

**ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT**

For

**ELECTRA (ELEC)
(COMPANY #579974)**

Prepared by: Ewa Glowacka of TEG & Associates

Date audit commenced: 26 January 2023

Date audit report completed: 20 February 2023

Audit report due date: 25-Feb-23

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EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Electra (ELEC) to encompass the Authority's request for annual audits, as required in clause 11.10 of Schedule 11 of the Electricity Industry Participation Code 2010, to assure compliance with the Code. The relevant rules audited are as required by the Guidelines for Distributor Audits V7.2, issued by the Electricity Authority.

At the time of this audit Electra had 47,389 ICPs (active and inactive), and it created 685 new ICPs during the audit period.

The audit identified 6 non-compliances. Overall Electra's' compliance has improved. The non-compliances identified in this audit are minor. The main issue, identified in the previous audit report, was the missing Initial Electrical Connection Date (IECD) for ICPs livened prior to 2021. At the time of finalizing this report all historic data was successfully populated however the correction of historic information discrepancies has the unfortunate consequential effect of generating non-compliance because changes are being made outside of required timelines.

An accurate registry is Electra's key objective. Electra put in place many processes and applications to monitor compliance on daily basis.

The audit period is 01/10/2021 to 15/01/2023.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Distributor audit provides some guidance on this matter. The Future Risk Rating score is 11 which results in an indicative audit frequency of 12 months. Our recommendation is 14 months.

We thank Electra for its full and complete cooperation in this audit.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1)	Inaccurate or missing information related to distributed generation, IECD, addresses recorded in the registry	Moderate	Low	2	Identified
Requirements to correct errors	2.2	11.2(2)	Incorrect or missing historical information in the registry across a number of areas.	Moderate	Low	2	Identified
Timeliness of provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	81 ICPs (3.3%) electrically connected during the audit period did not have IECD populated in the registry; One ICP (historic, prior 2021) does not have IECD populated 622 ICPs, including historic ICPs, had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event	Moderate	Low	2	Identified
Changes to registry information	4.1	8 of Schedule 11.1	Registry event (address, distributed generation, decommissioning) updates backdated more than three business days	Moderate	Low	2	Identified
ICP location address	4.4	2 of Schedule 11.1	For 24 ICPs the address descriptions do not allow ICPs to be readily located	Strong	Low	1	Identified
Distributor to provide ICP information	4.6	7(1) of Schedule 11.1	<ul style="list-style-type: none"> 6 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 1 UML ICP information recorded by Electra but retailers do not submit volumes to RM 	Moderate	Low	2	Identified

			<ul style="list-style-type: none"> • Effective Date in the registry for DG installation (sample of 20 ICPs) is not representative of the date of CoC • Incorrect Dedicated flag for “5 LE” ICPs • Incorrect installation flag “L” for 3 ICPs • No IECD for 81 ICPs electrically connected during this audit period • No IECD one ICP (historical, prior 2021) 				
Future Risk Rating							11

Future risk rating	1-2	3-6	7-9	10-19	20-24	25+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

ISSUES

Subject	Section	Issue	Description
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

