentary

No ANs were issued for switch moves during the audit period.

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

The event detail report for February 2018 to July 2018 was reviewed to identify CS files issued by Supercharged Energy. No CS files were issued for switch moves.

The process to manage the sending of the CS file within five business days of the event date was examined. The switch breach history report was reviewed.

Audit commentary

No switch moves were completed during the audit period.

This process is carried out by JCC. It is expected that the switching process will be moved in house once additional resources are trained.

The switch breach report did not record any late switch move CS files.

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 actual event date, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by two 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

The process for the management of read change requests was examined.

The detail report for February 2018 to July 2018 was reviewed to identify all read change requests and acknowledgements during the audit period.

- No read change requests for switch moves were issued by Supercharged Energy.
- No read change requests were issued to Supercharged Energy.

The switch breach history report was reviewed to identify late RR and AC files.

Audit commentary

This process is carried out by JCC until additional resource can be trained by Supercharged Energy. The RR process for move switched is no different to that used for transfer switches, an RR file will only be sent if the read is supported by two validated reads, as proven in **section 4.4**. It is expected that the switching process will be moved in house once additional resources are trained.

No switch move RRs or ACs were issued or received.

The switch breach report did not record any late RR or AC files.

Audit outcome

Compliant

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

Code reference

Clause 13 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 through or assume responsibility for:

- *a half hour metering installation (that is not a category 1 or 2 metering installation) at an ICP with a submission type of half hour in the registry and an AMI flag of "N"; or*
- *a half hour metering installation at an ICP that has a submission type of half hour in the registry and an AMI flag of "N" and is traded by the losing trader as non-half hour; or*
- *a non half hour metering installation at an ICP at which the losing trader trades electricity through a half hour metering installation with an AMI flag of "N".*

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

An event detail report for February 2018 to July 2018 was reviewed to determine whether any HH switches occurred during the period.

Audit commentary

No HH switches occurred during the audit period. Supercharged Energy does not intend to supply any meters with category 3 or higher.

Audit outcome

Not applicable

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

Code reference

Clause 15 Schedule 11.3

Code related audit information

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

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

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

Audit observation

An event detail report for February 2018 to July 2018 was reviewed to determine whether any HH switches occurred during the period.

Audit commentary

No HH switches occurred during the audit period. Supercharged Energy does not intend to supply any meters with category 3 or higher.

Audit outcome

Not applicable

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

Code reference

Clause 16 Schedule 11.3

Code related audit information

The gaining trader must complete the switch no later than three 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

An event detail report for February 2018 to July 2018 was reviewed to determine whether any HH switches occurred during the period.

Audit commentary

No HH switches occurred during the audit period. Supercharged Energy does not intend to supply any meters with category 3 or higher.

Audit outcome

Not applicable

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

Code reference

Clauses 17 and 18 Schedule 11.3

Code related audit information

A losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 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)):*
 - o *the participant identifier of the trader making the withdrawal request (clause 18(c)(i));*
 - and*
 - o *the withdrawal advisory code published by the Authority (clause 18(c)(ii))*

- *within 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

The switch withdrawal process was examined.

The event detail report for February to July 2018 was reviewed to:

- Identify all switch withdrawal requests issued by Supercharged Energy. The content of a sample of at least two ICPs from the event detail report for each withdrawal code (or all if less than two were available) were checked using the typical sampling methodology, as well as all withdrawal requests rejected by other traders.
- Identify all switch withdrawal acknowledgements issued by Supercharged Energy. A sample of nine (or all) rejections were checked.
- Confirm timeliness of withdrawal requests, as this is not currently being identified in the switch breach report.

The switch breach history report was examined.

Audit commentary

46 NWs were issued to Supercharged Energy, 14 were rejected. I checked all the rejected NWs and confirmed that all were rejected for valid reasons with the exception of ICP 0009121150WM490. Supercharged Energy requested the incorrect switch type of “transfer switch”. The losing trader issued a switch withdrawal of “WS” twice but both of these were rejected. The losing trader completed the switch after the second switch withdrawal request was rejected, so that the switch could be completed.

176 NWs were issued by Supercharged Energy; 15 were rejected by the other trader.

Withdrawal code	Description	Count	Count rejected
CE	Customer error	3	1
CX	Customer cancellation	18	0
UA	Unauthorised switch	155	14

As detailed in **section 4.1**, an incorrect list of ICPs was sent to JCC to switch in. An arrangement had not been entered into with these customers and not all the pre-conditions had been met. The affected ICPs were withdrawn as soon as this error was discovered. This accounts for the high number of “UA” unauthorised switch coded withdrawals sent.

I reviewed the withdrawal codes applied for a diverse sample of 16 NWs, including at least three for each code and 11 rejected files. All had the correct withdrawal code applied.

I note that the withdrawal for ICP 0005722462RN85D (referenced in **section 4.7**) has been sent with a code of “CX” customer cancellation. As Supercharged Energy has no customer at this address the incorrect code has been applied. This is recorded as non-compliance below.

