

**ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT**

For

**PRECINCT PROPERTY HOLDINGS LIMITED  
(PPNZ)**

Prepared by: Tara Gannon

Date audit commenced: 19 November 2019

Date audit report completed: 14 February 2020

Audit report due date: 15 February 2020

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## EXECUTIVE SUMMARY

This Distributor audit was conducted at the request of **Precinct Property Holdings Limited (PPNZ)** 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.

PPNZ'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.

The audit found six non-compliances, and no recommendations were made. Two of the non-compliances were cleared before the final report was issued, and corrective actions have been identified for the remaining non-compliances. The next audit frequency table indicates that the next audit be due in 18 months. I recommend that the next audit be completed in 21 months on 15/11/2021.

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)	Three network updates had incorrect event dates applied.	Strong	Low	1	Cleared
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Five ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.	Moderate	Low	2	Identified
Connection of NSP that is not point of connection to grid	3.9	10.30	The MEP and meter certification expiry date for PCF0011 were provided on 14/01/2019, 14 business days after electrical connection.	Moderate	Low	2	Identified
Changes to registry information	4.1	8 Schedule 11.1	19 late network updates. Three late pricing updates. Three late updates to decommissioned status.	Strong	Low	1	Identified
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	The initial electrical connection dates for 000138721PN2A5 and 0110110049PNC15 were inaccurate, and were corrected during the audit. Three network updates had incorrect event dates applied.	Strong	Low	1	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1) and 10.25(3)	Meter certification details were updated more than 20 business days after the certification date for PPH0011, PBS0011, PVG0011, PSI0011, PMP0011 and PTA0011.	Strong	Low	1	Identified
Future Risk Rating						8	

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	Description
		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

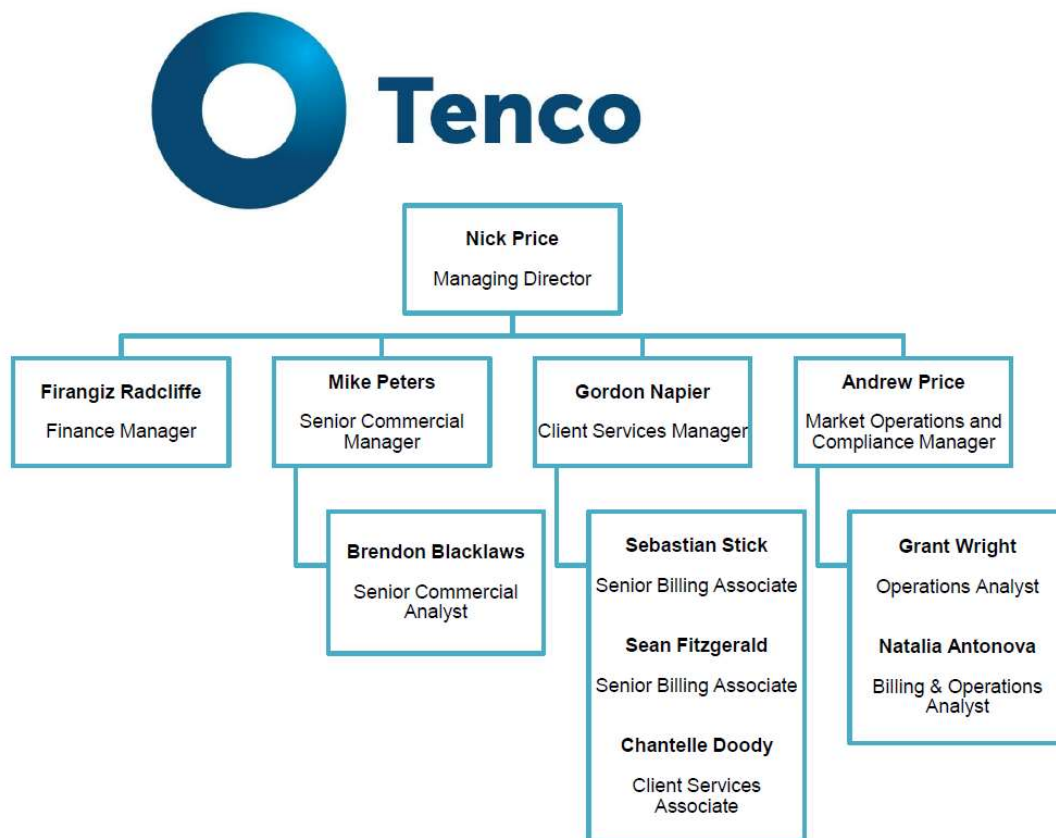
The Electricity Authority website was checked to determine whether PPNZ has any Code exemptions in place.