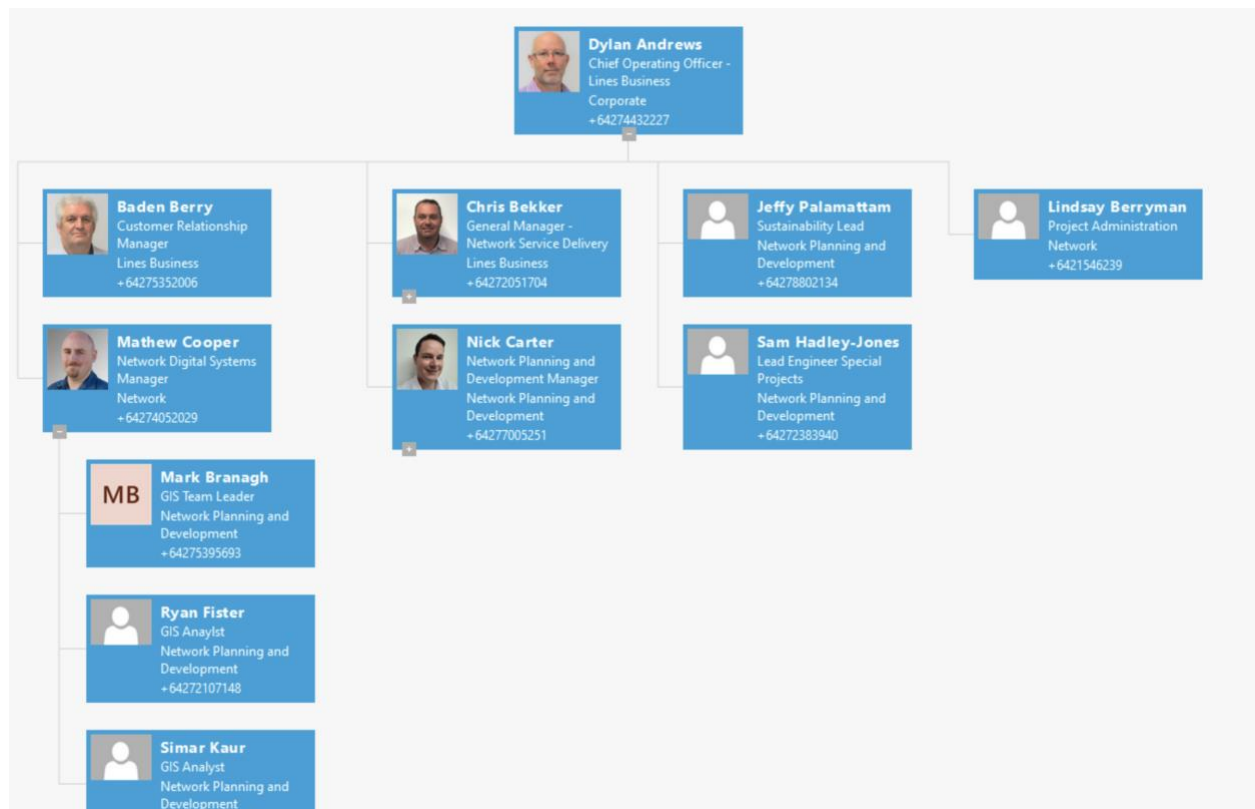
Audit observation

Electra confirms that there are no exemptions in place which are relevant to the scope of this audit.

Audit commentary

We checked the Electricity Authority website and confirm that there are no exemptions in place.

1.2. Structure of Organisation



1.3. Persons involved in this audit

Name	Title	Company
Mark Branagh	GIS Team Leader	Electra
Ryan Fister	GIS Analyst	Electra
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates Ltd

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

During the audit, we did not identify any contractors which assist Electra to meet their obligations relevant to the scope of this audit.

Audit commentary

There are no contractors who assist with, or are used in, the Electra operations that were audited.

1.5. Supplier list

WindMil software is provided by Milsoft Utility Solutions.

1.6. Hardware and Software

WindMil is used to store information about network configurations and the location of ICPs. Electra uses ESB (Enterprise Service Bus) to move data from Milsoft to the registry. It is a set of rules and principles for integrating numerous applications together over a bus-like infrastructure.

1.7. Breaches or Breach Allegations

No breaches or alleged breaches were recorded.

1.8. ICP and NSP Data

The table below shows NSPs located on the Electra network and the number of active and inactive ICPs.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
ELEC	MHO0331	Mangahao			MHO0331ELECGN	GN	1/05/11	18,306
ELEC	PRM0331	Paraparaumu			PRM0331ELECGN	GN	1/05/08	29,114

Status	Number of ICPs (24/01/2023)	Number of ICPs (2021)	Number of ICPs (2020)	Number of ICPs (10/19)	Number of ICPs (05/19)
New (999,0)	0	0	0	1	17
Ready (0,0)	28	24	16	32	56
Active (2,0)	46,473	45,493	45,536	45,167	45,009
Distributor (888,0)	5	4	1	0	0
Inactive – new connection in progress (1,12)	35	32	23	35	25
Inactive – electrically disconnected vacant property (1,4)	689	688	728	771	734
Inactive – electrically disconnected remotely by AMI meter (1,7)	146	130	124	126	118
Inactive – electrically disconnected at pole fuse (1,8)	20	14	11	9	4
Inactive – electrically disconnected due to meter disconnected (1,9)	20	18	12	13	10
Inactive – electrically disconnected at meter box fuse (1,10)	4	5	6	3	3
Inactive – electrically disconnected at meter box switch (1,11)	0	1	1	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	2	1	11	302	406
Inactive – reconciled elsewhere (1,5)	0	0	0	0	0
Decommissioned (3)	2,976	2,870	2,741	2,365	2,201

1.9. Authorisation Received

Electra provided a letter of authorisation to the auditors permitting the collection of data from other parties for matters directly related to the audit.

