

ELECTRICITY INDUSTRY PARTICIPATION CODE  
RECONCILIATION PARTICIPANT AUDIT REPORT

VERITEK

For

FOROURGOOD LIMITED  
NZBN: 9429046893093

Prepared by: Tara Gannon

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Audit report due date: 28 February 2023

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## TABLE OF CONTENTS

Executive summary .....	6
Audit summary .....	7
Non-compliances .....	7
Recommendations .....	9
Issues .....	10
1. Administrative.....	11
1.1. Exemptions from Obligations to Comply with Code (Section 11).....	11
1.2. Structure of Organisation.....	11
1.3. Persons involved in this audit.....	12
1.4. Use of Agents (Clause 15.34).....	12
1.5. Hardware and Software .....	12
1.6. Breaches or Breach Allegations.....	13
1.7. ICP Data .....	13
1.8. Authorisation Received .....	14
1.9. Scope of Audit .....	14
1.10. Summary of previous audit .....	15
2. Operational Infrastructure.....	18
2.1. Relevant information (Clause 10.6, 11.2, 15.2).....	18
2.2. Provision of information (Clause 15.35).....	21
2.3. Data transmission (Clause 20 Schedule 15.2) .....	21
2.4. Audit trails (Clause 21 Schedule 15.2).....	22
2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4).....	22
2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6)) .....	23
2.7. Physical location of metering installations (Clause 10.35(1)&(2)) .....	24
2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B) .....	24
2.9. Connection of an ICP (Clause 10.32) .....	25
2.10. Temporary Electrical Connection of an ICP (Clause 10.33).....	25
2.11. Electrical Connection of Point of Connection (Clause 10.33A) .....	26
2.12. Arrangements for line function services (Clause 11.16) .....	27
2.13. Arrangements for metering equipment provision (Clause 10.36) .....	28
2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5)) .....	28
2.15. Electrical disconnection of ICPs (Clause 10.33B).....	29
2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7) ....	29
2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2).....	30
2.18. Use of ICP identifiers on invoices (Clause 11.30) .....	31
2.19. Provision of information on dispute resolution scheme (Clause 11.30A).....	32
2.20. Provision of information on electricity plan comparison site (Clause 11.30B).....	32
3. Maintaining registry information.....	34
3.1. Obtaining ICP identifiers (Clause 11.3).....	34
3.2. Providing registry information (Clause 11.7(2)).....	34
3.3. Changes to registry information (Clause 10 Schedule 11.1) .....	35
3.4. Trader responsibility for an ICP (Clause 11.18) .....	37
3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1) .....	38
3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1).....	39

3.7.	Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)	40
3.8.	Management of “active” status (Clause 17 Schedule 11.1)	41
3.9.	Management of “inactive” status (Clause 19 Schedule 11.1)	41
3.10.	ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)	47
4.	Performing customer and embedded generator switching	48
4.1.	Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)	48
4.2.	Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)	48
4.3.	Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)	50
4.4.	Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)	52
4.5.	Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)	53
4.6.	Disputes - standard switch (Clause 7 Schedule 11.3)	54
4.7.	Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)	54
4.8.	Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)	55
4.9.	Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)	57
4.10.	Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)	57
4.11.	Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)	60
4.12.	Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)	62
4.13.	Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)	63
4.14.	Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)	64
4.15.	Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)	64
4.16.	Metering information (Clause 21 Schedule 11.3)	66
4.17.	Switch protection (Clause 11.15AA to 11.15AB)	68
5.	Maintenance of unmetered load	69
5.1.	Maintaining shared unmetered load (Clause 11.14)	69
5.2.	Unmetered threshold (Clause 10.14 (2)(b))	70
5.3.	Unmetered threshold exceeded (Clause 10.14 (5))	70
5.4.	Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)	71
6.	Gathering raw meter data	72
6.1.	Electricity conveyed & notification by embedded generators (Clause 10.13, Clause 10.24 and 15.13)	72
6.2.	Responsibility for metering at GIP (Clause 10.26 (6), (7) and (8))	73
6.3.	Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)	74
6.4.	Reporting of defective metering installations (Clause 10.43(2) and (3))	75
6.5.	Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)	75
6.6.	Derivation of meter readings (Clauses 3(1), 3(2) and 5 Schedule 15.2)	76
6.7.	NHH meter reading application (Clause 6 Schedule 15.2)	77
6.8.	Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)	77
6.9.	NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)	78
6.10.	NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)	78
6.11.	NHH meter interrogation log (Clause 10 Schedule 15.2)	79
6.12.	HHR data collection (Clause 11(1) Schedule 15.2)	79
6.13.	HHR interrogation data requirement (Clause 11(2) Schedule 15.2)	79
6.14.	HHR interrogation log requirements (Clause 11(3) Schedule 15.2)	80
7.	Storing raw meter data	82

7.1.	Trading period duration (Clause 13 Schedule 15.2).....	82
7.2.	Archiving and storage of raw meter data (Clause 18 Schedule 15.2) .....	82
7.3.	Non metering information collected / archived (Clause 21(5) Schedule 15.2).....	83
8.	Creating and managing (including validating, estimating, storing, correcting and archiving) volume information.....	84
8.1.	Correction of NHH meter readings (Clause 19(1) Schedule 15.2).....	84
8.2.	Correction of HHR metering information (Clause 19(2) Schedule 15.2).....	84
8.3.	Error and loss compensation arrangements (Clause 19(3) Schedule 15.2) .....	86
8.4.	Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2).....	86
9.	Estimating and validating volume information.....	87
9.1.	Identification of readings (Clause 3(3) Schedule 15.2).....	87
9.2.	Derivation of volume information (Clause 3(4) Schedule 15.2).....	88
9.3.	Meter data used to derive volume information (Clause 3(5) Schedule 15.2).....	88
9.4.	Half hour estimates (Clause 15 Schedule 15.2).....	89
9.5.	NHH metering information data validation (Clause 16 Schedule 15.2) .....	90
9.6.	Electronic meter readings and estimated readings (Clause 17 Schedule 15.2) .....	90
10.	Provision of metering information to the GRID OWNER in accordance with subpart 4 of Part 13 (clause 15.38(1)(f)) .....	92
10.1.	Generators to provide HHR metering information (Clause 13.136) .....	92
10.2.	Unoffered & intermittent generation provision of metering information (Clause 13.137) ...	92
10.3.	Loss adjustment of HHR metering information (Clause 13.138).....	93
10.4.	Notification of the provision of HHR metering information (Clause 13.140) .....	93
11.	Provision of submission information for reconciliation.....	94
11.1.	Buying and selling notifications (Clause 15.3).....	94
11.2.	Calculation of ICP days (Clause 15.6) .....	94
11.3.	Electricity supplied information provision to the reconciliation manager (Clause 15.7).....	97
11.4.	HHR aggregates information provision to the reconciliation manager (Clause 15.8) .....	98
12.	Submission computation .....	100
12.1.	Daylight saving adjustment (Clause 15.36) .....	100
12.2.	Creation of submission information (Clause 15.4).....	100
12.3.	Allocation of submission information (Clause 15.5) .....	102
12.4.	Grid owner volumes information (Clause 15.9).....	102
12.5.	Provision of NSP submission information (Clause 15.10) .....	103
12.6.	Grid connected generation (Clause 15.11).....	103
12.7.	Accuracy of submission information (Clause 15.12) .....	103
12.8.	Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2).....	105
12.9.	Reconciliation participants to prepare information (Clause 2 Schedule 15.3) .....	107
12.10.	Historical estimates and forward estimates (Clause 3 Schedule 15.3).....	107
12.11.	Historical estimate process (Clauses 4 and 5 Schedule 15.3).....	108
12.12.	Forward estimate process (Clause 6 Schedule 15.3).....	109
12.13.	Compulsory meter reading after profile change (Clause 7 Schedule 15.3).....	109
13.	Submission format and timing.....	110
13.1.	Provision of submission information to the RM (Clause 8 Schedule 15.3) .....	110
13.2.	Reporting resolution (Clause 9 Schedule 15.3) .....	111
13.3.	Historical estimate reporting to RM (Clause 10 Schedule 15.3) .....	111

14. Glossary of Terms.....	112
Conclusion .....	112
Participant response .....	112

## EXECUTIVE SUMMARY

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of **ForOurGood Ltd (FOGY)**, to support their application for renewal of certification in accordance with clauses 5 and 7 of schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits version 7.2.

FOGY is a HHR trader for meter category 1 and 2 ICPs. There has been a large increase in active ICP numbers during the audit period from 894 in 2021, to 4,956 in 2022.

FOGY's registry and switching processes are largely manual, and it is a credit to the FOGY team that the increase in workload from gaining customers has not resulted in an increase in late registry updates and switching files. The majority of late registry updates were caused by late notice of the required change by another party.

The accuracy of registry and submission data continues to be high, with a very small number of low impact exceptions identified. Where submission data is affected, corrections are expected to be provided through the revision process.

There were some low impact issues for switching data accuracy, particularly relating to last actual read dates where the CS event reading is estimated, and I have recommended a process improvement.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Based on the audit risk rating of 21, the indicative next audit date is in 12 months. I recommend that the next audit is completed in 15 months, on 28 May 2024.

The matters raised are shown in the table below.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Relevant information	2.1	11.2	<p>ICP 0438360974LC55A has an incorrect ANZSIC code recorded.</p> <p>ICP 0000063546TR2A9 has an incorrect inactive status event date recorded.</p> <p>ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.</p> <p>IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.</p>	Strong	Low	1	Investigating
Electrical Connection of Point of Connection	2.11	10.33A	One reconnection was not certified within five business days.	Moderate	Low	2	Identified
Changes to registry information	3.3	10 Schedule 11.1	<p>Nine late updates to active status for reconnections.</p> <p>Four late updates to inactive status for disconnections.</p> <p>Four late trader updates.</p> <p>One ANZSIC code update was made more than 20 business days after FOGY began trading at the ICP.</p>	Strong	Low	1	Identified
ANZSIC codes	3.6	9 (1(k) of Schedule 11.1	ICP 0438360974LC55A had an incorrect ANZSIC code recorded. 000000 residential was applied but S955 Civic Professional and Other Interest Group Services was expected.	Strong	Low	1	Cleared
Management of "inactive" status	3.9	19 Schedule 11.1	ICP 0000063546TR2A9 was disconnected on 12 July 2022 and was originally correctly entered on the registry as inactive from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an inactive record dated 20 June 2022.	Moderate	Low	2	Cleared

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Losing trader response to switch request and event dates - standard switch	4.2	3 and 4 Schedule 11.3	One AN had an incorrect response code applied.	Strong	Low	1	Identified
Losing trader must provide final information - standard switch	4.3	5 Schedule 11.3	Six transfer CS files contained an incorrect last actual read date.	Moderate	Low	2	Identified
Losing trader provides information - switch move	4.8	10 of schedule 11.3	One E2 breach where the CS event date was before the gaining trader's requested event date.	Strong	Low	1	Identified
Losing trader must provide final information - switch move	4.10	11 of schedule 11.3	Three switch move CS file contained incorrect switch event read types. Three switch move CS files contained an incorrect last actual read date. One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.	Moderate	Low	2	Identified
Gaining trader changes to switch meter reading - switch move	4.11	12 Schedule 11.3	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.	Strong	Low	1	Identified
Withdrawal of switch requests	4.15	17 and 18 Schedule 11.3	Two outgoing NWs had incorrect NW withdrawal advisory codes applied. One outgoing NW was issued in error and was rejected by the other trader. Three NA breaches. One incoming NW file was rejected in error.	Moderate	Low	2	Identified
Metering information	4.16	21 Schedule 11.3	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.	Strong	Low	1	Identified
Electricity conveyed & notification by embedded generators	6.1	10.13	Energy is not metered and quantified according to the code where meters are bridged.	Strong	Low	1	Identified



Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Identification of readings	9.1	3(3) Schedule 15.2	Three switch move CS files had incorrectly recorded switch event read types.	Strong	Low	1	Identified
Creation of submission information	12.2	15.4	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.	Strong	Low	1	Investigating
Accuracy of submission information	12.7	15.12	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.  IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.	Strong	Low	1	Investigating
Future Risk Rating						21	

Future risk rating	0	1-3	4-14	16-40	41-55	55+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Description	Recommendation
Relevant information	2.1	Replacement reading data from IntelliHUB	Arrange for IntelliHUB to provide replacement data if it is obtained within 100 days of the reading date.
Electrical Connection of Point of Connection	2.11	Check meter certification when arranging meter reconnections	If a meter requiring reconnection does not have current meter certification, attempt to arrange re-certification with the MEP.
Management of "inactive" status	3.9	Inactive ICPs with consumption	Check ICPs 0000162652HBF16, 0000502587NR344, 0000670816TUCFC, 0000974411TU5C0, 0100578446LCBA3, 0395721083LCCAF, 0476945267LCD1E and 1001156046CK19F to confirm the correct active status periods and process registry updates as necessary.

Subject	Section	Description	Recommendation
		Review of ICPs with inactive consumption	Not all ICPs appear to be investigated and actioned during the weekly checks of inactive consumption, and I recommend that the weekly checks are more thorough, with status updates made where necessary.
Losing trader must provide final information - standard switch	4.3	Processes for last actual read dates	Update processes to ensure that the last actual read date is consistently populated with the last date an actual reading was received for during the period of supply. Where a switch event reading is estimated, the last actual read date is expected to be before the last day of supply.
Electricity conveyed & notification by embedded generators	6.1	Distributed generation for ICP 0000052255HBB9D	Confirm whether distributed generation is present for ICP 0000052255HBB9D, and if it is, arrange for compliant I flow metering to be installed.

## ISSUES

Subject	Section	Description	Issue
		Nil	

## 1. ADMINISTRATIVE

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

#### Code reference

Section 11 of Electricity Industry Act 2010.

#### Code related audit information

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

#### Audit observation

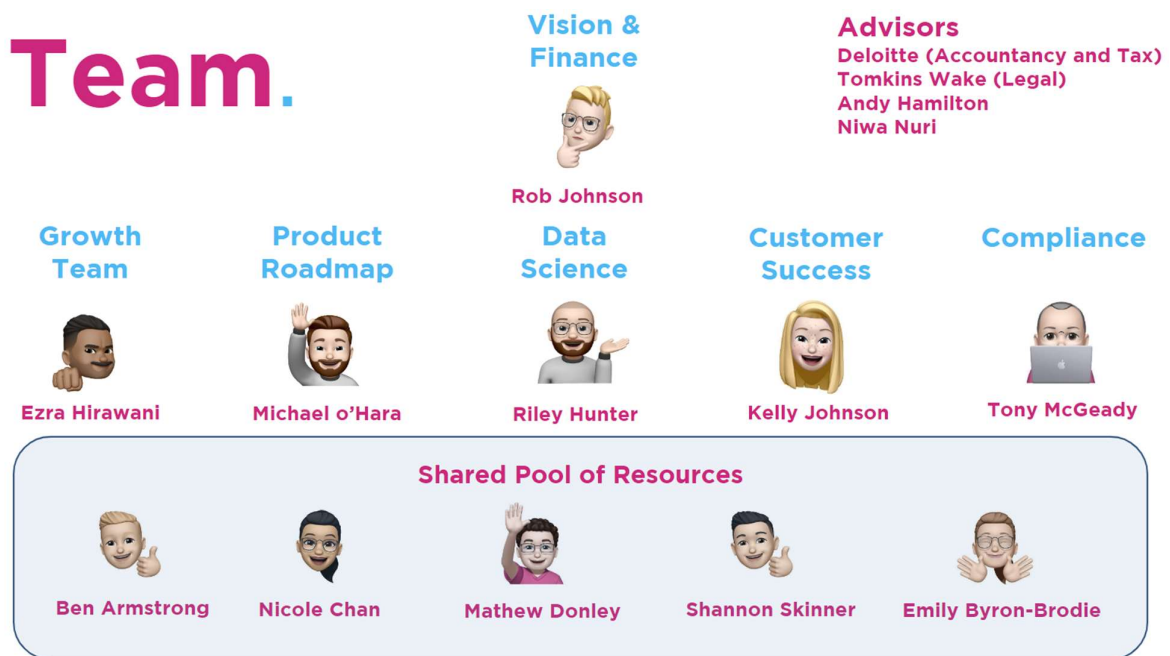
I checked the Authority's website to identify any relevant exemptions.

#### Audit commentary

FOGY does not have any exemptions in place.

### 1.2. Structure of Organisation

FOGY provided a copy of their organisational structure.



### 1.3. Persons involved in this audit

Auditor:

Tara Gannon

**Veritek Limited**

**Electricity Authority Approved Auditor**

Personnel assisting in this audit were:

Name	Title
Tony McGeady	Compliance
Nicole Chan	Software Developer and Customer Success

### 1.4. Use of Agents (Clause 15.34)

#### Code reference

*Clause 15.34*

#### Code related audit information

*A reconciliation participant who uses an agent*

- *remains responsible for the contractor's fulfilment of the participant's Code obligations*
- *cannot assert that it is not responsible or liable for the obligation due to something the agent has or has not done.*

#### Audit observation

I requested details of agents involved in any relevant processes.

#### Audit commentary

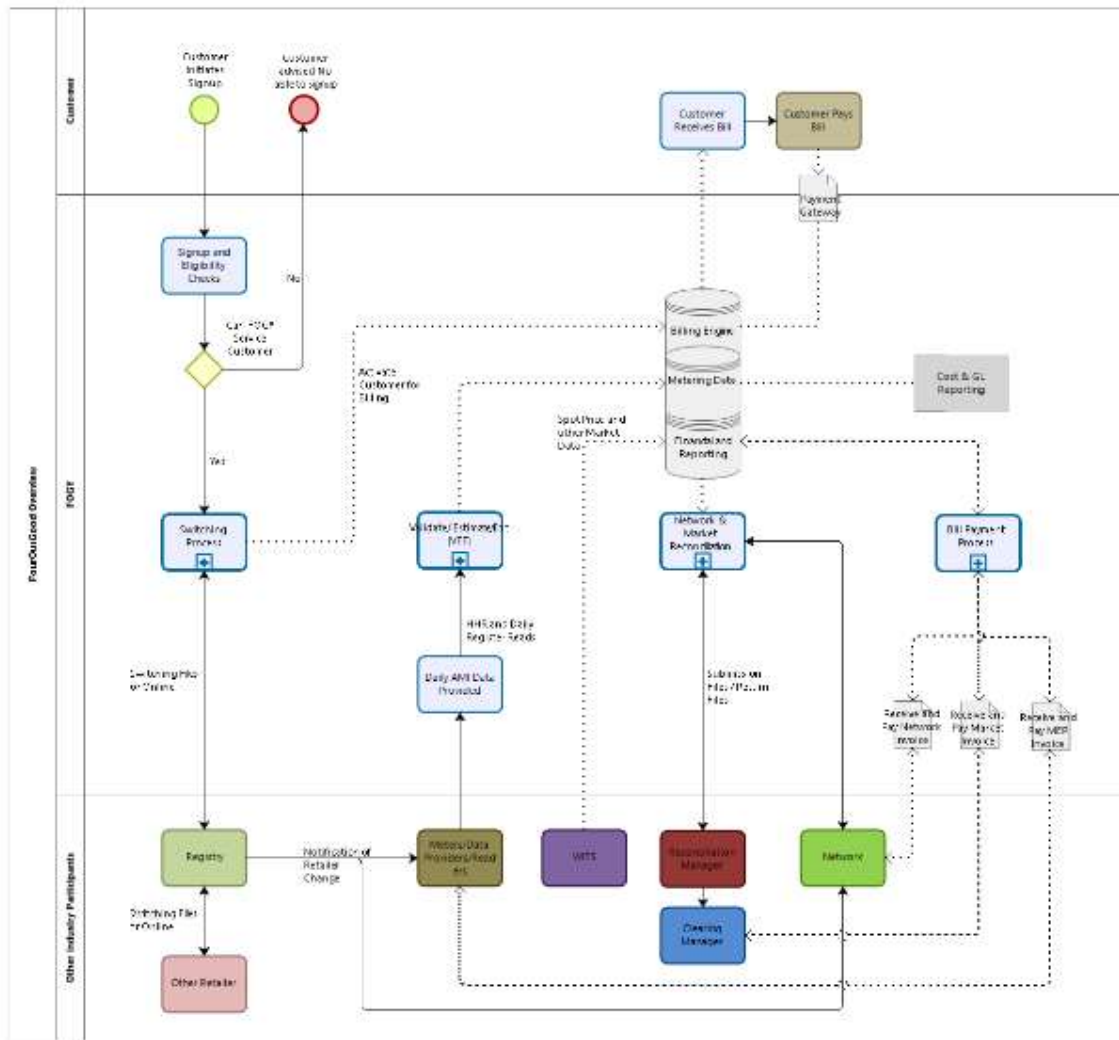
FOGY uses IntelliHUB Limited as an agent for supplying estimated HHR data. IntelliHUB Limited is an MEP providing AMI data, but the provision of estimates is undertaken as an agent to retailers not as an MEP.

