ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT

For

EASTLAND NETWORK LIMITED
AXOS MATERIAL CHANGE AUDIT
NZBN 9429039629548

Prepared by: Tara Gannon, Veritek Limited

Date audit commenced: 18 March 2023

Date audit report completed: 23 March 2023

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EXECUTIVE SUMMARY

Eastland Network Limited (Eastland) will be sold to **Firstgas Group** on 1 April 2023. As part of the change of ownership Eastland intends to migrate from the Gentrack system to Axos effective from 1 April 2023. Operations will remain in Tairawhiti, and it is expected that the existing team will continue day to day operations.

Currently, registry information is maintained within Gentrack and automatically transferred to and from the registry. Gentrack discrepancy reports are used to validate registry information.

From 1 April 2023 the Axos Registry Manager will be used to maintain ICP information, and transfer data to and from the registry. The registry synchronisation process will help to ensure that current values recorded in Axos match the registry, and unsuccessful updates will be identified and resolved.

Axos does not support completeness and accuracy checks against the registry and recommends that Eastland manages validation of Axos data against the registry using a data warehouse. A business case is currently being prepared for a data warehouse.

Axos can produce a report of ICP events recorded within its Registry Manager which is in the same format as the registry list file produced by the electricity registry. This report can be used to validate Axos information against registry information. Eastland is currently developing a process to compare these reports and will continue its regular validations to identify ICPs which may have been connected or had distributed generation added, and ICPs that are at "new", "ready" or "inactive - ready for decommissioning" status.

Until the data warehouse is available, I recommend that Eastland:

- validates data in fields held in Axos against the registry at least weekly, and investigate and resolve any discrepancies using the reports currently available, and
- reviews the registry AC020 audit compliance report at least monthly to identify potentially inaccurate information which requires investigation and correction.

Eastland has agreed to implement these recommendations.

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

Compliance was assessed for all areas which could be impacted by the material change, by reviewing test documentation and results, and Axos Systems – Registry Manager User Documentation, Axos Systems - Registry Manager Technical Documentation, and Axos Systems – Security Measures, Backup and Retention. One non-compliance was still existing from the previous report, relating to provision of information on Utilities Disputes for inbound telephone calls. This issue does not relate to the Axos material change and is expected to be resolved prior to 1 April 2023.

Eastland's next audit date is 7 July 2023, and I recommend that this audit date is retained.

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
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities disputes information not provided for inbound telephone queries.	Strong	Low	1	
Future Risk Rating						1	

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
Requirement to provide complete and accurate information	2.1	Errors in user and technical documentation	Correct documentation to reflect that ICPs can be moved from "new" to "decommissioned" status, and that this scenario has been tested.
Requirement to provide complete and accurate information	2.1	Registry – Axos validation	Validate data in fields held in Axos against the registry at least weekly; and investigate and resolve any discrepancies.
Requirement to provide complete and accurate information	2.1	Data consistency	Review the registry AC020 audit compliance reports at least monthly to identify potentially inaccurate information which requires investigation and correction.
Provision of information on dispute resolution scheme	2.4	Review Utilities Disputes information on letter templates	Review the Utilities Disputes information on letter templates to ensure that the details are current. Ensure old versions of templates containing out of date information on complaints resolution are not used.

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.

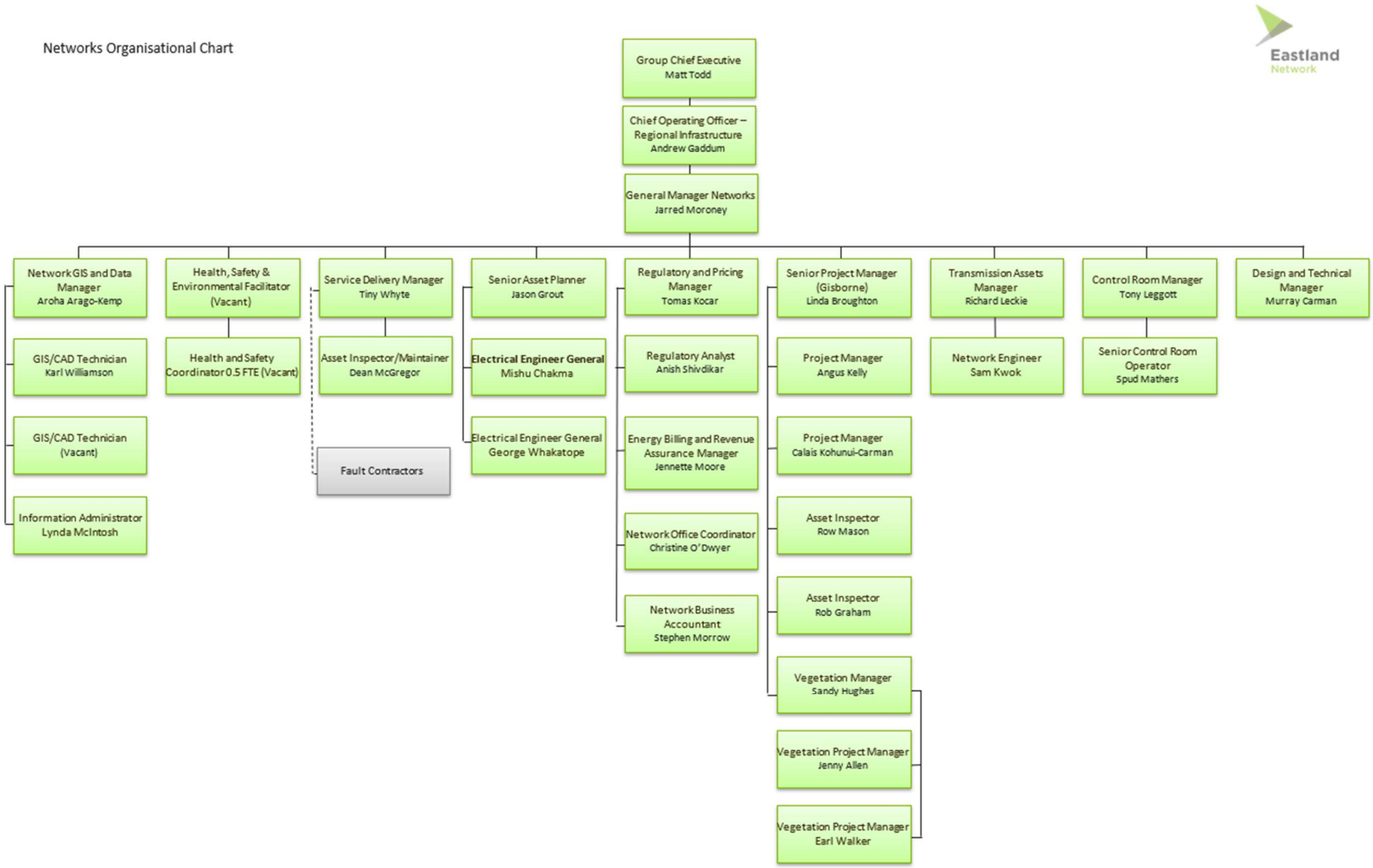
Audit observation

The Authority website was checked to determine whether there are code exemptions in place.