1.10. Scope of Audit

This Distributor audit was performed at the request of Electra to encompass the Authority's request for annual audits, as required in clause 11.10 of Schedule 11 of the Electricity Industry Participation Code

2010, to assure compliance with the Code. The audit was carried out on 26 January 2023 in the Electra’s office in Levin.

The audit covers the following processes under clause 16A.23 Part 16A performed by Electra

- (a) -The creation of ICP identifiers for ICPs
- (b) -The provision of ICP information to the registry and the maintenance of that information
- (c) - The creation and maintenance of loss factors

1.11. Summary of previous audit

The previous audit was conducted by Ewa Glowacka of TEG & Associates in October 2021. This found 8 non-compliances. The status of these has been updated below:

Subject	Section	Clause	Non Compliance	Comment
Requirement to provide complete and accurate information	2.1	11.2(1)	Inaccurate or missing information related to distributed generation, IECD, addresses, addresses recorded in the registry	Still exists
Requirements to correct errors	2.2	11.2(2)	Incorrect or missing historical information in the registry across a number of areas.	Still exists
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	9 ICPs did not have information loaded prior to electricity being traded at the ICP	Cleared
Timeliness of provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	92 ICPs (16.3%) electrically connected during the audit period did not have IECD populated in the registry at all. 70 ICPs (6.9%) had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event	Still exists
Management of status “New”	3.13	13 of Schedule 11.1	For 9 ICPs the status “NEW” was incorrectly managed	Cleared
Changes to registry information	4.1	8 of Schedule 11.1	Registry event updates backdated more than three business days (mostly prior April 2021)	Still exists
ICP location address	4.4	2 of Schedule 11.1	For 34 ICPs the address descriptions do not allow ICPs to be readily located	Still exists
Distributor to provide ICP information	4.6	7(1) of Schedule 11.1	15 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 6 UML ICPs information recorded by Electra but retailers do not submit volumes to RM	Still exists

			IECD - No IECD for 90 ICPs in this audit period and no IECD for 447 historical ICPs Effective Date in the registry for DG installation (sample of 16 ICPs) is not representative of the date of CoC	
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2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

The Audit Compliance Report for the audit period, the EDA file, LIS, and PR255 dated 24/01/2023 were checked. We discussed with Electra staff what processes were in place to ensure accurate information was provided to the registry.

Audit commentary

The table below shows a summary of our findings:

Section	Registry Discrepancy
2.2	Some Registry information has been missing or incorrect for some time: No IECD in the registry but "Active" <ul style="list-style-type: none">• 90 ICPs Distributed Generation Incorrect Installation Type <ul style="list-style-type: none">• 7 ICPs LE ICP Incorrect Dedicated flag for "5 LE" ICPs
3.5	IECD Input to the registry later than 10 business days <ul style="list-style-type: none">• 622 ICPs, (534 are historic ICPs), had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event
4.1	Registry information updated within 3 business days: <ul style="list-style-type: none">• Address 88.56%• Network 97.69 %• Decommissioning 41.46%
4.4	Addresses that could not be easily located <ul style="list-style-type: none">• 24 ICPs
4.6	Distributors to Provide ICP Information to the registry <u>UML</u> <ul style="list-style-type: none">• 6 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 1 UML ICP information recorded by Electra but retailers do

	<p>not submit volumes to RM</p> <p><u>Distributed generation</u></p> <ul style="list-style-type: none"> • Effective Date in the registry for DG installation (sample of 20 ICPs) is not representative of the date of CoC • Incorrect installation flag “L” for 7 ICPs <p><u>IECD</u></p> <ul style="list-style-type: none"> • No IECD for 81 ICPs electrically connected during this audit period • No IECD for one ICP (historical, prior 2021) <p><u>LE ICP</u></p> <ul style="list-style-type: none"> • Incorrect Dedicated flag for 5 “LE” ICPs
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Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2(1)</p> <p>From: 01-Oct-21</p> <p>To: 15-Jan-23</p>	<p>Inaccurate or missing information related to distributed generation, IECD, addresses, addresses recorded in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple Times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls recorded as moderate as exception tools are in place and appear to be effective. Historical information cleaning is occurring slowly. The day-to-day information is good. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Continually working to resolve IECD issues, livening app is working well when the livening agent is an approved contractor. When it isn't the followup process is difficult and time consuming.</p> <p>Electra have updated some of this information, with the addresses taking longer due to the difficult nature of finding them.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Electra has processes in place to ensure that new ICPs are readily locatable, and not duplicate. We have a livening process that works well with our approved livening agents. DG types are always difficult as our process requires the installer to notify us once installed. If this doesn't happen there is time and effort required to update the information.</p>		
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Audit outcome