### 1.5. Hardware and Software

The diagram below shows the processes and systems at a high level. A bespoke system has been developed and its functionality was checked as part of this audit. The Sequel system is cloud based, hosted by Microsoft and password protection is in place to ensure data security.

Azure automatically backs up the production databases, and FOGY takes its own daily backups which are retained for a rolling fortnight.

There have been minor incremental changes and improvements to systems during the audit period, but no material changes to systems and processes which would require a material change audit.



### 1.6. Breaches or Breach Allegations

FOGY has not had any breach allegations recorded by the Electricity Authority during the audit period.

### 1.7. ICP Data

The quantity of ICPs by status is shown below:

Status	2022	2021	2020
Active (2,0)	4,956	894	390
Inactive – new connection in progress (1,12)	-	-	-
Inactive – electrically disconnected vacant property (1,4)	16	1	1
Inactive – electrically disconnected remotely by AMI meter (1,7)	7	3	0
Inactive – electrically disconnected at pole fuse (1,8)	1	-	-

Inactive – electrically disconnected due to meter disconnected (1,9)	-	-	-
Inactive – electrically disconnected at meter box fuse (1,10)	-	-	-
Inactive – electrically disconnected at meter box switch (1,11)	5	1	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-	-	-
Inactive – reconciled elsewhere (1,5)	-	-	-
Decommissioned (3)	10	4	0

The active ICPs on the list file were summarised by meter category in the table below.

Metering Category	2022	2021	2020
1	4,655	894	390
2	1	-	-
3	-	-	-
4	-	-	-
5	-	-	-
9	-	-	-
Blank	-	-	-

### 1.8. Authorisation Received

A letter of authorisation was received.

### 1.9. Scope of Audit

This Electricity Industry Participation Code Reconciliation Participant audit was performed at the request of FOGY, to support their application for renewal of certification in accordance with clauses 5 and 7 of schedule 15.1. The audit was conducted in accordance with the Guideline for Reconciliation Participant Audits V7.2 and was completed remotely.

Registry list, event detail and audit compliance reports for 1 September 2021 to 30 September 2022, and a registry list snapshot for 30 September 2022 were reviewed.

FOGY deals with HHR AMI ICPs only. They do not conduct new connections and do not deal with unmetered load. The table below shows the tasks under clause 15.38 of part 15 for which FOGY requires certification.

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Within Audit Scope	Agents involved in performance of tasks
(a) - Maintaining registry information and performing customer and embedded generator switching	✓	
(b) – Gathering and storing raw meter data	✓	
(c)(i) - Creation and management of HHR volume information	✓	IntelliHUB creates HHR estimates
(c)(ii) - Creation and management of NHH volume information	✗	
(c)(iii) - Creation and management of HHR & NHH volume information	✗	
(c)(iv) - Creation and management of dispatchable load information	✗	
(d) – Calculation of ICP days	✓	
(da) - delivery of electricity supplied information under clause 15.7	✓	
(db) delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	
(e) – Provision of submission information for reconciliation	✓	
(f) - provision of metering information to the grid owner in accordance with subpart 4 of Part 13.	✗	

IntelliHUB were audited within the last seven months, and their audit report is expected to be submitted with this report.

### 1.10. Summary of previous audit

The previous audit was conducted in August 2021 by Tara Gannon of Veritek Limited. The summary tables below show the statuses of the non-compliances and recommendations raised in the previous audit. Further comment is made in the relevant sections of this report.

Subject	Section	Clause	Non-compliance	Status
Relevant information	2.1	11.2	ICP 0000143911UNC1E had consumption during a period which was expected to be inactive, and the status was corrected to active for the affected period during the audit.	Cleared
			ICP 0268714120LCD0A was updated to inactive from 26 February 2021 but should have been inactive from 23	Switched unable to be cleared

Subject	Section	Clause	Non-compliance	Status
			February 2021, and the status date has not been corrected because the ICP switched out.  IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.	Still existing
Changes to registry information	3.3	10 Schedule 11.1	Three late updates to active status for reconnections. Four late updates to inactive status for disconnections.	Still existing
Management of "inactive" status	3.9	19 Schedule 11.1	ICP 0000143911UNC1E had consumption during a period which was expected to be inactive, and the status was corrected to active for the affected period during the audit.	Still existing
Losing trader must provide final information - standard switch	4.3	5 Schedule 11.3	22 E2 breaches.  Five transfer CS files contained some incorrect information.	Still existing
Losing trader provides information - switch move	4.8	10 of schedule 11.3	One AN contained the AA response code but should have had AD.  Two ANs had proposed event dates before the gaining trader's proposed event date.	Still existing
Losing trader must provide final information - switch move	4.10	11 of schedule 11.3	Two E2 breaches.  Five switch move CS files contained some incorrect information.	Still existing
Gaining trader changes to switch meter reading - switch move	4.11	12 Schedule 11.3	Two RR breaches.  The RR for 0000812321TUECE (9 June 2020) was not supported by two actual readings.	Still existing
Withdrawal of switch requests	4.15	17 and 18 Schedule 11.3	Two NA breaches.  Two NWs had the DF reason code applied but should have had CE.	Still existing
Metering information	4.16	21 Schedule 11.3	Three CS files did not contain readings for the end of FOGY's last day of supply.	Still existing
Identification of readings	9.1	3(3) Schedule 15.2	Two CS files had estimated readings classified as actual readings.	Still existing
HHR aggregates	11.4	15.8	HHR aggregates file does not contain electricity supplied information.	Cleared



Subject	Section	Clause	Recommendation	Status
<p>Losing trader must provide final information - standard switch</p>	<p>4.3</p>	<p>CS creation process documentation</p>	<p>Update the CS complete switch process documentation as follows:</p> <p>Average daily consumption should be the average daily consumption between the last two actual readings during FOGY's period of supply. If there are less than two actual readings the incoming CS average daily consumption should be applied.</p> <p>The last actual read date should be the last actual read date during FOGY's period of supply.</p>	<p>Adopted. FOGY's procedure documentation and the SQL query used to generate the information which is manually entered into the registry user interface has been updated.</p>

## 2. OPERATIONAL INFRASTRUCTURE

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

#### Code reference

Clause 10.6, 11.2, 15.2

#### Code related audit information

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

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

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

#### Audit observation

The processes to find and correct incorrect information was examined. The registry validation processes were examined in detail in relation to the achievement of this requirement.

The registry list and AC020 reports were examined to identify any registry discrepancies, and to confirm that information was correct and not misleading.

#### Audit commentary

##### Registry data synchronisation and validation

FOGY uses the registry as the database of record, and updates ICP attributes directly on the registry through the registry user interface. As part of the update process, FOGY checks the change is correct and the registry update is successful. There is no validation between FOGY's records and the registry because the registry is the database of record. Registry information is downloaded as an input into:

- the reconciliation process to ensure that aggregation factors are correctly applied,
- the application process to determine whether an ICP can validly sign up,
- meter changes and removals, and
- other processes as needed.

Registry notification files are not reviewed, and registry acknowledgement files are processed automatically. Any record with an acknowledgement code other than "000" (no error – update was successful) generates an email which is reviewed and actioned by FOGY.

##### Static data accuracy

Static data accuracy was reviewed by checking the AC020 trader compliance report, registry list and a sample of registry updates made by FOGY on the event detail report. The following data inaccuracies were identified which were not corrected as soon as practicable:

Data field	Data inaccuracy	Report section
ANZSIC code	ICP 0438360974LC55A has an incorrect ANZSIC code recorded. 000000 residential was applied but S955 Civic Professional and Other Interest Group Services was expected.	3.6

Data field	Data inaccuracy	Report section
Status event date	ICP 0000063546TR2A9 was disconnected on 12 July 2022 and was originally correctly entered on the registry as inactive from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an inactive record dated 20 June 2022. There is no impact on submission because all consumption is reported regardless of status.	3.3, 3.9

### Read and volume data accuracy

Processes for validation of read and volume data are compliant. Review of a sample data confirmed that errors and meter accuracy issues are being detected and appropriately corrected. The following submission accuracy issues were identified:

- 122 ICPs have distributed generation recorded by the distributor. I checked the HHR aggregates submissions for the 112 ICPs which switched in prior to August 2022 and confirmed that I flow volumes were submitted for 111 of them in August 2022. ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.
- FOGY's services agreement for Metrix, Counties Power and IntelliHUB meters states that "an estimated value may be provided when an actual read is unavailable, and replacement/catch-up data will be provided if/when available." IntelliHUB provides estimates to FOGY where actual data is not available. The IntelliHUB Limited audit report records compliance for the estimation technique and audit trail, but records non-compliance for the provision of complete and accurate information, because IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date. This is non-compliance because more accurate information is available but is not used. This system limitation has been resolved by IntelliHUB since the previous audit and traders can now arrange with IntelliHUB actual data replacements up to 100 days.

Description	Recommendation	Audited party comment	Remedial action
Replacement reading data from IntelliHUB	Arrange for IntelliHUB to provide replacement data if it is obtained within 100 days of the reading date.	FOGY have implemented a full replacement approach with Intellihub. This was implemented at the time MEP Estimates were disabled.  As a secondary check any ICP's with actual reads after Estimates is checked at each revision and where it is believed actual data is available it is requested if not already provided.	Identified

### Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 2.1 With: Clause 11.2</p> <p>From: 01-Sep-21 To: 09-Dec-22</p>	<p>ICP 0438360974LC55A has an incorrect ANZSIC code recorded.</p> <p>ICP 0000063546TR2A9 has an incorrect inactive status event date recorded.</p> <p>ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.</p> <p>IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<p><b>Low</b></p>	<p>Controls are strong overall because a small number of exceptions were identified. The incorrect data is expected to have little to no impact on the reconciliation process. Where submission data is affected, corrected data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Property 0438360974LC55A has been updated to an ANZSIC of S955 Civic Professional and Other Interest Group Services.</p> <p>0000063546TR2A9 meter disconnection job undertaken by MEP on 12/07/2022, however when they got there the site was already disconnected (as confirmed in the MEP paperwork). There was a fire at the property on 20/06/2022 so FOGY believes it was likely that the network safety disconnected that date (especially as readings stopped on that date). As such FOGY updated the disconnection date to 20/06 to more accurately reflect date of disconnection. FOGY does not believe this needs to be adjusted.</p> <p>FOGY is continuing to communicate with Intellihub in order to obtain the missing I flow volume data for ICP 0000509243NR543. FOGY is currently waiting for a response from Intellihub.</p>		<p>15/03/2023</p>	<p>Investigating</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
Instruction manual has been updated to further emphasise that NT files sent for non-residential properties need to have the ANZSIC updated before sending.	31/01/2023	

## 2.2. Provision of information (Clause 15.35)

### Code reference

Clause 15.35

### Code related audit information

*If an obligation exists to provide information in accordance with Part 15, a participant must deliver that information to the required person within the timeframe specified in the Code, or, in the absence of any such timeframe, within any timeframe notified by the Authority. Such information must be delivered in the format determined from time to time by the Authority.*

### Audit observation

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

### Audit commentary

This area is discussed in several sections in this report and compliance is confirmed with regard to timeliness and format of information in accordance with Part 15.

### Audit outcome

Compliant

## 2.3. Data transmission (Clause 20 Schedule 15.2)

### Code reference

Clause 20 Schedule 15.2

### Code related audit information

*Transmissions and transfers of data related to metering information between reconciliation participants or their agents, for the purposes of the Code, must be carried out electronically using systems that ensure the security and integrity of the data transmitted and received.*

### Audit observation

HHR data is collected by MEPs and provided to FOGY by SFTP.

### Audit commentary

HHR data is provided by SFTP which ensures the security and integrity of data. It is imported into FOGY's database on receipt, and the raw files are zipped and archived. To confirm the accuracy of data transfer:

- I traced HHR data and readings from the MEP's source files to FOGY's database for two days for six ICPs which confirmed the volumes and readings were recorded and labelled correctly, and
- I traced one month of HHR data from FOGY's database to the HHR aggregates submission for 14 ICPs, which confirmed that the submissions were consistent with the data in the database.

The sample of ICPs included all MEPs who provide data.

#### **Audit outcome**

Compliant

### 2.4. Audit trails (Clause 21 Schedule 15.2)

#### **Code reference**

*Clause 21 Schedule 15.2*

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

*Each reconciliation participant must ensure that a complete audit trail exists for all data gathering, validation, and processing functions of the reconciliation participant.*

*The audit trail must include details of information:*

- *provided to and received from the registry manager,*
- *provided to and received from the reconciliation manager,*
- *provided and received from other reconciliation participants and their agents.*

*The audit trail must cover all archived data in accordance with clause 18.*

*The logs of communications and processing activities must form part of the audit trail, including if automated processes are in operation.*

*Logs must be printed and filed as hard copy or maintained as data files in a secure form, along with other archived information.*

*The logs must include (at a minimum) the following:*

- *an activity identifier (clause 21(4)(a))*
- *the date and time of the activity (clause 21(4)(b))*
- *the operator identifier for the person who performed the activity (clause 21(4)(c)).*

#### **Audit observation**

A complete audit trail was checked for all data gathering, validation and processing functions. I reviewed audit trails for a small sample of events. Large samples were not necessary because audit trail fields are expected to be the same for every transaction of the same type.

#### **Audit commentary**

If an estimate is conducted and actual data is subsequently provided by the MEP, the original estimated row is labelled as “double” and is ignored for billing and submission. Estimates are identified at trading period and daily level.

Appropriate audit trails are in place for all other activities.

#### **Audit outcome**

Compliant

### 2.5. Retailer responsibility for electricity conveyed - participant obligations (Clause 10.4)

#### **Code reference**

*Clause 10.4*

### Code related audit information

*If a participant must obtain a consumer's consent, approval, or authorisation, the participant must ensure it:*

- *extends to the full term of the arrangement,*
- *covers any participants who may need to rely on that consent.*

### Audit observation

I reviewed the current terms and conditions for all brands supplying ICPs under the FOGY participant code.

### Audit commentary

The terms and conditions for all brands which supplied ICPs during the audit period are compliant with this clause.

### Audit outcome

Compliant

## 2.6. Retailer responsibility for electricity conveyed - access to metering installations (Clause 10.7(2),(4),(5) and (6))

### Code reference

*Clause 10.7(2),(4),(5) and (6)*

### Code related audit information

*The responsible reconciliation participant must, if requested, arrange access for the metering installation to the following parties:*

- *the Authority*
- *an ATH*
- *an auditor*
- *an MEP*
- *a gaining metering equipment provider.*

*The trader must use its best endeavours to provide access:*

- *in accordance with any agreements in place*
- *in a manner and timeframe which is appropriate in the circumstances.*

*If the trader has a consumer, the trader must obtain authorisation from the customer for access to the metering installation, otherwise it must arrange access to the metering installation.*

*The reconciliation participant must provide any necessary facilities, codes, keys or other means to enable the party to obtain access to the metering installation by the most practicable means.*

### Audit observation

I reviewed the current terms and conditions for all brands supplying ICPs under the FOGY participant code.

### Audit commentary

The terms and conditions for all brands which supplied ICPs during the audit period are compliant with this clause. All attempts to access metering during the audit period have been successful.

### Audit outcome

Compliant

## 2.7. Physical location of metering installations (Clause 10.35(1)&(2))

### Code reference

Clause 10.35(1)&(2)

### Code related audit information

*A reconciliation participant responsible for ensuring there is a category 1 metering installation or category 2 metering installation must ensure that the metering installation is located as physically close to a point of connection as practical in the circumstances.*

*A reconciliation participant responsible for ensuring there is a category 3 or higher metering installation must:*

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

### Audit observation

Examination of the registry list confirmed all ICPs have meter category 1 or 2.

### Audit commentary

FOGY is not responsible for any metering installations with loss compensation factors.

### Audit outcome

Compliant

## 2.8. Trader contracts to permit assignment by the Authority (Clause 11.15B)

### Code reference

Clause 11.15B

### Code related audit information

*A trader must at all times ensure that the terms of each contract between a customer and a trader permit:*

- the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and*
- the terms of the assigned contract to be amended on such an assignment to—*
- the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or*
- such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and*
- the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and*
- the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and*
- the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).*



*The terms specified in subclause (1) must be expressed to be for the benefit of the Authority for the purposes of the Contracts (Privacy) Act 1982, and not be able to be amended without the consent of the Authority (clause 11.15B(2)).*

#### **Audit observation**

I reviewed the current terms and conditions for all brands supplying ICPs under the FOGY participant code.

#### **Audit commentary**

The terms and conditions for all brands which supplied ICPs during the audit period are compliant with this clause.

#### **Audit outcome**

Compliant

### **2.9. Connection of an ICP (Clause 10.32)**

#### **Code reference**

*Clause 10.32*

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

*A reconciliation participant must only request the connection of a point of connection if they:*

- *accept responsibility for their obligations in Parts 10, 11 and 15 for the point of connection; and*
- *have an arrangement with an MEP to provide 1 or more metering installations for the point of connection.*

#### **Audit observation**

FOGY does not deal with new connections. Examination of the AC020 and event detail reports confirmed that no new connections have occurred during the audit period.

#### **Audit commentary**

No new connections have occurred. All ICPs are metered, with an MEP recorded and metering category 1 or 2.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.33(1)*

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

*A trader may temporarily electrically connect a point of connection, or authorise a MEP to temporarily electrically connect a point of connection, only if:*

- *for a point of connection to the grid – the grid owner has approved the connection,*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*

- *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection,*
- *if the ICP has metered load, 1 or more certified metering installations are in place,*
- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

#### **Audit observation**

FOGY does not deal with new connections. Examination of the AC020 and event detail reports confirmed that no new connections have occurred during the audit period.

#### **Audit commentary**

No new connections have occurred.

#### **Audit outcome**

Compliant

### 2.11. Electrical Connection of Point of Connection (Clause 10.33A)

#### **Code reference**

*Clause 10.33A(1)*

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

*A reconciliation participant may electrically connect or authorise the electrical connection of a point of connection only if:*

- *for a point of connection to the grid – the grid owner has approved the connection,*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
  - *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within two business days of electrical connection,*
  - *if the ICP has metered load, 1 or more certified metering installations are in place,*
  - *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the electrical connection.*

#### **Audit observation**

The registry list and audit compliance reports were examined to determine compliance.

#### **Audit commentary**

All active ICPs have an MEP recorded and metering installed, and no new connections have occurred.

Quarterly, FOGY checks for ICPs with meter certifications which are close to expiring and advises the MEP. FOGY's reconnection policy does not include a check that the meter was certified, and until recently FOGY did not allow ICPs with disconnected meters to switch in. ICP 0000022928TR8FB was recorded as having expired meter certification when it was reconnected on 30 August 2022.

Description	Recommendation	Audited party comment	Remedial action
Check meter certification when arranging meter reconnections	If a meter requiring reconnection does not have current meter certification, attempt to arrange re-certification with the MEP.	FOGY will check meter certification when arranging meter reconnections in future. Training manuals have been updated.	Identified

Five meters were bridged during the audit period. One ICP was confirmed not to be in use and the other four ICPs had their meters recertified on un-bridging.

#### Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A  From: 30-Aug-22 To: 30-Aug-22	One reconnection was not certified within five business days.  Potential impact: None  Actual impact: None  Audit history: None  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as there is not currently a process to ensure that ICPs are certified on reconnection, but there are quarterly processes to check certification is current for all ICPs.  The audit risk is low as only one ICP was affected by the non-compliance.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY has raised a meter recertification SR with the meter company for ICP 0000022928TR8FB in order to resolve this issue.	10/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will check meter certification when arranging meter reconnections in future. Training manuals have been updated to emphasise this point more clearly.	10/02/2023	

## 2.12. Arrangements for line function services (Clause 11.16)

### Code reference

Clause 11.16

### Code related audit information

*Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must ensure that it, or its customer, has made any necessary arrangements for the provision of line function services in relation to the relevant ICP.*

*Before providing the registry manager with any information in accordance with clause 11.7(2) or clause 11.18(4), a trader must have entered into an arrangement with an MEP for each metering installation at the ICP.*

### Audit observation

I checked that use of system agreements or arrangements were in place with the relevant distributors.

### Audit commentary

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs connected to networks or with MEPs where no trading arrangements are in place are declined.

FOGY began trading on the LINE, TASM, MARK, CHBP and WAIK networks during the audit period. Arrangements are in place with all relevant networks.