Audit commentary

Review of exemptions on the Authority website confirmed that there are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation



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
Jennette Moore	Billing and Revenue Assurance Manager	Eastland Network
Casey Kaczmarczyk	Senior Service Delivery Analyst	Axos Systems

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

Eastland provided a list of approved contractors. These are set out in **section 1.5**.

1.5. Supplier list

Eastland provided a list of approved contractors, which is summarised below. There have been no changes since Eastland's previous audit in 2021.

Network Construction/Maintenance/Livening Agents		
Company	**Location**	**Name**
AC Electrical Services Gisborne Ltd	Gisborne	Stu Blair
Apex Power Systems Ltd	Gisborne	Jason Collier
Country to Coast Power	Gisborne	Max McLean
East Coast Power Lines	Wairoa	Corny Groen
Electrinet	Gisborne	Toby Pickering
Inline Construction Ltd	Gisborne	Aaron McKinnon
Power Connections Ltd	Gisborne	Glen McKinnon
Powerline Technologies Ltd	Gisborne	Steven Clark (Foxy)
ScanPower Ltd	Dannevirke	Dave Smith
Unison Contracting Services ltd	Hastings	Mark Lawrie
Inspectors		
Company	**Location**	**Name**
ECIS Ltd	Gisborne	Jai Goodyear
Mark Gregory	Wairoa	Mark Gregory
AC Electrical Services Gisborne Ltd	Gisborne	Stu Blair

1.6. Hardware and Software

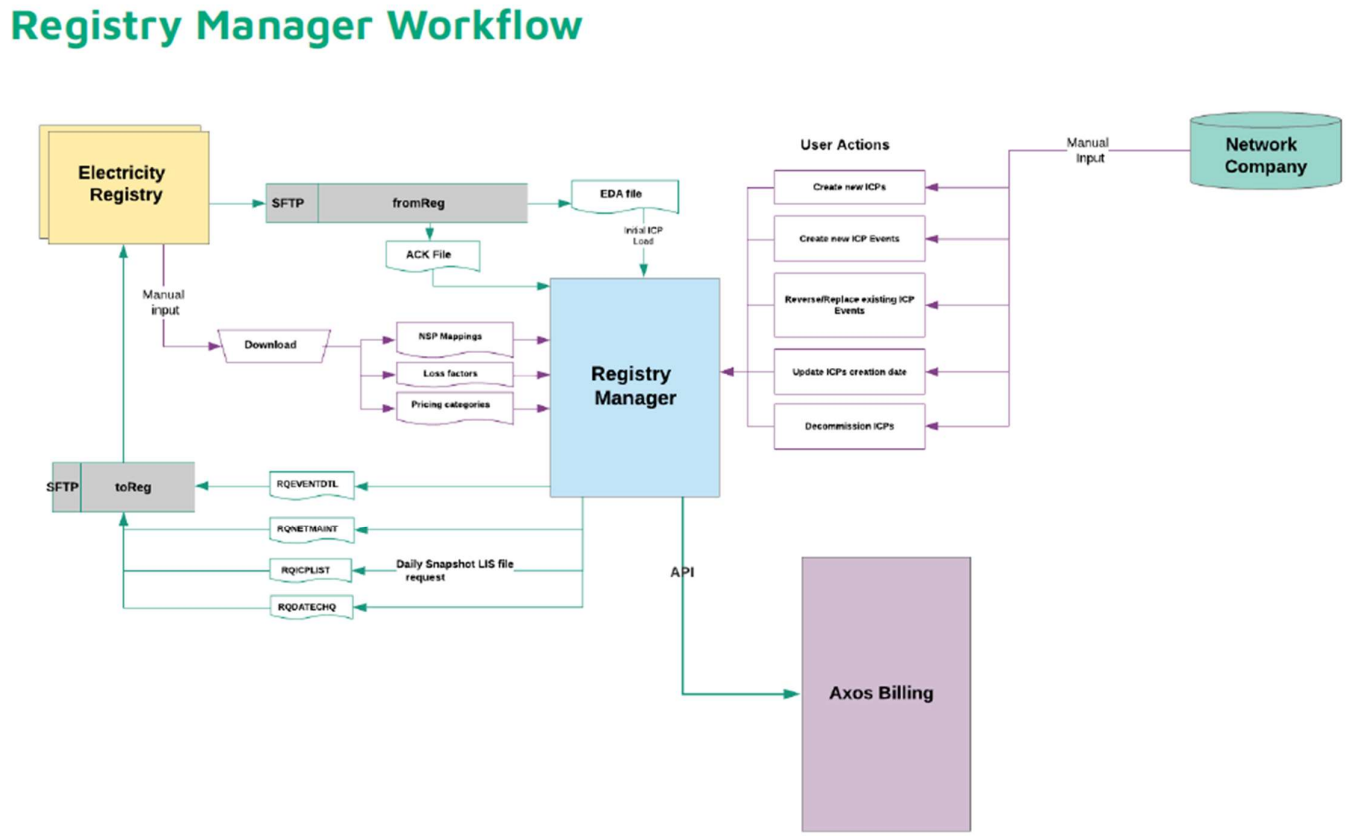
Registry and ICP information management – Axos

Eastland will begin using Axos for registry and ICP information management from 1 April 2023. The Axos Systems – Security Measures, Backup and Retention document was provided.

Axos is cloud based, and access will be restricted using logins and passwords. An audit trail of user actions is kept within Axos. Security arrangements are in place.

Data in the production database will be held indefinitely. Axos backups are daily and retained for 35 days. Data restoration processes are automated and tested, and data can be restored as at a set point in time within the last 35 days. Axos confirmed that in the event of a disaster affecting the production system, it would be able to be replicated with Eastland's data restored within a maximum of six hours.

Eastland provided the diagram below showing the integration of the Axos Registry Manager system with other systems and processes from the Axos System – Registry Manager Documentation v1.3:



Green arrows indicate automatic processes
Purple arrows indicate manual processes

GIS – ESRI Maximo

Eastland currently uses Powerview GIS and will begin using Maximo from 1 April 2023. The GIS change is outside of the scope of this audit.

Other systems

There will be no changes to other systems.

- files stored on the Egnyte server (Z:\) are maintained with versioning (the ability to rollback to previous files) on the cloud with two local copies of the files (as virtual appliances/servers) in Carnarvon St and Gladstone Rd,
- file and critical application servers at Eastland are backed up on the hour with a backup copy synchronised with the Cloud DR solution every six hours, except database servers which are synced every hour, and
- with Disaster Recovery, there are dedicated backup appliances in Carnarvon St and Gladstone Rd which backs up the target servers which can be recovered virtually either locally (i.e., on the appliance or restored to the virtual infrastructure) and if both sites are lost, recovered within the DR Cloud service provider; local backups are stored for three months onsite while the Cloud backups are kept forever.

1.7. Breaches or Breach Allegations

The Electricity Authority confirmed that there have been no alleged breaches related to the scope of this audit since Eastland's previous audit in December 2021.

1.8. ICP and NSP Data

Eastland has responsibility for the Eastland local network, which has one NSP and one balancing area. There have been no changes during the audit period. The table below sets out the details.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
EAST	TUI1101	TUIA FOR EAST			TUI1101EASTG	G	1 April 2015	25,927

There are no embedded networks connected to the Eastland network.