Non-compliant

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

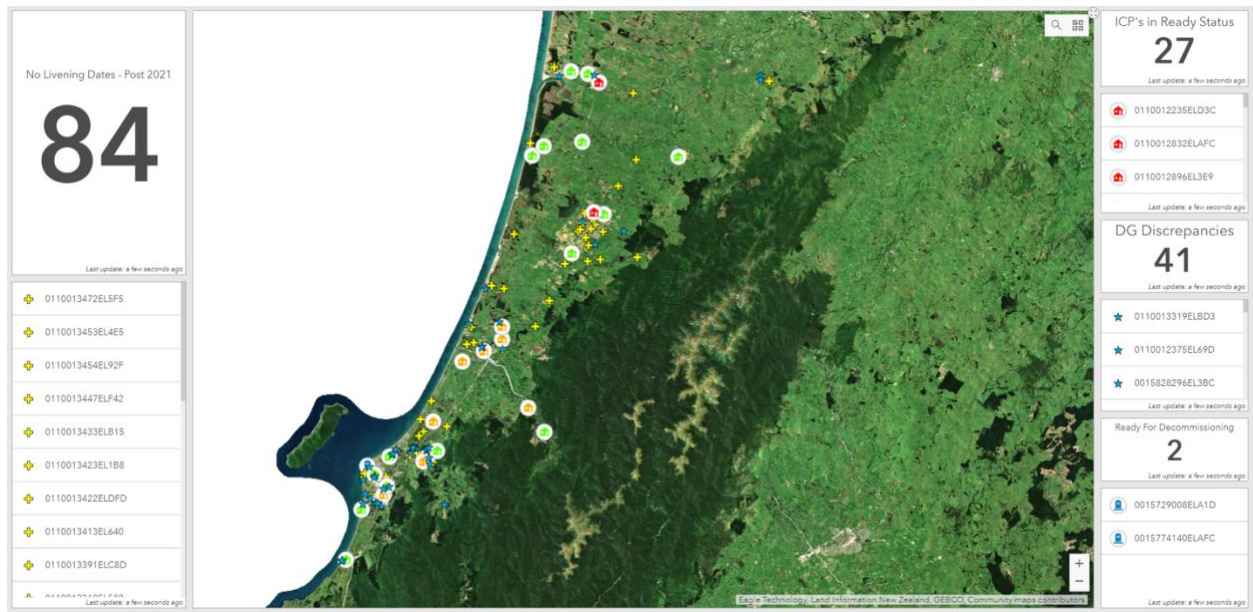
Audit observation

The Audit Compliance Report for the audit period, the EDA file and LIS file dated 24/01/2023 were checked. We discussed with Electra staff what processes were in place to identify incorrect information in their systems and the registry, and the process to correct that data as soon as practicable.

Audit commentary

Electra uses the dashboard, implemented last year, and the Service Desk, to monitor compliance with the Code over the past 24 hours. The dashboard is focussing on livening dates, distributed generation, decommissioning's and ICP's that have been left in a ready status for too long. The dashboard is checked daily. The Service Desk assists Electra in monitoring new ICPs to make sure they are issued within the timeframe specified by the Code, that ICPs have IECD (Initial Electrical Connection Date) recorded but the status remains "ready" or "Inactive- new connection in progress" in the registry, and to check for embedded generation.

Below is shown the most recent snapshot of the dashboard.



The data displayed for each dashboard section comes from different reports such as

The left-hand side of the dashboard refers to

- No Livening date – 2021 onwards - *Daily compliance report, sheet AC020Dist12*

The right-hand side of the dashboard refers to

- ICPs in ready status – *Daily LIS file, Filtered by ICP status '0' (Ready)*
- DG Discrepancies - *Daily compliance report, sheet AC020Dist14*
- Ready for decommissioning - *Daily LIS file, Filtered by ICP status '1' (Inactive), ICP status reason '6' (electronically disconnected and ready for decommissioning)*

No Initial Electrical Livening Date (IECD) but ICP is “Active”

Data used to be split into two sections, pre and post 2021. The reason for the split was to treat the pre 2021 missing livening dates as a problem that needed resolving. At the time of finalising this audit report all historical updates were finalised.