### Audit outcome

Compliant

## 2.13. Arrangements for metering equipment provision (Clause 10.36)

### Code reference

*Clause 10.36*

### Code related audit information

*A reconciliation participant must ensure it has an arrangement with the relevant MEP prior to accepting responsibility for an installation.*

### Audit observation

I checked that agreements or arrangements were in place with the relevant MEPs.

### Audit commentary

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs connected with MEPs where no trading arrangements are in place are declined.

FOGY began supplying ICPs with FCLM as MEP during the audit period. FOGY has arrangements in place with all relevant MEPs.

### Audit outcome

Compliant

## 2.14. Connecting ICPs then withdrawing switch (Clause 10.33A(5))

### Code reference

*Clause 10.33B*

### Code related audit information

*If a trader connects an ICP it is in the process of switching and the switch does not proceed or is withdrawn the trader must:*

- *restore the disconnection, including removing any bypass and disconnecting using the same method the losing trader used,*
- *reimburse the losing trader for any direct costs incurred.*

### Audit observation

The process for reconnecting ICPs during switch in was examined. Traders are only able to update ICP status for event dates where they are responsible for the ICP on the registry.

### Audit commentary

If an ICP was reconnected as part of the switching process and the switch was later withdrawn, FOGY would restore the disconnection and reimburse the losing trader for any direct costs incurred if requested.

I checked all ICPs which were reconnected and underwent withdrawals during the audit period and confirmed the reconnection occurred within FOGY's period of supply.

### Audit outcome

Compliant

## 2.15. Electrical disconnection of ICPs (Clause 10.33B)

### Code reference

*Clause 10.33B*

### Code related audit information

*Unless the trader is recorded in the registry or is meeting its obligation under 10.33A(5) it must not disconnect or electrically disconnect the ICP or authorise the metering equipment provider to disconnect or electrically disconnect the ICP.*

### Audit observation

The disconnection process was examined. Traders are only able to update ICP status for event dates where they are responsible for the ICP on the registry.

### Audit commentary

FOGY's policy is not to disconnect any ICP in the process of switching out.

### Audit outcome

Compliant

## 2.16. Removal or breakage of seals (Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7)

### Code reference

*Clause 48(1C), 48 (1D), 48 (1E), 48 (1F) of Schedule 10.7*

### Code related audit information

*A trader can remove or break a seal without authorisation from the MEP to:*

- *reset a load control switch, bridge or un-bridge a load control switch – if the load control switch does not control a tome block meter channel,*
- *electrically connect load or generation, of the load or generation has been disconnected at the meter,*
- *electrically disconnect load or generation, if the trader has exhausted all other appropriate methods of electrical disconnection,*
- *bridge the meter.*

*A trader that removes or breaks a seal in this way 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,*
- *update the registry (if the profile code has changed)*
- *notify the metering equipment provider.*

#### **Audit observation**

Policies and processes for removal and breakage of seals were reviewed. I checked ICPs where work had been conducted which could have resulted in seals being removed or broken, to determine compliance.

#### **Audit commentary**

All activities which could result in seals being removed or broken are usually completed by the MEP or their subcontractors. The MEPs are required to ensure that only qualified personnel perform work and manage and trace seals.

FOGY receives work completion paperwork from the MEPs and uses this information to confirm the correct ICP attributes including status and update the registry. The MEPs do not usually provide details of seals in their job completion paperwork.

Where seals have been removed or broken by a party which is not the MEP (such as a distributor or electrician completing a safety disconnection) a job is raised for the MEP to check and reseal the meter. I saw an example of a reseal and certify job during the audit.

I checked ICPs where work had been conducted which could have resulted in seals being removed or broken:

- disconnections and reconnections were mainly conducted remotely, and where seals were removed or broken FOGY confirmed that the MEP had been notified if the disconnection or reconnection was at the meter,
- where distributed generation is added I flow metering installed by the MEP, and
- the MEP was notified of all bridged meters.

#### **Audit outcome**

Compliant

### 2.17. Meter bridging (Clause 10.33C and 2A of Schedule 15.2)

#### **Code reference**

*Clause 10.33C and 2A of Schedule 15.2*

### Code related audit information

A trader, or a distributor or MEP which has been authorised by the trader, may only electrically connect an ICP in a way that bypasses a meter that is in place (“bridging”) 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 trader bridges a meter, the trader must:

- determine the quantity of electricity conveyed through the ICP for the period of time the meter was bridged,
- submit that estimated quantity of electricity to the reconciliation manager,
- within one business day of being advised that the meter is bridged, notify the MEP that they are required to reinstate the meter so that all electricity flows through a certified metering installation.

The trader must determine meter readings as follows:

- by substituting data from an installed check meter or data storage device
- if a check meter or data storage device is not installed, by using half hour data from another period where the trader considers the pattern of consumption is materially similar to the period during which the meter was bridged,
- if half hour data is not available, a non-half hour estimated reading that the trader considers is the best estimate during the bridging period must be used.

### Audit observation

Processes for bridged meters were reviewed, and events that could have resulted in meter bridging or been caused by meter bridging were reviewed.

### Audit commentary

FOGY only supplies HHR meters, which are usually disconnected and reconnected remotely. FOGY does not normally allow meters to be bridged. Meters are only bridged under extreme circumstances, such as power restoration following flooding.

Five bridged meters were identified during the audit period, all were bridged to allow the electricity to be connected after hours to prevent customer hardship. Two of the ICPs had a bridged relay and all consumption was confirmed to be recorded by the meter, and one meter was confirmed to not be in use. The other two ICPs had volume corrections processed.

### Audit outcome

Compliant

## 2.18. Use of ICP identifiers on invoices (Clause 11.30)

### Code reference

Clause 11.30

### Code related audit information

Each trader must ensure the relevant ICP identifier is printed on every invoice or document relating to the sale of electricity.

### Audit observation

The process to ensure that the ICP identifier is printed on every invoice or document relating to the sale of electricity was checked, including reviewing invoices for all brands supplying ICPs under the FOGY participant code.

### Audit commentary

FOGY's billing run information is used to populate an invoice template, and the invoice details are stored against each ICP and customer so that invoices can be reproduced if needed. I viewed invoices for each brand which supplied ICPs during the audit period and confirmed that the ICP number is displayed.

### Audit outcome

Compliant

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

### Code reference

*Clause 11.30A*

### Code related audit information

*A retailer 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 retailer and consumer, the retailer needs to provide this information in at least one communication in that series.*

### Audit observation

The process to ensure that information on Utilities Disputes is provided to customers was reviewed for all brands supplying ICPs under the FOGY participant code.

### Audit commentary

Information on Utilities Disputes is provided for all brands:

- on invoices and outbound communications relating to invoices,
- on outbound written communications in relation to enquiries and complaints,
- on their websites, and
- in their terms and conditions.

Each brand's terms and conditions state that they do not have a call centre and that email is the primary form of contact between the customer and retailer.

### Audit outcome

Compliant

## 2.20. Provision of information on electricity plan comparison site (Clause 11.30B)

### Code reference

*Clause 11.30B*



### Code related audit information

*A retailer that trades at an ICP recorded on the registry must provide clear and prominent information about Powerswitch:*

- *on their website*
- *in outbound communications to residential consumers about price and service changes*
- *to residential consumers on an annual basis*
- *in directed outbound communications about the consumer's bill.*

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

### Audit observation

The process to ensure that information on Powerswitch is provided to customers was reviewed for all brands supplying ICPs under the FOGY participant code.

### Audit commentary

Information on Powerswitch is provided:

- in outbound communications about price and service changes,
- in outbound communications about customer billing,
- on their websites, and
- via email on 1 April of each year.

### Audit outcome

Compliant

### 3. MAINTAINING REGISTRY INFORMATION

#### 3.1. Obtaining ICP identifiers (Clause 11.3)

##### Code reference

Clause 11.3

##### Code related audit information

*The following participants must, before assuming responsibility for certain points of connection on a local network or embedded network, obtain an ICP identifier for the point of connection:*

- a) a trader who has agreed to purchase electricity from an embedded generator or sell electricity to a consumer,*
- b) an embedded generator who sells electricity directly to the clearing manager*
- c) a direct purchaser connected to a local network or an embedded network,*
- d) an embedded network owner in relation to a point of connection on an embedded network that is settled by differencing,*
- e) a network owner in relation to a shared unmetered load point of connection to the network owner's network*
- f) a network owner in relation to a point of connection between the network owner's network and an embedded network.*

*ICP identifiers must be obtained for points of connection at which any of the following occur:*

- a consumer purchases electricity from a trader 11.3(3)(a)*
- a trader purchases electricity from an embedded generator 11.3(3)(b)*
- a direct purchaser purchases electricity from the clearing manager 11.3(3)(c)*
- an embedded generator sells electricity directly to the clearing manager 11.3(3)(d)*
- a network is settled by differencing 11.3(3)(e)*
- there is a distributor status ICP on the parent network point of connection of an embedded network or at the point of connection of shared unmetered load 11.3(3)(f).*

##### Audit observation

FOGY does not deal with new connections. Examination of the AC020 and event detail reports confirmed that no new connections have occurred during the audit period.

##### Audit commentary

No new connections have occurred.

##### Audit outcome

Compliant

#### 3.2. Providing registry information (Clause 11.7(2))

##### Code reference

Clause 11.7(2)

##### Code related audit information

*Each trader must provide information to the registry manager about each ICP at which it trades electricity in accordance with Schedule 11.1.*

##### Audit observation

The registry update process was reviewed. The registry list and audit compliance reports were examined to confirm process compliance.

### Audit commentary

FOGY currently populates the registry manually and does not deal with new connections. The timeliness and accuracy of registry updates is assessed in **sections 3.3, 3.8 and 3.9**.

### Audit outcome

Compliant

## 3.3. Changes to registry information (Clause 10 Schedule 11.1)

### Code reference

Clause 10 Schedule 11.1

### Code related audit information

*If information provided by a trader to the registry manager about an ICP changes, the trader must provide written notice to the registry manager of the change no later than 5 business days after the change.*

### Audit observation

The process to manage status changes is discussed in detail in **sections 3.8 and 3.9** below. The process to manage MEP nominations and trader updates was reviewed.

The registry list and audit compliance reports were examined and a sample of late status updates, trader updates and MEP nominations were checked as described in the audit commentary.

### Audit commentary

#### Status updates

Status updates are completed manually using the registry user interface. The timeliness of status updates is set out on the table below.

Event	Year	ICPs notified greater than 5 days	Average notification days	Percentage compliant
Reconnections	2020	2	23.33	33.3%
	2021	3	3.21	78.57%
	<b>2022</b>	<b>9</b>	<b>1.87</b>	<b>92.91%</b>
Disconnections	2020	1	8	0%
	2021	4	3.89	91.30%
	<b>2022</b>	<b>5</b>	<b>1.99</b>	<b>98.05%</b>

All late status updates for disconnections and reconnections were caused by:

- backdated switches and withdrawals,
- late notice of disconnection,
- late notice of a required update from inactive to inactive ready for decommissioning status at the network's request,
- delays in completing manual checks to identify ICPs requiring updates, which were completed one to five business days late, and

- delays in identifying a reconnection completed by another trader prior to switch in.

One disconnection update was not genuinely late but appeared so because an incorrect disconnection date was entered. ICP 0000063546TR2A9 was disconnected on 12 July 2022 and was originally entered on the registry as inactive from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an inactive record dated 20 June 2022. The incorrect status date is recorded as non-compliance in **sections 2.1** and **3.9**.

The reconnection updates were accurate, and where the ICP was reconnected by another trader prior to switching in FOGY made the ICP active from the switch in date.

### Trader updates

Trader updates including MEP nominations are completed manually using the registry user interface. The timeliness of trader updates is set out on the table below.

Event	Year	ICPs notified greater than 5 days	Average notification days	Percentage compliant
Trader updates	2020	N/A	N/A	N/A
	2021	0	0.00	100.00%
	<b>2022</b>	<b>4</b>	<b>5.76</b>	<b>76.47%</b>

All of the late updates were MEP nominations and were delayed by late notice from the MEP that a meter change was to occur or being unable to process an MEP nomination until other events were reversed. The MEP nominations checked were accurate.

One ANZSIC code update was made more than 20 business days after FOGY began trading at the ICP, because the CS file was backdated.

### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 10-Nov-21 To: 23-Sep-22	Nine late updates to active status for reconnections. Four late updates to inactive status for disconnections. Four late trader updates. One ANZSIC code update was made more than 20 business days after FOGY began trading at the ICP. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because a small number and proportion of updates were late. In most cases the late updates were caused by late notice of the required change by another party.</p> <p>The audit risk rating is low because the impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All Updates had been made prior to Audit. Additional notes made about follow-up timeframes		31/01/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Further care will be taken to ensure reconnection/disconnection tickets are checked daily and updated as soon as job confirmation is received.		31/01/2023	

### 3.4. Trader responsibility for an ICP (Clause 11.18)

#### Code reference

Clause 11.18

#### Code related audit information

A trader becomes responsible for an ICP when the trader is recorded in the registry as being responsible for the ICP.

A trader ceases to be responsible for an ICP if:

- another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or
- the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).
- if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):
  - o arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and
  - o advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).

A trader who is responsible for an ICP (excluding UML) must ensure that an MEP is recorded in the registry for that ICP (clause 11.18(4)).

A trader must not trade at an ICP (excluding UML) unless an MEP is recorded in the registry for that ICP (clause 11.18(5)).

#### Audit observation

FOGY does not deal with new connections. Examination of the AC020 and event detail reports confirmed that no new connections have occurred.

The MEP nomination and decommissioning processes were reviewed, and the registry list and audit compliance reports were examined to confirm process compliance. MEP nominations and decommissioned ICPs were examined.

### Audit commentary

#### Retailers responsibility to nominate and record a MEP in the registry

All ICPs supplied by FOGY are metered and have an MEP recorded in the registry. No new connections were completed, and all 17 MEP nominations made during the audit period were accepted. MEP nominations and rejections are handled manually.

#### Decommissioning

Final interrogations will occur for decommissioned ICPs because data is provided daily. Six ICPs were decommissioned during the audit period, and FOGY met the requirement to obtain a final reading and notify the MEP.

### Audit outcome

Compliant

## 3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)

### Code reference

Clause 9 Schedule 11.1

### Code related audit information

Each trader must provide the following information to the registry manager for each ICP for which it is recorded in the registry as having responsibility:

- a) the participant identifier of the trader, as approved by the Authority (clause 9(1)(a))
- b) the profile code for each profile at that ICP, as approved by the Authority (clause 9(1)(b))
- c) the metering equipment provider for each category 1 metering or higher (clause 9(1)(c))
- d) the type of submission information the trader will provide to the RM for the ICP (clause 9(1)(ea))
- e) if a settlement type of UNM is assigned to that ICP, either:
  - the code ENG if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or
  - in all other cases, the daily average kWh of unmetered load at the ICP (clause 9(1)(f)(ii)).
  - the type and capacity of any unmetered load at each ICP (clause 9(1)(g))
  - the status of the ICP, as defined in clauses 12 to 20 (clause 9(1)(j))
  - except if the ICP exists for the purposes of reconciling an embedded network or the ICP has distributor status, the trader must provide the relevant business classification code applicable to the customer (clause 9(1)(k)).

The trader must provide information specified in (a) to (j) above within 5 business days of trading (clause 9(2)).

The trader must provide information specified in 9(1)(k) no later than 20 business days of trading (clause 9(3))

### Audit observation

FOGY does not deal with new connections. Examination of the AC020 and event detail reports confirmed that no new connections have occurred.

### Audit commentary

No new connections have occurred, and no data discrepancies relating to new connection information were present.

### Audit outcome

Compliant

## 3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1)

### Code reference

Clause 9 (1(k) of Schedule 11.1

### Code related audit information

Traders are responsible to populate the relevant ANZSIC code for all ICPs for which they are responsible.

### Audit observation

FOGY only supplies ICPs with residential ANZSIC codes. The registry list and ACO20 reports were reviewed and ANZSIC codes were checked for a sample of ICPs to determine compliance.

### Audit commentary

All FOGY ICPs are residential with metering category 1 or 2 and have residential ANZSIC codes recorded.

FOGY normally only accepts residential ICPs, and ICPs with non-residential ANZSIC codes are declined during the application process. If FOGY decides to switch in a non-residential ICP they can allow acceptance by making the ICP details fit FOGY's criteria, and then correcting the changed ICP details once the switch is complete.

I checked a random sample of 25 category 1 ICPs, and the only category 2 ICP against google street view and registry information to determine whether the correct ANZSIC code was applied. The sample checked were correct apart from ICP 0438360974LC55A, which is a marae but was recorded as 000000 residential. The previous trader had recorded ANZSIC S955 Civic Professional and Other Interest Group Services, which appears reasonable.

### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.6 With: Clause 9 (1(k) of Schedule 11.1  From: 18-Mar-22 To: 09-Dec-22	ICP 0438360974LC55A had an incorrect ANZSIC code recorded. 000000 residential was applied but S955 Civic Professional and Other Interest Group Services was expected.  Potential impact: None  Actual impact: None  Audit history: None  Controls: Strong  Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are strong overall. Almost all ICPs have residential ANZSIC codes correctly recorded and there is a process to ensure correct ANZSIC codes are recorded for non-residential ICPs. This appears to be an isolated exception.</p> <p>The audit risk rating is assessed to be low as this field is a static data table and has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Property 0438360974LC55A has been updated to an ANZSIC of S955 Civic Professional and Other Interest Group Services.		09/02/2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Instruction manual has been updated to further emphasise that NT files sent for non-residential properties that have failed normal signup criteria, but have been whitelisted to allow signup need to have the ANZSIC updated before sending.		09/02/2023	

### 3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)

#### Code reference

*Clause 9(1)(f) of Schedule 11.1*

#### Code related audit information

*if a settlement type of UNM is assigned to that ICP, the trader must populate:*

*the code ENG - if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*

*the daily average kWh of unmetered load at the ICP - in all other cases (clause 9(1)(f)(ii)).*

#### Audit observation

Review of the registry list with history and AC020 reports confirmed that no ICPs with unmetered load have been supplied, and there were no unmetered load discrepancies.

#### Audit commentary

No ICPs with unmetered load have been supplied, and FOGY does not intend to supply unmetered load.

The systems API (application program interface) retrieves registry information as part of the application process to determine whether the ICP meets FOGY's sign-up criteria. Applications for ICPs with unmetered load are declined.

Pre-submission checks will identify ICPs where the distributor unmetered load details, shared ICP, daily unmetered kWh, or trader unmetered load details are not null, or the unmetered flag is yes. The checks are completed following import of registry list data used to determine aggregation factors for submission.

#### Audit outcome

Compliant



### 3.8. Management of “active” status (Clause 17 Schedule 11.1)

#### Code reference

Clause 17 Schedule 11.1

#### Code related audit information

The ICP status of “active” is managed by the relevant trader and indicates that:

- the associated electrical installations are electrically connected (clause 17(1)(a))
- the trader must provide information related to the ICP in accordance with Part 15, to the reconciliation manager for the purpose of compiling reconciliation information (clause 17(1)(b)).

Before an ICP is given the “active” status, the trader must ensure that:

- the ICP has only one customer, embedded generator, or direct purchaser (clause 17(2)(a))
- the electricity consumed is quantified by a metering installation or a method of calculation approved by the Authority (clause 17(2)(b)).

#### Audit observation

FOGY does not deal with new connections. Examination of the AC020 and event detail reports confirmed that no new connections have occurred.

The timeliness of data for reconnections is assessed in **section 3.3**, and a sample of 10 active status updates were checked for accuracy.

#### Audit commentary

Reconnection and registry population processes are manual. Active status updates are processed once FOGY has received written confirmation of the reconnection from the MEP.

All active ICPs have metering installed and only have one customer. Submission occurs for all ICPs regardless of status, to ensure all consumption information is captured.

No new connections have occurred, and no data discrepancies relating to new connection information were present. I checked a sample of ten reconnections and confirmed that they were processed accurately.

#### Audit outcome

Compliant

### 3.9. Management of “inactive” status (Clause 19 Schedule 11.1)

#### Code reference

Clause 19 Schedule 11.1

#### Code related audit information

The ICP status of “inactive” must be managed by the relevant trader and indicates that:

- electricity cannot flow at that ICP (clause 19(a)); or
- submission information related to the ICP is not required by the reconciliation manager for the purpose of compiling reconciliation information (clause 19(b)).

#### Audit observation

The disconnection process was examined using the AC020 and event detail reports. The timeliness of data for disconnections is assessed in **section 3.3**, and a sample of updates were checked for accuracy.