Analysis of the event detail report showed one NW file was issued late. This was issued by JCC on behalf of Supercharged Energy as soon as they were advised of the response to be sent.

The switch breach history report showed four AW files were issued late. These were issued by JCC on behalf of Supercharged Energy as soon as they were advised of the response to be sent.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.15 With: 17 and 18 Schedule 11.3 From: 07-Jul-18 To: 24-Aug-18	One switch withdrawal incorrectly rejected. Incorrect withdrawal code sent for one ICP. One late NW request issued. Four late AW responses sent. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating:		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak as the slow responses times to advise JCC are causing delays and subsequent breaches. The audit risk rating is low as the volume of late files is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was due to an under staffing issue that will be resolved by increased staff capacity in our Fiji office		Date 28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All staff will be trained to respond immediately. Response time will be managed and monitored through our CRM, Zoho		Date 28/8/2018	

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. Examples to confirm this procedure have been examined as part of the sending of final information for switches and read requests made.

Audit commentary

All meter readings used in the switching process are validated meter readings or permanent estimates. This process is discussed further in **section 4.3**.

Supercharged Energy'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

The Electricity Registry switch save protected retailer list was examined.

Win-back processes were discussed.

The event detail report for February to July 2018 was analysed to identify all withdrawn switches with a CX code applied prior to the switch completion date.

Audit commentary

Supercharged Energy is not a save protected retailer. They were unaware of the switch save protection scheme but stated they do not offer enticements when contacting customers switching away.

The event detail report identified 18 NWs with the CX (customer cancellation) withdrawal reason code. Three NWs with reason code CX were issued to save protected retailers before the switch was complete. These were examined and Supercharged Energy advised that the customers were happy to change to Supercharged Energy and no enticements were offered to retain them.

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

I reviewed the processes to identify shared unmetered load.

The registry list file as at 31 July 2018 was examined and found Supercharged Energy supplies one ICP with shared unmetered load.

Audit commentary

Processes to identify shared unmetered load are discussed in **section 2.1**.

ICP 0006093744RN6ED has shared unmetered load, and my recalculation of daily kWh based on the distributor information was within 0.02 kWh of Supercharged Energy's calculation.

ICP	Unm Load Details	Daily Unmetered kWh	Recalculation
0006093744RN6ED	0007;11.7;1/8 of 55W Street Light 70A Avonhead Rd	0.100	0.08

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 registry list file as at 31 July 2018 was examined to identify any ICPs with annual unmetered load that exceeds 3,000 kWh.

Audit commentary

No unmetered load over the 3,000 kWh threshold is supplied.

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

Audit observation

The registry list file as at 31 July 2018 was examined to identify any ICPs with annual unmetered load that exceeds 3,000 kWh.

Audit commentary

No unmetered load over the 3,000 kWh threshold is supplied.

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

The registry list file as at 31 July 2018 was examined to identify any DUMML ICPs.

Audit commentary

Supercharged Energy do not deal with any distributed unmetered load ICPs.

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 were examined.

The process to manage distributed generation was examined. The list file was analysed and all ICPs where the Distributor has indicated distributed generation were identified. This was further broken down to identify any ICPs with a non-distributed generation profile. The metering configuration for these ICPs was analysed to confirm if an injection channel was present.

No bridged meters were identified.

Audit commentary

Metering installations installed

All ICPs are metered and any unmetered load is quantified. No submission information is determined using subtraction.

Generation

Supercharged Energy supplies 20 ICPs with generation indicated by the distributor.

Metering	Registry profile	Reconciliation profile	submission	Count
I and X flow	RPS	RPS (X flow) and PV1 (I flow)		12
X flow only	RPS	RPS (X flow)		8

The registry does not reflect the correct profiles for the 12 ICPs which are submitted with profiles RPS and PV1. This has been corrected since the list file was provided. This is recorded as non-compliance in **section 2.1**.

The eight ICPs with distributed generation indicated by the Distributor but no generation metering installed and RPS profile were examined:

ICP	Generation Capacity	Fuel Type	Profile	Comment
0000004097TE005	3	solar	RPS	Registry has been updated effective from the generation installation date.
0000033465EABB3	4	solar	RPS	Solar installation is in progress but not completed as yet.
0000289650TE1FB	6	solar	RPS	Distributed generation is present and is not being submitted or gifted.
0000562930TE692	2	solar	RPS	Registry has been updated effective from the generation installation date.
0001608360WMCDF	50	solar	RPS	Solar installation is in progress but not completed as yet.
0005895790RNFDF	17	solar	RPS	Solar installation is in progress but not completed as yet.
0008803151WMBFC	36	solar	RPS	Registry has been updated effective from the generation installation date.
0072048080WM9EE	50	solar	RPS	Solar installation is in progress but not completed as yet.

- Three ICPs have been updated since the list file was provided.
- Four ICPs have a solar installation in progress. These will be updated once the installation is completed and generation metering is confirmed to be installed.
- ICP 0000289650TE1FB has solar installed and this should be being gifted.