#### Audit commentary

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

### 1.2. Structure of Organisation

TENCO provided an organisation chart:



### 1.3. Persons involved in this audit

Auditor:

**Tara Gannon**

**Veritek Limited**

**Electricity Authority Approved Auditor**

Personnel assisting in this audit were:

Name	Title	Organisation
Grant Wright	Operations Analyst	TENCO
Nick Price	Managing Director	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 contractors fulfillment of the participants Code obligations*
- *cannot assert that it is not responsible or liable for the obligation due to the action of a contractor*
- *must ensure that the contractor has at least the specified level of skill, expertise, experience, or qualification that the participant would be required to have if it were performing the obligation itself.*

#### Audit observation

TENCO performs all PPNZ'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

PPNZ 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 PPNZ had the following NSPs as at 24/12/19. Active ICP numbers are as at 22/11/19.

Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
PPNZ	PAZ0111	ANZ CENTRE	PEN1101	VECT	PAZ0111PPNZE	E	01/07/14	17
PPNZ	PBS0011	HSBC HOUSE	PEN1101	VECT	PBS0011PPNZE	E	01/05/15	24
PPNZ	PMH0011	MAYFAIR HOUSE	KWA0111	CKHK	PMH0011PPNZE	E	01/07/14	17
PPNZ	PMP0011	AMP CENTRE	PEN1101	VECT	PMP0011PPNZE	E	01/05/15	41
PPNZ	PPH0011	PASTORAL HOUSE	KWA0111	CKHK	PPH0011PPNZE	E	01/05/15	7
PPNZ	PPW0011	PWC TOWER	PEN1101	VECT	PPW0011PPNZE	E	01/07/14	59
PPNZ	PSI0011	STATE INSURANCE TOWER	WIL0331	CKHK	PSI0011PPNZE	E	01/08/14	63
PPNZ	PTA0011	1-3 THE TERRACE	WIL0331	CKHK	PTA0011PPNZE	E	01/05/15	11
PPNZ	PVG0011	VODAFONE ON THE QUAY	WIL0331	CKHK	PVG0011PPNZE	E	01/07/14	44
PPNZ	PWC0011	139 PAKENHAM ST AUCKLAND	PEN1101	VECT	PWC0011PPNZE	E	01/12/16	8
PPNZ	PWC0012	8-14 MADDEN STREET AUCKLAND	HOB1101	VECT	PWC0012PPNZE	E	15/06/17	16
PPNZ	PZH0011	ZURICH HOUSE	PEN1101	VECT	PZH0011PPNZE	E	01/07/14	25

One NSP has been end dated since the previous audit:

End dated NSPs								
Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	End date
PPNZ	PDH0011	DELOITTE HOUSE	KWA0111	CKHK	PDH0011PPNZE	E	1/07/14	31/05/18

Two new NSPs were created since the previous audit:

New NSPs								
Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
PPNZ	PCF0011	CHARLES FERGUSON TOWER	WIL0331	CKHK	PCF0011PPNZE	E	19/12/2018	22
PPNZ	PSB0011	34 BALLANTRAE PLACE WELLINGTON	WIL0331	CKHK	PSB0011PPNZE	E	13/02/2020	-

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

Status	Number of ICPs (2019)	Number of ICPs (2017)	Number of ICPs (2016)	Number of ICPs (2015)
New (999,0)	75	-	-	-
Ready (0,0)	11	1	-	-
Active (2,0)	354	347	324	345
Distributor (888,0)	-	-	-	-
Inactive – new connection in progress (1,12)	-	-	-	-
Inactive – electrically disconnected vacant property (1,4)	13	8	8	10
Inactive – electrically disconnected remotely by AMI meter (1,7)	1	3	2	-
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)	-	-	2	-
Inactive – reconciled elsewhere (1,5)	-	-	-	-
Decommissioned (3)	49	19	12	12

#### 1.9. Authorisation Received

A letter of authorisation was provided.