ICPs by status are set out in the table below:

Status	ICPs (2022)	ICPs (2021)	ICPs (2020)	ICPs (2019)
New (999,0)	-	-	-	1
Ready (0,0)	35	37	32	28
Active (2,0)	25,927	25,708	25,741	25,599
Distributor (888,0)	-	-	-	-
Inactive – new connection in progress (1,12)	11	24	12	10
Inactive – electrically disconnected vacant property (1,4)	515	461	442	450
Inactive – electrically disconnected remotely by AMI meter (1,7)	100	101	82	89
Inactive – electrically disconnected at pole fuse (1,8)	33	30	14	16

Status	ICPs (2022)	ICPs (2021)	ICPs (2020)	ICPs (2019)
Inactive – electrically disconnected due to meter disconnected (1,9)	18	11	15	15
Inactive – electrically disconnected at meter box fuse (1,10)	3	4	4	2
Inactive – electrically disconnected at meter box switch (1,11)	2	4	4	3
Inactive – electrically disconnected ready for decommissioning (1,6)	1	9	5	6
Inactive – reconciled elsewhere (1,5)	4	163	-	-
Decommissioned (3)	4,326	4,071	3,931	3,881

1.9. Authorisation Received

Eastland provided a letter of authorisation.

1.10. Scope of Audit

Currently, registry information is maintained within Gentrack and automatically transferred to and from the registry. Gentrack discrepancy reports are used to validate registry information.

From 1 April 2023 the Axos registry manager will be used to maintain ICP information, and transfer data to and from the registry.

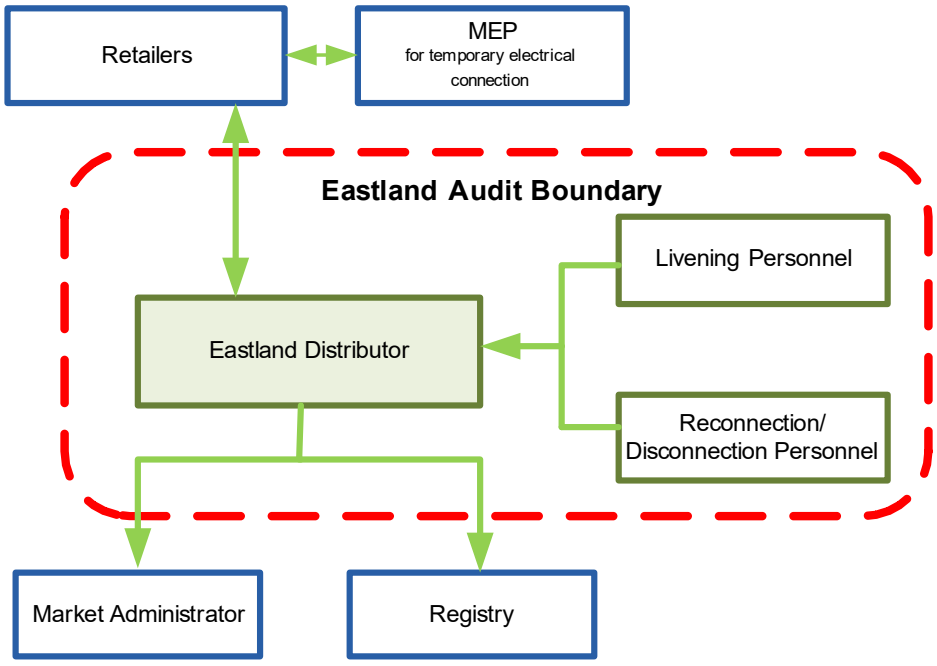
Clause 8(1) of Schedule 15.1 requires that if a distributor intends to make a "material" change to any certified facilities, processes, or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of Eastland so that it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

Compliance was assessed for all areas which could be impacted by the material change, by reviewing test documentation and results, and Axos Systems – Registry Manager User Documentation, Axos Systems - Registry Manager Technical Documentation, and Axos Systems – Security Measures, Backup and Retention.

The table below shows the tasks under clause 11.10(4) of Part 11, which Eastland is responsible for. There are no other contractors who assist with these tasks:

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

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



1.11. Summary of previous audit

The previous audit conducted in December 2021 by Rebecca Elliot of Veritek Limited was reviewed. That audit found nine non-compliances and made six recommendations. The current status of the non-compliances and recommendations are detailed in the table below:

Table of non-compliance

Subject	Section	Clause	Non-compliance	Status
Requirement to correct errors	2.2	11.2(2) and 10.6(2)	Corrections not actioned as soon as practicable.	The material change is not expected to decrease future compliance.
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities disputes information not provided as required by the code.	Some issues still remain. The material change is not expected to decrease future compliance.

Subject	Section	Clause	Non-compliance	Status
Provision of ICP Information to the registry manager	3.3	11.7	Seven electrically connected ICPs with no initial electrical connection date populated.	The material change is not expected to decrease future compliance. I re-checked incorrect initial electrical connection dates identified during the last audit and found they had been corrected apart from ICP 0002710699EN18F which was allegedly temporarily electrically connected to certify the meter on 17 March 2021, and then connected again from 19 March 2021. Eastland has recorded the initial electrical connection date as 19 March 2021 based on paperwork returned from the approved contractor. Eastland will provide their connection paperwork to the MEP, and ask them to investigate and provide evidence if they believe Eastland's initial electrical connection date is incorrect. If Eastland's date is confirmed to be incorrect, they will update Axos and the registry.
Timeliness of Provision of ICP Information to the registry manage	3.4	7(2) of Schedule 11.1	Late update to "ready" for three of 290 ICPs electrically connected during the audit period.	The material change is not expected to decrease future compliance.
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late population of the initial electrical connection date for some ICPs.	The material change is not expected to decrease future compliance.
Monitoring of "new" & "ready" statuses	3.14	15 Schedule 11.1	One ICP not decommissioned set up in error.	The material change is not expected to decrease future compliance.
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were backdated.	The material change is not expected to decrease future compliance.
ICP location address	4.4	2 Schedule 11.1	Four ICPs with duplicate addresses. 21 ICPs with a location address which is not readily locatable.	The material change is not expected to decrease future compliance. I rechecked the duplicate and incomplete addresses identified during the previous audit and found: • the duplicate addresses had been corrected to be made unique, and • the 13 ICPs with addresses that were not readily locatable had no further addressing information available, and the Eastland registry manager advised that did not have the ability to capture GPS coordinates for these ICPs.
Provide ICP Information to the Registry manager	4.6	7(1)(m) & (p)	One ICP with the incorrect initial electrical connection date.	The material change is not expected to decrease future compliance.

Subject	Section	Clause	Non-compliance	Status
		Schedule 11.1	Seven ICPs with missing initial electrical connection dates.	I re-checked incorrect initial electrical connection dates identified during the last audit and found they had been corrected apart from ICP 0002710699EN18F which was allegedly temporarily electrically connected to certify the meter on 17 March 2021, and then connected again from 19 March 2021. Eastland has recorded the initial electrical connection date as 19 March 2021 based on paperwork returned from the approved contractor. Eastland will provide their connection paperwork to the MEP, and ask them to investigate and provide evidence if they believe Eastland's initial electrical connection date is incorrect. If Eastland's date is confirmed to be incorrect, they will update Axos and the registry.

