

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT**

The logo for Veritek, featuring the word "VERITEK" in a blue serif font. A vertical blue line is positioned to the left of the text, and a horizontal blue line is positioned below the text, intersecting at the letter 'V'.

For

**NEW ZEALAND AIRWAYS LTD (NZAL)**  
**NZBN: 9429033590486**

Prepared by: Steve Woods

Date audit commenced: 8 February 2022

Date audit report completed: 1 April 2022

Audit report due date: 26 April 2022

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## EXECUTIVE SUMMARY

This Distributor audit was conducted at the request of **New Zealand Airways Ltd (NZAL)** to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.1, which was produced by the Electricity Authority.

NZAL's compliance is reliant on the compliance of TENCO, as the contractor. In this report, I have only recorded those matters where issues were discovered or where specific analysis was undertaken. TENCO's audit report will be submitted with this report.

Overall, the level of compliance was found to be high with strong controls recorded. This audit found six non-compliances and makes no recommendations.

The next audit frequency table indicates that the next audit be due in 18 months. I have considered this in conjunction with NZAL's comments and I recommend that the next audit be in 18 months.

The matters raised are set out in the table below.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1) and 10.6(1)	Two active ICPs with duplicate addresses that are not readily locatable.	Strong	Low	1	Identified
Participants may request distributors to create ICPs	3.2	11.5(3)	Two ICPs created late.	Strong	Low	1	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.	Information not provided to the registry prior to electricity being traded for nine ICPs.	Strong	Low	1	Identified
Timeliness of initial electrical connection date	3.5	7(2A) of Schedule 11.1	18 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.	Strong	Low	1	Disputed
ICP Location Address	4.4	2 Schedule 11.1	Two active ICPs with duplicate addresses that are not readily locatable.	Strong	Low	1	Identified
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1) and 10.25(3)	The meter installation certification expiry date advised late for NSP NPS0011.	Strong	Low	1	Identified
Future Risk Rating						6	

Future risk rating	0-1	2-5	6-8	9-20	21-29	30+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

## ISSUES

Subject	Section	Issue	Remedial action
		Nil	

## 1. ADMINISTRATIVE

### 1.1. Exemptions from Obligations to Comply with Code (Section 11)

#### Code reference

Section 11 of Electricity Industry Act 2010.

#### Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

#### Audit observation

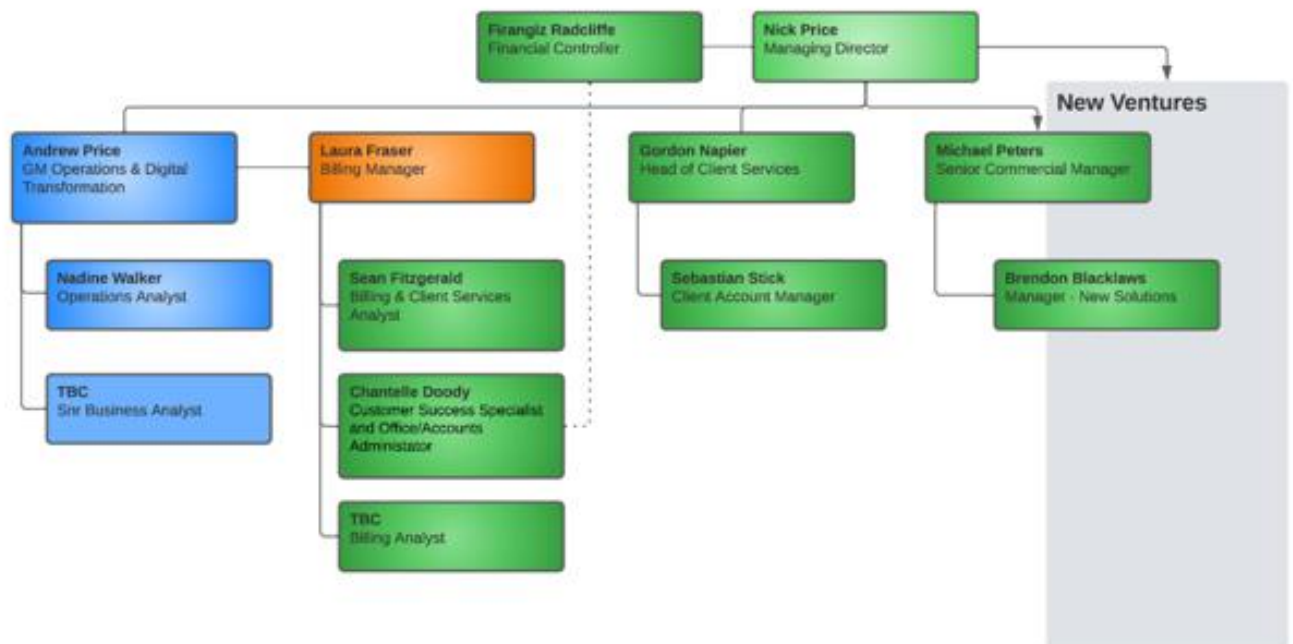
The Electricity Authority website was checked to determine whether NZAL has any Code exemptions in place.

#### Audit commentary

Review of exemptions on the Electricity Authority website confirmed that there are no exemptions in place for NZAL.

### 1.2. Structure of Organisation

TENCO provided an organisation chart:



### 1.3. Persons involved in this audit

Auditor:

Name	Company	Title
Steve Woods	Veritek Limited	Lead Auditor
Claire Stanley	Veritek Limited	Supporting Auditor

Personnel assisting in this audit were:

Name	Title	Organisation
Nick Price	Managing Director	TENCO
Andrew Price	Market Operations and Compliance Manager	TENCO

### 1.4. Use of contractors (Clause 11.2A)

#### Code reference

Clause 11.2A

#### Code related audit information

*A participant who uses a contractor*

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

#### Audit observation

TENCO performs all NZAL's responsibilities.

### 1.5. Supplier list

All activities covered by the scope of this audit are conducted by TENCO.

### 1.6. Hardware and Software

Hardware and software is discussed in the TENCO agent audit report.

### 1.7. Breaches or Breach Allegations

NZAL has not had any breach allegations relevant to this audit recorded by the Electricity Authority.