#### 1.10. Scope of Audit

This Distributor audit was performed at the request of PPNZ, 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

The previous audit was conducted in February 2018 by Tara Gannon of Veritek Limited. The audit recorded three non-compliances, and one issue. The current status of the non-compliances and issue is listed below.

Subject	Section	Clause	Non-compliance	Status
Timeliness of initial energisation date	3.5	7(2A) of Schedule 11.1	The initial energisation date for ICP 0110110050PN8E9 was populated 11 business day late.	Still existing.
Changes to registry information	4.1	8 Schedule 11.1	Six late status updates to decommissioned.	Still existing. Some late updates were identified.
Meter certification	6.9	10.25(1) and 10.25(3)	The Reconciliation Manager was notified 31 business days after certification for PWC0012.	Still existing.

Subject	Section	Issue	Remedial action	Status
Audit trails for NSP metering information	3.9	There is no audit trail for NSP metering updates via the RM portal.	I suggest the Electricity Authority investigate reporting on notification submission dates and times, so that compliance with these requirements can be assessed.	Auditors can now request notification dates and times from the reconciliation manager to determine compliance.

## 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 report. The registry list file as at 22/11/19, event detail report for 01/10/17 to 22/11/19, audit compliance report for 01/10/17 to 22/11/19, and NSP table were examined to confirm compliance.

#### Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause. Data completeness and accuracy was reviewed, and three incorrect event dates were identified.

Event dates should reflect the date from which the attribute values for the event apply. Three ICPs had incorrect event dates applied for their initial electrical connection date updates; the update date was applied instead of the initial electrical connection date.

ICP	Initial electrical connection date	Event Date	Update Date
0110110055PN5A6	15/08/2019	23/08/2019	23/08/2019 10:06
0110110056PN966	15/08/2019	23/08/2019	23/08/2019 10:05
0110110057PN523	12/08/2019	15/08/2019	15/08/2019 9:49

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1)  From: 12-Aug-18 To: 23-Aug-18	Three network updates had incorrect event dates applied.  Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, as they are sufficient to ensure updates have the correct event date assigned most of the time.</p> <p>The risk is low as three ICPs were affected. The correct event date could be determined from the initial electrical connection date, and the applied dates were within eight days of the correct date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected the Event dates in Registry		7/1/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Updated user training and documentation on Registry to ensure that Event date not input date is used when entering IED – this was just human error as opposed to a system issue		7/1/2020	

## 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

### 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 at 22/11/19 and event detail report for 01/10/17 to 22/11/19 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 in the TENCO audit report in relation to this clause. Examination of the registry list found 136 new ICPs were created during the audit period in accordance with this clause.

##### 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 audit 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.

136 new ICPs were created during the audit period. A sample of ten ICPs were checked to confirm compliance.

##### Audit commentary

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

The sample of ten new connections checked were requested by the building owner or electrical contractor, and this clause did not apply.

##### Audit outcome

Compliant

### 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 audit report.

The registry list as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were reviewed to identify all new connections during the period and check that information was provided as required by this clause.

#### Audit commentary

136 new ICPs were created during the audit period, and information was provided as required by this clause.

#### 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 as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were examined to determine the timeliness of the provision of ICP information for new connections.

#### Audit commentary

The distributor must provide to the registry the information listed in clause 7(1) of schedule 11.1 as soon as practicable, and before electricity is traded at the ICP.

136 new ICPs were created during the audit period, and 50 of those were electrically connected.

For all 50 ICPs which were electrically connected an address, proposed trader, ready status, and pricing information was recorded on the registry prior to initial electrical connection.

#### Audit outcome

Compliant



### 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 subclause (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 as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were examined to determine the timeliness of the provision of initial electrical connection date information for new connections.