Bridged meters

Supercharged Energy has not completed any reconnections, and no bridged meters were identified.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.1 With: 15.13 From: 18-Jul-18 To: present	Distributed generation for ICP 0000289650TE1FB is not being submitted or gifted. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as solar generation is a core part of Supercharged Energy's offering and the controls in place for this process will mitigate risk most of the time. The audit risk rating is low as distributed generation for one ICP should have been gifted but was missed.		
Actions taken to resolve the issue		Completion date	Remedial action status
We now have a process to change in import/export meters prior to solar connection that will eliminate the risk of this occurring again		Date 28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		28/8/2018	

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.

Audit commentary

Review of the NSP table confirmed that Supercharged Energy is not responsible for any GIPs. Compliance was not assessed.

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

The registry list and reconciliation submissions for February to July 2018 were reviewed, to identify any ICPs with profiles that require certification of the control device.

Audit commentary

Examination of the list file and submissions found that Supercharged Energy has only used the RPS and PV1 profiles. Control devices are not used for reconciliation purposes.

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. No defective meters were identified during the audit period.

Audit commentary

Defective meters are typically identified through the meter reading validation process, or from information provided by the MEP (this is included in the service agreement between FCLM and Supercharged Energy) or customer. Upon identifying a possible defective meter, Supercharged Energy raises a field services job to investigate.

No defective meters have been identified during the audit period.

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.

Clock synchronisation processes for agents and MEPs were reviewed as part of their agent and MEP audits.

Audit commentary

All information used to determine volume is collected by FCLM as an MEP and Wells for manually read meters. Wells and FCLM monitor clock synchronisation, this is covered as part of their audits and none have been advised.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

All validated meter readings must be derived from meter readings.

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

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

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

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

Audit observation

The data collection process was examined. Reads for six ICPs from the source files through to the reconciliation submissions produced by JCC were examined. The sample included reads for FCLM and Wells.

Processes for review of meter condition information provided by Wells were reviewed, including reviewing a sample of events.

Processes for customer and photo reads were reviewed.

Audit commentary

A sample of readings were checked from the source files provided by FCLM and Wells to reconciliation submissions and found to match.

JCC reviews the meter readers notes from Wells and passes any that relate to meter condition to Supercharged Energy to action. No meter condition incidents have been received.

Customer reads will only be accepted if they can be validated against another set of validated meter readings not provided by the consumer. I examined the one example that has been processed since trading commenced and confirmed that it was validated appropriately.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 15.2

Code related audit information

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

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

Audit observation

The process of the application of meter readings was examined.

Audit commentary

Application of NHH reads was reviewed as part of the historic estimate checks in **section 12.11** and found to be compliant. The content of CS files was examined in **sections 4.3**. Switch in readings are appropriately treated as if they have occurred at midnight on the switch in date.

Audit outcome

Compliant

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

The process to manage missed reads was examined.

The event detail report for February to July 2018 was reviewed to identify all ICPs which had a period of supply end during the audit period. Two ICPs were identified:

- ICP 0005187362RN7F0 switched out effective from its switch in date, effectively removing its period of supply as no actual reads were required
- ICP 0072048150WMDA8 was decommissioned.

Audit commentary

Supercharged Energy will trade the majority of their ICPs on AMI metered sites. Those with manually read meters (in the majority of cases this is only expected to be until solar panels can be installed) are read by Wells. All meter readers notes are reviewed by JCC upon receipt and any that require action are passed to Supercharged Energy to action.

ICP 0072048150WMDA8 was decommissioned and had an actual read during the period of supply.

Audit outcome

Compliant

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

The meter read attainment process was examined.

Monthly reports for the months of February to July 2018 were reviewed.

Audit commentary

As discussed in **section 6.8**, there are processes in place to ensure that reads are attained.

Supercharged Energy began trading in February 2018, and therefore no ICPs have been supplied for 12 months or more.

Audit outcome

Compliant

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

The meter reading process was examined. Monthly reports for the months of February to July 2018 were reviewed.

Audit commentary

As discussed in **section 6.8**, there are processes in place to ensure that reads are attained.

Review of the monthly meter reading reports confirmed that the read attainment requirements were met.

Month	Total NSPs where ICPs were supplied > 4 months	NSPs <90% read	ICPs unread for 4 months	Overall percentage read
Feb 2018	0	0	0	N/A
Mar 2018	0	0	0	N/A
Apr 2018	0	0	0	N/A
May 2018	0	0	0	N/A
Jun 2018	1	0	0	100.0%
Jul 2018	2	0	1	95.5%

Meter reading frequency reports were provided for February to July 2018. The reports were consistent with the format required. I confirmed that the reports for May, June and July were sent before the 20th business day of each month.

Audit outcome

Compliant

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

NHH data is collected by FCLM and Wells as an agent. The data interrogation log requirements were reviewed as part of their agent and MEP audits.

Audit commentary

Compliance with this clause has been demonstrated by Supercharged Energy's agent Wells, and FCLM as an MEP, as part of their own audits.

Audit outcome

Compliant

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

The registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with the submission type HHR.

Supercharged Energy intend to move to HHR submission and this capability was assessed. HHR data is collected by FCLM from the services access interface.