## 1.8. ICP and NSP Data

Review of the NSP table showed NZAL had the following NSPs as of 26 January 2022.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
NZAL	NAH0011	139 THE TERRACE ASTERON HOUSE	WIL0331	CKHK	NAH0011NZALE	E	01/04/2021	12
NZAL	NPP0011	PRIME PROPERTY TOWER	WIL0331	CKHK	NPP0011NZALE	E	01/04/2021	20
NZAL	NPS0011	NZAL PSIS BUILDING	WIL0331	CKHK	NPS0011NZALE	E	01/06/2021	22
NZAL	NSR0011	81 MOLESWORTH STREET	KWA0111	CKHK	NSR0011NZALE	E	1/04/2014	13
NZAL	NTO0011	TECHNOLOGY ONE HOUSE	WIL0331	CKHK	NTO0011NZALE	E	14/09/2018	33
NZAL	NUL0011	498 JACKSON ST PETONE WELLINGTON	GFD0331	CKHK	NUL0011NZALE	E	01/06/2021	10
NZAL	NWH0011	WEL HOUSE	HAM0331	WAIK	NWH0011NZALE	E	1/04/2010	17
NZAL	NAT0011	500 VICTORIA STREET HAMILTON	HAM0331	WAIK	NAT0011NZALE	E	1/02/2018	15
NZAL	NBS0011	10 BRANDON STREET WELLINGTON	KWA0111	CKHK	NBS0011NZALE	E	01/04/2021	25

Five existing networks with start dates during the audit period were due to switching to a new retailer.

No NSPs were created, decommissioned or transferred to or from other networks during the audit period.

Status	Number of ICPs (2022)	Number of ICPs (2020)	Number of ICPs (2017)	Number of ICPs (2016)
Distributor (888)	-	-	-	-
New (999)	-	-	-	1
Ready (000)	-	-	2	-
Active (2,0)	167	146	117	143
Inactive - new connection in progress (1,12)	-	1	-	-
Inactive – vacant (1,4)	7	7	1	2
Inactive – AMI remote disconnection (1,7)	-	-	-	-
Inactive – at pole fuse (1,8)	-	-	-	-

Status	Number of ICPs (2022)	Number of ICPs (2020)	Number of ICPs (2017)	Number of ICPs (2016)
Inactive – de-energised due to meter disconnected (1,9)	1	1	-	-
Inactive – de-energised at meter box switch (1,10)	-	-	-	-
Inactive - at meter box switch (1,11)	-	-	-	-
Inactive – ready for decommissioning (1,6)	-	-	-	-
Inactive – reconciled elsewhere (1,5)	-	1	1	1
Decommissioned (3)	19	17	15	14

#### 1.9. Authorisation Received

All information was provided directly; an authorisation letter was not required.

#### 1.10. Scope of Audit

This Distributor audit was performed at the request of NZAL, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

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

Functions Requiring Audit Under Clause 11.10(4) of Part 11	Contractors Involved in Performance of Tasks
The creation of ICP identifiers for ICPs.	TENCO
The provision of ICP information to the registry and the maintenance of that information.	
The creation and maintenance of loss factors.	

The audit report for TENCO will be submitted with this audit.

### 1.11. Summary of previous audit

NZAL provided a copy of their previous audit conducted in April 2020 by Rebecca Elliot of Veritek Limited. The audit recorded six non-compliances described in the table below and made no recommendations.

**Table of Non-Compliance**

Subject	Section	Clause	Non-compliance	Status
Participants may request distributors to create ICPs	3.2	11.5(3)	One ICP created late.	Existing for different ICP
Connection of NSP that is not point of connection to grid	3.9	10.30	The Reconciliation Manager was advised after 23 business days for NBS0011.	Cleared
Changes to registry information	4.1	8 Schedule 11.1	One late Network event.	Cleared
ICP location Address	4.4	2 Schedule 11.1	The list file showed two duplicate addresses.	Still existing for different ICPs
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1) and 10.25(3)	The meter installation certification expiry date advised late for NSPs NPS0011 and NWH0011.	Still existing
Responsibility for metering information when creating an NSP that is not a POC to the grid	6.9	10.25(2)	The meter installation certification expiry date advised after 31 days for NSP NBS0011.	Has not occurred during the audit period.

## 2. OPERATIONAL INFRASTRUCTURE

### 2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1))

#### Code reference

*Clause 11.2(1) and 10.6(1)*

#### Code related audit information

*A participant must take all practicable steps to ensure that information that the participant is required to provide to any person under Parts 10 or 11 is:*

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

#### Audit observation

The management of this process is discussed in the TENCO contractor report. The list file as of 31 December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

#### Audit commentary

Compliance is recorded for TENCO.

The audit compliance reports identified two ICPs with addresses that are duplicates, therefore they are not readily locatable. These have been passed to TENCO to add additional address details to ensure these are readily locatable.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1)  From: 01-Mar-20 To: 31-Dec-22	Two active ICPs with duplicate addresses that are not readily locatable.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong, as they are robust and mitigate risk to an acceptable level.  The audit risk rating is deemed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
The duplicate address were found during the audit, this was a result of someone putting the unit number in the user reference field.		March-22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will look to put automated monitoring in place for duplicate address. We have started reviewing ICPs we have inherited from local networks building by building and will improve the records.		Ongoing	

## 2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2))

### Code reference

Clause 11.2(2) and 10.6(2)

### Code related audit information

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

### Audit observation

Processes to provide information were reviewed and observed throughout the audit, and as part of TENCO's agent audit.

### Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause. Incorrect information is normally corrected daily, or as soon as possible upon discovery.

### Audit outcome

Compliant

## 2.3 Removal or breakage of seals (Clause 48(1A) and 48(1B) of Schedule 10.7)

### Code reference

*Clause 48(1A) and 48(1B) of Schedule 10.7*

### Code related audit information

*If the distributor provides a load control signal to a load control switch in the metering installation, the distributor can remove or break a seal without authorisation from the MEP to bridge or unbridge the load control device or load control switch – as long as the load control switch does not control a time block meter channel.*

*If the distributor removes or breaks a seal in this way, it must:*

- *ensure personnel are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code*
- *replace the seal with its own seal*
- *have a process for tracing the new seal to the personnel*
- *notify the metering equipment provider and trader*

### Audit observation

The management of this process is discussed in the TENCO contractor report. The PR-255 file was examined to determine whether load control devices existed on the network.

### Audit commentary

Compliance is recorded in the TENCO audit. Load control devices do exist on the network, NZAL do not complete any work requiring a change of seal, the retailer will initiate any such work required with a contractor.

### Audit outcome

Compliant

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

### Code reference

*Clause 11.30A*

### Code related audit information

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

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

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

### Audit observation

The TENCO agent audit report discusses the management of this information. The Disputes Resolution information was examined to determine compliance.

**Audit commentary**

Compliance is recorded for TENCO.

**Audit outcome**

Compliant

### 3. CREATION OF ICPS

#### 3.1. Distributors must create ICPs (Clause 11.4)

##### Code reference

Clause 11.4

##### Code related audit information

*The distributor must create an ICP identifier in accordance with Clause 1 of Schedule 11.1 for each ICP on the distributor's network. This includes an ICP identifier for the point of connection at which an embedded network connects to the distributor's network.*

##### Audit observation

The new connection process is discussed in the TENCO audit report.

The registry list as of December 2021 and the event detail report for 1 March 2020 to 31 December 2021 were reviewed to identify all new connections during the period and check that ICPs were created as required by this clause.