#### Audit commentary

136 new ICPs were created during the audit period, and 50 of those were electrically connected. 45 initial electrical connection dates were populated on the registry within ten business days of electrical connection, and five were late.

All late updates were checked:

- for four ICPs, the process to update the initial electrical connection date was triggered late due to a backdated update to “active” status by the trader; and
- for one ICP the step to update the initial electrical connection date was initially missed because the ICP quickly moved to “inactive” status in Salesforce. The registry was updated once the ICP became “active”.

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.5 With: Clause 7(2) of Schedule 11.1  From: 26-Mar-18 To: 16-Jan-19	Five 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 times  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 ensure that initial electrical connection dates are updated on time most of the time. Paperwork is often sent to the retailer first, then passed to TENCO, which can cause delays in updating the initial electrical connection date.  The impact is low, because there is no direct impact on settlement and all late updates were made within 16 business days of the initial electrical connection date.

Actions taken to resolve the issue	Completion date	Remedial action status
The IED's were updated as soon as they presented on our Compliance Dashboard	During the audit period	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We continue to work with retailers to ensure that the claiming of ICP's and setting to Active on the networks is timely to allow us to maintain compliance – where we are aware of an IED prior to a retailer setting to Active we now enter this at the time a opposed to waiting for the retailer.	Ongoing	

### 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 was examined in **section 3.2**.

The registry list as at 20/05/19 and event detail report for 01/10/17 to 22/11/19 were examined to determine 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 PPNZ's network.

The 50 new ICPs which were electrically connected during the audit period had a proposed trader recorded prior to initial electrical connection.

#### 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 new connection process was examined in **section 3.2**. The registry list as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were examined to determine compliance.

136 new ICPs were created during the audit period. A sample of ten ICPs were checked 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. The sample of ten new connections checked were approved to be connected by the trader.

Review of the registry list confirmed that a trader is recorded for all active ICPs.

### 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 unmetered 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 was examined in **section 3.2**. The registry list as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were examined to determine compliance.

### Audit commentary

The 50 new ICPs which were electrically connected during the audit period had certified meters on their initial electrical connection dates. 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 reconciliation participant responsible for ensuring there is a metering installation for the point of connection.*

*The distributor must, within five 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 was reviewed.

#### Audit commentary

Two new NSPs were connected during the audit period:

NSP	NSP start date	Findings
PCF0011	19/12/2018	The NSP and date of connection were provided within five business days of electrical connection. The MEP and meter certification expiry date were provided on 14/01/2019, 14 business days after electrical connection.
PSB0011	13/02/2020	The NSP has not been connected, and the NSP and expected date of connection have been provided.

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.9 With: Clause 7(2) of Schedule 11.1  From: 19-Dec-18 To: 14-Jan-19	The MEP and meter certification expiry date for PCF0011 were provided on 14/01/2019, 14 business days after electrical connection.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate as they are sufficient to ensure that MEP and meter certification information is provided on time most of the time.</p> <p>The impact is low, because the meter was certified at the time of electrical connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The meter certification details were provided on the 14/01/2019 which we acknowledge was late. This was a conversion from a customer network to an Embedded Network following redevelopment, the existing meters were therefore just recertified as opposed to be replaced or newly installed. With the Christmas/New Year the paperwork from the MEP was slightly late in reaching us which contributed to the delay.		14/01/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We continue proactively work with the MEP's on ensuring timely access to meter certification data – in this case as the meters were not replaced we could have and possibly should have used the existing GN meter expiry dates given they were not changing.		Ongoing	

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

#### Code reference

Clause 10.30(A)

#### 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.*

#### Audit observation

The NSP table was reviewed.

#### Audit commentary

New NSP PCF0011 was electrically connected during the audit period. The NSP was not temporarily electrically connected.

#### 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:*

*xxxxxxxxxxccc where:*

- *xxxxxxxxxx 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

The ICP creation process is discussed in the TENCO audit report.

### Audit commentary

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

### 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 at 22/11/19 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 for 01/10/17 to 22/11/19 was reviewed to identify all ICPs at “new” status. Monitoring of ICPs at “new” status is discussed in **section 3.14**.