Table of Recommendations

Subject	Section	Recommendation	Description	Status
Removal or breakage of seals	2.3	Managing bridging of load control	Ensure all personnel engaged in load control device bridging are qualified to perform the bridging and sealing activities.	Contractors and personnel are assessed and deemed competent through the AHC authorisation process. All contractors and personnel completing these activities are qualified through annual courses.
			Prepare and maintain a training and competency schedule for all relevant personnel.	An annual course is arranged by Eastland and provided by Mita Consulting Ltd, an electricity industry training provider.
			Ensure that re-sealing occurs when bridging activities are conducted by non-ATH approved personnel.	Forms and seals are provided to approved and trained contractors and personnel.
			Ensure MEPs are notified as well as traders that bridging has occurred.	Eastland's policy is not to bridge meters. If bridging occurs the Billing and Revenue Assurance Manager is advised, and she will notify the affected MEP and retailer.
ICP location address	4.4	ICPs without readily locatable addresses	Investigate populating GPS co-ordinates for the ICPs without readily locatable addresses recorded.	GPS coordinates can be populated within Axos, but Eastland does not intend to use them.
Distributed generation	4.6	Unknown DG	Outline to Solar installers that notification must be provided of inspection and testing results. Consider observing testing and inspection at the expense of distributed generators.	Solar installers have been reminded of their obligations under Eastland's connection standard and the Code requirements. Eastland's Engineers follow up installers if paperwork is not received. Eastland advised that these changes have improved the timeliness of distributed generation updates.

Subject	Section	Recommendation	Description	Status
				Due to current resource constraints there are no plans to have onsite observations for testing.

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

I considered whether the migration to Axos was likely to result in incorrect or misleading information. I viewed user and technical documentation, and test results.

Audit commentary

User training

At the time the audit was completed, training on the use of Axos was underway, and expected to be completed prior to going live.

Technical, user and testing documentation is available and was reviewed during the audit. A minor error was found on review, which was passed to Axos who will update the documentation and re-distribute it to Eastland.

Recommendation	Description	Audited party comment	Remedial action
Errors in user and technical documentation	Correct documentation to reflect that ICPs can be moved from "new" to "decommissioned" status, and that this scenario has been tested.	Detail in the Registry Manager User Documentation. Scenario tested 22/03/2023. Axos/ENL discussion had during training.	Adopted

Registry synchronisation

Event attribute data will be entered into Axos, instead of Gentrack, and transferred to the registry.

ICP status, address, network, and pricing information is maintained in Axos. Each event type has an event date field which can be populated by the user. If no event date is entered, the participant event importer which creates the ICP events will assume that the event relates to today's date if any of the event attributes differ from the most recent registry record.

Axos validates data on saving to ensure that it meet's the registry's requirements for fields which are also held on the registry, and drop down boxes are used to restrict input values where practical. System controls over data consistency and completeness include:

- network and POC must be valid for Eastland Network,
- reconciliation type must be valid for the distributor and ICP type,
- the proposed trader must be a valid participant identifier,
- generation capacity and fuel type can only be populated if the installation type is B or G,

- initial electrical connection dates cannot be future dated or prior to the ICP creation date,
- for addressing, it is mandatory to populate a value in the physical address town or physical address suburb field, and it is mandatory to populate a value in the physical address street or physical address property name, and
- if GPS northing or easting is populated, the other must also be populated.

The Axos file importer generates status, address, network, and pricing events which are sent to the registry via SFTP. Axos can also process event reversals and replacements. Replacements occur where a user changes an ICP attribute and makes the event date the same as a previous event. Reversals are processed by selecting the most recent event within the registry manager and clicking the reverse button.

When a new or replacement record is saved, or an existing record is reversed, it is added to the list to be synchronised to the registry during the next overnight refresh cycle. If the user selects the "up sync" button the update will be sent to the registry immediately. Until the event is synchronised to the registry it is possible to delete or amend it before it is processed.

Axos retrieves registry acknowledgement files every five minutes. The files are reviewed in the registry manager to identify successful and failed updates, and failed updates will be investigated and reprocessed. This process also identifies time outs, where files have been sent to the registry but no response has been received for investigation.

Registry events are updated in Axos daily using the down sync process, which captures and adds registry data updates within the last seven days. The down sync process requests a registry list snapshot report for all ICPs on the Eastland Network. Once the snapshot is received, it is compared to the Axos records to determine whether the ICP is present and has ICP event records in Axos. If the ICP is present and has event records it will retrieve any events processed in the last seven days as an event detail report and update Axos with any events not already added. If the ICP is not present and/or does not have ICP event records in Axos a full historic event detail report for the ICP which will be loaded into Axos. It is very unlikely that any ICPs will not have records in Axos, because Eastland intends to create all ICPs and process all updates from Axos.

Registry and data validation

The registry synchronisation process will ensure that Axos and the registry's records are consistent most of the time. Any unsynchronised or failed updates will be identified, investigated, and resolved.

Axos does not have an event completeness check, and Axos recommends that Eastland manages validation of Axos data against the registry using a data warehouse. A business case is currently being prepared for a data warehouse.

Axos can produce a report of ICP events recorded within its Registry Manager which is in the same format as the registry list file produced by the electricity registry. This report can be used to validate Axos information against registry information. Eastland is currently developing a process to compare these reports.

Eastland also intends to complete the following validations:

- daily manual review of notification files to identify ICPs which have been updated to PV1 profile; these will be checked against distributed generation, certification, and inspection records to determine whether distributed generation has been installed and Axos and the registry will be updated as necessary,
- daily checks for ICPs at "active" status with no initial electrical connection date will continue to be run by the information team; the information required to do this is available by reviewing notification files, a registry list or an Axos ICP event report which contains the same information as the registry list, and

- ICPs at “inactive - ready for decommissioning”, “new” or “ready” status will be identified for follow up using the ICP current status filter in Axos; a registry list report can be used to identify how long the affected ICPs have been at the status.

In addition to the planned checks, I recommend that the registry’s AC020 trader compliance report is reviewed to identify potential data discrepancies between registry fields for investigation and correction.

Recommendation	Description	Audited party comment	Remedial action
Registry – Axos validation	Validate data in fields held in Axos against the registry at least weekly; and investigate and resolve any discrepancies.	LIS & EDA files will be imported daily. Variances will be checked and investigated daily.	Adopted
Data consistency	Review the registry AC020 audit compliance reports at least monthly to identify potentially inaccurate information which requires investigation and correction.	Report to be incorporated into assurance checks and run weekly to ensure data accuracy after the system change.	Adopted

Initial data migration

Registry data will be loaded into Axos, there will be no direct data transfer for fields also stored on the registry from Gentrack to Axos. A full event history for every ICP on the Eastland Network will be retrieved from the registry as an event detail report starting from 1 January 1999 and loaded into Axos. The event history up to 6 March 2023 has already been successfully loaded into the test system, and events from 6 March 2023 onwards are intended to be added. Axos confirmed that all events loaded successfully.

Prior to going live historic data will be updated, and then the daily down sync process will be used to retrieve all events created in the last week. The down sync process requests a registry list snapshot report for all ICPs on the Eastland Network. Once the snapshot is received, it is compared to the Axos records to determine whether the ICP is present and has ICP event records in Axos. If the ICP is present and has event records it will retrieve any events processed in the last seven days as an event detail report and update Axos with any events not already added. If the ICP is not present and/or does not have ICP event records in Axos a full historic event detail report for the ICP which will be loaded into Axos.