##### Audit commentary

Compliance is recorded for TENCO. Examination of the registry list found 22 ICPs were created during the period. ICPs were created in accordance with this clause for all new connections.

##### Audit outcome

Compliant

#### 3.2. Participants may request distributors to create ICPs (Clause 11.5(3))

##### Code reference

Clause 11.5(3)

##### Code related audit information

*The distributor, within three business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.*

##### Audit observation

The new connection process is discussed in the TENCO report. ICP requests are made by embedded network management or traders. If the request is not made by a trader this rule does not apply.

##### Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause.

There were 22 new ICPs created during the audit period. This clause assumes that the ICP requests will be made by traders, of the sample of 10 new ICPs reviewed, five were requested by the trader and three were created within three business days, two ICPs were not created within three business days. Five ICPs were requested by customers therefore this clause does not apply in this scenario.

##### Audit outcome

Non-compliant



Non-compliance	Description		
Audit Ref: 3.2 With: Clause 11.5(3) From: 01-Mar-20 To: 31-Dec-22	Two ICPs created late. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to ensure ICPs are created on time most of the time.  The risk is low as only two ICPs were affected, and additional information required was actively followed-up by NZAL.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICPs are generally created within 3 business days. Once all information was obtained the ICPs were generated.		During audit.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have hired another resource in operations team to provide further capacity. Investigating creating website application form for individual ICP requests		Ongoing	

### 3.3. Provision of ICP Information to the registry manager (Clause 11.7)

#### Code reference

Clause 11.7

#### Code related audit information

*The distributor must provide information about ICPs on its network in accordance with Schedule 11.1.*

#### Audit observation

The new connection process is discussed in the TENCO report.

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were reviewed to identify all new connections during the period and check that information was provided as required by this clause.

#### Audit commentary

Information was provided as required by this clause for all ICPs created during the audit period.

#### Audit outcome

Compliant

### 3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule 11.1)

#### **Code reference**

*Clause 7(2) of Schedule 11.1*

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

*The distributor must provide information specified in Clauses 7(1)(a) to 7(1)(o) of Schedule 11.1 as soon as practicable and prior to electricity being traded at the ICP.*

#### **Audit observation**

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were checked to determine the timeliness of the provision of ICP information for NZAL's new connections.

#### **Audit commentary**

The audit compliance report confirmed that nine ICPs were not populated to the registry prior to electricity being traded at the ICP. The nine ICPs were reviewed and found that all ICPs related to the one embedded network for the same two dates. They were created as "new", and on receipt of the meter installation paperwork it was identified that the ICPs had not been updated to "ready" on the registry, this was a result of human error.

#### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1  From: 01-Mar-20 To: 31-Dec-22	Information not provided to the registry prior to electricity being traded for nine ICPs.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong, as they are robust and mitigate risk to an acceptable level.  The audit risk rating is deemed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP was moved to ready as soon as we became aware that it was still sitting at NEW upon confirmation of the electrical connection.		21/09/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was human error and for new Embedded Networks where we have issued NEW ICP's in preparation for the network to go live at a later date all ICP's will be moved to READY from the NSP go live date.		2020	

### 3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)

#### Code reference

*Clause 7(2A) of Schedule 11.1*

#### Code related audit information

*The distributor must provide the information specified in sub-clause (1)(p) to the registry manager no later than 10 business days after the date on which the ICP is initially electrically connected.*

#### Audit observation

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to determine the timeliness of the provision of initial electrical connection date information for new connections.

#### Audit commentary

The Initial electrical connection dates were populated within ten days for four ICPs. 18 ICP's were updated more than 10 business days after electrical connection. A typical sample of six late updates were checked to determine why they were delayed.

The sample checked found that:

- five ICPs had the IECD populated initially, and this was reversed and re-entered at the request for the trader as they had claimed the ICPs on the incorrect code, and
- one was delayed due to late paperwork and a delay in the trader updating the “active” status.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1  From: 01-Mar-20 To: 31-Dec-22	18 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.  Potential impact: Low  Actual impact: Low  Audit history: Multiple  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong, as they are sufficient to prevent the late updates most of the time, five ICPs checked were the result of a trader request.  The audit risk rating is deemed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
IED was initially input within 1BD, the retailer requested we reverse our network event as they had claimed on wrong retailer code. Once we input the network event again it looked like we updated late.		During Audit	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Non issue, caused by retailer asking us to reverse events to accommodate their errors.		N/A	

### 3.6. Connection of ICP that is not an NSP (Clause 11.17)

#### Code reference

Clause 11.17

#### Code related audit information

*A distributor must, when connecting an ICP that is not an NSP, follow the connection process set out in Clause 10.31.*

*The distributor must not connect an ICP (except for an ICP across which unmetered load is shared) unless a trader is recorded in the registry as accepting responsibility for the ICP.*

*In respect of ICPs across which unmetered load is shared, the distributor must not connect an ICP unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load, and all traders that are responsible for an ICP on the shared unmetered load have been advised.*

#### **Audit observation**

The new connection process is discussed in the TENCO report.

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

#### **Audit commentary**

As discussed in the TENCO agent audit report, the new connection process requires applications for new connections to be approved by traders.

Review of the registry list confirmed that a trader is currently recorded for all active ICPs, and there is no known shared unmetered load on NZAL's network.

#### **Audit outcome**

Compliant

### 3.7. Connection of ICP that is not an NSP (Clause 10.31)

#### **Code reference**

*Clause 10.31*

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

*A distributor must not connect an ICP that is not an NSP unless requested to do so by the trader trading at the ICP, or if there is only shared unmetered load at the ICP and each trader has been advised.*

#### **Audit observation**

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

#### **Audit commentary**

NZAL will not electrically connect an ICP without a reconciliation participant accepting responsibility. Examination of the list file and the combined audit compliance reports confirmed this.

The ten new connections which were electrically connected during the report period were reviewed and were approved to be connected by the trader.

#### **Audit outcome**

Compliant

### 3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A)

#### **Code reference**

*Clause 10.31A*

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

*A distributor may only temporarily electrically connect an ICP that is not an NSP if requested by an MEP for a purpose set out in clause 10.31A(2), and the MEP:*

- *has been authorised to make the request by the trader responsible for the ICP; and*

*the MEP has an arrangement with that trader to provide metering services.*

*If the ICP is only shared un-metered load, the distributor must advise the traders of the intention to temporarily connect the ICP unless:*

*advising all traders would impose a material cost on the distributor, and*

*in the distributor's reasonable opinion, the advice would not result in any material benefit to any of the traders.*

#### **Audit observation**

The new connection process is discussed in the TENCO report.

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

#### **Audit commentary**

All electrically connected ICPs had certified meters on their initial electrical connection date. No temporary electrical connections were identified.