### Audit commentary

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

75 ICPs are currently at “new” status. All will be connected to new NSP PSB0011, and remain at “new” status until the NSP is connected and available.

21 ICPs connected to PCF0011 temporarily had “new” status assigned until the new NSP was connected.

### 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 as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were examined.

### Audit commentary

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

75 ICPs are currently at “new” status, and none have had the status applied for more than two years.

11 ICPs are currently at “ready” status. ICP 1001164596PN5D8 had been at “ready” since 29/06/17. Plans for connection were put on hold by the tenant and were last followed up on 27/08/19.

### 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:*
  - *the unique loss category code assigned to the ICP*
  - *the ICP identifier of the ICP*
  - *the NSP identifier of the NSP to which the ICP is connected*
  - *the plant name of the embedded generating station.*

#### **Audit observation**

The registry list as at 22/11/19 was examined to determine compliance.

#### **Audit commentary**

Review of the registry list confirmed that no ICPs have embedded generation.

#### **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**

Sub-clause (4) states that no participant may electrically connect a point of connection without the permission of the Reconciliation Participant.

The registry list as at 22/11/19 was reviewed to determine compliance.

#### **Audit commentary**

PPNZ obtains permission from the trader before electrically connecting ICPs, as discussed in **section 3.2**.

Review of the registry list confirmed that no unmetered load is connected, apart from residual load ICPs. PPNZ does not intend to connect any other unmetered load to the network in the future.

#### **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 three business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or three business days after the distributor has decommissioned the ICP.*

#### Audit observation

The management of this process is discussed in the TENCO report. I also examined the event detail report for 01/10/17 to 22/11/19 and AC020 report for 01/10/17 to 22/11/19 to identify late changes to registry information during the report period.

Initial population of data for new connections is discussed in **sections 3.4** and **3.5**.

#### Audit commentary

When information that is held by the registry changes, the distributor responsible for that ICP must provide notice to the registry of that change within three business days of that change taking effect. The event detail reports were examined to identify backdated event updates.

#### Address events

All address updates were made on time. On average there were 0.00 business days between the event date and update date. A sample of five updates were checked and confirmed to be accurate.

#### Network events

84.30% of network updates were made on time, and 19 updates were four to 250 business days late. On average there were 3.21 business days between the event date and update date.

All late updates were checked:

- 17 updates were delayed by four business days due to TENCO's Christmas 2018 to New Year 2019 shutdown; and
- the two latest updates (made 16 and 253 business days after the event date) were corrections.

The content of the updates was confirmed to be accurate.

#### Pricing events

93.48% of pricing updates were made on time, and three updates were 9 to eleven business days late. On average there were 0.93 business days between the event date and update date.

All three late updates occurred following a trader's backdated request for a price change. The content of the five updates was checked and confirmed to be accurate.

#### Status events

90.00% of status updates to "decommissioned" were made within three business days of the event date, or within three business days of the trader's update to "ready for decommissioning" status where the update occurred after 01/11/18.

Three updates were made more than three business days after the event date where the update occurred before 01/11/18. In all three cases, the change was made within two business days of the trader's update to "ready for decommissioning".

#### NSP changes

No NSP changes occurred during the audit period.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 11-Jan-18 To: 02-Feb-18	19 late network updates. Three late pricing updates. Three late updates to decommissioned status. Potential impact: Low Actual impact: Low Audit history: Three times 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 ensure updates are on time most of the time. In most cases checked, the late update was at the request of another party, caused by another party's late provision of information to PPNZ or the registry, or was a correction.  The risk is assessed as low as a relatively small proportion of updates were affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Registry management and updates is a daily process for Tenco on behalf of PPNZ, as soon as we see a required change in the dashboard the updates to Registry were completed, in some cases however we are reliant on other participants which causes us a consequential non-compliance		During the audit period	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Registry Management remains a key focus for Tenco and educating our staff on the impact of any late updates continues – we are confident in our systems and processes to capture changes when they are required or requested.	Ongoing	

#### 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 at 22/11/19 and NSP table were compared to determine compliance.