#### Audit commentary

### Inactive status updates

Disconnection and registry population processes are manual. Inactive status updates are processed once FOGY has received written confirmation of the disconnection from the MEP.

FOGY does not complete new connections, and no ICPs are at “inactive - new connection in progress” status. No ICPs with the AMI flag set to no had the “electrically disconnected remotely by AMI meter” status reason code applied.

I checked a sample of 12 inactive status updates including at least three (or all) active updates to each inactive status. The updates were processed with the correct status and event date apart from ICP 000063546TR2A9 was disconnected on 12 July 2022 and was originally entered on the registry as inactive from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an inactive record dated 20 June 2022. This is recorded as non-compliance below.

### Inactive ICPs with consumption

All consumption is reported for reconciliation regardless of the ICP’s status. A weekly check of ICPs with inactive status and non-zero consumption is conducted, and it is intended that ICPs will be moved to active status as necessary.

I checked all 145 ICPs which had consumption during periods with inactive status.

136 ICPs had consumption on the disconnection or reconnection date only, or the ICP status was returned to active prior to the audit.

Nine ICPs remained inactive for the period of consumption, and I confirmed that volumes during the inactive period were submitted for the seven ICPs where I received data for the affected submission periods. For all seven ICPs, switches were initiated by other traders, and it is possible that the other traders reconnected the ICPs during FOGY’s period of supply. FOGY is investigating each of the ICPs to confirm the correct active status dates and will process status corrections as required.

ICP	Disconnection date	Reconnection date	Switch out date	Non-zero consumption recorded between disconnection and reconnection dates
0000162652HBF16	19 September 2022 (switched in with inactive status)	20 October 2022 by gaining trader.	NT issued but the switch was withdrawn.	22 September 2022 to 10 October 2022.
0000502587NR344	29 March 2022 (switched in with inactive status)	-	20 June 2022	31 March 2022 to 19 June 2022.
0000670816TUCFC	16 November 2021	-	15 December 2021	16 November 2021 to 14 December 2021.
0000974411TU5CO	5 April 2022	-	-	5 April 2022 to 21 June 2022.
0100578446LCBA3	20 September 2022	-	7 October 2022	20 September 2022 to 25 September 2022.
0395721083LCCAF	1 December 2021	-	27 December 2021	1 December 2021 to 26 December 2021.

ICP	Disconnection date	Reconnection date	Switch out date	Non-zero consumption recorded between disconnection and reconnection dates
0476945267LCD1E	26 July 2022	-	24 August 2021	26 July 2022 to 22 August 2022.
1001156046CK19F	13 October 2021	-	15 February 2022	13 October 2021 to 14 February 2022.

Description	Recommendation	Audited party comment	Remedial action
Inactive ICPs with consumption	Check ICPs 0000162652HBF16, 0000502587NR344, 0000670816TUCFC, 0000974411TU5CO, 0100578446LCBA3, 0395721083LCCAF, 0476945267LCD1E and 1001156046CK19F to confirm the correct active status periods and process registry updates as necessary.	<p>0000162652HBF16 signed up to FOGY on 19/09/2022. FOGY did not reconnect the property and so the status on the registry did not change. On 10/10/2022 it was confirmed by MEP that CTCT reconnected on the 21/09/2022 through a contractor reconnection. A switch process to CTCT was started but they did not complete it and did not return the property back to a disconnected state which is a breach. On 10/10/2022 as part of our checks we recognised that the property was using power. FOGY then disconnected the property on 11/10/2022 to return it to its intended disconnected state. FOGY will update the registry to active in future when we confirm that a different retailer has reconnected and not returned to a disconnected state – which is a breach.</p> <p>0000502587NR344 property was reconnected by WISE before switch completed and WISE failed to update the registry before switching. FOGY will implement checks in future to make sure that the registry is updated when other retailers fail to do so.</p> <p>0000670816TUCFC was disconnected by us for non-payment on 16/11/2022. MEP confirmed that site was reconnected by Electric Kiwi on the 16<sup>th</sup> of November when no switch was in progress – which is breach by the meter company. ELKI never returned the ICP to a disconnected state and FOGY followed up ELKI about sending a switch but they never did. Property was eventually switched to GBUG. FOGY is unable to update registry to reflect prior status changes. FOGY will update the registry to active in future when we confirm that a different retailer has reconnected and not returned to a</p>	Identified

Description	Recommendation	Audited party comment	Remedial action
		<p>disconnected state – which is a breach.</p> <p>0000974411TU5C0 registry date is accurate and property remained disconnected from 05/04/2022. MEP confirmed the following: 'I can see that the ICP is inactive in the registry from the 11/04/2022 and can also confirm that the 10/04 was the last day that we had a communicating read in our system. As the meter wasn't removed in our system, only disconnected, the read data would begin to estimate based off previous data – resulting in the slight increase each in kWh day. We will turn this off on our end so that you do not receive the estimated data'. FOGY advises that our actions were correct and that no resolution is needed on our end. Appearance of usage is due to error with Intellihub's systems.</p> <p>0100578446LCBA3 was manually disconnected on 20/09/2022. Intellihub estimated consumption from the meter for the period 20/09 - 25/09. There was no consumption as was indicated for the actual reads from 25/09 onwards. ICP was inactive and no consumption at property. Intellihub's estimation system only made it appear as if there was consumption. There was no error on FOGY's behalf here.</p> <p>0395721083LCCAF was disconnected 01/12/2021. FOGY did not reconnect – a different retailer will have. Property was switched to CTCT on 27/12/2022. Looks as if there was consumption as of 24/12/2022. Property was not in switch on the registry so it should not have been reconnected by meter company – this is a breach.</p> <p>0476945267LCD1E was disconnected 26/07 and remained disconnected. Apparent consumption is as a result of meter company estimation in system. There was no reconnection and ICP was still disconnected.</p> <p>1001156046CK19F has an open breach case against GBUG with EA at the moment. FOGY disconnected the property multiple times and GBUG reconnected multiple times without ever completing the switch. The property should never have been reconnected and GBUG should have returned the property to a disconnected state upon not completing the switch. FOGY will update the registry to reflect other retailer reconnections in future.</p>	

Description	Recommendation	Audited party comment	Remedial action
		However it was a breach for GBUG to keep reconnecting without completing switch.	
Review of ICPs with inactive consumption	Not all ICPs appear to be investigated and actioned during the weekly checks of inactive consumption, and I recommend that the weekly checks are more thorough, with status updates made where necessary.	<p>All of the above ICP queries were caused by other retailers reconnecting and then not completing the switches.</p> <p>Some of these were not picked up in weekly checks as the meter was in a non-communicating state for a period, so data was not available to identify these had been reconnected.</p> <p>FOGY will continue to check weekly for consumption on disconnected sites, and where required organize a follow-up disconnection when switch not completed by retailer that livened.</p> <p>FOGY by default submits our data for both active and inactive sites to the market, so there is no impact on the market if these do remain in-active while identifying why it was reconnected.</p> <p>FOGY will continue to request the reconnecting Retailer to either complete the switch or restore it to the original disconnected state.</p> <p>And where applicable will update the registry to Active once other options are exhausted</p>	[auditor comment]

**Vacant ICPs with consumption**

I checked all 186 ICPs with vacant consumption during the audit period, and found the vacant consumption was submitted for reconciliation.

**Audit outcome**

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 20-Jun-22</p> <p>To: 12-Jul-22</p>	<p>ICP 0000063546TR2A9 was disconnected on 12 July 2022 and was originally correctly entered on the registry as inactive from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an inactive record dated 20 June 2022.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p><b>Low</b></p>	<p>Controls are moderate overall. There are processes in place to ensure that status updates are correct and inactive consumption is identified, however, inactive consumption is not always investigated on a timely basis.</p> <p>The impact is low because inactive consumption is submitted. The incorrect status date for ICP 0000063546TR2A9 does not impact on submission, because all volumes are submitted regardless of status.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>0000063546TR2A9 meter disconnection job undertaken by MEP on 12/07/2022, however when they got there the site was already disconnected (as confirmed in the MEP paperwork). There was a fire at the property on 20/06/2022 so FOGY believes it was likely that the network safety disconnected that date (especially as readings stopped on that date). As such FOGY updated the disconnection date to 20/06 to more accurately reflect date of disconnection.</p>		<p>07/02/2023</p>	<p>Cleared</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Current Process cover this and Updates and corrections will always be made after the case is investigated and suitable information to support any changes is available</p>		<p>07/02/2023</p>	

### 3.10. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)

#### Code reference

Clause 15 Schedule 11.1

#### Code related audit information

*If an ICP has had the status of "New" or "Ready" for 24 calendar months or more, the distributor must ask the trader whether it should continue to have that status and must decommission the ICP if the trader advises the ICP should not continue to have that status.*

#### Audit observation

FOGY does not deal with new connections. Examination of the registry list, AC020 and event detail reports confirmed that no new connections have occurred, and no ICPs are at "new" or "ready" status.

#### Audit commentary

No new connections occurred during the audit period, and there are no ICPs with a status of "new" or "ready" where FOGY is the proposed trader.

#### Audit outcome

Compliant

## 4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

### 4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)

#### Code reference

Clause 2 Schedule 11.3

#### Code related audit information

*The standard switch process applies where a trader and a customer or embedded generator enters into an arrangement in which the trader commences trading electricity with the customer or embedded generator at a non-half hour or unmetered ICP at which another trader supplies electricity, or the trader assumes responsibility for such an ICP.*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of a switch no later than two business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and one or more profile codes associated with that ICP.*

#### Audit observation

The switch gain process was examined to determine when FOGY deem all conditions to be met. A typical sample of NTs were checked to confirm that these were notified to the registry within two business days, and that the correct switch type was selected.

#### Audit commentary

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

Transfer switch type is applied where a customer is transferring between retailers at an address. This information is collected as part of the customer application process, by asking whether the customer is "paying bills to another retailer for this property" or is "moving in and/or have not paid bills to another retailer for this property".

I checked the metering category for the 3,152 transfer switch ICPs where this information was available on the PR255 report and found none had metering categories of three or above. I checked the five most backdated NTs and found the NTs were issued on time, and the correct switch type was selected.

#### Audit outcome

Compliant

### 4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)

#### Code reference

Clauses 3 and 4 Schedule 11.3

#### Code related audit information

*Within three business days after receiving notice of a switch from the registry manager, the losing trader must establish a proposed event date. The event date must be no more than 10 business days after the*



date of receipt of such notification, and in any 12-month period, at least 50% of the event dates must be no more than five business days after the date of notification. The losing trader must then:

- provide acknowledgement of the switch request by (clause 3(a) of Schedule 11.3):
- providing the proposed event date to the registry manager and a valid switch response code (clause 3(a)(i) and (ii) of Schedule 11.3); or
- providing a request for withdrawal of the switch in accordance with clause 17 (clause 3(c) of Schedule 11.3).

When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice from the registry manager under clause 22(a) the losing trader had been responsible for less than 2 months.

#### Audit observation

The event detail report was reviewed to:

- identify AN files issued by FOGY during the audit period,
- assess compliance with the requirement to meet the setting of event dates requirement, and
- a diverse sample ANs were checked to determine whether the codes had been correctly applied.

The switch breach history report was examined for the audit period.

#### Audit commentary

AN files are created manually using the registry user interface, and timeliness is monitored using the switch breach report. AN response codes were checked:

- two ICPs had the AA (acknowledge and accept) code correctly applied,
- 449 ICPs had the AD (advanced metering) code; 448 had advanced metering at the time the file was issued, but 0002938685WAACA had the AMI flag set to no so AA should have been applied, and
- one ICP had the OC (occupied premises) code correctly applied.

The event detail report was reviewed to assess compliance with the setting of event date requirements:

- 442 ANs (97.8%) had proposed event dates within five business days of the NT arrival date, and
- all 452 ANs had proposed event dates within ten business days of the NT arrival date.

The switch breach report did not record any AN breaches.

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 18-Jul-22 To: 18-Jul-22	One AN had an incorrect response code applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong. Although the files are created manually, only one (0.1%) of the 869 transfer and switch move AN files checked had an incorrect response code. The ICP had previously had an advanced meter and the flag was changed to N the month before it switched out.</p> <p>The impact is assessed to be low, as the MEP had the correct metering information populated on the registry.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No actions have been taken to remediate the CS sent with incorrect response code as the meter is now listed as AMI Comm.		09/02/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We've updated our instruction manual for AN processes to say when AA response codes should be sent so we will not make this mistake again.		09/02/2023	

#### 4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)

##### Code reference

Clause 5 Schedule 11.3

##### Code related audit information

If the losing trader provides information to the registry manager in accordance with clause 3(a) of Schedule 11.3 with the required information, no later than five business days after the event date, the losing trader must complete the switch by:

- providing event date to the registry manager (clause 5(a)); and
- provide to the gaining trader a switch event meter reading as at the event date, for each meter or data storage device that is recorded in the registry with accumulator of C and a settlement indicator of Y (clause 5(b)); and
- if a switch event meter reading is not a validated reading, provide the date of the last meter reading (clause 5(c)).

##### Audit observation

An event detail report was reviewed to identify CS files issued by FOGY during the audit period. The accuracy of the content of CS files was confirmed by checking a sample of files. The content checked included:

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

CS files with an average daily kWh that was negative, zero, or over 200 kWh were identified and checked.

The process to manage the sending of the CS file within five business days was examined, and the switch breach history report for the audit period was reviewed for CS breaches.

## Audit commentary

### CS timeliness

CS files are created manually using the registry user interface, and timeliness is monitored using the switch breach report. The switch breach history report did not record any breaches for transfer switch CS files.

### CS content

FOGY's estimated daily kWh is calculated between the last two actual readings, and if less than two actual readings were available the value from the incoming CS would be applied. Analysis of estimated daily kWh in the event detail report found no CS files had average daily kWh which was negative, zero or over 200 kWh.

I checked all 450 transfer CS files for consistency between event read types and last actual read dates. I found six transfer CS files where the CS event date was the day after the last actual read date with an estimated CS event read, and the last actual read date was incorrectly recorded as the last day of responsibility instead of the last actual read date. The affected CS files are:

- 0306853035LCD06 17 January 2022
- 0000147471TRABE 15 September 2022
- 0002938685WAACA 18 July 2022
- 0000110437ENC19 15 June 2022
- 0000432180TE335 22 March 2022, and
- 0080674000WR338 1 February 2022.

I checked a random sample of a further two transfer CS files and found that all information was correct.

Description	Recommendation	Audited party comment	Remedial action
Processes for last actual read dates	Update processes to ensure that the last actual read date is consistently populated with the last date an actual reading was received for during the period of supply. Where a switch event reading is estimated, the last actual read date is expected to be before the last day of supply.	Misunderstanding from previous documentation. FOGY have updated our instruction manual to be clear that the Last Actual Read Date should be the last actual read date, not the date before the switch date.	Identified

## Audit outcome

### Non-compliant

Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 08-Feb-22 To: 16-Sep-22	Six transfer CS files contained an incorrect last actual read date. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate because most CS file content was accurate, but almost all CS files with estimated switch event readings had incorrect last actual read dates recorded.</p> <p>The impact is low, because there is no direct impact on the customer, other trader, or reconciliation. The last actual read date can be used to help assess the likelihood that the estimated switch reading is correct.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Our instruction manual was not clear that the Last Actual Read Date on CS files should be the date of the last Actual Read. It has now been corrected. Our processes have been updated so information to be put in the CS file is the correct date.		09/02/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process updates to query the last actual read date from our database rather than the last read date (which includes estimates) should ensure that the correct date is populated in the Last Actual Read Date field in future.		09/02/2023	

#### 4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)

##### Code reference

Clause 6(1) and 6A Schedule 11.3

##### Code related audit information

The losing trader and the gaining trader must both use the same switch event meter reading as determined by the following procedure:

- if the switch event meter reading provided by the losing trader differs by less than 200 kWh from a value established by the gaining trader, the gaining trader must use the losing trader's validated meter reading or permanent estimate (clause 6(a)); or
- the gaining trader may dispute the switch meter reading if the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more (clause 6(b)).

If the gaining trader disputes a switch meter reading because the switch event meter reading provided by the losing trader differs by 200 kWh or more, the gaining trader must, within 4 calendar months of the registry manager giving the gaining trader written notice of having received information about the switch completion, provide to the losing trader a changed switch event meter reading supported by 2 validated meter readings.

- the losing trader can choose not to accept the reading however must advise the gaining trader no later than 5 business days after receiving the switch event meter reading from the gaining trader (clause 6A(a)); or
- if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader (clause 6A(b)).

## Audit observation

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

The event detail report was analysed to identify all read change requests and acknowledgements during the audit period, and a sample of files were checked.

I also checked a sample of five estimated CS files provided by other traders where no RR was issued to determine whether the correct readings were recorded.

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

## Audit commentary

### RR

RR requests are generally initiated via email between the two parties and only once an agreement has been reached an RR file is sent to complete. RR files are generated automatically.

FOGY issued 211 RR files for transfer switches. 39 were rejected and 172 were accepted. A sample of five rejected files and five accepted files were checked. In all cases there was a genuine reason for FOGY's RR, the file content was accurate and supported by two actual reads obtained by FOGY (or an actual read on the event date), and the reads recorded in FOGY's system reflected the outcome of the RR process.

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

### AC

All RR requests received are evaluated and validated against the ICP information. If the request is within validation requirements these are accepted. AC files are generated manually, and the timeliness of AC files is monitored using the switch breach history report which did not record any late AC files during the audit period.

FOGY received one RR for a transfer switch, which they accepted. The correct reads were recorded in FOGY's system.

### CS files with estimated readings where no RR is issued

I reviewed five transfer CS files with estimated reads where no RR was issued and found the correct read values and read types were recorded.

## Audit outcome

Compliant

## 4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)

### Code reference

*Clause 6(2) and (3) Schedule 11.3*

### Code related audit information

*If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry: and*

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b));*
- *the gaining trader within five business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading.*

### Audit observation

The process for the management of read requests was examined. The event detail report was analysed to identify read change requests issued and received under Clause 6(2) and (3) Schedule 11.3 and determine compliance.

### Audit commentary

FOGY is a HHR only trader, and this clause does not apply where FOGY is the losing trader.

### Audit outcome

Compliant

## 4.6. Disputes - standard switch (Clause 7 Schedule 11.3)

### Code reference

Clause 7 Schedule 11.3

### Code related audit information

*A losing trader or gaining trader may give written notice to the other that it disputes a switch event meter reading provided under clauses 1 to 6. Such a dispute must be resolved in accordance with clause 15.29 (with all necessary amendments).*

### Audit observation

The switching process documentation was examined.

### Audit commentary

There have not been any disputes.

### Audit outcome

Compliant

## 4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)

### Code reference

Clause 9 Schedule 11.3

### Code related audit information

*The switch move process applies where a gaining trader has an arrangement with a customer or embedded generator to trade electricity at an ICP using non-half-hour metering or an unmetered ICP, or to assume responsibility for such an ICP, and no other trader has an agreement to trade electricity at that ICP, this is referred to as a switch move and the following provisions apply:*

*If the "uninvited direct sale agreement" applies, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*In the event of a switch move, the gaining trader must advise the registry manager of a switch and the proposed event date no later than 2 business days after the arrangement comes into effect.*

*In its advice to the registry manager the gaining trader must include:*

- a proposed event date (clause 9(2)(a)); and
- that the switch type is "MI" (clause 9(2)(b)); and

- *one or more profile codes of a profile at the ICP (clause 9(2)(c)).*

#### Audit observation

The switch gain process was examined to determine when FOGY deem all conditions to be met. A typical sample of NTs were checked to confirm that these were notified to the registry within two business days, and that the correct switch type was selected.

#### Audit commentary

FOGY's processes are compliant with the requirements of Section 36M of the Fair Trading Act 1986. Switch move NT files are sent at 4am the day after all pre-conditions are met, and the withdrawal process is used if the customer changes their mind.

Switch move is applied where a new customer is moving into an address. This information is collected as part of the customer application process, by asking whether the customer is "paying bills to another retailer for this property" or is "moving in and/or have not paid bills to another retailer for this property".

I checked the metering category for the 1,025 switch move ICPs where this information was available on the PR255 report and found none had metering categories of three or above. I checked the five most backdated NTs and found that they were issued on time, and the switch type selected was consistent with information the customer provided.

#### Audit outcome

Compliant

### 4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)

#### Code reference

*Clause 10(1) Schedule 11.3*

#### Code related audit information

*10(1) Within 5 business days after receiving notice of a switch move request from the registry manager—*

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

#### Audit observation

The event detail report was reviewed to:

- identify AN files issued by FOGY during the audit period,
- assess compliance with the requirement to meet the setting of event dates requirement, and
- a diverse sample ANs were checked to determine whether the codes had been correctly applied.