Eastland is still to confirm the close off date for Gentrack, because billing (which is outside the scope of this audit) will be completed in April 2023 for the March 2023 period. No ICP events will be processed in Gentrack after 31 March 2023. To ensure that the registry and Gentrack are consistent prior to the registry data being loaded, Eastland compares a registry list file to Gentrack’s records weekly and investigates and corrects any discrepancies. They also monitor notification and acknowledgement files from the registry daily to identify any failed updates which are investigated and corrected. Eastland intends to ensure that any registry discrepancies are resolved and any update failures have been identified and corrected before the down synch process is run to update Axos prior to going live.

Axos will action a full validation of historical events and field content before going live, to ensure that data is complete and accurate.

Axos also records "custom attributes" which are fields used by Eastland's internal systems, such as transformer numbers. These "custom attributes" are outside of the scope of this audit.

Audit outcome

Compliant

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. I considered whether the migration to Axos was likely to result in incorrect or misleading information.

Audit commentary

Timeliness of corrections depends on people and processes and will be checked during the first audit after go-live.

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 personal 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

Processes for removal and breakage of seals are not affected by the material change.

Audit commentary

Eastland may remove or break a seal to bridge load control switches after hours as a result of direct contact from a customer, and these processes are not affected by the material change.

The previous audit made some recommendations relating to removal and breakage of seals to improve future compliance, which I followed up:

Recommendation	Outcome
Ensure all personnel engaged in load control device bridging are qualified to perform the bridging and sealing activities.	Contractors and personnel are assessed and deemed competent through the AHC authorisation process. All contractors and personnel completing these activities are qualified through annual courses.
Prepare and maintain a training and competency schedule for all relevant personnel.	An annual course is arranged by Eastland and provided by Mita Consulting Ltd, an electricity industry training provider.
Ensure that re-sealing occurs when bridging activities are conducted by non-ATH approved personnel.	Forms and seals are provided to approved and trained contractors and personnel.
Ensure MEPs are notified as well as traders that bridging has occurred.	Eastland's policy is not to bridge meters. If bridging occurs the Billing and Revenue Assurance Manager is advised, and she will notify the affected MEP and retailer.

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 Disputes Resolution information was examined for Eastland to determine compliance. The Eastland website was checked, correspondence to consumers was provided by Eastland and the phone messaging was examined.

Audit commentary

Utilities Disputes processes are not affected by the material change.

Information on Utilities Disputes is provided:

- on the website,
- as part of email signatures, and
- as part of customer letter templates.

I found that one of the letter templates provided (the Shelterbelt notice) was an old version which contained out of date information which referred to the Electricity and Gas Complaints Commissioner Scheme and www.egcomplaints.co.nz. All correspondence directly addressed to customers should refer to Utilities Disputes and https://www.udl.co.nz/.

Recommendation	Description	Audited party comment	Remedial action
Review Utilities Disputes information on letter templates	Review the Utilities Disputes information on letter templates to ensure that the details are current. Ensure old versions of templates containing out of date information on complaints resolution are not used.	All documentation has been checked to ensure correct UDL information is included. Old templates have now been archived separately.	Adopted

There is currently no message on Utilities Disputes played for incoming calls. The message was lost during recent separation of Eastland Network from Eastland Group phone systems, and is expected to be reinstated prior to 1 April 2023.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.4 With: Clause 11.30A From: 01-Feb-21 To: 23-Mar-23	Utilities disputes information not provided for inbound telephone queries. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as strong. Information on Utilities Disputes was temporarily not provided for inbound telephone enquiries because it was accidentally omitted following a change to the phone system. The audit risk rating is low because Utilities Disputes information is available on the website, email footers and correspondence, and the telephone message is expected to be reinstated by 1 April 2023.

Actions taken to resolve the issue	Completion date	Remedial action status
Phone messaging to be re-recorded and reinstated as soon as possible.	31/03/2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above	as above	

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 process to create ICPs using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

The new connection application process will not change as part of this material change.

Eastland will create an ICP and enter the ICP's attributes into Axos. Address, network, and pricing events are transferred to the registry once the minimum information required to create the ICP is saved and synchronised to the registry. There are controls over fields to ensure that they are consistent and meet the registry's requirements.

The registry automatically applies an ICP status, dependent on which fields are populated in the Axos registry update. Eastland confirmed that they will provide sufficient information for the first registry update to enable ICPs to move directly to "ready" status.

- An ICP is created with "new" status if an ICP number, network participant identifier and address attributes are provided.
- An ICP is created with "ready" status if the point of connection, price category code, reconciliation type code, installation type, dedicated NSP, proposed trader and loss category code are also supplied.

If an ICP is created with "new" status it will be updated to "ready" status on the registry once the information required is added into Axos and synchronised with the registry.

Axos updates the ICP status in its database to match the registry through its acknowledgement process.

Future compliance is not expected to be affected by the material change.

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 was examined, and I found that the migration to Axos is unlikely to affect future compliance.

Audit commentary

The new connection application process will not change as part of this material change. New connection data will be entered into Axos, instead of Gentrack, and transferred to the registry.

For all new connections an "engineering review" is completed prior to the application for an ICP. The application for service form (AFS) is normally completed by the electrician and includes the nominated trader. This is provided to one of Eastland's approved contractors, who approves the application from an engineering perspective, and then submits it to Eastland for the final approval and the creation of an ICP. This process is being digitised so that all applications will be received electronically.

The date the AFS is submitted to Eastland is entered into Gentrack as the "received date"; the ICP is then created and provided to the retailer by email. There is a blanket acceptance in place with traders and if a trader rejects the ICP then it is moved back to the "new" status until a trader accepts responsibility. If the nomination is rejected by the trader, Eastland contacts the customer to request they nominate a new trader.

The timeliness of ICP creation will be assessed in the first audit following implementation of the material change, and future compliance is not expected to be affected by the material change.

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 process to provide ICP information using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

New connection data will be entered into Axos, instead of Gentrack, and transferred to the registry.

ICPs will be created in Axos, and the user will be able to populate address, network, and pricing event information at the same time. There are controls over fields to ensure that they are consistent and meet the registry requirements. Once the required fields are populated and saved, they are synchronised with the registry according to the process in **section 2.1**. Axos does not allow reversal of the first event providing ICP information to the registry, but the record can be replaced if necessary.

Future compliance is not expected to be affected by the material change.

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

I considered whether the migration to Axos was likely to result in late provision of registry information. I viewed user and technical documentation, and test results.

Audit commentary

New connection data will be entered into Axos, instead of Gentrack, and transferred to the registry.

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. The synchronisation processes discussed in **section 2.1** will ensure that data is updated on the registry.

The timeliness of ICP information will be assessed in the first audit following implementation of the material change, and future compliance is not expected to be affected by the material change. The timeliness of provision of initial electrical connection dates is discussed separately in **section 3.5**.

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 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

I considered whether the migration to Axos was likely to result in late provision of registry information. I viewed user and technical documentation, and test results.

Audit commentary

Initial electrical connection dates will be entered into Axos, instead of Gentrack, and transferred to the registry.

Initial electrical connection dates will be entered into Axos and synchronised with the registry once Eastland receives confirmation that initial electrical connection is complete.