Audit commentary

HHR data is collected by FCLM from the services access interface.

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

The registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with the submission type HHR.

Supercharged Energy intend to move to HHR submission. All HHR data will be collected by MEPs.

Audit commentary

MEPs are responsible for meeting the meter interrogation data requirements, and compliance was demonstrated as part of their MEP audits. All HHR data will be collected by MEPs.

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

The registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with submission type HHR.

Supercharged Energy intend to move to HHR submission. All HHR data will be collected by FCLM.

Audit commentary

MEPs are responsible for meeting the meter interrogation log requirements, and this is reviewed as part of their audits. All HHR data will be collected by FCLM.

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

The registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with submission type HHR but intend to move to HHR submission.

All HHR data will be provided by FCLM.

Audit commentary

Compliance with this clause has been demonstrated by the FCLM as part of their MEP audit.

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.

Audit commentary

Compliance with this clause has been demonstrated by FCLM and Wells.

I viewed raw data from February 2018 when Supercharged Energy began trading. JCC on behalf of Supercharged Energy intends to retain raw meter data for at least 48 months.

Review of audit trails confirmed that reads cannot be modified without an audit trail being created, as discussed further in **section 2.4**.

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

Processes to record non-metering information were discussed.

Audit commentary

No non-metering information is collected by Supercharged Energy.

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 errors are detected during validation of non-half hour meter readings, one of the following must be undertaken:

19(1)(a) - confirmation of the original meter reading by carrying out another meter reading

19(1)(b) - replacement of the original meter reading by another meter reading (even if the replacement meter reading may be at a different date)

19(1)(c) - if the original meter reading cannot be confirmed or replaced by a meter reading from another interrogation, then an estimated reading is substituted and the estimated reading is marked as an estimate and it is subsequently replaced in accordance with clause 4(2).

Audit observation

Correction of NHH meter readings is completed by JCC as Supercharged Energy's agent. JCC's RM and Network Submission Processes document was reviewed.

Audit commentary

No NHH corrections were made during the audit period. JCC has processes in place to ensure that any corrections are compliant.

Audit outcome

Compliant

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 errors are detected during validation of half hour metering information the correction must be as follows:

19(2)(a) - if a check meter or data storage device is installed at the metering installation, data from this source may be substituted

19(2)(b) - in the absence of any check meter or data storage device, data may be substituted from another period if the total of all substituted intervals matches the total consumption recorded on the meter, if available, and the pattern of consumption is considered materially similar to the period in error.

Audit observation

The registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with submission type HHR.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

The same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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

If error compensation and loss compensation are carried out as part of the process of determining accurate data, the compensation process must be documented and must comply with audit trail requirements.

Audit observation

The physical meter location point is not specifically mentioned in the terms and conditions, but the existing practices in the electrical industry achieve compliance.

Review of a registry list as at 31 July 2018 confirmed that Supercharged Energy do not supply any ICPs with metering category 3 or above.

Audit commentary

Supercharged Energy only supplies ICPs with metering categories 1 and 2, and does not deal with any installations with error or loss compensation.

Audit outcome

Compliant

8.4. Correction of HHR and NHH raw meter data (Clause 22(1) and (2) Schedule 15.2)

Code reference

Clause 22(1) and (2) 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:

22(2)(a) - the date of the correction or alteration

22(2)(b) - the time of the correction or alteration

22(2)(c) - the operator identifier of the reconciliation participant

22(2)(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

22(2)(e) - the technique used to arrive at the corrected data

22(2)(f) - the reason for the correction or alteration.

Audit observation

Corrections are discussed in **sections 8.1**, 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 was reviewed as part of the FCLM MEP audit and Wells audits.

Audit commentary

Compliance with this clause has been demonstrated by the FCLM and Wells.

Audit trails are compliant. Retention of raw metering data is discussed in **section 7.2** and audit trails are discussed in **section 2.4**.

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

A sample of reads and volumes were traced from the source files to Supercharged Energy's systems and reconciliation submissions in **section 2.3**.

Provision of estimated reads to other participants during switching was reviewed in **sections 4.3** and **4.4**.

Correct identification of estimated reads, and review of the estimation process was completed in **sections 8.1**.

Audit commentary

Readings are 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

A sample of submission data was reviewed in **sections 11** and **12**, to confirm that volume was based on readings as required.

Audit commentary

Review of submission data confirmed that it is based on readings as required by this clause.

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

A sample of submission data was reviewed in **sections 11** and **12**, to confirm that volume was based on readings as required.

Meter data is collected by FCLM and Wells. Compliance was assessed as part of their MEP and agent audits.

Audit commentary

The MEPs retain the raw, unrounded data. Compliance with this clause has been demonstrated by the Wells and FCLM as part of their own audits.

Submission data is rounded to two decimal places.

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

The registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with submission type HHR.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

As recorded in **section 8.2**, the same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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

NHH metering information validation is completed by JCC as an agent to Supercharged Energy. JCC's RM and Network Submission Processes document was reviewed.