An accurate registry is Electra’s key objective. To identify missing IECDs prior to 2021 Electra took the following steps, which were agreed to during a meeting with the Authority

1. Where a livening agent is known– check date with them first
 - a. No livening agent, check with the retailer that applied for ICP.
2. Incorrect livening agent go back to applying retailer
 - a. If non-Electra approved, then record retailer and livening agent, add IECD
 - b. If Electra approved, add IECD
3. Check access to the network at asset for ICP
4. Ask retailer for any proposed livening date, or if they have any record of when the ICP was commissioned or the livening documents.
5. Go to MEP, they may not communicate
6. Last case scenario uses Active date

To identify missing IECD 2021 onwards the following parameters are used:

- The ‘no livening dates 2021 onwards’ will continually monitor the ICPs that are being made active on Electra’s network by the retailer, but are yet to have livening date assigned to them by Electra or an approved contractor.

- If an ICP stays as live on the network for 4 working days; a job is generated and a process is started to chase and ascertain the livening date (alert in the Service Desk).

ICPs on the network in “Ready” status

The top right-hand side of the dashboard is where the ICPs in “Ready” status are displayed. These are ICPs that Electra have created but are yet to be picked up by the retailer.

- 0-6 months, green (No action required);
- 6-12 months, Amber (Create a job under the ICP and ask the retailer if still needed);
- 12 months plus, Red (Chase the retailer to decommission).

Ready for decommissioning

At the bottom of the righthand side column are the ICPs with the status “Inactive -ready to be decommissioned” assigned by retailers. For Electra to decommission an ICP they need to receive confirmation from a retailer that an ICP is disconnected from the network and left electrically safe. Electra will request the retailer to confirm the aforementioned.

A weekly manual check of the compliance report is carried out, filling out an Audit compliance spreadsheet that keeps track of non-compliances. This verifies that the ICP monitoring dashboard is working and allows them to address any arising issues. An extract from the spreadsheet is shown below (from different periods in the audit period), in the bracket we show relevant sections of the audit report.

Date	IECD populated later than 10 days (section 3.5)	Duplicate addresses (section 4.4)	No IECD (section 3.5)	Distributor NHH generation discrepancies (section 4.1)
5/10/21	3	35	551	52
12/10/21	7	34	543	36
19/10/21	1	34	536	39
26/10/21	27	34	513	40
2/11/21	0	34	518	42
9/11/21	4	34	513	43
16/11/21	2	33	512	47
15/02/22	23	33	487	47
22/02/22	56	33	434	46
1/03/22	61	33	376	46

8/03/22	55	33	322	44
15/03/22	108	33	226	47
22/03/22	146	33	79	47
29/03/22	31	34	53	47
20/12/22	2	24	80	37
27/12/22	0	24	84	37
3/01/23	0	24	87	37
10/01/23	0	24	88	37
17/01/23	4	24	89	40

The area where compliance improved significantly is historic IECD. A lot of work has been done to address missing IECDs for “Active” ICPs. It is a long process but the methodology used by Electra is correct. It was described in detail at the beginning of this section. At the time of this audit there were 81 ICPs (current audit period) and one historic (prior 2021) ICP with no IECD.

Electra have created a Survey123 app for livening dates which is used by contractors. It allows them to be notified as soon as a livening agent has lived a property and increases the accuracy of the IECD for newly connected installations. The Survey123 application has been used for a while. At the beginning there were some issues which were successfully resolved. Electra is planning to use the same application for the decommissioning of installations. Electra approved a number of contractors to work in their network on behalf of retailers. It is the retailers obligation to notify Electra which contractor will be used. Unfortunately retailers do not fully understand that once a contractor is assigned and later changes, without advising Electra, it results in a delay of populating the IECD in the registry because no information is available in time to update the registry. Electra is working hard to resolve the issue.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.2 With: 11.2(2) From: 01-Oct-21 To: 15-Jan-23	Incorrect or missing historical information in the registry across a number of areas. Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	Controls recorded as moderate as exception tools that are in place appear to be effective. Historical information cleaning is occurring slowly. The day-to-day information is good. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continually working to resolve IECD issues, livening app is working well when the livening agent is an approved contractor. When it isn't the followup process is difficult and time consuming. Electra have updated some of this information, with the addresses taking longer due to the difficult nature of finding them.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes in place to track the non compliances and we do our best endeavour to fix them as soon as we know about them.			

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

Code reference

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

Code related audit information

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

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

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

Audit observation

This was discussed during the audit.

Audit commentary

Electra is not involved, this is not a course of their normal business. None occurred in audit period.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

This was discussed during the audit. Electra's website and email template was reviewed.

Audit commentary

Details of the dispute resolution scheme are on the website and any public facing emails contain a link. The call centre (Customer Service) also has a script they follow advising of the customers of the Utilities Dispute process.