#### **Audit outcome**

Compliant

### **3.9. Connection of NSP that is not point of connection to grid (Clause 10.30)**

#### **Code reference**

*Clause 10.30*

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

*A distributor must not connect an NSP on its network that is not a point of connection to the grid unless requested to do so by the trader responsible for ensuring there is a metering installation for the point of connection.*

*The distributor that initiates the connection under Part 11 and connects the NSP must, within 5 business days of connecting the NSP that is not a point of connection to the grid, advise the reconciliation manager of the following in the prescribed form:*

- *the NSP that has been connected*
- *the date of the connection*
- *the participant identifier of the MEP for each metering installation for the NSP*
- *the certification expiry date of each metering installation for the NSP.*

#### **Audit observation**

The NSP table on the registry was examined.

#### **Audit commentary**

No new NSPs were created during the audit period.

#### **Audit outcome**

Compliant

### 3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30A and 10.30B)

#### Code reference

*Clause 10.30A and 10.30B*

#### Code related audit information

*A distributor may only temporarily electrically connect an NSP that is not a point of connection to the grid if requested by an MEP for a purpose set out in clause 10.30A(3), and the MEP:*

- *has been authorised to make the request by the reconciliation participant responsible for the NSP; and*
- *the MEP has an arrangement with that reconciliation participant to provide metering services.*

*A distributor may only electrically connect an NSP if:*

- *each distributor connected to the NSP agrees*
- *the trader responsible for delivery of submission information has requested the electrical connection*
- *the metering installations for the NSP are certified and operational metering*

#### Audit observation

The NSP table on the registry was examined.

#### Audit commentary

No new NSPs were created during the audit period.

#### Audit outcome

Compliant

### 3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1)

#### Code reference

*Clause 1(1) Schedule 11.1*

#### Code related audit information

*Each ICP created by the distributor in accordance with Clause 11.4 must have a unique identifier, called the "ICP identifier", determined in accordance with the following format:*

*yyyyyyyyyyxxxx where:*

- *yyyyyyyyyy is a numerical sequence provided by the distributor*
- *xx is a code that ensures the ICP is unique (assigned by the Authority to the issuing distributor)*
- *ccc is a checksum generated according to the algorithm provided by the Authority.*

#### Audit observation

Compliance is recorded for TENCO. ICPs are created in a spreadsheet. The spreadsheet is used to create unique numbering sets for each network. Each network has its own numbering convention, usually with tenancy or shop numbers incorporated into the ICP number.

The checksum is added manually from the "Checksum" system supplied by Vector for where a group of ICPs is created. For the creation of a single ICP, TENCO uses the checksum facility available on the registry.

### **Audit outcome**

Compliant

## **3.12. Loss category (Clause 6 Schedule 11.1)**

### **Code reference**

*Clause 6 Schedule 11.1*

### **Code related audit information**

*Each ICP must have a single loss category that is referenced to identify the associated loss factors.*

### **Audit observation**

The list file as of December 2021 was examined to confirm whether all active ICPs have a single loss category.

### **Audit commentary**

Each active ICP only has a single loss category, which clearly identifies the relevant loss factor.

### **Audit outcome**

Compliant

## **3.13. Management of “new” status (Clause 13 Schedule 11.1)**

### **Code reference**

*Clause 13 Schedule 11.1*

### **Code related audit information**

*The ICP status of “New” must be managed by the distributor to indicate:*

- *the associated electrical installations are in the construction phase (Clause 13(a) of Schedule 11.1)*
- *the ICP is not ready for activation (Clause 13(b) of Schedule 11.1).*

### **Audit observation**

The ICP creation process was reviewed as part of the TENCO agent audit.

The registry list file as of December 2021 and the event detail file covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

### **Audit commentary**

Compliance is recorded in the TENCO audit report in relation to this clause.

There are currently no ICPs with the “new” status. Monitoring of ICPs at “new” status is discussed in **section 3.14**. No ICPs have been at “new” status for over 24 months.

### **Audit outcome**

Compliant



### 3.14. Monitoring of “new” & “ready” statuses (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 has had the status of “Ready” for 24 months or more:

- the distributor must ask the trader who intends to trade at the ICP whether the ICP should continue to have that status (Clause 15(2)(a) of Schedule 11.1)
- the distributor must decommission the ICP if the trader advises that the ICP should not continue to have that status (Clause 15(2)(b) of Schedule 11.1).

#### Audit observation

Monitoring of “new” and “ready” status is discussed in the TENCO report. The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

#### Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause.

Examination of the list file found no ICPs at “new” status and no ICPs at “ready” status.

#### Audit outcome

Compliant

### 3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1)

#### Code reference

Clause 7(6) Schedule 11.1

#### Code related audit information

If the ICP connects the distributor's network to an embedded generating station that has a capacity of 10 MW or more (clause 7(1)(f) of Schedule 11.1):

- The loss category code must be unique; and
- The distributor must provide the following to the reconciliation manager:
  - o the unique loss category code assigned to the ICP
  - o the ICP identifier of the ICP
  - o the NSP identifier of the NSP to which the ICP is connected
  - o the plant name of the embedded generating station.

#### Audit observation

The registry list as of December 2021 was examined to determine compliance.

#### Audit commentary

The list file was examined. There is no embedded generation on the NZAL network that has a generation capacity greater than 10MW.

#### Audit outcome

Compliant

### 3.16. Electrical connection of a point of connection (Clause 10.33A)

#### Code reference

Clause 10.33A(4)

#### Code related audit information

*No participant may electrically connect a point of connection or authorise the electrical connection of a point of connection, other than a reconciliation participant.*

#### Audit observation

The new connection process of ICPs and NSPs is discussed in the TENCO report.

The registry list as of December 2021 was reviewed to determine compliance.

#### Audit commentary

NZAL obtains permission from the trader before electrically connecting ICPs.

#### Audit outcome

Compliant

### 3.17. Electrical disconnection of a point of connection (Clause 10.30C and 10.31C)

#### Code reference

Clause 10.30C and 10.31C

#### Code related audit information

*A distributor can only disconnect, or electrically disconnect an ICP on its network:*

- *if empowered to do so by legislation (including the Code)*
- *under its contract with the trader for that ICP or NSP*
- *under its contract with the consumer for that ICP*

#### Audit observation

Processes to manage this are discussed in the TENCO agent report.

#### Audit commentary

Compliance is confirmed for the process detailed in the TENCO agent report.

NZAL only conduct disconnection where ICPs are to be decommissioned and they obtain permission from the trader prior to decommissioning.

#### Audit outcome

Compliant

### 3.18. Meter bridging (Clause 10.33C)

#### **Code reference**

Clause 10.33C

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

*A distributor may only electrically connect an ICP in a way that bypasses a meter that is in place ("bridging") if the distributor has been authorised by the responsible trader.*

*The distributor can then only proceed with bridging the meter if, despite best endeavours:*

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

*If the distributor bridges a meter, the distributor must notify the responsible trader within 1 business day and include the date of bridging in its advice.*

#### **Audit observation**

The TENCO process for bridging control devices was examined.