Daily checks for ICPs at ”active” status with no initial electrical connection date will continue to be run by the information team. The information required to do this is available by reviewing notification files, a registry list, or an Axos ICP event report which contains the same information as the registry list. Any ICPs which have been moved to “active” status without an initial electrical connection date will be investigated by searching for paperwork, checking for information on the electricity and gas high risk database and following up with the livening agent.

The timeliness of initial electrical connection dates will be assessed in the first audit following implementation of the material change, and future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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 **sections 3.1** and **3.2**. I considered whether the migration to Axos was likely to result in late or inaccurate provision of registry information.

Audit commentary

The new connection application and approval process will not change as part of this material change. Traders will continue to engage agents who are approved to work on Eastland's network to conduct electrical connection activities. Eastland does not conduct electrical connection, and the design of the new connections process includes a step where the trader accepts responsibility in accordance with this clause. Eastland will continue to create ICPs at "ready" with a proposed trader.

Review of the registry list confirmed that:

- a trader is recorded for all ICPs with "active" or "inactive" status,
- a proposed trader is recorded for all ICPs with "ready" status, and
- shared unmetered load is not recorded for ICPs on Eastland's network.

The material change will not affect the trader acceptance process, and future compliance is not expected to be affected by the material change.

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, and I found that the migration to Axos is unlikely to affect future compliance.

Audit commentary

ICPs will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP. Trader acceptance is confirmed during the application process.

The material change will not affect the trader acceptance process, and future compliance is not expected to be affected by the material change.

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, and I found that the migration to Axos is unlikely to affect future compliance.

Audit commentary

Eastland's processes are robust in relation to this clause as an ICP will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP.

Future compliance is not expected to be affected by the material change.

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, and I found that the migration to Axos is unlikely to affect future compliance.

Audit commentary

Eastland is responsible for one NSP. The material change will not affect the NSP creation process, and future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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, and I found that the migration to Axos is unlikely to affect future compliance.

Audit commentary

Eastland is responsible for one NSP. The material change will not affect the NSP creation process, and future compliance is not expected to be affected by the material change.

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:

yyyyyyyyyyxxccc 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

The process to create ICPs using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

ICP numbers are created in the correct format by Axos. All ICPs created in Gentrack will be imported into Axos prior to going live, and Axos prevents duplicate ICP numbers from being created. Test results confirmed that the process is operating as expected in the test system.

Future compliance is not expected to be affected by the material change.

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 process to provide loss category information using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

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

The synchronisation processes discussed in **section 2.1** will ensure that loss category data is updated on the registry. Future compliance is not expected to be affected by the material change.

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 process to create ICPs using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

Status management will not change as part of this material change, and ICPs will continue to move directly to "ready" status if they are ready for connection. "New" status will only be applied where an ICP is not ready for activation.

Eastland will create an ICP and enter the ICP's attributes into Axos. Address, network, and pricing events are transferred to the registry once the minimum information required to create the ICP is saved and synchronised to the registry. There are controls over fields to ensure that they are consistent and meet the registry's requirements.

The registry automatically applies an ICP status, dependent on which fields are populated in the Axos registry update. Eastland confirmed that they will provide sufficient information for the first registry update to enable ICPs to move directly to "ready" status.

- An ICP is created with "new" status if an ICP number, network participant identifier and address attributes are provided.
- An ICP is created with "ready" status if the point of connection, price category code, reconciliation type code, installation type, dedicated NSP, proposed trader and loss category code are also supplied.

If an ICP is created with "new" status it will be updated to "ready" status on the registry once the information required is added into Axos and synchronised with the registry.

If an ICP is created at "ready" status and found to no longer be required, the pricing category can be removed in Axos by reversing the price category entry. Once synchronised with the registry this will return the ICP to "new" status, and then it can be moved to "decommissioned - set up in error" status.

Axos updates the ICP status in its database to match the registry through its acknowledgement process.

Future compliance is not expected to be affected by the material change.

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

The process to monitor ICPs at "new" and "ready" status was reviewed.

Audit commentary

There will be no change to the process to monitor ICPs at "new" and "ready" statuses.

ICPs at "new" and "ready" status can be identified using a current ICP status filter on the Axos registry manager landing page. A registry list report can be used to identify how long the affected ICPs have been at the status. Eastland intends to use this to identify ICPs at "new" and "ready" status each month, and follow up any ICPs at the status for more than six months with the proposed trader.

Review of the registry list confirmed that no ICPs are at "new" status and 35 ICPs are at "ready" status. 34 of the 35 ICPs have been at "ready" status for less than 24 months, and one ICP has been at "ready" status for 25 months.

Future compliance is not expected to be affected by the material change.

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 was examined.

Audit commentary

Eastland does not supply any embedded generation stations with a capacity of 10 MW or more. Future compliance is not expected to be affected by the material change.

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 was examined in relation to the electrical connection process.

Audit commentary

The new connection application process will not change as part of this material change. New connection data will be entered into Axos, instead of Gentrack, and transferred to the registry.

New streetlight connections are allowed to be unmetered connections. For all new streetlight connections, the new connection process is expected to be followed with an AFS application being submitted by the council.

Future compliance is not expected to be affected by the material change.

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

The disconnection process was examined.

Audit commentary

The physical disconnection process will not change as part of this material change.

Eastland will only undertake an electrical disconnection when a request is received from a trader, or for safety. In both instances Eastland will liaise with the relevant trader.

Future compliance is not expected to be affected by the material change.

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 one business day and include the date of bridging in its advice.

Audit observation

Processes for meter bridging were reviewed.

Audit commentary

Eastland do not bridge meters on their network. This work is completed by an MEP's authorised agent on behalf of a trader.

Future compliance is not expected to be affected by the material change.

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 13th 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.

Audit observation

The process to maintain ICP information using Axos was checked. NSP changes do not occur because Eastland has only one NSP connected. I viewed user and technical documentation, and test results.

Audit commentary

When information recorded in the registry changes, the distributor should ensure that the registry is updated within three business days.

Address, network, and pricing updates

The user selects the event type which requires update in Axos, and the screen is automatically populated with the existing values for each field in Axos and today's event date. The user modifies the event and event date information as required. Future event dates are not allowed and drop down lists and field validations are set to help to ensure only valid values are entered. Once saved, the changes will synchronised to the registry during the next scheduled overnight synchronisation, or immediately by selecting up sync.

Axos retrieves registry acknowledgement files every five minutes. The files are reviewed in the registry manager to identify successful and failed updates. Failed updates appear as synchronisation status alerts on the landing page in Axos, and will be investigated.

If an event needs to be changed, it can be deleted before the record is synchronised with the registry, otherwise Axos allows event reversals and replacements to be sent. Events can only be reversed if they are the latest event for that event type.

Registry events processed by other parties are updated in Axos daily. A daily synchronisation captures registry data updates within the last seven days. Axos does not use notification files.

Status updates

Status updates to "new" and "ready" are created by the registry once the information required to achieve the status has been populated. ICPs can be reversed from "ready" to "new" status by removing the distributor pricing information in Axos and the update being synchronised with the registry. The "new" and "ready" status information is imported back into Axos through the registry synchronisation process.

ICPs can be moved to "distributor" or "decommissioned" statuses according to the general registry event update process, where the change is processed in Axos and then synchronised with the registry.