The registry list for 01/10/17 to 22/11/19 was reviewed to identify any ICPs which had a change of NSP during the report period.

##### 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.

Review of the registry list for 01/10/17 to 22/11/19 confirmed that no NSP changes occurred during the report period.

##### 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 3 business days after receiving a request for that information.*

##### Audit observation

The management of customer queries was examined.

#### **Audit commentary**

PPNZ occasionally receives direct requests for ICP identifiers. These are provided immediately, by looking up the ICP based on information that the customer provides.

#### **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 determine correct and unique addresses was examined during the TENCO agent audit. The AC020 report for 01/10/17 to 22/11/19 was reviewed to determine compliance.

##### **Audit commentary**

All active ICPs had complete and unique addresses recorded.

##### **Audit outcome**

Compliant

#### **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

Processes to ensure information is accurate were examined during the TENCO agent audit. The registry list as at 22/11/19 and AC020 report for were reviewed to determine compliance.

For all new connections which were electrically connected during the report period, the initial electrical connection date, meter certification date, and earliest active date were matched.

I confirmed that all ICPs initially electrically connected by PPNZ after 29/08/13<sup>1</sup> had an initial electrical connection date populated.

#### Audit commentary

Review of the registry list identified some data discrepancies. I found most of the discrepancies were resolved through TENCO's data validation processes prior to the audit. Non-compliance is recorded where data remained incorrect at the time of the audit, or was not identified and corrected through TENCO's processes.

#### Initial electrical connection dates

For the 50 new connections which were electrically connected during the audit period, the initial electrical connection date was matched to the meter certification date and earliest active date. The following exceptions were not identified and corrected prior to the audit:

ICP	Initial electrical connection date	Earliest active date	Meter certification date	Findings
0000138721PN2A5	10/05/2018	10/05/2018	31/05/2018	The IECD was corrected to match the meter cert date during the audit.
0110110049PNC15	02/09/2016	18/07/2016	18/07/2016	The IECD was corrected to match the meter cert date and initial electrical connection date during the audit.

<sup>1</sup> When the code change requiring initial electrical connection dates came into effect.

I confirmed that all ICPs initially electrically connected by PPNZ after 29/08/13 had an initial electrical connection date populated.

Event dates should reflect the date from which the attribute values for the event apply. Three ICPs had incorrect event dates applied for their initial electrical connection date updates; the update date was applied instead of the initial electrical connection date.

ICP	Initial electrical connection date	Event Date	Update Date
0110110055PN5A6	15/08/2019	23/08/2019	23/08/2019 10:06
0110110056PN966	15/08/2019	23/08/2019	23/08/2019 10:05
0110110057PN523	12/08/2019	15/08/2019	15/08/2019 9:49

### Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)</p> <p>Schedule 11.1</p> <p>From: 18-Jul-16</p> <p>To: 30-Aug-18</p>	<p>The initial electrical connection dates for 000138721PN2A5 and 0110110049PNC15 were inaccurate, and were corrected during the audit.</p> <p>Three network updates had incorrect event dates applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as the strong because most information is correctly recorded, and controls are in place to detect and correct errors.</p> <p>The number of discrepancies is minor and has no direct impact on reconciliation. All incorrect initial electrical connection dates were corrected, and the correct initial electrical date could be determined for the updates with incorrect event dates.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected the 3 incorrect Event dates in Registry		7/1/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Updated user training and documentation on Registry to ensure that Event date not input date is used when entering IED – this was just human error as opposed to a system issue		7/1/2020	

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

The registry list as at 22/11/19, AC020 report for 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19 were reviewed to identify all new connections during the period and check that pricing information was provided as required by this clause.

##### Audit commentary

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

As discussed in **section 3.4**, all 50 ICPs which were electrically connected had pricing information recorded on the registry prior to initial electrical connection.

##### 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 at 22/11/19 was examined to confirm compliance.

##### Audit commentary

PPNZ does not record GPS coordinates 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 at 22/11/19 was reviewed to identify all ICPs at “ready” status.

##### Audit commentary

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

11 ICPs which have not been electrically connected are at “ready” status. ICPs at “ready” status for more than 24 months are discussed in **section 3.14**.