#### **Audit commentary**

Compliance is recorded in the TENCO audit. TENCO confirmed no meters were bridged during the audit period.

#### **Audit outcome**

Compliant

## 4. MAINTENANCE OF REGISTRY INFORMATION

### 4.1. Changes to registry information (Clause 8 Schedule 11.1)

#### Code reference

*Clause 8 Schedule 11.1*

#### Code related audit information

*If information held by the registry that relates to an ICP for which the distributor is responsible changes, the distributor must give written notice to the registry manager of that change.*

*Notification must be given by the distributor within three business days after the change takes effect, unless the change is to the NSP identifier of the NSP to which the ICP is usually connected (other than a change that is the result of the commissioning or decommissioning of an NSP).*

*In those cases, notification must be given no later than eight business days after the change takes effect.*

*If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 13<sup>th</sup> business day and be backdated to the date the change took effect.*

*In the case of decommissioning an ICP, notification must be given by the later of 3 business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or 3 business days after the distributor has decommissioned the ICP.*

*In the case of a change to price category codes, where the change is backdated, no later than 3 business days after the distributor and the trader responsible for the ICP agree on the change.*

#### Audit observation

The management of this process is discussed in the TENCO report. I also examined the audit compliance reports for the period from 1 March 2020 to 31 December 2021 to identify late updates.

#### Audit commentary

Analysis of the audit compliance reports identified the following:

##### Address events

There were 41 address events during the audit period; all 41 (100%) were updated within one business day.

##### Network Events

There were 34 network events during the audit period, excluding initial electrical connection date updates; all except one were updated within the required timeframe .

Initial electrical connection date updates are discussed in **section 3.5**.

##### Pricing Events

There were 22 pricing events during the audit period; all 22 (100%) were updated within three business days.

##### Status Events

There were two ICPs decommissioned during the audit period. They were updated within three business days of the trader making them ready for decommissioning.

##### NSP changes

No NSP changes occurred during the report period.

### **Audit outcome**

Compliant

## 4.2. Notice of NSP for each ICP (Clauses 7(1),(4) and (5) Schedule 11.1)

### **Code reference**

*Clauses 7(1), 7(4) and 7(5) Schedule 11.1*

### **Code related audit information**

*Under Clause 7(1)(b) of Schedule 11.1, the distributor must provide to the registry manager the NSP identifier of the NSP to which the ICP is usually connected.*

*If the distributor cannot identify the NSP that an ICP is connected to, the distributor must nominate the NSP that the distributor thinks is most likely to be connected to the ICP, taking into account the flow of electricity within its network, and the ICP is deemed to be connected to the nominated NSP.*

### **Audit observation**

The management of this process is discussed in the TENCO report.

The registry list as of December 2021 and the NSP table were compared to determine compliance.

I checked the audit compliance reports for the period from 1 March 2020 to 31 December 2021 to identify discrepancies.

### **Audit commentary**

Compliance is recorded for TENCO.

I compared the registry list and NSP table and confirmed that all active ICPs were mapped to an NSP consistent with the ICP address information.

There were no discrepancies identified by the audit compliance reports.

### **Audit outcome**

Compliant

## 4.3. Customer queries about ICP (Clause 11.31)

### **Code reference**

*Clause 11.31*

### **Code related audit information**

*The distributor must advise a customer (or any person authorised by the customer) or embedded generator of the customer or embedded generator's ICP identifier within three business days after receiving a request for that information.*

### **Audit observation**

The management of customer queries was examined.

### **Audit commentary**

NZAL does not receive direct requests for ICP identifiers, but if they were received these would be provided immediately.

### **Audit outcome**

Compliant

#### 4.4. ICP location address (Clause 2 Schedule 11.1)

### **Code reference**

*Clause 2 Schedule 11.1*

### **Code related audit information**

*Each ICP identifier must have a location address that allows the ICP to be readily located.*

### **Audit observation**

The process to manage address accuracy was examined in the TENCO report. The registry list file as of December 2021 was reviewed.

### **Audit commentary**

Review of NZAL's list file found that all active and inactive ICPs have unique addresses with sufficient information to allow the ICPs to be readily located.

Two ICPs with duplicate addresses were identified by the audit compliance reports. These have been passed to TENCO to correct.

### **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Mar-20 To: 31-Dec-22	Two active ICPs with duplicate addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to ensure addresses are unique most of the time.  The risk is low as a small number of ICPs are affected, and the registry has been updated.		
Actions taken to resolve the issue		Completion date	Remedial action status
The duplicate address were found during the audit, this was a result of someone putting the unit number in the user reference field		March-22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will look to put automated monitoring in place for duplicate address. We have started reviewing ICPs we have inherited from local networks building by building and will improve the records.		Ongoing	

#### 4.5. Electrically disconnecting an ICP (Clause 3 Schedule 11.1)

##### Code reference

Clause 3 Schedule 11.1

##### Code related audit information

*Each ICP created after 7 October 2002 must be able to be electrically disconnected without electrically disconnecting another ICP, except for ICPs that are the point of connection between a network and an embedded network, or ICPs that represent the consumption calculated by the difference between the total consumption for the embedded network and all other ICPs on the embedded network.*

##### Audit observation

The management of this process is discussed in the TENCO report.

##### Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause.

##### Audit outcome

Compliant

#### 4.6. Distributors to Provide ICP Information to the Registry manager (Clause 7(1) Schedule 11.1)

##### Code reference

Clause 7(1) Schedule 11.1

##### Code related audit information

For each ICP on the distributor's network, the distributor must provide the following information to the registry manager:

- the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)
- the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)
- the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)
- the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)
- the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)
- if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):
  - a) the unique loss category code assigned to the ICP
  - b) the ICP identifier of the ICP
  - c) the NSP identifier of the NSP to which the ICP is connected
  - d) the plant name of the embedded generating station
- the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)
- if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):
  - a) a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity
  - b) a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period
  - c) if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-
    - (i) no capacity value recorded in the registry field for the chargeable capacity; and
    - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded
  - d) if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-
    - (i) the annual capacity value recorded in the registry field for the chargeable capacity; and
    - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded
  - e) the actual chargeable capacity of the ICP in any other case



- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1)*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)*
- *the status of the ICP (Clause 7(1)(k) of Schedule 11.1)*
- *designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)*
- *if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):*
  - a) *the nameplate capacity of the generator; and*
  - b) *the fuel type*
- *the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).*

#### **Audit observation**

The management of registry data is discussed in the TENCO contractor report.

The audit compliance reports for the period from 1 March 2020 to 31 December 2021 were examined to check for the population of all required information.