COMPLAINTS PROCESS



[Home](#) > [Contact Us](#) > [Complaints process](#)

As a customer of Electra you have the right to expect quality service and support at all times. If you have a complaint or problem, including land issues, we want to know so that we can fix it. All our staff are committed to treating complaints seriously and reaching resolutions as quickly and fairly as possible.

Here are the ways you can go about letting us know:



Talk to us

A quick chat with a staff member at Electra is often all that is required to resolve your concern. Call us on [0800 Electra \(0800 353 2872\)](tel:0800 353 2872) between 8am - 5pm weekdays and ask to speak with our General Manager - Lines Business. He will take personal responsibility for ensuring your complaint is thoroughly investigated and resolved as quickly and fairly as possible. We endeavour to resolve all formal complaints within a period of 20 days and we do not charge for this service.



Utilities Disputes Limited

We sincerely hope that your complaint has been resolved by this stage. If not, you can contact Utilities Disputes on [0800 22 33 40](tel:0800 22 33 40) or go to www.utilitiesdisputes.co.nz
Utilities Disputes is a free and independent service for resolving complaints about utilities providers.

Electra is a member of the Utilities Disputes Scheme including land complaints.



The example of an email is shown below:

Baden Berry
Customer Relationship Manager

0275352006



Electra is a member of the Utilities Disputes Scheme.
Utilities Disputes is a free and independent service for resolving complaints about utilities providers, and can be contacted on [0800 22 33 40](tel:0800 22 33 40) or go to www.utilitiesdisputes.co.nz



Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Electra does not have a prescribed form for applying for a new connection. Retailers know what information is required and they provide this in a free form email. Electra monitors the email inbox (newcons@electra.co.nz) and usually begins the connection approval and ICP creation the same day. Electra checks the proposed connection in the GIS system to confirm the physical location address and to check that the network assets and capacity are available. If no work is required on the network to connect the new ICP and the trader has provided all the information required, then the application is approved.

Electra runs an Access database which creates ICP identifiers in batches of 100. These are copied into a spreadsheet called "New ICPs to issue". The new application is recorded in this spreadsheet against the next valid ICP identifier with information such as customer name, address, retailer, and the request date.

The ICP chosen from the spreadsheet (assigned by requesting retailers) is entered into WindMil along with the other information required to be uploaded to the registry. The retailer is notified by email. The retailer will then engage an Electra approved contractor to make the connection to the Electra network.

If additional work is required for a new connection, then the customer, via the retailer, is asked to contact an Electra approved contractor to prepare a quote for the work to be completed. Once the customer agrees and pays a deposit for the work to go ahead, the connection is approved and the ICP is created and issued as per the standard process.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

The distributor, within 3 business days of receiving a request for the creation of an ICP identifier for an ICP, must either create a new ICP identifier or advise the participant of the reasons it is unable to comply with the request.

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new ICP connections to the network. The application is recorded in a spreadsheet along with ICP information required to assign a new ICP identifier such as customer name, address, retailer and request date. WindMil is populated with the information which is uploaded to the registry.

19 ICPs were randomly selected from ICPs created during the audit period. There were no issues found and many ICP requests were responded to on the same day they were received. If ICPs can't be created within 3 business days, a trader is notified. Compliance was confirmed by sampling 19 randomly chosen requests for new connection.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new ICP connections to the network. The application is recorded in a spreadsheet along with ICP information such as customer name, address, retailer and request date. WindMil is populated with the information which is uploaded to the registry. The trader provides all the information Electra requires to assign a new ICP. WindMil uploads ICP information to the registry. The registry assigns the "Ready" status.

19 new ICPs were randomly selected and data checked both in WindMil and the registry and no issues were found.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

WindMil is populated with the information required to establish a new ICP. This information is provided by the trader. Every day at 7pm, WindMil uploads new ICP information to the registry which assigns the "Ready" status.

19 new ICPs were randomly selected and the data was checked. We confirm Electra provided information specified in the above clauses as soon as practicable and prior to electricity being traded at the ICP. In the majority cases ICPs are uploaded to the registry the same or following day.

In the last audit non-compliance was recorded because some ICPs were loaded with the status of "New", updated to "Ready", but later the status was changed by Electra system to the status "New". ICPs with the status "New" can't be claimed in the registry by a trader. Our analysis of registry did not find any re-occurrence of this problem.

Audit outcome

Compliant

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

The Audit Compliance report identified 622 ICPs had their IECD populated later than 10 business days. Compliance in this area has improved; in the previous audit period the Audit Compliance report recorded 1,017 ICP.