The switch breach history report was examined for the audit period.

#### Audit commentary

## AN

AN files are created manually using the registry user interface, and timeliness is monitored using the switch breach report. AN response codes were checked:

- two ICPs had the AA (acknowledge and accept) code correctly applied,
- 410 ICPs had the AD (advanced metering) code correctly applied, and
- 54 ICPs had the OC (occupied premises) code; I checked a sample of five and confirmed that they were correctly applied.

The event detail report was reviewed to assess compliance with the setting of event dates requirements:

- no ANs had proposed event dates before the gaining trader's proposed event date, and
- all 466 ANs had proposed event dates within ten business days of the NT arrival date.

The switch breach report did not record any AN breaches.

## CS

CS files are created manually using the registry user interface, and timeliness is monitored using the switch breach history report.

The switch breach history report recorded one E2 breach where the CS event date was before the gaining trader's requested event date. The error was a typo, the NT and AN proposed event date was 2 March 2022, but the switch was completed for 3 February 2022. A withdrawal was immediately completed and accepted by the other trader, and the switch was then re-requested and completed for the correct date.

### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.8 With: 10(1) Schedule 11.3  From: 03-Mar-22 To: 03-Mar-22	One E2 breach where the CS event date was before the gaining trader's requested event date.  Potential impact: Low  Actual impact: Low  Audit history: Twice  Controls: Strong  Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	The controls are strong, the error was isolated and caused by a typo. FOGY is aware of the event date requirements.  The audit risk rating is low because the switch was withdrawn and completed from the correct date.



Actions taken to resolve the issue	Completion date	Remedial action status
The error was a typo, the NT and AN proposed event date was 2 March 2022, but the switch was completed for 3 February 2022. A withdrawal was immediately completed and accepted by the other trader, and the switch was then re-requested and completed for the correct date.	07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process is clearly defined and additional checks added to ensure correct dates are sent	07/02/2023	

#### 4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)

##### Code reference

*Clause 10(2) Schedule 11.3*

##### Code related audit information

*If the losing trader determines a different date, then within 10 business days of receiving notice the losing trader must also complete the switch by providing to the registry manager as described in subclause (1)(a):*

- *the event date proposed by the losing trader; and*
- *a valid switch response code; and*
- *final information as required under clause 1.*

##### Audit observation

The event detail report was reviewed to identify AN files issued by FOGY during the audit period, and assess compliance with the requirement to meet the setting of event dates requirement.

##### Audit commentary

All switch move AN files had proposed event dates consistent with the gaining trader's requested date. Switches were completed as required by this clause.

##### Audit outcome

Compliant

#### 4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)

##### Code reference

*Clause 11 Schedule 11.3*

##### Code related audit information

*The losing trader must provide final information to the registry manager for the purposes of clause 10(1)(a)(ii), including—*

- *the event date (clause 11(a)); and*

- a switch event meter reading as at the event date for each meter or data storage device that is recorded in the registry with an accumulator type of C and a settlement indicator of Y (clause 11(b)); and
- if the switch event meter reading is not a validated meter reading, the date of the last meter reading of the meter or storage device (clause (11(c)).

### Audit observation

An event detail report was reviewed to identify CS files issued by FOGY during the audit period. The accuracy of the content of CS files was confirmed by checking a sample of files. The content checked included:

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

CS files with an average daily kWh that was negative, zero, or over 200 kWh were identified and a sample of five were checked.

The process to manage the sending of the CS file within five business days was examined, and the switch breach history report for the audit period was reviewed for CS breaches.

### Audit commentary

CS files are created manually using the registry user interface.

FOGY's estimated daily kWh is calculated between the last two actual readings, and if less than two actual readings were available the value from the incoming CS would be applied. Analysis of estimated daily kWh in the event detail report found no CS files had average daily kWh which was negative, zero or over 200 kWh.

I checked all 408 switch move CS files for consistency between event read types and last actual read dates, and found:

Exception type	Exception count	Findings
Last actual read date was more than one day before the CS event date with an actual CS event read.	1	ICP 0030200378PC78F 12 September 2022 had an incorrect switch event read type recorded. The ICP received daily reads up to 22 August 2022 and the last readings received indicated that there was no consumption. The last reading from 22 August 2022 was applied as the switch event reading, which was reasonable based on estimated consumption of zero, but it was incorrectly recorded as an actual instead of an estimated reading.
CS event date was the day after the last actual read date with an estimated CS event read.	11	I checked a sample of five CS files and found: 0002938685WAACA 18 July 2022 and 0000147471TRABE 15 September 2022 had their last actual read date incorrectly recorded as the last day of responsibility instead of the last actual read date. 0000752270TEECD 21 May 2022 and 1001260404UN39B 24 July 2022 had the event read type incorrectly recorded as estimated when it should have been actual. 0339943041LCEB7 8 August 2022 had its last actual read date incorrectly recorded as the last day of responsibility instead of the last actual read date. The switch event reading was recorded as 111130 -

Exception type	Exception count	Findings
		estimate but should have been 111135 - estimate a difference of +5 kWh.

I checked a random sample of a further three switch move CS files and found that all information was correct.

### Audit outcome

Non-compliant

Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 26-May-22</p> <p>To: 12-Sep-22</p>	<p>Three switch move CS file contained incorrect switch event read types.</p> <p>Three switch move CS files contained an incorrect last actual read date.</p> <p>One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>Low</b></p>	<p>Controls are rated as moderate because most CS file content was accurate.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> <li>actual and estimated switch event readings are treated as permanent by the historic estimate process; because the CS files affected were switch moves and FOGY is a HHR trader, the incorrect classification does not have any impact on the other trader's ability to issue read renegotiations under Clause 6 (2) and (3) Schedule 11.3,</li> <li>the last actual read date can be used to help assess the likelihood that the estimated switch reading is correct and does not have a direct impact on the customer, other trader, or reconciliation, and</li> <li>the difference between the CS read and read recorded in the system for ICP 0339943041LCEB7 8 August 2022 is 5 kWh, so the impact on billing and settlement is low.</li> </ul>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>FOGY submitted the CS for 0339943041LCEB7 on 09/08/2022 in order to avoid a registry breach. The property was disconnected on 26/06. We had no reads from the MEP until 12/08/2022 so we went off the reading that was provided in the manual disconnection paperwork from the MEP for 111130. FOGY does not believe that we submitted an incorrect read.</p>	<p>07/02/2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY Endeavours to send the correct readings at the time the CS file is due. Existing processes cover this and FOGY will complete RR's should it be identified that a correct actual reading is available	07/02/2023	

#### 4.11. Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)

##### Code reference

Clause 12 Schedule 11.3

##### Code related audit information

*The gaining trader may use the switch event meter reading supplied by the losing trader or may, at its own cost, obtain its own switch event meter reading. If the gaining trader elects to use this new switch event meter reading, the gaining trader must advise the losing trader of the switch event meter reading and the actual event date to which it refers as follows:*

- *if the switch meter reading established by the gaining trader differs by less than 200 kWh from that provided by the losing trader, both traders must use the switch event meter reading provided by the gaining trader (clause 12(2)(a)); or*
- *if the switch event meter reading provided by the losing trader differs by 200 kWh or more from a value established by the gaining trader, the gaining trader may dispute the switch meter reading. In this case, the gaining trader, within 4 calendar months of the date the registry manager gives the gaining trader written notice of having received information about the switch completion, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by 2 validated meter readings and the losing trader must either (clause 12(2)(b) and clause 12(3)):*
- *advise the gaining trader if it does not accept the switch event meter reading and the losing trader and the gaining trader must resolve the dispute in accordance with the dispute's procedure in clause 15.29 (with all necessary amendments) (clause 12(3)(a)); or*
- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader (clause 12(3)(b)).*

*12(2A) If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry,*

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 12(2A)(b));*
- *the gaining trader no later than 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading (clause 12(2B)).*

##### Audit observation

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

The event detail report was analysed to identify all read change requests and acknowledgements during the audit period, and a sample of files were checked.

I also checked a sample of five estimated CS files provided by other traders where no RR was issued to determine whether the correct readings were recorded.

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

### Audit commentary

#### RR

RR requests are generally initiated via email between the two parties and only once an agreement has been reached an RR file is sent to complete. RR files are generated automatically.

FOGY issued 184 RR files for switch moves. 16 were rejected and 168 were accepted. A sample of five rejected files and five accepted files were checked. In all cases there was a genuine reason for FOGY's RR, the file content was accurate and supported by two actual reads obtained by FOGY (or an actual read on the event date), and the reads recorded in FOGY's system reflected the outcome of the RR process.

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

#### AC

All RR requests received are evaluated and validated against the ICP information. If the request is within validation requirements these are accepted. AC files are generated manually, and the timeliness of AC files is monitored using the switch breach history report.

FOGY did not receive any RR files for switch moves and did not issue any AC files. The switch breach history report did not record any late AC files.

#### CS files with estimated readings where no RR is issued

I reviewed five switch move CS files with estimated reads where no RR was issued and found the correct read values and read types were recorded.

#### Agreed switch reading not applied for an outgoing CS file

0339943041LCEB7 8 August 2022 had its switch event reading recorded as 111130 - estimate in the CS file but should have been 111135 - estimate, a difference of +5 kWh. The agreed switch reading was not applied in FOGY's system.

### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.11 With: Clause 12 Schedule 11.3  From: 08-Aug-22 To: 08-Aug-22	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because I only found one instance where the agreed switch event reading was not applied.</p> <p>The impact is low. The difference between the CS read and read recorded in the system for ICP 0339943041LCEB7 8 August 2022 is 5 kWh, so the impact on billing and settlement is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>FOGY submitted the CS for 0339943041LCEB7 on 09/08/2022 in order to avoid a registry breach. The property was disconnected on 26/06. We had no reads from the MEP until 12/08/2022 so we went off the reading that was provided in the manual disconnection paperwork from the MEP for 111130. FOGY does not believe that we submitted an incorrect read. But acknowledge that an RR should have been sent to correct this due to updated data in our system post switch</p>		07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A process update will be put in place that whenever a re-estimate or new read information becomes available after sending a CS, an RR process will be initiated. It is rare that FOGY would need to Trigger this as we do not often receive or re-estimate data post switch, other than when triggered by an RR from the Gaining retailer</p>		07/02/2023	

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

##### Code reference

Clause 14 Schedule 11.3

##### Code related audit information

*The gaining trader switch process applies when a trader has an arrangement with a customer or embedded generator to trade electricity at an ICP at which the losing trader trades electricity with the customer or embedded generator, and one of the following applies at the ICP:*

- *the gaining trader will trade electricity through a half hour metering installation that is a category 3 or higher metering installation; or*
- *the gaining trader will trade electricity through a non-AMI half hour metering installation and the losing trader trades electricity through a non-AMI non half hour metering installation; or*
- *the gaining trader will trade electricity through a non-AMI non half hour metering installation and the losing trader trades electricity through anon-AMI half hour metering installation.*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of the switch and expected event date no later than 3 business days after the arrangement comes into effect.*

*14(2) The gaining trader must include in its advice to the registry manager:*

- a) a proposed event date; and*
- b) that the switch type is HH.*

*14(3) The proposed event date must be a date that is after the date on which the gaining trader advises the registry manager, unless clause 14(4) applies.*

*14(4) The proposed event date is a date before the date on which the gaining trader advised the registry manager, if:*

*14(4)(a) – the proposed event date is in the same month as the date on which the gaining trader advised the registry manager; or*

*14(4)(b) – the proposed event date is no more than 90 days before the date on which the gaining trader advises the registry manager, and this date is agreed between the losing and gaining traders.*

#### **Audit observation**

FOGY does not deal with any HH switches.

#### **Audit commentary**

No HH NT files were issued. I checked the metering category for the 3,152 transfer switch ICPs and 1,025 switch move ICPs where this information was available on the PR255 report and found none had metering categories of three or above.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 15 Schedule 11.3*

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

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

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

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

#### **Audit observation**

FOGY does not deal with any HH switches.

#### **Audit commentary**

Review of the event detail report confirmed that no HH AN files were issued. All ICPs supplied have metering category 1 or 2.

#### **Audit outcome**

Compliant

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

##### Code reference

Clause 16 Schedule 11.3

##### Code related audit information

*The gaining trader must complete the switch no later than 3 business days, after receiving the valid switch response code, by advising the registry manager of the event date.*

*If the ICP is being electrically disconnected, or if metering equipment is being removed, the gaining trader must either-*

*16(a)- give the losing trader or MEP for the ICP an opportunity to interrogate the metering installation immediately before the ICP is electrically disconnected or the metering equipment is removed; or*

*16(b)- carry out an interrogation and, no later than 5 business days after the metering installation is electrically disconnected or removed, advise the losing trader of the results and metering component numbers for each data channel in the metering installation.*

##### Audit observation

FOGY does not deal with any HH switches.

##### Audit commentary

Review of the event detail report confirmed that no HH CS files were issued. All ICPs supplied have metering category 1 or 2.

##### Audit outcome

Compliant

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

##### Code reference

Clauses 17 and 18 Schedule 11.3

##### Code related audit information

*A losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 2 calendar months after the event date of the switch.*

*If a trader requests the withdrawal of a switch, the following provisions apply:*

- *for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):*
  - o *the participant identifier of the trader making the withdrawal request (clause 18(c)(i));*
  - and*
  - o *the withdrawal advisory code published by the Authority (clause 18(c)(ii))*
- *within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal (clause 18(d))*
- *on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c). All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request (clause 18(e))*



- *if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16 (clause 18(f))*

### Audit observation

The event detail report was reviewed to:

- identify all switch withdrawal requests issued by FOGY, and a sample were checked, and
- identify all switch withdrawal acknowledgements issued by FOGY, and a sample were checked.

The switch breach history report was checked for any late switch withdrawal requests or acknowledgements.

### Audit commentary

NW and AW files are issued manually using the registry user interface and timeliness of AW files is monitored using the switch breach history report. NW codes are determined from customer and registry data.

#### NW

273 NW files were issued by FOGY. 35 (12.8%) were rejected and 2,388 were accepted. I reviewed a diverse sample of two (or all) NWs per NW advisory code and found the following errors:

- 0000517650NRF0E 12 August 2022 had the DF (date failed) code incorrectly assigned; the ICP had been requested as a switch move but was occupied, so WS (wrong switch type) should have been applied,
- 0418159874LCC1C 30 August 2022 had the DF (date failed) code assigned where an incorrect move in date had been recorded; CE (customer error) code should have been applied because the proposed date was not more than ten business days in the future, and
- 0000230283ENCDE 29 August 2022 was issued in error with the WP (wrong premises) code and should not have been issued at all; the NW was rejected.

Three NA breaches were recorded for late NW files, which were delayed while investigation occurred to confirm that the wrong property had been requested and a withdrawal was required.

#### AW

35 (12.8%) of the 273 AWs issued by FOGY were rejections. I reviewed a sample of two or all rejections per NW reason code and confirmed they were rejected based the information available at the time the response was issued except 0000660219WEF63 23 May 2022, which was rejected in error and not reissued by the other trader. The losing trader then issued an NT and the ICP switched out the following month.

The switch breach report did not record any late AW files.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3  From: 03-Mar-22 To: 21-Sep-22	Two outgoing NWs had incorrect NW withdrawal advisory codes applied. One outgoing NW was issued in error and was rejected by the other trader. Three NA breaches. One incoming NW file was rejected in error. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate. The late files were all wrong premises withdrawals, which are often difficult to identify and require thorough investigation before the NW is issued. NW and AW files are generated manually, and a small number were issued in error or with an incorrect code.  The impact on other participants is low. The late NW files were 70-98 days overdue, the invalidly issued NW was rejected by the other trader, and the ICP for invalidly rejected NW switched out to the losing trader.		
Actions taken to resolve the issue		Completion date	Remedial action status
Customer for 0000517650NRF0E had already closed their account with FOGY. NWDF was sent as move in date was incorrect. NWWs did not need to be applied		07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
FOGY will ensure that code NWCE is used in future where proposed date is no more than ten business days in the future. Training manuals have been updated to reflect this.		07/02/2023	

#### 4.16. Metering information (Clause 21 Schedule 11.3)

##### Code reference

Clause 21 Schedule 11.3

##### Code related audit information

For an interrogation or validated meter reading or permanent estimate carried out in accordance with Schedule 11.3:

*21(a)- the trader who carries out the interrogation, switch event meter reading must ensure that the interrogation is as accurate as possible, or that the switch event meter reading is fair and reasonable.*

*21(b) and (c) - the cost of every interrogation or switch event meter reading carried out in accordance with clauses 5(b) or 11(b) or (c) must be met by the losing trader. The costs in every other case must be met by the gaining trader.*

#### Audit observation

The meter reading process in relation to meter reads for switching purposes was examined.

#### Audit commentary

All FOGY ICPs have category 1 or 2 metering and HHR submission type.

ICPs switch in and out as transfer switches or switch moves and the content of CS and RR files was examined in **sections 4.3, 4.4, 4.10 and 4.11**. ICP 0339943041LCEB7 8 August 2022 had its switch event reading recorded as 111130 - estimate in the CS file but should have been 111135 - estimate, a difference of +5 kWh.

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

#### Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3  From: 08-Aug-22 To: 08-Aug-22	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong because I only found one instance where the agreed switch event reading did not reflect an actual or estimated reading at the end of the last day of supply.  The impact is low. The difference between the CS read and read recorded in the system for ICP 0339943041LCEB7 8 August 2022 is 5 kWh so the impact on billing and settlement is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY submitted the CS for 0339943041LCEB7 on 09/08/2022 in order to avoid a registry breach. The property was disconnected on 26/06. We had no reads from the MEP until 12/08/2022 so we went off the reading that was provided in the manual disconnection paperwork from the MEP for 111130.		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>As in Audit Ref: 4.11</p> <p>A process update will be put in place that whenever a re-estimate or new read information becomes available after sending a CS, an RR process will be initiated. It is rare that FOGY would need to Trigger this as we do not often receive or re-estimate data post switch, other than when triggered by an RR from the Gaining retailer</p>	07/02/2023	

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

##### Code reference

*Clause 11.15AA to 11.15AC*

##### Code related audit information

*A losing retailer (including any party acting on behalf of the retailer) must not initiate contact to save or win back any customer who is switching away or has switched away for 180 days from the date of the switch.*

*The losing retailer may contact the customer for certain administrative reasons and may make a counteroffer only if the customer initiated contact with the losing retailer and invited the losing retailer to make a counteroffer.*

*The losing retailer must not use the customer contact details to enable any other retailer (other than the gaining retailer) to contact the customer.*

##### Audit observation

Winback and withdrawal processes were reviewed.

The event detail report recorded 29 NWs with the CX (customer cancellation) withdrawal code which were issued within 180 days of switch completion where FOGY was the losing trader. A sample were checked.

##### Audit commentary

FOGY sends an automated email to customers, prompting them to contact FOGY if they did not initiate the switch. No enticements or offers are made as part of this process.

29 ICPs had an NW was issued with a CX withdrawal reason code within 180 days of switch completion where FOGY was the losing trader. 27 NWs were accepted and two were rejected. I checked a sample of ten NWs including the two rejected by the other trader and confirmed that no enticements were offered.

##### Audit outcome

Compliant

## 5. MAINTENANCE OF UNMETERED LOAD

### 5.1. Maintaining shared unmetered load (Clause 11.14)

#### Code reference

Clause 11.14

#### Code related audit information

*The trader must adhere to the process for maintaining shared unmetered load as outlined in clause 11.14:*

*11.14(2) - The distributor must give written notice to the traders responsible for the ICPs across which the unmetered load is shared, of the ICP identifiers of the ICPs.*

*11.14(3) - A trader who receives such a notification from a distributor must give written notice to the distributor if it wishes to add or omit any ICP from the ICPs across which unmetered load is to be shared.*

*11.14(4) - A distributor who receives such a notification of changes from the trader under (3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared.*

*11.14(5) - If a distributor becomes aware of any change to the capacity of a shared unmetered load ICP or if a shared unmetered load ICP is decommissioned, it must give written notice to all traders affected by that change as soon as practicable after that change or decommissioning.*

*11.14(6) - Each trader who receives such a notification must, as soon as practicable after receiving the notification, adjust the unmetered load information for each ICP in the list for which it is responsible to ensure that the entire shared unmetered load is shared equally across each ICP.*

*11.14(7) - A trader must take responsibility for shared unmetered load assigned to an ICP for which the trader becomes responsible as a result of a switch in accordance with Part 11.*

*11.14(8) - A trader must not relinquish responsibility for shared unmetered load assigned to an ICP if there would then be no ICPs left across which that load could be shared.*

*11.14(9) - A trader can change the status of an ICP across which the unmetered load is shared to inactive status, as referred to in clause 19 of Schedule 11.1. In that case, the trader is not required to give written notice to the distributor of the change. The amount of electricity attributable to that ICP becomes UFE.*

#### Audit observation

Review of the registry list with history and AC020 reports confirmed that no ICPs with unmetered load have been supplied, and there were no unmetered load discrepancies.