A recommendation to validate Axos data against the registry is made in **section 2.1**. Timeliness and accuracy of registry updates will be checked during the first audit after go-live. Future compliance is not expected to be affected by the material change.

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 process to provide NSP information using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

There is no uncertainty regarding NSP and ICP relationships on Eastland's network, as there is only one NSP and one balancing area. The NSP for each ICP is notified to the registry as part of the new connections process.

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

Eastland supply ICP numbers to customers on request, and this process will not be affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

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 provide address information using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

Axos uses a combination of NZ Post, LINZ, and Statistics NZ information in its address search function. The user begins typing an address and Axos looks up to the linked information and the user can select the valid address. If the address cannot be found the details are manually populated.

Axos system controls prevent duplicate addresses from being entered, an error message is produced if a user attempts to create an ICP with an address that matches an existing ICP. It is mandatory to populate a value in the physical address town or physical address suburb field, and it is mandatory to populate a value in the physical address street or physical address property name. If GPS northing or easting is populated, the other must also be populated.

Test results confirmed that the address update and reversal processes are operating as expected.

I rechecked the duplicate and incomplete addresses identified during the previous audit and found:

- the duplicate addresses had been corrected to be made unique, and
- the 13 ICPs with addresses that were not readily locatable had no further addressing information available, and the Eastland registry manager advised that they did not have the ability to capture GPS coordinates for these ICPs.

Future compliance is not expected to be affected by the material change.

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

This part of the new connection process will not change.

Audit commentary

For new connections, this clause is well understood and there are no shared service mains on the Eastland network. The new connection process includes a step where the isolation point is identified as part of the application.

Future compliance is not expected to be affected by the material change.

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

- *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 process to provide complete and accurate ICP information using Axos was checked. I viewed user and technical documentation, and test results.

Audit commentary

ICP status, address, network, and pricing information is maintained in Axos, along with the event date that each combination of event attributes applied from. Axos validates data on saving to ensure that it meet's the registry's requirements for fields which are also held on the registry, and drop down boxes are used to restrict input values where practical. These validations are discussed further in **section 2.1**.

The Axos file importer generates status, address, network, and pricing events which are sent to the registry via SFTP. Axos can also process event reversals of the most recent event, and replacements.

When a new or replacement record is saved, or an existing record is reversed, it is added to the list to be synchronised to the registry during the next overnight refresh cycle. If the user selects the "up sync" button the update will be sent to the registry immediately. Until the event is synchronised to the registry it is possible to delete or amend it before it is processed.

Axos retrieves registry acknowledgement files every five minutes. The files are reviewed in the registry manager to identify successful and failed updates, and failed updates will be investigated and reprocessed. This process also identifies time outs for investigation, where files have been sent to the registry, but no response has been received.

Initial Electrical Connection Date

Eastland does not perform initial electrical connections; traders engage approved agents to connect new ICPs. Once Eastland receives confirmation of the correct initial electrical connection date Axos will be updated, and the new network attributes will be transferred to the registry through the synchronisation process. Axos does not allow initial electrical connection dates which are future dated or prior to the ICP creation date.

Daily checks for ICPs at "active" status with no initial electrical connection date will continue to be run by the information team. The information required to do this is available by reviewing notification files, a registry list, or an Axos ICP event report which contains the same information as the registry list. Any ICPs which have been moved to "active" status without an initial electrical connection date will be investigated by searching for paperwork, checking for information on the electricity and gas high risk database and following up with the livening agent.

I re-checked incorrect initial electrical connection dates identified during the last audit and found they had been corrected apart from ICP 0002710699EN18F which was allegedly temporarily electrically connected to certify the meter on 17 March 2021, and then connected again from 19 March 2021. Eastland has recorded the initial electrical connection date as 19 March 2021 based on paperwork returned from the approved contractor. Eastland will provide their connection paperwork to the MEP, and ask them to investigate and provide evidence if they believe Eastland's initial electrical connection date is incorrect. If Eastland's date is confirmed to be incorrect, they will update Axos and the registry.

Future compliance is not expected to be affected by the material change.

Distributed generation

The distributed generation application process will not change. Once generation is confirmed to have been installed and the correct details are confirmed by checking the application, installation certificates and records of inspection, Axos will be updated, and the new network attributes will be transferred to the registry through the synchronisation process.

Distributed Generators must apply to Eastland for approval to connect distributed generation. The work is then completed and the distributed generator is required to provide Eastland with inspection and certification records to confirm that generation is installed and compliant. Previous audits recorded that there were sometimes delays in providing this notification and paperwork. To help identify late notice of installation, Eastland will continue to review EIEP submissions from traders for I flow volumes and manually check notification files for profile changes to PV1. Where one of these checks indicate generation is present but none is recorded, Eastland checks the high risk database to confirm the capacity and fuel type and follows up with the installer.

Eastland plans to review its distributed generation connection and operation standard later this year.

I followed up the previous audit recommendations to improve distributed generation processes:

Recommendation	Outcome
Outline to Solar installers that notification must be provided of inspection and testing results.	Solar installers have been reminded of their obligations under Eastland's connection standard and the Code requirements. Eastland's Engineers follow up installers if paperwork is not received. Eastland advised that these changes have improved the timeliness of distributed generation updates.
Consider observing testing and inspection at the expense of distributed generators.	Due to current resource constraints there are no plans to have onsite observations for testing.

Future compliance is not expected to be affected by the material change.

Unmetered load

Part 11 states the distributors must provide unmetered load type and capacity of the unmetered load to the registry "if known". If distributor unmetered load is populated, it is required to be accurate.

Once Eastland receives confirmation of correct unmetered load details Axos will be updated, and the new network attributes will be transferred to the registry through the synchronisation process. Unmetered new connections follow the same application process as metered new connections.

Future compliance is not expected to be affected by the material change.

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 management of registry information was reviewed. I viewed user and technical documentation, and test results.

Audit commentary

Once Eastland confirms the correct pricing details Axos will be updated, and the new pricing attributes will be transferred to the registry through the synchronisation process.

Eastland is usually able to confirm pricing details prior to electrical connection of the ICP. If any changes are required these are updated as soon as possible.

Timeliness of pricing information depends on people and processes and will be checked during the first audit after go-live. Future compliance is not expected to be affected by the material change.

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 was reviewed to determine compliance.

Audit commentary

Eastland do not populate GPS co-ordinates. Future compliance is not expected to be affected by the material change.

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

The management of ICPs in relation to the use of the "ready" status was examined. I viewed user and technical documentation, test results and the registry list.

Audit commentary

ICPs will continue to move directly to "ready" status if they are ready for connection.

Eastland will create an ICP and enter the ICP's attributes into Axos. Address, network, and pricing events are transferred to the registry once the minimum information required to create the ICP is saved and synchronised to the registry. There are controls over fields to ensure that they are consistent and meet the registry's requirements.

The registry automatically applies an ICP status, dependent on which fields are populated in the Axos registry update. Eastland confirmed that they will provide sufficient information for the first registry update to enable ICPs to move directly to "ready" status.

- An ICP is created with "new" status if an ICP number, network participant identifier and address attributes are provided.

- An ICP is created with "ready" status if the point of connection, price category code, reconciliation type code, installation type, dedicated NSP, proposed trader and loss category code are also supplied.