##### 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 for 01/10/17 to 22/11/19 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 at 01/10/17 to 22/11/19, and event detail report for 01/10/17 to 22/11/19, and AC020 report for 01/10/17 to 22/11/19 were reviewed to determine compliance.

##### Audit commentary

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

52 ICPs were decommissioned during the audit 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 to determine compliance.

##### Audit commentary

No price categories were created or changed 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 to determine compliance.

#### Audit commentary

New loss category code PPNZ04 was created in compliance with this clause.

#### 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 to determine compliance.

#### Audit commentary

PPNZ did not end date any loss factor codes during the audit period.

PPNZ updated the loss factor values for the following codes during the audit period in accordance with this clause:

Loss factor	Updated from
PPNZ01	01/05/18 and 01/05/19
PPNZ02	01/05/18 and 01/05/19
PPNZ03	01/07/19

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.*

*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 (a "transfer"), 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 process for the creation and decommissioning of NSPs was reviewed as part of the TENCO agent audit.

The NSP table was examined, and notifications were reviewed.

#### Audit commentary

Compliance is recorded for TENCO.

- PDH0011 was decommissioned on 31/05/19.
- Two new NSPs were created during the audit period:

NSP	NSP start date	Comment
PCF0011	19/12/2018	All new ICPs were created by PPNZ.
PSB0011	13/02/2020	All new ICPs were created by PPNZ.

- No ICPs transferred from other networks to PPNZ during the audit period.

Written notice was provided as required by this clause.

#### 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 process to provide balancing area information was reviewed as part of the TENCO agent audit.

The NSP table was examined, and notifications were reviewed.

### Audit commentary

Compliance is recorded for TENCO.

Two new NSPs were created during the audit period:

NSP	NSP start date	Balancing area
PCF0011	19/12/2018	PCF0011PPNZE
PSB0011	13/02/2020	PSB0011PPNZE

For each new NSP, the correct balancing area information was provided in accordance with this clause.

### 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 process to provide balancing area information was reviewed as part of the TENCO agent audit.

The NSP table was examined, and notifications were reviewed.

### Audit commentary

Compliance is recorded for TENCO.

Two new NSPs were created during the audit period (listed in **section 6.1**), and information was provided to the reconciliation manager as required by this clause.

#### **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 process to provide NSP supporting information was reviewed as part of the TENCO agent audit.

The NSP table and the registry list for 01/10/17 to 22/11/19 were examined.

#### **Audit commentary**

Compliance is recorded for TENCO.

Two new NSPs were created during the audit period (listed in **section 6.1**), and information was provided to the reconciliation manager as required by this clause.

#### **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 process to maintain balancing area information was reviewed as part of the TENCO agent audit.

The NSP table was examined.

#### **Audit commentary**

Compliance is recorded for TENCO.



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 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 for 01/10/17 to 22/11/19 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.

**Audit commentary**

Compliance is recorded for TENCO. The NSP table was reviewed:

Distributor	NSP POC	Description	MEP	Certification Expiry
PPNZ	PAZ0111	ANZ CENTRE	AMCI	9/10/2020
PPNZ	PBS0011	HSBC HOUSE	AMCI	2/05/2020
PPNZ	PCF0011	CHARLES FERGUSON TOWER	AMCI	16/12/2022
PPNZ	PMH0011	MAYFAIR HOUSE	AMCI	21/03/2024
PPNZ	PMP0011	AMP CENTRE	AMCI	3/04/2022
PPNZ	PPH0011	PASTORAL HOUSE	AMCI	26/08/2024
PPNZ	PPW0011	PWC TOWER	AMCI	16/01/2021
PPNZ	PSI0011	STATE INSURANCE TOWER	AMCI	14/03/2024
PPNZ	PTA0011	1-3 THE TERRACE	AMCI	15/01/2020
PPNZ	PVG0011	VODAFONE ON THE QUAY	AMCI	13/03/2024
PPNZ	PWC0011	139 PAKENHAM ST AUCKLAND	AMCI	10/10/2026
PPNZ	PWC0012	8-14 MADDEN STREET AUCKLAND	AMCI	30/03/2022

Distributor	NSP POC	Description	MEP	Certification Expiry
PPNZ	PZH0011	ZURICH HOUSE	AMCI	26/03/2024
PPNZ	PSB0011	34 BALLANTRAE PLACE WELLINGTON	New - to be connected 13/02/20	

All connected NSPs have certified metering installations.