#### Audit commentary

FOGY does not supply any ICPs with unmetered load.

#### Audit outcome

Compliant

## 5.2. Unmetered threshold (Clause 10.14 (2)(b))

### Code reference

Clause 10.14 (2)(b)

### Code related audit information

*The reconciliation participant must ensure that unmetered load does not exceed 3,000 kWh per annum, or 6,000 kWh per annum if the load is predictable and of a type approved and published by the Authority.*

### Audit observation

Review of the registry list with history and AC020 reports confirmed that no ICPs with unmetered load have been supplied.

### Audit commentary

FOGY does not supply any ICPs with unmetered load.

### Audit outcome

Compliant

## 5.3. Unmetered threshold exceeded (Clause 10.14 (5))

### Code reference

Clause 10.14 (5)

### Code related audit information

*If the unmetered load limit is exceeded the retailer must:*

- *within 20 business days, commence corrective measure to ensure it complies with Part 10*
- *within 20 business days of commencing the corrective measure, complete the corrective measures.*
- *no later than 10 business days after it becomes aware of the limit having been exceeded, advise each participant who is or would be expected to be affected of:*
  - o *the date the limit was calculated or estimated to have been exceeded.*
  - o *the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.*

### Audit observation

Review of the registry list with history and AC020 reports confirmed that no ICPs with unmetered load have been supplied.

### Audit commentary

FOGY does not supply any ICPs with unmetered load.

### Audit outcome

Compliant

#### 5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)

##### Code reference

*Clause 11 Schedule 15.3, Clause 15.37B*

##### Code related audit information

*An up-to-date database must be maintained for each type of distributed unmetered load for which the retailer is responsible. The information in the database must be maintained in a manner that the resulting submission information meets the accuracy requirements of clause 15.2.*

*A separate audit is required for distributed unmetered load data bases.*

*The database must satisfy the requirements of Schedule 15.5 with regard to the methodology for deriving submission information.*

##### Audit observation

Review of the registry list with history and AC020 reports confirmed that no ICPs with unmetered load have been supplied.

##### Audit commentary

FOGY does not supply any ICPs with unmetered load.

##### Audit outcome

Compliant

## 6. GATHERING RAW METER DATA

### 6.1. Electricity conveyed & notification by embedded generators (Clause 10.13, Clause 10.24 and 15.13)

#### Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

#### Code related audit information

A participant must use the quantity of electricity measured by a metering installation as the raw meter data for the quantity of electricity conveyed through the point of connection.

This does not apply if data is estimated or gifted in the case of embedded generation under clause 15.13.

A trader must, for each electrically connected ICP that is not also an NSP, and for which it is recorded in the registry as being responsible, ensure that:

- there is one or more metering installations,
- all electricity conveyed is quantified in accordance with the Code,
- it does not use subtraction to determine submission information for the purposes of Part 15.

An embedded generator must give notification to the reconciliation manager for an embedded generating station, if the intention is that the embedded generator will not be receiving payment from the clearing manager or any other person through the point of connection to which the notification relates.

#### Audit observation

Processes for metering, submission, and distributed generation were reviewed. The registry list and AC020 reports were examined to determine compliance.

#### Audit commentary

##### Metering installations installed

All active ICPs have an MEP recorded and metering installed. No submission information is determined by subtraction.

##### Distributed generation

122 ICPs have distributed generation recorded by the distributor. 121 have settled X and I flow meter registers installed and HHR profiles, and ICP 0000052255HBB9D is under investigation to confirm whether distributed generation is present. The customer believes no generation is present and no generation installation details are recorded in Work Safe's high risk database for the address <https://www.worksafe.govt.nz/topic-and-industry/energy-safety/electricity-and-gas-high-risk-database/>.

Description	Recommendation	Audited party comment	Remedial action
Distributed generation for ICP 0000052255HBB9D	Confirm whether distributed generation is present for ICP 0000052255HBB9D, and if it is, arrange for compliant I flow metering to be installed.	This investigation is still ongoing.  If it is confirmed that Generation is in fact present at the ICP then FOGY will arrange for compliant I flow metering to be installed.	Investigating

I checked the HHR aggregates submissions for the 112 ICPs which switched in prior to August 2022 and confirmed that I flow volumes were submitted for 111 of them in August 2022. ICP 0000509243NR543



had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.

No ICPs had distributed generation recorded by the trader and not the distributor. All ICPs have the HHR profile applied, therefore there were no profiles inconsistent with the generation fuel type.

### Bridged meters

Six bridged meters were identified during the audit period. Two of the ICPs had a bridged relay and all consumption was confirmed to be recorded by the meter, and one meter was confirmed to not be in use. The other two ICPs had volume corrections processed.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.1 With: Clause 10.13  From: 26-Nov-21 To: 20-Sep-22	Energy is not metered and quantified according to the code where meters are bridged.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are strong because meters are bridged rarely. The volume of ICPs with bridged meters is small and there are processes in place to ensure that an estimate of consumption is submitted to minimise the impact.		
Actions taken to resolve the issue		Completion date	Remedial action status
Processes are in place and were followed to resolve any identified bridged meters. All examples above followed that process to resolved and volumes were correctly submitted		07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes are in place and were followed to resolve any identified bridged meters. All examples above followed that process to resolved and volumes were correctly submitted		07/02/2023	

## 6.2. Responsibility for metering at GIP (Clause 10.26 (6), (7) and (8))

### Code reference

Clause 10.26 (6), (7) and (8)

### Code related audit information

For each proposed metering installation or change to a metering installation that is a connection to the grid, the participant, must:

- provide to the grid owner a copy of the metering installation design (before ordering the equipment)
- provide at least three months for the grid owner to review and comment on the design,
- respond within three business days of receipt to any request from the grid owner for additional details or changes to the design,
- ensure any reasonable changes from the grid owner are carried out.

The participant responsible for the metering installation must:

- advise the reconciliation manager of the certification expiry date not later than 10 business days after certification of the metering installation,
- become the MEP or contract with a person to be the MEP,
- advise the reconciliation manager of the MEP identifier no later than 20 days after entering into a contract or assuming responsibility to be the MEP.

### Audit observation

FOGY does not have responsibility for any GIPs.

### Audit commentary

FOGY does not have responsibility for any GIPs.

### Audit outcome

Compliant

## 6.3. Certification of control devices (Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3)

### Code reference

Clause 33 Schedule 10.7 and clause 2(2) Schedule 15.3

### Code related audit information

The reconciliation participant must advise the metering equipment provider if a control device is used to control load or switch meter registers.

The reconciliation participant must ensure the control device is certified prior to using it for reconciliation purposes.

### Audit observation

The registry list was reviewed to determine which profiles were used, and the AC020 report was reviewed to identify exceptions.

### Audit commentary

FOGY only uses the HHR profile, which does not require certification of control devices.

### Audit outcome

Compliant

#### 6.4. Reporting of defective metering installations (Clause 10.43(2) and (3))

##### Code reference

*Clause 10.43(2) and (3)*

##### Code related audit information

*If a participant becomes aware of an event or circumstance that leads it to believe a metering installation could be inaccurate, defective, or not fit for purpose they must:*

- *advise the MEP,*
- *include in the advice all relevant details.*

##### Audit observation

I checked the controls in place to identify defective metering.

##### Audit commentary

FOGY has the following checks in place to identify potentially defective metering.

- Sum-check validation between the sum of the intervals and the difference between midnight reads. The threshold is 0.01 kWh.
- An alert for any “null” values, indicating missing data.
- Check for 48 intervals and that a midnight read is present.

12 examples of potential faulty or stopped meters were identified during the audit period, and I confirmed that the MEP was advised.

##### Audit outcome

Compliant

#### 6.5. Collection of information by certified reconciliation participant (Clause 2 Schedule 15.2)

##### Code reference

*Clause 2 Schedule 15.2*

##### Code related audit information

*Only a certified reconciliation participant may collect raw meter data, unless only the MEP can interrogate the meter, or the MEP has an arrangement which prevents the reconciliation participant from electronically interrogating the meter:*

*2(2) - The reconciliation participant must collect raw meter data used to determine volume information from the services interface or the metering installation or from the MEP.*

*2(3) - The reconciliation participant must ensure the interrogation cycle is such that it does not exceed the maximum interrogation cycle in the registry.*

*2(4) - The reconciliation participant must interrogate the meter at least once every maximum interrogation cycle.*

*2(5) - When electronically interrogating the meter the participant must:*

- a) ensure the system is to within +/- 5 seconds of NZST or NZDST*
- b) compare the meter time to the system time,*
- c) determine the time error of the metering installation,*
- d) if the error is less than the maximum permitted error, correct the meter's clock,*
- e) if the time error is greater than the maximum permitted error then:*

- i) correct the metering installation's clock,*
- ii) compare the metering installation's time with the system time,*
- iii) correct any affected raw meter data.*
- f) download the event log.*

2(6) – *The interrogation systems must record:*

- *the time*
- *the date*
- *the extent of any change made to the meter clock.*

#### **Audit observation**

FOGY does not collect data; this is provided by the MEP.

#### **Audit commentary**

FOGY does not collect data; this is provided by the MEP.

Clock synchronisation and meter event reports are received from the MEPs, saved on FOGY's file server, and reviewed weekly to identify any issues that require action. No clock adjustments of more than 30 seconds have been notified to date.

FOGY intends to automate the review of clock synchronisation events to make the process more efficient as ICP numbers are increasing.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clauses 3(1), 3(2) and 5 Schedule 15.2*

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

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

*All validated meter readings must be derived from meter readings.*

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

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

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

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

#### **Audit observation**

FOGY does not collect data; this is provided by the MEP.

### Audit commentary

FOGY does not collect data; this is provided by the MEP.

### Audit outcome

Compliant

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

### Code reference

*Clause 6 Schedule 15.2*

### Code related audit information

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

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

### Audit observation

The process of the application of meter readings was examined.

### Audit commentary

All FOGY ICPs have category 1 or 2 metering and HHR submission type. ICPs switch in and out as transfer switches or switch moves and the content of CS and RR files was examined in **sections 4.3, 4.4, 4.10 and 4.11**. CS and RR readings are applied from the correct date and time.

### Audit outcome

Compliant

## 6.8. Interrogate meters once (Clause 7(1) and (2) Schedule 15.2)

### Code reference

*Clause 7(1) and (2) Schedule 15.2*

### Code related audit information

*Each reconciliation participant must ensure that a validated meter reading is obtained in respect of every meter register for every non half hour metered ICP for which the participant is responsible, at least once during the period of supply to the ICP by the reconciliation participant and used to create volume information.*

*This may be a validated meter reading at the time the ICP is switched to, or from, the reconciliation participant.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 7(1).*

### Audit observation

FOGY only deals with HHR data.

### Audit commentary

FOGY only deals with HHR data.

#### **Audit outcome**

Not applicable

### 6.9. NHH meters interrogated annually (Clause 8(1) and (2) Schedule 15.2)

#### **Code reference**

*Clause 8(1) and (2) Schedule 15.2*

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

*At least once every 12 months, each reconciliation participant must obtain a validated meter reading for every meter register for non-half hour metered ICPs, at which the reconciliation participant trades continuously for each 12-month period.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 8(1).*

#### **Audit observation**

FOGY only deals with HHR data.

#### **Audit commentary**

FOGY only deals with HHR data.

#### **Audit outcome**

Not applicable

### 6.10. NHH meters 90% read rate (Clause 9(1) and (2) Schedule 15.2)

#### **Code reference**

*Clause 9(1) and (2) Schedule 15.2*

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

*In relation to each NSP, each reconciliation participant must ensure that for each NHH ICP at which the reconciliation participant trades continuously for each 4 months, for which consumption information is required to be reported into the reconciliation process. A validated meter reading is obtained at least once every 4 months for 90% of the non-half hour metered ICPs.*

*A report is to be sent to the Authority providing the percentage, in relation to each NSP, for which consumption information has been collected no later than 20 business days after the end of each month.*

*If exceptional circumstances prevent a reconciliation participant from obtaining the validated meter reading, the reconciliation participant is not required to comply with clause 9(1).*

#### **Audit observation**

FOGY only deals with HHR data.

#### **Audit commentary**

FOGY only deals with HHR data.

#### **Audit outcome**

Not applicable

## 6.11. NHH meter interrogation log (Clause 10 Schedule 15.2)

### Code reference

Clause 10 Schedule 15.2

### Code related audit information

The following information must be logged as the result of each interrogation of the NHH metering:

*10(a) - the means to establish the identity of the individual meter reader,*

*10(b) - the ICP identifier of the ICP, and the meter and register identification,*

*10(c) - the method being used for the interrogation and the device ID of equipment being used for interrogation of the meter.*

*10(d) - the date and time of the meter interrogation.*

### Audit observation

FOGY only deals with HHR data.

### Audit commentary

FOGY only deals with HHR data.

### Audit outcome

Not applicable

## 6.12. HHR data collection (Clause 11(1) Schedule 15.2)

### Code reference

Clause 11(1) Schedule 15.2

### Code related audit information

*Raw meter data from all electronically interrogated metering installations must be obtained via the services access interface.*

*This may be carried out by a portable device or remotely.*

### Audit observation

HHR data is provided by the MEP and is obtained from the services access interface.

### Audit commentary

HHR data is provided by the MEP and is obtained from the services access interface.

### Audit outcome

Compliant

## 6.13. HHR interrogation data requirement (Clause 11(2) Schedule 15.2)

### Code reference

Clause 11(2) Schedule 15.2

### Code related audit information

The following information is collected during each interrogation:

11(2)(a) - the unique identifier of the data storage device

11(2)(b) - the time from the data storage device at the commencement of the download unless the time is within specification and the interrogation log automatically records the time of interrogation,

11(2)(c) - the metering information, which represents the quantity of electricity conveyed at the point of connection, including the date and time stamp or index marker for each half hour period. This may be limited to the metering information accumulated since the last interrogation,

11(2)(d) - the event log, which may be limited to the events information accumulated since the last interrogation,

11(2)(e) - an interrogation log generated by the interrogation software to record details of all interrogations.

The interrogation log must be examined by the reconciliation participant responsible for collecting the data and appropriate action must be taken if problems are apparent or an automated software function flags exceptions.

#### **Audit observation**

FOGY does not collect data; this is provided by the MEP.

#### **Audit commentary**

FOGY does not collect data; this is provided by the MEP.

#### **Audit outcome**

Compliant

### 6.14. HHR interrogation log requirements (Clause 11(3) Schedule 15.2)

#### **Code reference**

Clause 11(3) Schedule 15.2

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

The interrogation log forms part of the interrogation audit trail and, as a minimum, must contain the following information:

11(3)(a)- the date of interrogation

11(3)(b)- the time of commencement of interrogation

11(3)(c)- the operator identification (if available)

11(3)(d)- the unique identifier of the meter or data storage device

11(3)(e)- the clock errors outside the range specified in Table 1 of clause 2,

11(3)(f)- the method of interrogation

11(3)(g)- the identifier of the reading device used for interrogation (if applicable).

#### **Audit observation**

FOGY does not collect data; this is provided by the MEP.

#### **Audit commentary**

FOGY does not collect data; this is provided by the MEP.



**Audit outcome**

Compliant

## 7. STORING RAW METER DATA

### 7.1. Trading period duration (Clause 13 Schedule 15.2)

#### Code reference

Clause 13 Schedule 15.2

#### Code related audit information

*The trading period duration, normally 30 minutes, must be within  $\pm 0.1\%$  ( $\pm 2$  seconds).*

#### Audit observation

FOGY does not collect data; this is provided by the MEP.

#### Audit commentary

FOGY does not collect data; this is provided by the MEP.

#### Audit outcome

Compliant

### 7.2. Archiving and storage of raw meter data (Clause 18 Schedule 15.2)

#### Code reference

Clause 18 Schedule 15.2

#### Code related audit information

*A reconciliation participant who is responsible for interrogating a metering installation must archive all raw meter data and any changes to the raw meter data for at least 48 months, in accordance with clause 8(6) of Schedule 10.6.*

*Procedures must be in place to ensure that raw meter data cannot be accessed by unauthorised personnel.*

*Meter readings cannot be modified without an audit trail being created.*

#### Audit observation

FOGY does not collect data; this is provided by the MEP.

#### Audit commentary

FOGY does not collect data; this is provided by the MEP.

FOGY stores all raw meter data files on its server after they are loaded into the database. Daily files which are more than two weeks old are zipped to save space on the network. I viewed data retained from 2019 during the audit.

Readings cannot be modified without an audit trail being created, and the original data is retained. I viewed these audit trails, and they are discussed in further detail in **section 2.4**.

#### Audit outcome

Compliant

### 7.3. Non metering information collected / archived (Clause 21(5) Schedule 15.2)

#### **Code reference**

*Clause 21(5) Schedule 15.2*

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

*All relevant non-metering information, such as external control equipment operation logs, used in the determination of profile data must be collected, and archived in accordance with clause 18.*

#### **Audit observation**

FOGY does not deal with any non-metering information.

#### **Audit commentary**

FOGY does not deal with any non-metering information.

#### **Audit outcome**

Not applicable

## 8. CREATING AND MANAGING (INCLUDING VALIDATING, ESTIMATING, STORING, CORRECTING AND ARCHIVING) VOLUME INFORMATION

### 8.1. Correction of NHH meter readings (Clause 19(1) Schedule 15.2)

#### Code reference

Clause 19(1) Schedule 15.2

#### Code related audit information

*If a reconciliation participant detects errors while validating non-half hour meter readings, the reconciliation participant must:*

- 19(1)(a) - confirm the original meter reading by carrying out another meter reading,*
- 19(1)(b) – replace the original meter reading the second meter reading (even if the second meter reading is at a different date)*
- 19(1A) if a reconciliation participant detects errors while validating non half hour meter readings, but the reconciliation participant cannot confirm the original meter reading or replace it with a meter reading from another interrogation, the reconciliation participant must:*
  - *substitute the original meter reading with an estimated reading that is marked as an estimate;*
  - and*
  - *subsequently replace the estimated reading in accordance with clause 4(2)*

#### Audit observation

FOGY only deals with HHR data.

#### Audit commentary

FOGY only deals with HHR data.

#### Audit outcome

Not applicable

### 8.2. Correction of HHR metering information (Clause 19(2) Schedule 15.2)

#### Code reference

Clause 19(2) Schedule 15.2

#### Code related audit information

*If a reconciliation participant detects errors while validating half hour meter readings, the reconciliation participant must correct the meter readings as follows:*

- 19(2)(a) - if the relevant metering installation has a check meter or data storage device, substitute the original meter reading with data from the check meter or data storage device; or*
- 19(2)(b) - if the relevant metering installation does not have a check meter or data storage device, substitute the original meter reading with data from another period provided:*
  - (i) The total of all substituted intervals matches the total consumption recorded on a meter, if available; and*
  - (ii) The reconciliation participant considers the pattern of consumption to be materially similar to the period in error.*

### Audit observation

I checked the process for estimation and correction, and reviewed examples. The process is the same whether it is an estimation or a correction.

### Audit commentary

There are two estimation methodologies. If a midnight read is available on either side of the period to be estimated, the system will automatically calculate and apportion the correct kWh figure between reads evenly across the relevant intervals. If register reads are not available, estimation is conducted manually based on similar historic consumption. Linear estimation is processed automatically within the database.

If an estimate is conducted and actual data is subsequently provided by the MEP, the original row (estimated data) is labelled as "double" and is ignored for billing and submission. A row labelled as "estimate" may have some or all of the intervals estimated. It can be determined which intervals are estimated because they are different to the row above. The source field displays the correction technique and reason at a daily level, and which intervals are estimated or corrected.