#### **Audit commentary**

Data completeness and accuracy was reviewed and confirmed to be compliant.

#### **Audit outcome**

Compliant

4.7. Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)

#### **Code reference**

*Clause 7(3) Schedule 11.1*

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

*The distributor must provide the following information to the registry manager no later than 10 business days after the trading of electricity at the ICP commences:*

- *the actual price category code assigned to the ICP (Clause 7(3)(a) of Schedule 11.1)*
- *the actual chargeable capacity of the ICP determined by the price category code assigned to the ICP (if any) (Clause 7(3)(b) of Schedule 11.1)*
- *the actual distributor installation details of the ICP determined by the price category code assigned to the ICP (if any) (Clause 7(3)(c) of Schedule 11.1).*

### **Audit observation**

The new connection process is discussed in the TENCO report.

The registry list file as of December 2021 and the combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to confirm compliance.

### **Audit commentary**

Pricing information was updated on the registry before trading of electricity commenced for all ICPs created and energised during the audit period, examination of the audit compliance report confirmed this.

### **Audit outcome**

Compliant

## **4.8. GPS coordinates (Clause 7(8) and (9) Schedule 11.1)**

### **Code reference**

*Clause 7(8) and (9) Schedule 11.1*

### **Code related audit information**

*If a distributor populates the GPS coordinates (optional), it must meet the NZTM2000 standard in a format specified by the Authority.*

### **Audit observation**

The registry list as of December 2021 was examined to confirm compliance.

### **Audit commentary**

NZAL do not populate GPS co-ordinates on the registry.

### **Audit outcome**

Compliant

## **4.9. Management of "ready" status (Clause 14 Schedule 11.1)**

### **Code reference**

*Clause 14 Schedule 11.1*

### **Code related audit information**

*The ICP status of "Ready" must be managed by the distributor and indicates that:*

- *the associated electrical installations are ready for connecting to the electricity supply (Clause 14(1)(a) of Schedule 11.1); or*
- *the ICP is ready for activation by a trader (Clause 14(1)(b) of Schedule 11.1)*

*Before an ICP is given the "Ready" status in accordance with Clause 14(1) of Schedule 11.1, the distributor must:*

- *identify the trader that has taken responsibility for the ICP (Clause 14(2)(a) of Schedule 11.1)*
- *ensure the ICP has a single price category (Clause 14(2)(b) of Schedule 11.1).*

### **Audit observation**

Processes to manage ICPs at “ready” status were reviewed as part of the TENCO agent audit.

The registry list as of December 2021 was reviewed to identify that all ICPs at “ready” status had a nominated trader and a single price category recorded.

### **Audit commentary**

Analysis of the registry list found no ICPs at the “ready” status. All ICPs that have been at the “ready” status had a nominated trader and a single price category recorded.

### **Audit outcome**

Compliant

## 4.10. Management of “distributor” status (Clause 16 Schedule 11.1)

### **Code reference**

*Clause 16 Schedule 11.1*

### **Code related audit information**

*The ICP status of “distributor” must be managed by the distributor and indicates that the ICP record represents a shared unmetered load installation or the point of connection between an embedded network and its parent network.*

### **Audit observation**

The registry list as of December 2021 was reviewed to identify any ICPs at distributor status.

### **Audit commentary**

The distributor status was not used at all during the report period

### **Audit outcome**

Compliant

## 4.11. Management of “decommissioned” status (Clause 20 Schedule 11.1)

### **Code reference**

*Clause 20 Schedule 11.1*

### **Code related audit information**

*The ICP status of “decommissioned” must be managed by the distributor and indicates that the ICP is permanently removed from future switching and reconciliation processes (Clause 20(1) of Schedule 11.1).*

*Decommissioning only occurs when:*

- *electrical installations associated with the ICP are physically removed (Clause 20(2)(a) of Schedule 11.1); or*
- *there is a change in the allocation of electrical loads between ICPs with the effect of making the ICP obsolete (Clause 20(2)(b) of Schedule 11.1); or*
- *in the case of a distributor only ICP for an embedded network, the embedded network no longer exists (Clause 20(2)(c) of Schedule 11.1).*

### **Audit observation**

The management of this process is discussed in the TENCO report. The registry list as of December 2021, and combined registry compliance audit reports covering the period from 1 March 2020 to 31 December 2021 were examined to determine compliance

### **Audit commentary**

Compliance is recorded in the TENCO audit report in relation to this clause.

Two ICPs were decommissioned during the report period, and the registry was updated in accordance with this clause. The timeliness of updates to decommissioned status are discussed in **section 4.1**.

No ICPs are currently at “ready for decommissioning” status.

### **Audit outcome**

Compliant

## **4.12. Maintenance of price category codes (Clause 23 Schedule 11.1)**

### **Code reference**

*Clause 23 Schedule 11.1*

### **Code related audit information**

*The distributor must keep up to date the table in the registry of the price category codes that may be assigned to ICPs on each distributor's network by entering in the table any new price category codes.*

*Each entry must specify the date on which each price category code takes effect, which must not be earlier than two months after the date the code is entered in the table.*

*A price category code takes effect on the specified date.*

### **Audit observation**

The price category code table on the registry was examined.

### **Audit commentary**

No price categories were created during the audit period.

### **Audit outcome**

Compliant

## 5. CREATION AND MAINTENANCE OF LOSS FACTORS

### 5.1. Updating table of loss category codes (Clause 21 Schedule 11.1)

#### Code reference

*Clause 21 Schedule 11.1*

#### Code related audit information

*The distributor must keep the registry up to date with the loss category codes that may be assigned to ICPs on the distributor's network.*

*The distributor must specify the date on which each loss category code takes effect.*

*A loss category code takes effect on the specified date.*

#### Audit observation

The loss category code table on the registry was examined.

#### Audit commentary

No new loss category codes were created during the audit period.

#### Audit outcome

Compliant

### 5.2. Updating loss factors (Clause 22 Schedule 11.1)

#### Code reference

*Clause 22 Schedule 11.1*

#### Code related audit information

*Each loss category code must have a maximum of two loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.*

*If the distributor wishes to replace an existing loss factor on the table in the registry, the distributor must enter the replaced loss factor on the table in the registry.*

#### Audit observation

The loss category code table on the registry was examined.

#### Audit commentary

NZAL did not update any loss factor values during the audit period.

There was a maximum of one loss factor per loss factor category code per month, and all trading periods had a single applicable loss factor.