Audit commentary

JCC's NHH validation process meets the requirements of Clause 16 of Schedule 15.2 and will identify invalid data and consumption outside of the expected pattern or range.

Audit outcome

Compliant

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

Code reference

Clause 17 Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

17(4)(f) - a review of meter and data storage device event list. Any event that could have affected the integrity of metering data must be investigated.

Audit observation

I reviewed the AMI data validation process, including meter event logs and validation checks.

Audit commentary

Electronic meter reading information is provided to Supercharged Energy by agents and MEPs. Meters are interrogated regularly, and there is little risk that data can be overwritten. Data is held for a longer period at the meter and can be re-interrogated later if required.

The Code requires “...a review of meter and data storage device event log. Any event that could have affected the integrity of metering data must be investigated.”

FCLM are to advise Supercharged Energy of meter events as part of their service agreement. The data received is reviewed and acted upon by JCC. FCLM advise of events via email, and no events have been received to date.

Audit outcome

Compliant

10. PROVISION OF METERING INFORMATION TO THE PRICING MANAGER 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 pricing manager and 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

Supercharged Energy is not responsible for any NSPs. No information is provided to the pricing manager 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 pricing manager and 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 pricing manager and 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

Supercharged Energy is not responsible for any NSPs. No information is provided to the pricing manager 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

Supercharged Energy is not responsible for any NSPs. No information is provided to the pricing manager 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 the pricing manager or 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

Supercharged Energy is not responsible for any NSPs. No information is provided to the pricing manager 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

The registry list and reconciliation submissions for February to July 2018 were reviewed, to identify all profiles used.

Audit commentary

Examination of the list file and submissions found that Supercharged Energy has only used the RPS and PV1 profiles. Trader notifications were not required.

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 process for the calculation of ICP days was examined by checking a diverse sample of ten NSPs with a small number of ICPs to confirm the AV110 ICP days calculation was correct.

I reviewed variances in GR100 reports for February to June 2018 and investigated any large discrepancies.

Audit commentary

The process for the calculation of ICP days was examined by checking ten NSPs with a small number of ICPs. The ICP days calculation was confirmed to be correct.

The following table shows the ICP days difference between Supercharged Energy files and the RM return file (GR100) for all revisions provided for February to June 2018. Negative percentage figures indicate that the Supercharged Energy ICP days figures are higher than those contained on the registry. The discrepancies involve a small numbers of days.

Month	Initial	1-Mth	3-Mth
Feb 18	-	-	0.00%
Mar 18	-	-	0.00%
Apr 18	3.90%	-0.55%	0.00%
May 18	-0.14%	0.00%	-
Jun 18	0.00%	0.00%	-

The April 2018 initial differences were reviewed and found to relate to switch timing.

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

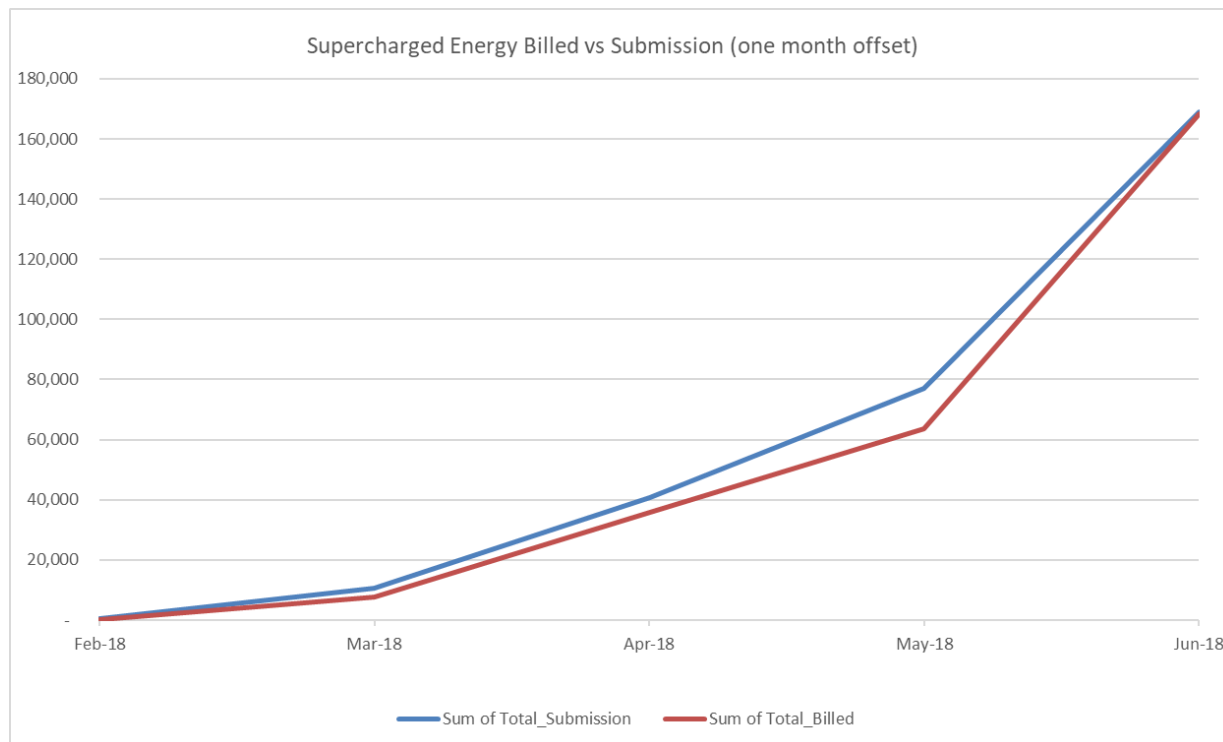
The process for the calculation of electricity supplied was examined by checking five NSPs with a small number of ICPs each to confirm the AV120 billed calculation was correct.