I reviewed examples of corrections to confirm the correction method:

Issue	Correction method
Bridged meter	<p>Consumption during the bridged period is estimated based the consumption for the same weekday after the meter is unbridged.</p> <p>I checked five examples of bridged meters. Two had a bridged relay and all consumption was confirmed to be recorded by the meter, and one meter was confirmed to not be in use. The other two ICPs had corrections processed and I confirmed that the expected process was followed.</p>
Communications issue	<p>Data is estimated and replaced with actual data once the communication issue is resolved, or a permanent estimate if the data cannot be retrieved.</p> <p>I checked four examples of communications faults and confirmed the process was followed.</p>
No power	<p>Where a meter has a no power meter event, FOGY will determine whether there has been a genuine outage. If the outage is genuine, zero will be reported, and if it is not genuine a permanent estimate will be created based on historic information before the outage.</p> <p>I checked three examples of no power faults and confirmed the process was followed.</p>
Faulty meter	<p>Where a meter is either 1) not recording consumption, or 2) has a fault preventing data from being recorded accurately, data will be permanently estimated based on the history before the fault occurred or after the meter is replaced.</p> <p>I reviewed three examples of faulty meters and confirmed that investigation occurred, and corrections were processed as necessary.</p>
Meter changes	<p>Where a meter change occurs, opening and closing meter change readings are entered. On the day of the change, zeros are recorded for trading periods after the meter removal on the old meter and for trading periods before the meter installation on the new meter.</p> <p>I reviewed three examples of meter changes and confirmed that the expected process was followed.</p>

### Audit outcome

Compliant

### 8.3. Error and loss compensation arrangements (Clause 19(3) Schedule 15.2)

#### Code reference

Clause 19(3) Schedule 15.2

#### Code related audit information

*A reconciliation participant may use error compensation and loss compensation as part of the process of determining accurate data. Whichever methodology is used, the reconciliation participant must document the compensation process and comply with audit trail requirements set out in the Code.*

#### Audit observation

FOGY does not have ICPs with error or loss compensation arrangements.

#### Audit commentary

FOGY does not have ICPs with error or loss compensation arrangements.

#### Audit outcome

Compliant

### 8.4. Correction of HHR and NHH raw meter data (Clause 19(4) and (5) Schedule 15.2)

#### Code reference

Clause 19(4) and (5) Schedule 15.2

#### Code related audit information

*In correcting a meter reading in accordance with clause 19, the raw meter data must not be overwritten. If the raw meter data and the meter readings are the same, an automatic secure backup of the affected data must be made and archived by the processing or data correction application.*

*If data is corrected or altered, a journal must be generated and archived with the raw meter data file. The journal must contain the following:*

*19(5)(a)- the date of the correction or alteration*

*19(5)(b)- the time of the correction or alteration*

*19(5)(c)- the operator identifier for the person within the reconciliation participant who made the correction or alteration,*

*19(5)(d)- the half-hour metering data or the non-half hour metering data corrected or altered, and the total difference in volume of such corrected or altered data,*

*19(5)(e)- the technique used to arrive at the corrected data,*

*19(5)(f)- the reason for the correction or alteration.*

#### Audit observation

I checked the processes for estimation and correction.

#### Audit commentary

Raw data is not edited during the estimation and correction processes, and compliant audit trails are created.

#### Audit outcome

Compliant

## 9. ESTIMATING AND VALIDATING VOLUME INFORMATION

### 9.1. Identification of readings (Clause 3(3) Schedule 15.2)

#### Code reference

Clause 3(3) Schedule 15.2

#### Code related audit information

All estimated readings and permanent estimates must be clearly identified as an estimate at source and in any exchange of metering data or volume information between participants.

#### Audit observation

FOGY does not deal with any NHH data. Identification of actual and estimated HHR volumes was checked.

#### Audit commentary

Readings and volumes are identified as estimated or actual as required by this clause. Three CS files did not have read types correctly recorded:

Switch type	ICP	Event date	Finding
MI	0030200378PC78F	12 September 2022	Recorded as actual but should have been estimated. The read did not relate to last day of supply, and an actual read for that date was not available at the time the CS was issued.
MI	0000752270TEECD	21 May 2022	Recorded as estimated but should have been actual.
MI	1001260404UN39B	24 July 2022	Recorded as estimated but should have been actual.

#### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2  From: 21-May-22 To: 12-Sep-22	Three switch move CS files had incorrectly recorded switch event read types.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Strong  Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	The controls are rated as strong, because a very small proportion of CS files contained incorrect read types.  The audit risk rating is assessed to be low. Actual and estimated switch event readings are treated as permanent by the historic estimate process. Because the CS files affected were switch moves and FOGY is a HHR trader, the incorrect classification does not have any impact on the other trader's ability to issue read renegotiations under Clause 6 (2) and (3) Schedule 11.3.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>0000752270TEECD was an estimated read that was provided by the MEP. FOGY has updated process checks to ensure we will send all future CS's with correct read type, as recorded in our system.</p> <p>1001260404UN39B at the time of sending the CS, the read for 23/07/2022 had not been received from the MEP, that read arrived on 28/07/2022, CS was sent on 27/07/2022.</p>	07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will ensure that all estimated CS reads are flagged as estimates in future.	07/02/2023	

## 9.2. Derivation of volume information (Clause 3(4) Schedule 15.2)

### Code reference

*Clause 3(4) Schedule 15.2*

### Code related audit information

*Volume information must be directly derived, in accordance with Schedule 15.2, from:*

*3(4)(a) - validated meter readings*

*3(4)(b) - estimated readings*

*3(4)(c) - permanent estimates.*

### Audit observation

FOGY will not deal with any NHH data. HHR data is used and is estimated or corrected if necessary.

### Audit commentary

FOGY will not deal with any NHH data. HHR data is used and is estimated or corrected if necessary.

### Audit outcome

Compliant

## 9.3. Meter data used to derive volume information (Clause 3(5) Schedule 15.2)

### Code reference

*Clause 3(5) Schedule 15.2*

### Code related audit information

*All meter data that is used to derive volume information must not be rounded or truncated from the stored data from the metering installation.*

### Audit observation

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



### Audit commentary

Data is not rounded or truncated until the submission files are produced and then rounding occurs to two decimal places.

### Audit outcome

Compliant

## 9.4. Half hour estimates (Clause 15 Schedule 15.2)

### Code reference

Clause 15 Schedule 15.2

### Code related audit information

*If a reconciliation participant is unable to interrogate an electronically interrogated metering installation before the deadline for providing submission information, the submission to the reconciliation manager must be the reconciliation participant's best estimate of the quantity of electricity that was purchased or sold in each trading period during any applicable consumption period for that metering installation.*

*The reconciliation participant must use reasonable endeavours to ensure that estimated submission information is within the percentage specified by the Authority.*

### Audit observation

I checked the process for estimation and correction. The process is the same whether it is an estimation or a correction.

### Audit commentary

There are two estimation methodologies. If a midnight read is available on either side of the period to be estimated, the system will automatically calculate and apportion the correct kWh figure between reads evenly across the relevant intervals. If register reads are not available, estimation is conducted manually based on similar historic consumption. The method used is at the user's discretion, and options include:

- a similar day, including days before or after the period to be estimated,
- uniform estimates, which may be based on CS averages and vary by time periods,
- linear estimates, and
- zeros.

If an estimate is conducted and actual data is subsequently provided by the MEP, the original estimated row is labelled as "double" and is ignored for billing and submission. Estimates are identified at trading period and daily level. I checked five examples where estimated data had been replaced with actual and confirmed that the original estimated data was labelled "double" and replaced.

I checked a sample of ten estimates, including five temporary estimates and five permanent estimates. FOGY met the requirement to use reasonable endeavours and estimates were within  $\pm 10$  kWh of the actual replacement data across each day estimated for the temporary estimates. For all the temporary estimate examples provided, the estimated data was replaced with actual data within two days.

FOGY's services agreement for Metrix, Counties Power and IntelliHUB meters states that "an estimated value may be provided when an actual read is unavailable; and replacement/catch-up data will be provided if/when available." IntelliHUB provides estimates to FOGY where actual data is not available. The IntelliHUB Limited audit report records compliance for the estimation technique and audit trail, but records non-compliance for the provision of complete and accurate information, because replacement data is only provided for a 15-day period. This is recorded as non-compliance in **section 2.1**.

### Audit outcome

Compliant

#### 9.5. NHH metering information data validation (Clause 16 Schedule 15.2)

##### Code reference

Clause 16 Schedule 15.2

##### Code related audit information

*Each validity check of non-half hour meter readings and estimated readings must include the following:*

*16(2)(a) - confirmation that the meter reading or estimated reading relates to the correct ICP, meter, and register,*

*16(2)(b) - checks for invalid dates and times*

*16(2)(c) - confirmation that the meter reading or estimated reading lies within an acceptable range compared with the expected pattern, previous pattern, or trend,*

*16(2)(d) - confirmation that there is no obvious corruption of the data, including unexpected 0 values.*

##### Audit observation

FOGY does not deal with any NHH data.

##### Audit commentary

FOGY does not deal with any NHH data.

##### Audit outcome

Not applicable

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

##### Code reference

Clause 17 Schedule 15.2

##### Code related audit information

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

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

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

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

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

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

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

*17(4)(f) - a review of the meter and data storage device event log for any event that could have affected the integrity of metering data,*

*17(4)(g) – a review of the relevant metering data where there is an event that could have affected the integrity of the metering data.*

*If there is an event that could affect the integrity of the metering data (including events reported by MEPs but excluding where the MEP is responsible for investigating and remediating the event) the reconciliation must investigate and remediate any events.*

*If the event may affect the integrity or operation of the metering installation the reconciliation participant must notify the metering equipment provider.*

#### **Audit observation**

I checked the validation processes to confirm compliance.

#### **Audit commentary**

HHR validation checks include:

- a sum-check validation between the sum of the intervals and the difference between midnight reads, the threshold is 0.01 kWh,
- a check that a midnight read and data for all intervals is present; missing data is identified in the database because any record with a “null” fails validation,
- if data is provided for a day which already has values populated, one of the rows will be marked as a “duplicate” and will not be used (I checked an example which confirmed compliance),
- zero values are expected, and the sum-check validation will ensure only expected zeros are “passed”,
- consumption for each ICP is checked against previous periods as part of the submission validation checks discussed in **section 12.2**, and
- a weekly check of ICPs with inactive status and non-zero consumption.

Meter event reports are received from the MEPs via SFTP and saved on FOGY’s file server. They are reviewed weekly to identify any issues that could affect meter accuracy, which are checked and followed up with the MEP as necessary. FOGY provided examples of meter events requiring action to date, confirming that appropriate action is taken to investigate and resolve any issues. I saw evidence of meter issues being identified through review and meter events and actioned, with corrections processed as needed. The correction process is discussed in **section 8.2**.

FOGY intends to automate the review of meter events to make the process more efficient as ICP numbers are increasing.

#### **Audit outcome**

Compliant

## 10. PROVISION OF METERING INFORMATION TO THE GRID OWNER IN ACCORDANCE WITH SUBPART 4 OF PART 13 (CLAUSE 15.38(1)(F))

### 10.1. Generators to provide HHR metering information (Clause 13.136)

#### Code reference

Clause 13.136

#### Code related audit information

*The generator (and/or embedded generator) must provide to the grid owner connected to the local network in which the embedded generator is located, half hour metering information in accordance with clause 13.138 in relation to generating plant that is subject to a dispatch instruction:*

- *that injects electricity directly into a local network; or*
- *if the meter configuration is such that the electricity flows into a local network without first passing through a grid injection point or grid exit point metering installation.*

#### Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit outcome

Not applicable

### 10.2. Unoffered & intermittent generation provision of metering information (Clause 13.137)

#### Code reference

Clause 13.137

#### Code related audit information

*Each generator must provide the relevant grid owner half-hour metering information for:*

- *any unoffered generation from a generating station with a point of connection to the grid 13.137(1)(a)*
- *any electricity supplied from an intermittent generating station with a point of connection to the grid. 13.137(1)(b)*

*The generator must provide the relevant grid owner with the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of that generator's volume information (clause 13.137(2))*

*If such half-hour metering information is not available, the generator must provide the pricing manager and the relevant grid owner a reasonable estimate of such data (clause 13.137(3)).*

#### Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit outcome

Not applicable

### 10.3. Loss adjustment of HHR metering information (Clause 13.138)

#### Code reference

Clause 13.138

#### Code related audit information

*The generator must provide the information required by clauses 13.136 and 13.137,*

*13.138(1)(a)- adjusted for losses (if any) relative to the grid injection point or, for embedded generators the grid exit point, at which it offered the electricity,*

*13.138(1)(b)- in the manner and form that the pricing manager stipulates,*

*13.138(1)(c)- by 0500 hours on a trading day for each trading period of the previous trading day.*

*The generator must provide the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of the generator's volume information.*

#### Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit outcome

Not applicable

### 10.4. Notification of the provision of HHR metering information (Clause 13.140)

#### Code reference

Clause 13.140

#### Code related audit information

*If the generator provides half-hourly metering information to a grid owner under clauses 13.136 to 13.138, or 13.138A, it must also, by 0500 hours of that day, advise the relevant grid owner.*

#### Audit observation

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit commentary

FOGY does not have responsibilities for the provision of information to the grid owner.

#### Audit outcome

Not applicable

## 11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

### 11.1. Buying and selling notifications (Clause 15.3)

#### Code reference

Clause 15.3

#### Code related audit information

*Unless an embedded generator has given a notification in respect of the point of connection under clause 15.3, a trader must give notice to the reconciliation manager if it is to commence or cease trading electricity at a point of connection using a profile with a profile code other than HHR, RPS, UML, EG1, or PV1 at least five business days before commencing or ceasing trader.*

*The notification must comply with any procedures or requirements specified by the reconciliation manager.*

#### Audit observation

The registry list was reviewed to determine which profiles were used.

#### Audit commentary

FOGY only uses the HHR profile, and trading notifications are not required.

#### Audit outcome

Compliant

### 11.2. Calculation of ICP days (Clause 15.6)

#### Code reference

Clause 15.6

#### Code related audit information

*Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of:*

*15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

*The ICP days information must be calculated using the data contained in the retailer or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.*

#### Audit observation

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

I reviewed the GR100 ICP days comparison and GR090 ICP missing reports for the audit period and investigated a sample of variances.

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

## Audit commentary

### AV110 ICP days submission

ICP days submissions and generated from the database and checked against previous submissions for the same month. Differences are checked to confirm whether the recorded days are correct.

The process for the calculation of ICP days was examined by checking ICP days submitted for September 2022 for 30 NSPs with a small number of ICPs against the active ICP days on the registry list with history. The totals matched the expected values.

Breach information provided by the Electricity Authority did not identify any late ICP days submissions.

### GR090 ICP missing

The GR090 ICPMISS reports are loaded into the database and reviewed quarterly to investigate and resolve discrepancies.

I reviewed the 70 ICPs missing from the most submissions between May 2021 to August 2022 (including all ICPs missing from more than one submission) and confirmed that they were missing because an inactive status was recorded on the registry, a backdated withdrawal had been completed, or they were included in the report as missing from the registry in error.

### GR100 ICP days comparison

The GR100 ICPCOMP reports are loaded into the database and reviewed quarterly to investigate and resolve discrepancies. I reviewed the GR100 reports for May 2020 to August 2022 and found the differences are small and reasonable. The negative percentage figures in the table below indicate that the FOGY ICP days are higher than those on the registry.

I found that no differences remained after revision 3. I checked all differences remaining in revision 3 and found they were caused by backdated status updates and switches and will wash out with the next revision.

Month	Ri	R1	R3	R7	R14
May 2020	-0.09%	-0.31%	-0.09%	-0.31%	0.00%
Jun 2020	-0.46%	-0.45%	-0.46%	-0.46%	0.00%
Jul 2020	0.00%	-0.12%	-0.07%	-0.25%	0.00%
Aug 2020	-0.30%	-0.28%	-0.27%	-0.27%	0.00%
Sep 2020	-0.32%	0.06%	-0.31%	-0.26%	0.00%
Oct 2020	-0.14%	-0.17%	-0.17%	0.00%	0.00%
Nov 2020	-	-0.23%	-0.23%	0.00%	0.00%
Dec 2020	-0.31%	-0.38%	-0.31%	0.00%	0.00%
Jan 2021	-0.37%	-0.50%	-0.50%	0.00%	0.00%

Month	Ri	R1	R3	R7	R14
Feb 2021	-0.54%	-0.68%	0.00%	0.00%	0.00%
Mar 2021	-0.49%	0.00%	0.00%	0.00%	0.00%
Apr 2021	0.08%	0.00%	0.00%	0.00%	0.00%
May 2021	0.00%	0.00%	0.00%	0.00%	0.00%
Jun 2021	0.00%	-0.06%	0.00%	0.00%	0.00%
Jul 2021	0.10%	0.00%	0.00%	0.00%	0.00%
Aug 2021	0.00%	0.00%	0.00%	0.00%	-
Sep 2021	-0.05%	0.00%	0.00%	0.00%	-
Oct 2021	0.11%	0.03%	0.09%	0.00%	-
Nov 2021	0.01%	-0.07%	0.00%	0.00%	-
Dec 2021	0.05%	0.07%	0.00%	0.00%	-
Jan 2022	0.12%	-0.01%	0.00%	0.00%	-
Feb 2022	0.09%	0.00%	0.00%	0.00%	-
Mar 2022	-0.03%	0.00%	0.00%	-	-
Apr 2022	0.00%	-0.07%	0.00%	-	-
May 2022	0.00%	0.00%	-0.04%	-	-
Jun 2022	-0.01%	0.00%	0.03%	-	-
Jul 2022	-0.03%	0.00%	-	-	-
Aug 2022	-0.03%	0.01%	-	-	-

### Audit outcome

Compliant



### 11.3. Electricity supplied information provision to the reconciliation manager (Clause 15.7)

#### Code reference

*Clause 15.7*

#### Code related audit information

*A retailer must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each NSP, aggregated by invoice month, for which it has provided submission information to the reconciliation manager, including revised submission information for that period as non-loss adjusted values in respect of:*

*15.7(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

#### Audit observation

The process for the calculation of as billed volumes was examined by checking a sample of NSPs with a small number of ICPs to confirm the AV120 calculation was correct.

GR130 reports were reviewed to confirm whether the relationship between billed and submitted data appears reasonable.

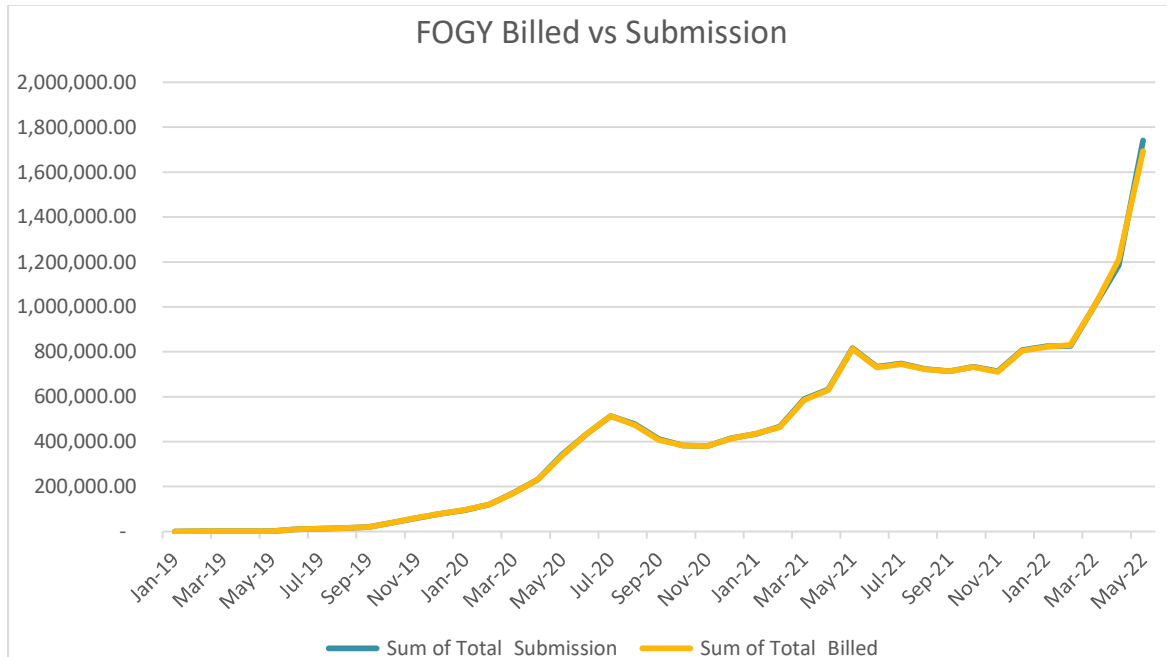
Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

#### Audit commentary

ICPs are billed daily based on midnight readings, and the values are stored in the billing consumption table. The billing and submission data are synchronised, as both are based on daily consumption.

The process for the calculation of as billed volumes was examined by checking five NSPs against daily billing information. The AV120 billed consumption calculation was confirmed to be correct for the NSPs checked.