#### Audit outcome

Compliant

## 6. CREATION AND MAINTENANCE OF NSPS (INCLUDING DECOMMISSIONING OF NSPS AND TRANSFER OF ICPS)

### 6.1. Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1)

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

*If the distributor is creating or decommissioning an NSP that is an interconnection point between two local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.*

*If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between two embedded networks, the embedded network owner must give written notice to the reconciliation manager of the creation or decommissioning.*

*If the distributor is creating or decommissioning an NSP that is a point of connection between an embedded network and another network, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.*

*The notice provided to the reconciliation manager must be provided no later than 30 days prior to the intended date of creation or decommissioning.*

*If the intended date of creation or decommissioning changes the distributor must provide an updated notice as soon as possible.*

*If the distributor wishes to change the record in the registry of an ICP that is not recorded as being usually connected to an NSP in the distributor's network, so that the ICP is recorded as being usually connected to an NSP in the distributor's network, the distributor must:*

- *give written notice to the reconciliation manager*
- *give written notice to the Authority*
- *give written notice to each affected reconciliation participant*
- *comply with Schedule 11.2.*

#### Audit observation

The NSP table on the registry was examined.

#### Audit commentary

No NSPs were created, decommissioned or transferred to or from other networks during the audit period.

#### Audit outcome

Compliant

## 6.2. Provision of NSP information (Clause 26(1) and (2) Schedule 11.1)

### Code reference

Clause 26(1) and (2) Schedule 11.1

### Code related audit information

*If the distributor wishes to create an NSP or transfer an ICP as described above, the distributor must request that the reconciliation manager create a unique NSP identifier for the relevant NSP.*

*The request must be made at least 10 business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between two local networks. In all other cases, the request must be made at least one month before the NSP is electrically connected or the ICP is transferred.*

### Audit observation

The NSP table on the registry was examined.

### Audit commentary

No new NSPs were created during the audit period.

### Audit outcome

Compliant

## 6.3. Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1)

### Code reference

Clause 24(1) and Clause 26(3) Schedule 11.1

### Code related audit information

*If a participant has notified the creation of an NSP on the distributor's network, the distributor must give written notice to the reconciliation manager of the following:*

- *if the NSP is to be located in a new balancing area, all relevant details necessary for the new balancing area to be created and notification that the NSP to be created is to be assigned to the new balancing area*
- *in all other cases, notification of the balancing area in which the NSP is located.*

### Audit observation

The NSP table on the registry was examined.

### Audit commentary

No new NSPs were created during the audit period.

### Audit outcome

Compliant

#### 6.4. Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1)

##### **Code reference**

Clause 26(4) Schedule 11.1

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

*If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must give notice to the reconciliation manager at least one month before the creation or transfer of:*

- *the network on which the NSP will be located after the creation or transfer (Clause 26(4)(a))*
- *the ICP identifier for the ICP that connects the network and the embedded network (Clause 26(4)(b))*
- *the date on which the creation or transfer will take effect (Clause 26(4)(c)).*

##### **Audit observation**

The NSP table and the registry list as of December 2021 were examined.

##### **Audit commentary**

No new NSPs were created during the audit period.

##### **Audit outcome**

Compliant

#### 6.5. Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1)

##### **Code reference**

Clause 24(2) and (3) Schedule 11.1

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

*The distributor must give written notice to the reconciliation manager of any change to balancing areas associated with an NSP supplying the distributor's network. The notification must specify the date and trading period from which the change takes effect and be given no later than three business days after the change takes effect.*

##### **Audit observation**

The NSP table on the registry was examined.

##### **Audit commentary**

No balancing areas were changed during the audit period.

##### **Audit outcome**

Compliant



## 6.6. Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1)

### Code reference

Clause 27 Schedule 11.1

### Code related audit information

*If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least one month before the transfer.*

### Audit observation

The NSP table on the registry was examined.

### Audit commentary

No existing ICPs became NSPs during the audit period.

### Audit outcome

Compliant

## 6.7. Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2)

### Code reference

Clause 1 to 4 Schedule 11.2

### Code related audit information

*If the distributor wishes to transfer an ICP, the distributor must give written notice to the Authority in the prescribed form, no later than three business days before the transfer takes effect.*

### Audit observation

The NSP table and the registry list as of December 2021 were examined.

### Audit commentary

No ICPs were transferred from other networks during the audit period.

### Audit outcome

Compliant

## 6.8. Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3))

### Code reference

Clause 10.25(1) and 10.25(3)

### Code related audit information

*A network owner must, for each NSP that is not a point of connection to the grid for which it is responsible, ensure that:*

- *there is one or more metering installations (Clause 10.25(1)(a)); and*
- *the electricity is conveyed and quantified in accordance with the Code (Clause 10.25(1)(b)).*

For each NSP covered in 10.25(1) the network owner must, no later than 20 business days after a metering installation at the NSP is recertified advise the reconciliation manager of:

- the reconciliation participant for the NSP
- the participant identifier of the metering equipment provider for the metering installation
- the certification expiry date of the metering installation.

#### Audit observation

Processes to ensure that meters are present and certified were reviewed as part of the TENCO agent audit.

The NSP table was examined, and notifications were reviewed.

#### Audit commentary

Compliance is recorded for TENCO.

The following NSPs have had meter certification date changes since 1 March 2020:

Distributor	NSP POC	Description	MEP	Certification Expiry
NZAL	NAH0011	139 THE TERRACE ASTERON HOUSE	AMCI	7/05/2028
NZAL	NAT0011	500 VICTORIA STREET HAMILTON	AMCI	13/01/2028
NZAL	NBS0011	10 BRANDON STREET WELLINGTON	AMCI	8/01/2025
NZAL	NPP0011	PRIME PROPERTY TOWER	FCLM	15/01/2023
NZAL	NPS0011	NZAL PSIS BUILDING	AMCI	12/05/2025
NZAL	NSR0011	81 MOLESWORTH STREET	AMCI	20/08/2023
NZAL	NTO0011	TECHNOLOGY ONE HOUSE	FCLM	26/07/2026
NZAL	NUL0011	498 JACKSON ST PETONE WELLINGTON	AMCI	06/04/2024
NZAL	NWH0011	WEL HOUSE	FCLM	7/07/2026

All NSPs have certified metering installations. The metering installations for NUL0011 and NPS0011 were recertified during the audit period. The reconciliation manager was advised of the metering installation certification expiry date later than 20 business days for NPS0011.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.8 With: Clause 10.25(1) and 10.25(3)  From: 01-Mar-20 To: 31-Dec-22	The meter installation certification expiry date advised late for NSP NPS0011.  Potential impact: Low  Actual impact: Low  Audit history: Twice  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as strong, as they are sufficient to ensure updates are on time most of the time.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Tenco enters the metering certification from the MEP as soon as we receive and process the paperwork, in some cases the MEP's paperwork is late thus causing Tenco to be non-compliant.		During the audit period	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Tenco continue to proactively follow up for meter paperwork with the MEP when it has not been received. Contracting with the MEP's directly from the 01/10/2021 we anticipate should assist with the timeliness of meter install paperwork. It is worth noting due to covid there is backlogs across all businesses		Ongoing	

## 6.9. Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2))

### Code reference

Clause 10.25(2)

### Code related audit information

If the network owner proposes the creation of a new NSP which is not a point of connection to the grid it must:

- assume responsibility for being the metering equipment provider (Clause 10.25(2)(a)(i)); or
- contract with a metering equipment provider to be the MEP (Clause 10.25(2)(a)(ii)); and
- no later than 20 business days after identifying the MEP advise the reconciliation manager in the prescribed form of the reconciliation participant for the NSP (Clause 10.25(2)(b)); and
- no later than five business days after the date of certification of each metering installation, advise the reconciliation manager of
  - a) the MEP for the NSP (Clause 10.25(2)(c)(i)); and
  - b) the NSP of the certification expiry date (Clause 10.25(2)(c)(ii)).