GR130 reports since Supercharged Energy has been trading were reviewed to confirm whether the relationship between billed and submitted data appears reasonable.

Audit commentary

The chart below shows a comparison between submissions and the electricity supplied information.

Comparison between Submitted Volumes and Electricity Supplied



The billed information is expected to be derived from the financial records. The billed information submitted as part of this report is currently being derived from the network billing volumes as the billing information is not able to be used. I checked the billed volumes from the financial records by examining the invoices for five NSPs with a small volume to assess the difference to the volumes being billed from the volumes being submitted and found the volumes were both over and under for the NSP checked. Overall there was 26.16% more kWh submitted than was billed. Supercharged Energy are assessing their billing platform requirements to address this. The incorrect information being submitted is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7 From: 23-Feb-18 To: present	<p>Network billing information incorrectly being submitted as billed information when this should be from the financial system.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as none as the billing information not able to be used for this reporting producing a meaningless report.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are integrating our CRM with the registry and the CRM will then provide a data feed to the billing program to ensure a high level of accuracy.		Date 28/8/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Integration with the registry as above		Date 28/8/2018	

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

The registry list file as at 31 July 2018 was examined and found Supercharged Energy does not supply any ICPs with submission type HHR.

I checked the GR090 ICP missing files for March 2017 to June 2018.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

Supercharged Energy does not deal currently deal with HHR data. Review of the GR090 ICP missing files for March 2017 to June 2018 confirmed that HHR aggregates submissions were not expected for Supercharged Energy ICPs.

The same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

Audit outcome

Compliant

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 registry list file as at 31 July 2018 was examined and I found Supercharged Energy does not supply any ICPs with submission type HHR.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit.

Audit commentary

Daylight savings processes for FCLM were reviewed as part of their MEP audit.

The same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for this function since that audit.

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

NHH reconciliation submissions are created by JCC as Supercharged Energy's agent.

Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

A sample of NHH submissions were checked for accuracy in **sections 12.11** and **12.12**. No issues were identified.

A sample of NHH ICPs were checked in the NHH submission data to ensure they were handled correctly, including:

- 10 ICPs with distributed generation
- ICP 0006093744RN6ED which switched in during July 2018 with shared unmetered load.

There were no ICPs with disconnected or vacant consumption. No bridged, stopped or faulty meters were identified.

No breaches had been recorded for late provision of submission information.

The same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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

Processes to ensure that information used to aggregate the reconciliation reports is consistent with the registry were reviewed in **section 2.1**.

JCC's RM submission processes documentation was reviewed.

The process for aggregating the AV080 was examined by:

- comparing the AV080 data to meter register level submission data for 16 AV080 rows for July 2018; and
- comparing the meter register level submission data to the registry list to confirm the accuracy of aggregation.

The GR170 to AV080 files were compared for revision submissions from February to May 2018.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

JCC refreshes reconciliation data from the registry immediately prior to running reconciliation reports to ensure that aggregation factors and statuses are correct.

JCC provides a copy of reconciliation submissions to Supercharged Energy.

The registry list, AV080 data and meter register level submission data were compared for July 2018, which confirmed aggregation factors were applied for the correct dates.

JCC's reconciliation process inserts zero lines where a NSP has been included in a previous revision but is not present in the current revision. GR170 and AV080 files were compared for February to May 2018 and found to contain the same NSPs.

For HHR submission the same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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 on the registry and registry list were reviewed.

Audit commentary

Supercharged Energy is not responsible for any GIPs; 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 registry list and NSP table were reviewed.

Audit commentary

Supercharged Energy is not a local 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 registry list and NSP table were reviewed.

Audit commentary

Supercharged Energy 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

Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

Correction processes are discussed in **section 8.1**.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

Review of alleged breaches confirmed that no reconciliation submissions were made late.

The minor error found for the HE scenario detailed in **section 12.11** was corrected during the site audit and this will flow through to submission in the next revision.

For HHR submission, the same processes used for Plus Energy will be deployed for Supercharged Energy. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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).

Volume information created using estimated readings must be subsequently replaced at the earliest opportunity by the reconciliation participant by volume information that has been created using validated meter readings or permanent estimates by, at the latest, the month 14 revision cycle.

A permanent estimate may be used in place of a validated meter reading, but only if, despite having used reasonable endeavours; the reconciliation participant has been unable to obtain a validated meter reading.