I checked the difference between submission and electricity supplied information from January 2019 to May 2022, and the results are shown in the chart below. The total difference between electricity supplied and submission data is 0.3% for the year ended May 2022.



No alleged breaches were recorded for late provision of submission information.

#### Audit outcome

Compliant

### 11.4. HHR aggregates information provision to the reconciliation manager (Clause 15.8)

#### Code reference

Clause 15.8

#### Code related audit information

Using relevant volume information, each retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity consumed for each half hourly metered ICP for which it has provided submission information to the reconciliation manager, including:

15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period

15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.

#### Audit observation

I confirmed that the process for the calculation and aggregation of HHR data is correct, by matching HHR aggregates information with the HHR volumes data for a sample of submissions.

The GR090 ICP Missing files were examined, and an extreme case sample of ICPs missing were checked.

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

### Audit commentary

Report aggregation was checked by:

- tracing HHR data and readings from the MEP's source files to FOGY's database for two days for six ICPs, which confirmed the volumes and readings were recorded and labelled correctly,
- tracing one month of HHR data from FOGY's database to the HHR aggregates submission for 14 ICPs, which confirmed that the submissions were consistent with the data in the database, and
- matching the HHR volumes and aggregates files for 40 revisions during the audit period, which found that the volumes and aggregates files matched within  $\pm 0.4$  kWh.

The GR090 ICPMISS reports are loaded into the database and reviewed quarterly to investigate and resolve discrepancies. I reviewed the 70 ICPs missing from the most submissions between May 2021 to August 2022 (including all ICPs missing from more than one submission) and confirmed that they were missing because an inactive status was recorded on the registry, a backdated withdrawal had been completed, or they were included in the report as missing from the registry in error.

No alleged breaches were recorded for late provision of submission information.

### Audit outcome

Compliant

## 12. SUBMISSION COMPUTATION

### 12.1. Daylight saving adjustment (Clause 15.36)

#### Code reference

Clause 15.36

#### Code related audit information

*The reconciliation participant must provide submission information to the reconciliation manager that is adjusted for NZDT using 1 of the techniques set out in clause 15.36(3) specified by the Authority.*

#### Audit observation

Daylight saving adjustment was checked during the audit.

#### Audit commentary

Daylight saving adjustment occurs in a compliant manner.

#### Audit outcome

Compliant

### 12.2. Creation of submission information (Clause 15.4)

#### Code reference

Clause 15.4

#### Code related audit information

*By 1600 hours on the 4th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all NSPs for which the reconciliation participant is recorded in the registry as having traded electricity during the consumption period immediately before that reconciliation period (in accordance with Schedule 15.3).*

*By 1600 hours on the 13th business day of each reconciliation period, the reconciliation participant must deliver submission information to the reconciliation manager for all points of connection for which the reconciliation participant is recorded in the registry as having traded electricity during any consumption period being reconciled in accordance with clauses 15.27 and 15.28, and in respect of which it has obtained revised submission information (in accordance with Schedule 15.3).*

#### Audit observation

Processes to ensure that submissions are accurate were reviewed. Alleged breaches during the audit period were reviewed to determine whether any reconciliation submissions were late.

#### Audit commentary

HHR submission and correction processes were reviewed in **sections 11.4** and **8.2** and found to be compliant. HHR volumes are reviewed prior to submission, and these checks are discussed in **section 12.3**.

Submission data was reviewed for a sample of ICPs:

- no unmetered load was supplied during the audit period,
- all consumption is submitted regardless of status and whether there is an active customer, and review of ICPs with vacant and inactive consumption during the audit period confirmed this, and

- 122 ICPs have distributed generation recorded by the distributor; I checked the HHR aggregates submissions for the 112 ICPs which switched in prior to August 2022 and confirmed that I flow volumes were submitted for 111 of them in August 2022 but ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October (I flow volumes will be provided from August 2022 onwards through the revision process).

No alleged breaches were recorded for late provision of submission information.

### Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4  From: 08-Aug-22 To: 09-Dec-22	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.  Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because most submission information was accurate. The impact is low because corrected submission information will be provided through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY is continuing to communicate with Intellihub in order to obtain the missing I flow volume data for ICP 0000509243NR543. FOGY is currently waiting for a response from Intellihub.	20/02/203	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Current process cover this and any issues identified are investigated and action on gaining the appropriate information. Any revisions then correct this information to the Market	07/02/2023	

## 12.3. Allocation of submission information (Clause 15.5)

### Code reference

Clause 15.5

### Code related audit information

*In preparing and submitting submission information, the reconciliation participant must allocate volume information for each ICP to the NSP indicated by the data held in the registry for the relevant consumption period at the time the reconciliation participant assembles the submission information. Volume information must be derived in accordance with Schedule 15.2.*

*However, if, in relation to a point of connection at which the reconciliation participant trades electricity, a notification given by an embedded generator under clause 15.13 for an embedded generating station is in force, the reconciliation participant is not required to comply with the above in relation to electricity generated by the embedded generating station.*

### Audit observation

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

Processes to ensure that submissions are accurate were reviewed.

### Audit commentary

As discussed in **section 9.6**, FOGY's HHR data validation processes are compliant with the requirements of Clause 17 Schedule 15.2. FOGY completes pre submission reviews to ensure data is accurate, including comparisons to previous periods at ICP level.

### Audit outcome

Compliant

## 12.4. Grid owner volumes information (Clause 15.9)

### Code reference

Clause 15.9

### Code related audit information

*The participant (if a grid owner) must deliver to the reconciliation manager for each point of connection for all of its GXPs, the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.9(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period (clause 15.9(b)).*

### Audit observation

FOGY is not a grid owner.

### Audit commentary

FOGY is not a grid owner.

### Audit outcome

Not applicable

## 12.5. Provision of NSP submission information (Clause 15.10)

### Code reference

Clause 15.10

### Code related audit information

*The participant (if a local or embedded network owner) must provide to the reconciliation manager for each NSP for which the participant has given a notification under clause 25(1) Schedule 11.1 (which relates to the creation, decommissioning, and transfer of NSPs) the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.10(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period (clause 15.10(b)).*

### Audit observation

FOGY is not an embedded network owner.

### Audit commentary

FOGY is not an embedded network owner.

### Audit outcome

Not applicable

## 12.6. Grid connected generation (Clause 15.11)

### Code reference

Clause 15.11

### Code related audit information

*The participant (if a grid connected generator) must deliver to the reconciliation manager for each of its points of connection, the following:*

- *submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period (clause 15.11(a))*
- *revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period (clause 15.11(b)).*

### Audit observation

FOGY does not have any grid connected generation.

### Audit commentary

FOGY does not have any grid connected generation.

### Audit outcome

Not applicable

## 12.7. Accuracy of submission information (Clause 15.12)

### Code reference

Clause 15.12

### Code related audit information

*If the reconciliation participant has submitted information and then subsequently obtained more accurate information, the participant must provide the most accurate information available to the reconciliation manager or participant, as the case may be, at the next available opportunity for submission (in accordance with clauses 15.20A, 15.27, and 15.28).*

### Audit observation

The revision process was checked during the audit to confirm compliance.

### Audit commentary

All estimates are replaced with actual data where it is available, and revision files are provided whether data has changed or not. No alleged breaches were recorded for late provision of submission information.

The following submission accuracy issues were identified:

- 122 ICPs have distributed generation recorded by the distributor; I checked the HHR aggregates submissions for the 112 ICPs which switched in prior to August 2022 and confirmed that I flow volumes were submitted for 111 of them in August 2022 but ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October (I flow volumes will be provided from August 2022 onwards through the revision process), and
- FOGY's services agreement for Metrix, Counties Power and IntelliHUB meters states that "an estimated value may be provided when an actual read is unavailable, and replacement/catch-up data will be provided if/when available"; IntelliHUB provides estimates to FOGY where actual data is not available and the IntelliHUB Limited audit report records compliance for the estimation technique and audit trail, but records non-compliance for the provision of complete and accurate information, because IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date which is non-compliance because more accurate information is available but is not used.

### Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 12.7 With: Clause 15.12  From: 08-Aug-22 To: 09-Dec-22	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.  IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.  Potential impact: None  Actual impact: None  Audit history: None  Controls: Strong  Breach risk rating: 1



Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong, because most submission information was accurate.</p> <p>The impact is low because corrected submission information will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
FOGY is continuing to communicate with Intellihub in order to obtain the missing I flow volume data for ICP 0000509243NR543. FOGY is currently waiting for a response from Intellihub.		20/02/2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
As with Audit ref 12.2 - Current process cover this and any issues identified are investigated and action on gaining the appropriate information. Any revisions then correct this information to the Market		07/02/2023	

## 12.8. Permanence of meter readings for reconciliation (Clause 4 Schedule 15.2)

### Code reference

Clause 4 Schedule 15.2

### Code related audit information

*Only volume information created using validated meter readings, or if such values are unavailable, permanent estimates, has permanence within the reconciliation processes (unless subsequently found to be in error).*

*The relevant reconciliation participant must, at the earliest opportunity, and no later than the month 14 revision cycle, replace volume information created using estimated readings with volume information created using validated meter readings.*

*If, despite having used reasonable endeavours for at least 12 months, a reconciliation participant has been unable to obtain a validated meter reading, the reconciliation participant must replace volume information created using an estimated reading with volume information created using a permanent estimate in place of a validated meter reading.*

### Audit observation

FOGY does not deal with NHH data. The presence of HHR estimates at revision 14 was checked.

### Audit commentary

Where actual data cannot be obtained, FOGY contacts the MEP to request the missing data and if necessary, raises a field services order to resolve the issue preventing the data from being obtained.

24 ICPs had some trading periods where actual data could not be obtained for by revision 14, and FOGY created permanent estimates based on the best information available. The ICPs affected are:

ICP	Permanent estimated from	Permanent estimated to	Permanent estimate days
0000712135TU114	30 March 2021	31 August 2021	310
0000002429TR87B	25 November 2020	31 August 2021	280
0268714120LCD0A	20 October 2020	26 May 2021	219
0001426351UNAA3	25 April 2021	31 August 2021	128
0000161413TR9C6	16 May 2021	2 August 2021	79
0000270373ENE58	15 June 2021	31 August 2021	78
1001125574LC5D7	15 June 2021	31 August 2021	78
0000223348UNEA1	30 April 2021	4 June 2021	72
0000009372UN49D	30 July 2021	31 August 2021	66
0407628258LC832	16 April 2021	18 May 2021	33
0005138337RN5DE	6 July 2021	2 August 2021	28
1099576528CN3AB	25 April 2021	5 May 2021	22
1000004234BPE4A	15 June 2021	21 June 2021	14
0031614186PCF63	1 June 2021	9 June 2021	9
0321078659LC684	15 June 2021	23 June 2021	9
0007139174RND6E	18 March 2021	6 June 2021	8
0005411548RN1E5	25 March 2021	12 April 2021	5
0005933595RNFD3	8 April 2021	23 April 2021	5
0005485045RNAFF	7 June 2021	8 June 2021	2
1001118991LC522	15 April 2021	22 April 2021	2
0005137969RND27	17 July 2021	17 July 2021	1
0412523051LC9E9	4 April 2021	4 April 2021	1
0000921598TU38B	18 January 2021	18 January 2021	1

#### Audit outcome

Compliant

## 12.9. Reconciliation participants to prepare information (Clause 2 Schedule 15.3)

### Code reference

Clause 2 Schedule 15.3

### Code related audit information

If a reconciliation participant prepares submission information for each NSP for the relevant consumption periods in accordance with the Code, such submission information for each ICP must comprise the following:

- half hour volume information for the total metered quantity of electricity for each ICP notified in accordance with clause 11.7(2) for which there is a category 3 or higher metering installation (clause 2(1)(a)) for each ICP about which information is provided under clause 11.7(2) for which there is a category 1 or category 2 metering installation (clause 2(1)(ac) to 2(1)(ae)):
  - a) any half hour volume information for the ICP; or
  - b) any non-half hour volumes information calculated under clauses 4 to 6 (as applicable).
  - c) unmetered load quantities for each ICP that has unmetered load associated with it derived from the quantity recorded in the registry against the relevant ICP and the number of days in the period, the distributed unmetered load database, or other sources of relevant information (clause 2(1)(c))
- to create non half hour submission information a reconciliation participant must only use information that is dependent on a control device if (clause 2(2)):
  - a) the certification of the control device is recorded in the registry; or
  - b) the metering installation in which the control device is location has interim certification.
- to create submission information for a point of connection the reconciliation participant must use volume information (clause 2(3))
- to calculate volume information the reconciliation participant must apply raw meter data:
  - a) for each ICP, the compensation factor that is recorded in the registry (clause 2(4)(a))
  - b) for each NSP the compensation factor that is recorded in the metering installations most recent certification report (clause 2(4)(b))

### Audit observation

Aggregation and content of reconciliation submissions was reviewed, and the registry list and AC020 reports were reviewed.

### Audit commentary

All ICPs have meter category 1 and HHR submission type. No unmetered load is connected, no loss or compensation arrangements are required and no profiles requiring certification of load control devices are used.

Aggregation of the HHR volumes and aggregates files was checked and found to be compliant in **section 11.4**.

### Audit outcome

Compliant

## 12.10. Historical estimates and forward estimates (Clause 3 Schedule 15.3)

### Code reference

Clause 3 Schedule 15.3

### Code related audit information

*For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the techniques described in clauses 4 to 7 to create historical estimates and forward estimates.*

*Each estimate that is a forward estimate or a historical estimate must clearly be identified as such (clause 3(2)).*

*If validated meter readings are not available for the purpose of clauses 4 and 5, permanent estimates may be used in place of validated meter readings (clause 3(3)).*

### Audit observation

FOGY does not deal with NHH data.

### Audit commentary

FOGY does not deal with NHH data.

### Audit outcome

Not applicable

## 12.11. Historical estimate process (Clauses 4 and 5 Schedule 15.3)

### Code reference

*Clauses 4 and 5 Schedule 15.3*

### Code related audit information

*The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historical estimates of volume information for each ICP when the relevant seasonal adjustment shape is available, and the reconciliation participant is not using an approved profile in accordance with clause 4A.*

*If the Authority has approved a profile for the purpose of apportioning volume information (in kWh) to part or full consumption periods, a reconciliation participant may use the profile despite the relevant seasonal adjustment shape being available; and if it uses the profile, must otherwise prepare the historical estimate in accordance with the methodology in clause 4.*

*If a seasonal adjustment shape is not available, and the **reconciliation participant** is not using an approved **profile** under clause 4A, the methodology for preparing an historical estimate of volume information for each ICP must be the same as in clause 4, except that the relevant quantities kWh<sub>px</sub> must be prorated as determined by the reconciliation participant using its own methodology or on a flat shape basis using the relevant number of days that are within the consumption period and within the period covered by kWh<sub>px</sub>.*

### Audit observation

FOGY does not deal with NHH data.

### Audit commentary

FOGY does not deal with NHH data.

### Audit outcome

Not applicable

## 12.12. Forward estimate process (Clause 6 Schedule 15.3)

### Code reference

Clause 6 Schedule 15.3

### Code related audit information

*Forward estimates may be used only in respect of any period for which an historical estimate cannot be calculated.*

*The methodology used for calculating a forward estimate may be determined by the reconciliation participant, only if it ensures that the accuracy is within the percentage of error specified by the Authority.*

### Audit observation

FOGY does not deal with NHH data.

### Audit commentary

FOGY does not deal with NHH data.

### Audit outcome

Not applicable

## 12.13. Compulsory meter reading after profile change (Clause 7 Schedule 15.3)

### Code reference

Clause 7 Schedule 15.3

### Code related audit information

*If the reconciliation participant changes the profile associated with a meter, it must, when determining the volume information for that meter and its respective ICP, use a validated meter reading or permanent estimate on the day on which the profile change is to take effect.*

*The reconciliation participant must use the volume information from that validated meter reading or permanent estimate in calculating the relevant historical estimates of each profile for that meter.*

### Audit observation

The registry list and event detail report were reviewed to determine which profiles were used.

### Audit commentary

FOGY only uses the HHR profile, and no profile changes occurred during the audit period.

### Audit outcome

Compliant

## 13. SUBMISSION FORMAT AND TIMING

### 13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3)

#### Code reference

*Clause 8 Schedule 15.3*

#### Code related audit information

*For each category 3 of higher metering installation, a reconciliation participant must provide half hour submission information to the reconciliation manager.*

*For each category 1 or category 2 metering installation, a reconciliation participant must provide to the reconciliation manager:*

- *Half hour submission information; or*
- *Non half hour submission information; or*
- *A combination of half hour submission information and non-half hour submission information*

*However, a reconciliation participant may instead use a profile if:*

- *The reconciliation participant is using a profile approved in accordance with clause Schedule 15.5; and*
- *The approved profile allows the reconciliation participant to provide half hour submission information from a non-half hour metering installation; and*
- *The reconciliation participant provides submission information that complies with the requirements set out in the approved profile.*

*Half hour submission information provided to the reconciliation manager must be aggregated to the following levels:*

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *trading period*

*The non-half hour submission information that a reconciliation participant submits must be aggregated to the following levels:*

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *consumption period or day*

#### Audit observation

I checked processes to ensure the correct aggregation of submission information.

#### Audit commentary

Aggregation factors are determined directly from registry information. There were no examples of incorrect aggregation identified.

### Audit outcome

Compliant

## 13.2. Reporting resolution (Clause 9 Schedule 15.3)

### Code reference

Clause 9 Schedule 15.3

### Code related audit information

*When reporting submission information, the number of decimal places must be rounded to not more than 2 decimal places.*

*If the unrounded digit to the right of the second decimal place is greater than or equal to 5, the second digit is rounded up, and*

*If the digit to the right of the second decimal place is less than 5, the second digit is unchanged.*

### Audit observation

I reviewed the rounding of data on the AV090 and AV140 reports as part of the aggregation checks.

### Audit commentary

Data is rounded to two decimal places.

### Audit outcome

Compliant

## 13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)

### Code reference

Clause 10 Schedule 15.3

### Code related audit information

*By 1600 hours on the 13th business day of each reconciliation period the reconciliation participant must report to the reconciliation manager the proportion of historical estimates per NSP contained within its non-half hour submission information.*

*The proportion of submission information per NSP that is comprised of historical estimates must (unless exceptional circumstances exist) be:*

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*
- *100% for revised data provided at the month 14 revision (clause 10(3)(c)).*

### Audit observation

FOGY does not deal with any NHH data.

### Audit commentary

FOGY does not deal with any NHH data.

### Audit outcome

Not applicable

## 14. GLOSSARY OF TERMS

<b>E2 breach for switch move</b>	NT Proposed Transfer Date and CS Actual Transfer date do not match; AND CS Actual Transfer Date is a) earlier than the NT Proposed Transfer Date; OR b) more than 10 business days after receipt of the NT.
<b>NA breach</b>	NW arrival date is more than two calendar months after the CS Actual Transfer Date.

## CONCLUSION

FOGY's registry and switching processes are largely manual, and it is a credit to the FOGY team that the increase in workload from gaining customers has not resulted in an increase in late registry updates and switching files. The majority of late registry updates were caused by late notice of the required change by another party.

The accuracy of registry and submission data continues to be high, with a very small number of low impact exceptions identified. Where submission data is affected, corrections are expected to be provided through the revision process.

There were some low impact issues for switching data accuracy, particularly relating to last actual read dates where the CS event reading is estimated, and I have recommended a process improvement.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Based on the audit risk rating of 21, the indicative next audit date is in 12 months. I recommend that the next audit is completed in 15 months, on 28 May 2024.

## PARTICIPANT RESPONSE

FOGY has had considerable growth during the Audit period and are happy that the majority of the non-compliances found are covered by existing processes, and where applicable improvements have been made to those processes as a result of the Audit.

We would like it noted that a number of these non-compliances were the result of other retailers reconnecting properties FOGY had disconnected, then failing to complete a switch request and then not restoring the ICP back to a disconnected state when they decide not to complete the switch.

The current approach to allow retailers to reconnect a property that they are not yet the retailer is being abused by some retailers. FOGY believes reconnections of vacant properties before switch completion is required, but we believe (and is our practice):

- that before a reconnection is initiated on a vacant property where you are not the retailer, an NT file should be sent before raising the Service Request to the MEP.
- The MEP should not reconnect without checking if a switch has been initiated where the requesting retailer is not the current responsible retailer.
- If for any reason the switch is withdrawn or not able to be completed the initiator of the reconnection, should request and bear the costs to disconnect the property again.

FOGY continues to develop and improve our processes and systems to ensure compliance requirements are met.