If an ICP is created with "new" status it will be updated to "ready" status on the registry once the information required is added into Axos and synchronised with the registry.

Axos updates the ICP status in its database to match the registry through its acknowledgement process.

Review of the registry list confirmed that all ICPs at "ready" status had a single price category assigned and proposed trader identified. Monitoring of ICPs at "ready" status is discussed in **section 3.14**.

Future compliance is not expected to be affected by the material change.

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 was reviewed to identify ICPs at distributor status.

Audit commentary

Eastland does not have any embedded networks or shared unmetered load; therefore, there are no ICPs with a "distributor" status.

Future compliance is not expected to be affected by the material change.

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 decommissioning process was reviewed. I viewed user and technical documentation, and test results.

Audit commentary

There will be no change to the physical decommissioning process. Status data will be entered into Axos, instead of Gentrack, and transferred to the registry. Once decommissioning is confirmed, Axos will be updated, and the new status attributes will be transferred to the registry through the synchronisation process.

ICPs at "ready for decommissioning" status can be identified using a current ICP status filter on the Axos registry manager landing page. A registry list report can be used to identify how long the affected ICPs have been at the status. ICPs that have been electrically disconnected for more than 280 days will have a notification sent to the retailers of these ICPs, with a request for permission to permanently decommission. If this is confirmed by the trader, the process to decommission the site is followed. Requests for decommissioning are also received directly from traders. In all instances written permission must then be received from the property owner. Only once this has been received will the ICP be moved to "ready for decommissioning". With the dissolution of East tech during the previous audit period, this work has passed to Electrinet to action on Eastland's behalf. Notifications are provided back to Eastland.

Axos will ensure that decommissioned status can only be applied where an ICP has "new", "inactive - ready for decommissioning" or "distributor" status, in line with the registry's requirements. If an ICP is created at "ready" status and found to no longer be required, the pricing category can be removed in Axos by reversing the price category entry. Once synchronised with the registry this will return the ICP to "new" status, and then it can be moved to "decommissioned - set up in error" status.

Status reason codes are selected from a drop down box. I reviewed test results which confirmed the process to move ICPs to "decommissioned" status and reverse decommissioning events is operating as expected in the test system.

Future compliance is not expected to be affected by the material change.

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, and the impact of the material change on price category codes was assessed.

Audit commentary

Price category codes will continue to be created and updated manually using the registry user interface.

Registry price category codes will be imported into Axos for selection as ICP attributes. Test results showed that the import process is operating as expected and the imported codes are available for selection on the pricing category drop down list.

Future compliance is not expected to be affected by the material change.

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, and the impact of the material change on loss factor updates was assessed.

Audit commentary

Loss factor codes will continue to be created manually using the registry user interface.

Registry loss factor codes will be loaded into Axos for selection as ICP attributes. Test results showed that the import process is operating as expected and the imported codes are available for selection on the loss factor drop down list. Future compliance is not expected to be affected by the material change.

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, and the impact of the material change on loss factor updates was assessed.

Audit commentary

The loss category code table on the registry was examined, and the impact of the material change on loss factor updates was assessed.

Audit commentary

Loss factor codes will continue to be updated manually using the registry user interface. Future compliance is not expected to be affected by the material change.

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 NSP table was examined.

Audit commentary

Eastland is responsible for one NSP and NSP information has not changed since 2015. NSP information is managed outside Axos using the registry user interface. Future compliance is not expected to be affected by the material change.

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 was examined.

Audit commentary

Eastland is responsible for one NSP and NSP information has not changed since 2015. Future compliance is not expected to be affected by the material change.

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 was examined.

Audit commentary

Eastland is responsible for one NSP and balancing area information has not changed since 2015. Future compliance is not expected to be affected by the material change.

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 was reviewed.

Audit commentary

Eastland is not responsible for any embedded networks. Future compliance is not expected to be affected by the material change.

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 was examined.

Audit commentary

Eastland is responsible for one NSP and balancing area information has not changed since 2015. Future compliance is not expected to be affected by the material change.

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 reviewed.

Audit commentary

Eastland is responsible for one NSP and no ICPs are likely to become NSPs. Future compliance is not expected to be affected by the material change.

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 was reviewed.

Audit commentary

Eastland has not initiated the transfer of any ICPs. Future compliance is not expected to be affected by the material change.

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

The NSP supply point table was examined.

Audit commentary

Eastland is not responsible for any NSPs which are not points of connection to the grid. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

The NSP supply point table was reviewed.

Audit commentary

Eastland is not responsible for any NSPs which are not points of connection to the grid. Future compliance is not expected to be affected by the material change.

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 supply point table was reviewed.

Audit commentary

Eastland have not initiated any changes of network owner. Future compliance is not expected to be affected by the material change.

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 NSP supply point table was reviewed.

Audit commentary

Eastland is not responsible for any embedded networks. Future compliance is not expected to be affected by the material change.

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 supply point table was reviewed.

Audit commentary

Eastland have not initiated any transfers of ICPs. Future compliance is not expected to be affected by the material change.

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 supply point table was reviewed.

Audit commentary

Eastland is not responsible for any embedded networks, and has not initiated transfers of any ICPs. Future compliance is not expected to be affected by the material change.

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 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

Eastland does not allow any shared unmetered load connections on its network, and it does not have any existing shared unmetered load connections. Future compliance is not expected to be affected by the material change.

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 was reviewed to identify any ICPs with shared unmetered load connected.

Audit commentary

Eastland have no shared unmetered load connections on their network. Future compliance is not expected to be affected by the material change.

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 impact of the material change on creation and review of loss factors was assessed.

Audit commentary

Future compliance is not expected to be affected by the material change, because loss factors are reviewed manually using information from the billing system, registry, and reconciliation manager systems.

Audit outcome

Compliant

CONCLUSION

From 1 April 2023 the Axos Registry Manager will be used to maintain ICP information, and transfer data to and from the registry. The registry synchronisation process will help to ensure that current values recorded in Axos match the registry, and unsuccessful updates will be identified and resolved.

Axos does not support completeness and accuracy checks against the registry and recommends that Eastland manages validation of Axos data against the registry using a data warehouse. A business case is currently being prepared for a data warehouse.

Axos can produce a report of ICP events recorded within its Registry Manager which is in the same format as the registry list file produced by the electricity registry. This report can be used to validate Axos information against registry information. Eastland is currently developing a process to compare these reports and will continue its regular validations to identify ICPs which may have been connected or had distributed generation added, and ICPs that are at "new", "ready" or "inactive - ready for decommissioning" status.

Until the data warehouse is available, I recommend that Eastland:

- validates data in fields held in Axos against the registry at least weekly, and investigate and resolve any discrepancies using the reports currently available, and
- reviews the registry AC020 audit compliance report at least monthly to identify potentially inaccurate information which requires investigation and correction.

Eastland has agreed to implement these recommendations.

Eastland's next audit date is 7 July 2023, and I recommend that this audit date is retained.

PARTICIPANT RESPONSE

From 1 April 2023 the noted recommendations made by Veritek as Auditor will be adopted.

- Phone system will be in place pre 1/04/2023
- Weekly Axos system field validation checks will be undertaken
- Report AC020 will be run weekly initially and be further reviewed at the next Audit due date 7 July 2023.

We thank Veritek for the attention to this audit. The positive engagement and input is appreciated.