Audit observation

Processes to replace estimates with permanent estimates by revision 14 were discussed.

Supercharged Energy began trading in February 2018, and no 14-month revisions have been completed.

Audit commentary

No 14-month revisions have been completed. AMI metering is expected for all of Supercharged Energy's ICPs. The no read process would be followed to attempt to gain a read, and if this was unable to be gained by the 14-month revision a permanent estimate will be inserted.

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 must comprise the following:

- *half hour volume information 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) *half hour volume information for the ICP; or*
 - b) *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

Aggregation and content of reconciliation submissions was reviewed for NHH submissions.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

JCC prepares submission information for each NSP for the relevant consumption periods in accordance with these clauses.

Compliance with this clause was assessed:

- all Supercharged Energy's ICPs have metering category 1 or 2
- one ICP with shared unmetered load is supplied, and submission data was checked and found to be compliant in **sections 12.2 and 12.11**
- no profiles requiring a certified control device are used
- no loss or compensation arrangements are required
- aggregation of the AV080 reports is compliant.

I confirmed that the same processes used for Plus Energy will be deployed for Supercharged Energy HHR submissions. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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

Eight AV080 submissions for revisions 1 and 3 were reviewed to confirm that historic estimates are included and identified.

Permanence of meter readings is reviewed in **section 12.8**. The methodology to create forward estimates is reviewed in **section 12.12**.

Audit commentary

I reviewed eight AV080 submissions for a diverse sample of months and revisions and confirm that forward and historic estimates are included and identified as such.

Audit outcome

Compliant

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

Historic estimate is calculated by JCC as Supercharged Energy's agent.

JCC provided February 2018 to July 2018 reconciliation submissions, accompanied by supporting data and seasonal adjusted daily shape values (SASV) used to calculate the submissions.

I re-performed the calculations for the scenarios below. This included a check that the correct shape files had been applied.

Audit commentary

Historic estimate was manually recalculated using the correct SASV files, for the scenarios below.

Test	Scenario	Test expectation	Result
a	ICP becomes Active part way through a month	Consumption is only calculated for the Active portion of the month.	Did not occur
b	ICP becomes Inactive part way through a month.	Consumption is only calculated for the Active portion of the month.	Compliant
c	ICP become Inactive then Active again within a month.	Consumption is only calculated for the Active portion of the month.	Did not occur
d	ICP switches in part way through a month on an estimated switch reading	Consumption is calculated to include the 1st day of responsibility.	Compliant
e	ICP switches out part way through a month on an estimated switch reading	Consumption is calculated to include the last day of responsibility.	Did not occur
f	ICP switches out then back in within a month	Consumption is calculated for each day of responsibility.	Did not occur
g	Continuous ICP with a read during the month	Consumption is calculated assuming the readings are valid until the end of the day.	Compliant
h	Continuous ICP without a read during the month	Consumption is calculated assuming the readings are valid until the end of the day.	Compliant

Test	Scenario	Test expectation	Result
I	Rollover Reads	Consumption is calculated correctly in the instance of meter rollovers.	Did not occur
J	Unmetered load for a full month	Consumption is calculating based on daily unmetered kWh for full month.	Did not occur
k	Unmetered load for a part month	Consumption is calculating based on daily unmetered kWh for active days of the month.	Compliant
l	Network/GXP/Connection (POC) alters partway through a month.	Consumption is separated and calculated for the separate portions of where it is to be reconciled to.	Compliant
m	ICP with a customer read during the month	Customer reads are not used to calculate historic estimate unless appropriately validated.	Compliant
n	ICP with a photo read during the month	Photo reads are not used to calculate historic estimate unless appropriately validated.	Did not occur
o	ICP has a meter with a multiplier greater than 1	The multiplier is applied correctly.	Compliant
p	Switch in part way through a month and then a meter change in the same month	Consumption is calculated correctly for the period from the switch into the date of the meter change	Non-compliant

The example checked for test “p” was calculated incorrectly due to the incorrect meter end date being applied, so that is was the same as the new meter start date. This was due to human error and was corrected during the site audit. The impact on submission was negligible.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 12.11 With: 4 and 5 Schedule 15.3 From: 13-Mar-18 To: 14-Mar-18	One HE scenario calculated incorrectly. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as all scenarios tested worked correctly except one which was a dating error. The audit risk rating is low as only the volume of ICPs being traded is small and the volume associated with the error found was less than one kWh.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was corrected during the site audit		Date 28/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Standard meter change procedure will be followed		Date 28/8/2018	

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

Forward estimate is calculated by JCC as Supercharged Energy's agent.

Forward estimates were checked for accuracy by analysing the GR170 file for variances for February to June 2018.

Audit commentary

The forward estimate process is based on the average daily consumption for the previous read period for each meter register. If previous read period information is not available, the forward estimate consumption is based on the estimated daily consumption provided by the previous retailer in the CS file.

The accuracy of the initial submission, in comparison to each subsequent revision is required to be within 15% and within 100,000kWh. The target was met for all revisions to date.