- 88 (14%) out of 622 were late updates related to ICPs electrically connected during the audit period. The date range was 11 to 130 BD. It is a slightly higher percentage than in the previous audit which was 6.9% but the date range is smaller and the period covered by this audit is 18 months. Previously it was 12 months.
- 534 (86%) out of 622 were late updates were historical updates. Date range was 16 to 2105 BD. The number of late updates is lower than during the last audit, which was 946. The clean-up project conducted by Electra whereby they are updating historically missing data progresses very well. Only 10 historic ICPs require data population.

2,428 ICPs had their status changed to "Active" after 29/08/13. For 81 ICPs (3.3%) the Initial Electrical Connection Date (IECD) was not populated because Electra did not receive information from livening

contractors. 10 ICPs are historic ICPs. Electra is in the process of confirming IECDs for them with contractors. Last case scenario Electra will use “Active” date.

IECD recorded by Electra, but ICP not yet “Active” status in the registry”

The Audit Compliance report identified one ICP 0110013317EL848. In the registry its status is “inactive- new connection in progress”. Electra provided paperwork from the living agent showing the Initial Electrical Connection Date was 16/01/2023. Electra contacted a retailer and requested data change.

Electra downloads the LIS file daily. The operator is alerted, via the Service Desk, that IECD is known but the registry status is “Ready” or “Inactive- new connection in progress”. After 3 business days a reminder is sent to the retailer.

The following table shows ICPs where the IECD is different to that of the first “Active” date

39 in total; we sampled 10 ICPs. For each of them Electra provided evidence, notification from living contractors, that the date was correct. In all cases the retailer was changing the ICP to “Active” later, the same date as a date of metering installation certification. It was discussed with Electra who commented that in the period June 2022 to September 2022, a metering contractor was not authorised to liven an installation therefore a contractor had to go back to certify metering after livening. This situation was resolved after September 2022.

ICP	IECD	Status Event Date populated by trader	Elapsed Days IECD and Status Event Date	Comment
0110013409ELE7C	08/12/2022	14/12/2022	6	Electra information is correct
0110013374ELB78	21/11/2022	22/11/2022	1	Electra information is correct
0110012976EL057	23/08/2022	21/11/2022	90	Electra information is correct
0110013245EL9C1	09/09/2022	29/09/2022	20	Electra information is correct
0110013177ELDBF	28/07/2022	12/08/2022	15	Electra information is correct
0110013080EL966	01/07/2022	19/07/2022	18	Electra information is correct
0110013083EL5A6	30/06/2022	12/07/2022	12	Electra information is correct
0110013059ELA75	30/06/2022	12/07/2022	12	Electra information is correct
0110013108EL73C	22/06/2022	07/07/2022	15	Electra information is correct
0110013081EL523	18/06/2022	06/07/2022	18	Electra information is correct

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.5 With: 7(2A) of	81 ICPs (3.3%) electrically connected installations during the audit period did not have IECD populated in the registry; One ICP (historic, prior 2021)

Schedule 11.1 From: 01-Oct-21 To: 15-Jan-23	does not have IECD populated 622 ICPs, including historic ICPs, had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. The new process of weekly monitoring the Audit Compliance Report helps to decrease the number of late updates and not having IECD recorded at all. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Historic ICPs have been updated where required. Some are already decommissioned, obtaining a livening date seems a pointless exercise.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electra have a livening app for approved livening agents to notify us. Unfortunately, not all livenings are completed by these contractors. Electra frequently have discussions with retailers re their proposed livening agent and who actually livened. This is an ongoing problem and will need worked through with retailers and livening agents.			

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new connections and ICPs. This process ensures the proposed retailer is recorded in the registry at the time of the initial upload of an ICP to the registry. The daily file is created in WindMil and uploaded to the registry at 7pm from WindMil. Electra follows the connection process set out in clause 10.31.

The ICP sample records checked in the registry indicated that the process was followed.

Audit outcome

Compliant

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Traders apply to Electra for new connections and ICPs. This request always provides Electra with the request to connect the ICP to the network. Once the connection to the network is approved by Electra it issues the ICP to the trader permitting them to engage one of Electra's approved and authorised contractors to connect and electrically connect the ICP onto the network.

Shared unmetered load is not allowed to be connected onto the Electra network.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

If the ICP is only shared unmetered load, the distributor must advise the traders of the intention to temporarily connect the ICP unless:

advising all traders would impose a material cost on the distributor, and in the distributor's reasonable opinion the advice would not result in any material benefit to any of the traders.

Audit observation

The new connection process documents were reviewed and discussed with Electra staff.