Meter certification details were updated for the following NSPs during the audit period. Two updates were made within 20 business days of re-certification, and six updates were late. The late updates were primarily caused by delays in receiving the meter certification details.

POC code	Change mechanism	Change date	Certification date	Business days
PAZ0111	NSPMTRG File	26/11/2018 16:05	13/11/2018	9
PPW0011	RM Portal	26/06/2018 9:26	29/05/2018	19
PPH0011	NSPMTRG File	12/01/2018 11:27	05/12/2017	24
PBS0011	NSPMTRG File	14/06/2018 16:22	02/05/2018	30
PVG0011	RM Portal	28/05/2019 10:48	15/03/2019	49
PSI0011	RM Portal	28/05/2019 9:04	14/03/2019	50
PMP0011	RM Portal	12/09/2019 10:35	26/05/2018	327
PTA0011	RM Portal	13/11/2019 14:10	15/01/2015	1,094

### Audit outcome

Non-compliant

Non-compliance	Description
<p>Audit Ref: 6.8</p> <p>With: Clause 10.25(1) and 10.25(3)</p> <p>From: 05-Dec-17</p> <p>To: 15-Mar-19</p>	<p>Meter certification details were updated more than 20 business days after the certification date for PPH0011, PBS0011, PVG0011, PSI0011, PMP0011 and PTA0011.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>The controls are strong, because the delays were primarily caused by the MEP being unable to provide information on time.</p> <p>The impact is low. The meters with late updates were certified at all times.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
All LE ICP's have current and correct metering cert dates, a couple of the updates as noted were put into the system late however meter recerts occurred well prior to the existing meter expiry date.	Throughout the whole period	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Tenco on behalf of all its clients including PPNZ have submitted a proposed change to bring LE ICP metering details into Registry – our main constraint is getting meter recert details in from the MEP's on time as we are only aware of expiry dates and where they recert early and Tenco do not get notice at the time causes non-compliance – we are proactively looking to work with the 2 MEP's we use to improve the notices we receive.	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:*
  - a) *the reconciliation participant for the NSP (Clause 10.25(2)(b)(i)); and*
  - b) *the MEP for the NSP (Clause 10.25(2)(b)(ii)); and*
  - c) *no later than 20 business days after the data of certification of each metering installation, advise the reconciliation participant for the NSP of the certification expiry date (Clause 10.25(2)(c)).*

##### 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.

Two new NSPs were connected during the audit period, and meter certification details were provided to the reconciliation manager as required by this clause:

NSP	NSP start date	Findings
PCF0011	19/12/2018	The MEP and meter certification expiry date were provided on 14/01/2019, 14 business days after electrical connection, and 15 business days after meter certification. This is recorded as non-compliance in <b>section 3.9</b> .
PSB0011	13/02/2020	The NSP has not been connected or certified.

#### 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 was examined.

#### Audit commentary

PPNZ 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 NSP 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 for 01/10/17 to 22/11/19 were examined.

#### **Audit commentary**

PPNZ has not acquired any networks during the period.

Review of the registry list confirmed that there were no ICPs transferred from other networks during the audit 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**

PPNZ 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

The registry list for 01/10/17 to 22/11/19 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 for 01/10/17 to 22/11/19 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 changes 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.

#### Audit outcome

Compliant



## CONCLUSION

PPNZ'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.

The audit found six non-compliances, and no recommendations were made. Two of the non-compliances were cleared before the final report was issued, and corrective actions have been identified for the remaining non-compliances. The next audit frequency table indicates that the next audit be due in 18 months. I recommend that the next audit be completed in 21 months on 15/11/2021.

## PARTICIPANT RESPONSE

Tenco on behalf of PPNZ have reviewed the above audit report on the 14/02/2020 and agree with the findings contained within it.