Quantity of balancing areas with differences over 15% (Over 100,000 units)

Month	Revision 1	Revision 3	Revision 7	Revision 14	Total
Feb 2018	0	0	-	-	1
Mar 2018	0	0	-	-	1
Apr 2018	0	0	-	-	7
May 2018	0	-	-	-	9
Jun 2018	0	-	-	-	17

Total variation between revisions (Positive means initial higher than revision)

Month	Revision 1	Revision 3	Revision 7	Revision 14
Feb 2018	0.00%	-11.68%	-	-
Mar 2018	4.20%	-26.92%	-	-
Apr 2018	0.00%	-12.19%	-	-
May 2018	-16.98%	-	-	-
Jun 2018	0.32%	-	-	-

I reviewed the differences at balancing area level and checked all six balancing area differences of more than $\pm 20\%$. The differences were caused by forward estimates being replaced with historic estimates.

Audit outcome

Compliant

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

Review of the registry list as at 31 July 2018 confirmed that all ICPs have RPS profile.

In **section 6.1**, I found that 12 ICPs with generation have PV1 profile applied. These ICPs were checked to confirm that there was an actual or permanent estimate reading on the day of the profile change.

Audit commentary

All 12 ICPs with PV1 profile had an actual or permanent estimate reading recorded on the day of the profile change:

- two ICPs switched in with generation metering, and the switch read was applied
- ten ICPs had generation metering installed, and the meter installation read was applied.

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

Submission information provided to the reconciliation manager must be aggregated to the following level:

- *NSP code (clause 8(a))*
- *reconciliation type (clause 8(b))*
- *profile (clause 8(c))*
- *loss category code (clause 8(d))*
- *flow direction (clause 8(e))*
- *dedicated NSP (clause 8(f))*
- *trading period for half hour metered ICPs and consumption period or day for all other ICPs (clause 8(g)).*

Audit observation

Processes to ensure that information used to aggregate the reconciliation reports is consistent with the registry were reviewed in **section 2.1**.

Aggregation of volumes is discussed in **section 12.3**.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

Submission information is provided to the reconciliation manager in the appropriate format and is aggregated to the following level:

- NSP code
- reconciliation type
- profile
- loss category code
- flow direction
- dedicated NSP
- consumption period.

I confirmed that the same processes used for Plus Energy will be deployed for Supercharged Energy HHR submissions. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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 on the AV080 reports as part of the aggregation checks.

Supercharged Energy intend to move to HHR submission and this capability was assessed as part of this audit by reviewing the Plus Energy reconciliation participant audit in which JCC carries out these functions.

Audit commentary

Review of 14 AV080 non half hour volumes reports confirmed that submission data is rounded to two decimal places.

The reporting resolution for HHR submission is confirmed in the Plus Energy audit. Permission has been granted by Plus Energy to submit their audit report as proof of compliance in relation to this requirement. A letter from the Plus Energy auditor confirming that all the relevant processes have been tested to confirm compliance is also submitted. I confirmed with JCC that no changes have been made to the processes or database used for these functions since that audit.

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

The timeliness of submissions of historic estimate was reviewed in **section 12.2**.

Supercharged Energy began trading in February 2018. I reviewed all three month submissions available to determine whether historic estimate requirements were met. No seven or 14 month revisions have been completed yet.

Audit commentary

The quantity of historic estimate is contained in the submission file, and is not a separate report.

The three month revision files were examined for February to April 2018; the thresholds were met.

Month	Revision 3 80% Met	Total
Feb 2018	1	1
Mar 2018	1	1
Apr 2018	9	9

The table below shows that the percentage of historic estimate across all NSPs is well above the required targets for the three month revisions.

Month	Revision 3 80% Target
Feb 2018	100.0%
Mar 2018	95.3%
Apr 2018	99.1%

Audit outcome

Compliant

CONCLUSION

This audit found 13 non-compliances and makes one recommendation. The non-compliances found were largely as a result of rapid customer growth without enough resource to manage the onboarding of these customers and a lack of robust processes to ensure all the requirements are met has caused the majority of the non-compliance found. Reconciliation is occurring compliantly as JCC is receiving the meter reading data directly and producing the submission files.

This audit found 13 non-compliances and makes one recommendation. The non-compliances found were largely because of rapid customer growth without enough resource to manage the onboarding of these customers and a lack of robust processes to ensure all the requirements are met. Reconciliation is occurring in a compliant manner as JCC is receiving the meter reading data directly and producing the submission files.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance found during this audit. The table below provides some guidance on this matter and contains a future risk rating score of 39, which results in an indicative audit frequency of 12 months. I have considered this in conjunction with Supercharged Energy's responses and the audit findings and I recommend that the next audit be within six months of this audit. I recommend a shorter audit period than the future risk rating indicates due to number of processes still to be developed or refined as identified in the audit. I note that a material change audit should be undertaken to assess the compliance of the Fiji operation before the registry management services pass from JCC back to Supercharged Energy.

PARTICIPANT RESPONSE

Supercharged Energy have reviewed this report and their comments are recorded in this audit. No further comments were provided.