### **Audit observation**

Processes to ensure that meters are present and certified were reviewed as part of the TENCO agent audit.

The NSP table was examined, and notifications were reviewed.

### **Audit commentary**

Compliance is recorded for TENCO.

No new NSPs were created during the audit period.

### **Audit outcome**

Compliant

## 6.10. Obligations concerning change in network owner (Clause 29 Schedule 11.1)

### **Code reference**

*Clause 29 Schedule 11.1*

### **Code related audit information**

*If a network owner acquires all or part of a network, the network owner must give written notice to:*

- *the previous network owner (Clause 29(1)(a) of Schedule 11.1)*
- *the reconciliation manager (Clause 29(1)(b) of Schedule 11.1)*
- *the Authority (Clause 29(1)(c) of Schedule 11.1)*
- *every reconciliation participant who trades at an ICP connected to the acquired network or part of the network acquired (Clause 29(1)(d) of Schedule 11.1)*

*at least one month's notification is required before the acquisition (Clause 29(2) of Schedule 11.1).*

*The notification must specify the ICPs to be amended to reflect the acquisition and the effective date of the acquisition (Clause 29(3) of Schedule 11.1).*

### **Audit observation**

The NSP table on the registry was examined.

### **Audit commentary**

NZAL has not acquired any networks.

### **Audit outcome**

Compliant

## 6.11. Change of MEP for embedded network gate meter (Clause 10.22(1)(b))

### **Code reference**

*Clause 10.22(1)(b)*

### **Code related audit information**

*If the MEP for an ICP which is also an NSP changes the participant responsible for the provision of the metering installation under Clause 10.25, the participant must advise the reconciliation manager and the gaining MEP.*

### **Audit observation**

The management of this process is discussed in the TENCO report. The Network Supply Points table was examined to determine whether there have been any MEP changes during the audit period.

### **Audit commentary**

There have been no MEP changes during the audit period.

### **Audit outcome**

Compliant

## 6.12. Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2)

### **Code reference**

*Clauses 5 and 8 Schedule 11.2*

### **Code related audit information**

*The distributor must give the Authority confirmation that it has received written consent to the proposed transfer from:*

- *the distributor whose network is associated with the NSP to which the ICP is recorded as being connected immediately before the notification (unless the notification relates to the creation of an embedded network) (Clause 5(a) of Schedule 11.2)*
- *every trader trading at an ICP being supplied from the NSP to which the notification relates (Clause 5(b) of Schedule 11.2).*

*The notification must include any information requested by the Authority (Clause 8 of Schedule 11.2).*

### **Audit observation**

The NSP table and the registry list as of December 2021 were examined.

### **Audit commentary**

NZAL has not acquired any networks during the period.

### **Audit outcome**

Compliant

## 6.13. Transfer of ICPs for embedded network (Clause 6 Schedule 11.2)

### **Code reference**

*Clause 6 Schedule 11.2*

### **Code related audit information**

*If the notification relates to an embedded network, it must relate to every ICP on the embedded network.*

### **Audit observation**

The NSP table was examined.

### **Audit observation**

NZAL has not acquired any networks.

### **Audit outcome**

Compliant

## 7. MAINTENANCE OF SHARED UNMETERED LOAD

### 7.1. Notification of shared unmetered load ICP list (Clause 11.14(2) and (4))

#### Code reference

*Clause 11.14(2) and (4)*

#### Code related audit information

*The distributor must give written notice to the registry manager and each trader responsible for the ICPs across which the unmetered load is shared of the ICP identifiers of those ICPs.*

*A distributor who receives notification from a trader relating to a change under Clause 11.14(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 of the addition or omission of the ICP.*

#### Audit observation

The registry list as of December 2021 was examined to determine compliance.

#### Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

#### Audit outcome

Compliant

### 7.2. Changes to shared unmetered load (Clause 11.14(5))

#### Code reference

*Clause 11.14(5)*

#### Code related audit information

*If the distributor becomes aware of a 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 or decommissioning as soon as practicable after the change or decommissioning.*

#### Audit observation

The registry list as of December 2021 was examined to determine compliance.

#### Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

#### Audit outcome

Compliant

## 8. CALCULATION OF LOSS FACTORS

### 8.1. Creation of loss factors (Clause 11.2)

#### Code reference

*Clause 11.2*

#### Code related audit information

*A participant must take all practicable steps to ensure that information that the participant is required to provide to any person under Part 11 is:*

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

#### Audit observation

The calculation of loss factors is discussed in the TENCO report.

#### Audit commentary

Compliance is recorded for TENCO, and I confirmed that there have been no change to this process since the last TENCO audit.

TENCO derives loss factors for loss category codes from the published parent network loss factors for similar installations. It is expected that ICPs on embedded networks will have the same loss factor as a similar type of connection on the parent network.

To do this, TENCO determines the gateway loss factor from the LE ICP's loss factor, then determines the local network loss factor which would be likely to apply to the embedded network ICPs if they were connected to the local network. TENCO then calculates the overall loss factor and multiplies this by the local network loss factor to determine the value for each embedded network loss factor code.

TENCO maintains the internal loss factors in the registry, and within their pricing schedules which are issued to retailers.

I stepped through the process and confirmed that the loss factors were calculated and assigned as expected. There has not been any update to the loss factors during the audit period.

#### Audit commentary

Compliant

## CONCLUSION

The audit was conducted in accordance with the Guideline for Distributor Audits V7.1, which was produced by the Electricity Authority.

NZAL's compliance is reliant on the compliance of TENCO, as the contractor. In this report, I have only recorded those matters where issues were discovered or where specific analysis was undertaken. TENCO's audit report will be submitted with this report.

Overall, the level of compliance was found to be high with strong controls recorded. This audit found six non-compliances and makes no recommendations.

The next audit frequency table indicates that the next audit be due in 18 months. I have considered this in conjunction with NZAL's comments and I recommend that the next audit be in 18 months.



## PARTICIPANT RESPONSE

Tenco have reviewed the above audit report on the 21<sup>st</sup> of April 2022 and agree with the findings contained within it. I disagree with the 18 ICPs which didn't have the IED populated in time as this was a false positive due to another participant making an error and Tenco having to reverse events.