Audit commentary

Electra staff are aware of the Code requirements in this area. Electra Staff state there have not been any requests to temporarily connect any installation during this audit period

ICPs are not electrically connected to the network by Electra staff. Traders arrange the connection of ICPs to the network using approved Electra contractors who are authorised by Electra to carry out work on their network. Traders issue the job requests to the Electra authorised contractors to connect and electrically connect an ICP.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table in the registry was examined. It was discussed with Electra staff.

Audit commentary

No new NSP which is not a point of connection to the grid was created during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

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

A distributor may only electrically connect an NSP if:

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

Audit observation

The Registry NSP table was reviewed along with the LIS file and the clause was discussed with Electra Staff.

Audit commentary

Electra Staff state there have not been any requests to temporarily electrically connect any NSP that is not a point of connection to the grid during this audit period.

Electra Staff are aware of the code requirements in this area.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

xxxxxxxxxxccc where:

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

An MS Access database tool is used to create a unique sequential number combined with the distributor code “EL” to create each ICP Identifier on the Electra network. It was verified that the tool creates ICPs with the correct format. The MS Access database creates ICP identifiers in batches of 100. These are copied to the spreadsheet called “New ICPs to issue”, which is where traders requests for new ICPs are recorded.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

A loss category code is assigned to an ICP when it is first generated in WindMil along with the information required to be uploaded to the registry. Files are uploaded to the registry, with the new ICP information, on a daily basis where the registry assigns the status of "READY".

19 new ICPs were randomly selected and data checked both in WindMil and the registry, and no issues were found.

Audit outcome

Compliant

3.13. Management of "new" status (Clause 13 Schedule 11.1)

Code reference

Clause 13 Schedule 11.1

Code related audit information

The ICP status of "New" must be managed by the distributor to indicate:

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Retailers apply to Electra for new ICP connections to the network. The retailer provides all the information Electra requires so once that information is processed by Electra an ICP is created in the registry and assigned the status of READY. Electra does not use the NEW status in the registry

Audit outcome

Compliant

3.14. Monitoring of "new" & "ready" statuses (Clause 15 Schedule 11.1)

Code reference

Clause 15 Schedule 11.1

Code related audit information

If an ICP has had the status of “New” or has had the status of “Ready” for 24 months or more:

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

Audit observation

The Audit Compliance Report and the LIS files were checked.

Audit commentary

The Audit Compliance Report recorded one ICP in the registry that has remained in the “Ready” status for more than 24 months. Electra has been in contact with CTCT to confirm if they still wish to use this ICP.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The LIS file was examined.

Audit commentary

Electra has an embedded generation station of 37 MW capacity on its network. ICP 0110007806EL3CF Mangahao Power Station. It has the unique loss category code assigned (MHO1).

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Once provided with the ICP by Electra, retailers arrange the physical connection of ICPs to the network using approved Electra contractors that are authorised by Electra to carry out connection work on the network. The contractors are inherently authorised by the retailer and Electra to connect to the network.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

This was discussed during the audit with Electra staff.

Audit commentary

This is dealt with by service delivery at the request of retailers. The actual disconnection request is between a retailer and an approved contractor.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

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

- *the MEP is unable to remotely electrically connect the ICP*

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

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

Audit observation

This was discussed during the audit with Electra staff.

Audit commentary

This action is not a course of normal business and has not occurred during this audit period.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

Notification must be given by the distributor within 3 business days after the change takes effect, unless the change is to the NSP identifier of the NSP to which the ICP is usually connected (other than a change that is the result of the commissioning or decommissioning of an NSP).

In those cases, notification must be given no later than 8 business days after the change takes effect.

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

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

Audit observation

The management of registry updates and NSP changes was reviewed. The process was discussed with Electra's staff.

The LIS files, Audit Compliance reports, and the EDA files for the audit period were reviewed to determine compliance. A diverse sample of 10 backdated events, by event type, were reviewed to determine the reasons for the late updates.

Audit commentary

Any changes to ICP information are done in WindMill. A small number of updates are made directly in the registry as required e.g. changing the ICP status from "READY" to "NEW" before it is decommissioned.

The Audit Compliance reports were analysed to identify backdated event updates. The summary of late updates is below:

Pricing events

The Electra UoSA allows the back dating of a price code as far as a month or to the latest price plan change event (whichever is the most recent).

On 01/12/2021 the Code was changed in relation to pricing events in the registry. As long the registry is updated within 3 business days of receiving a notification, there is no non-compliance of the backdated price code.

Retailer's files are uploaded to the system and automatically registry notification files are created and uploaded to the registry. Usually it happens the same day or a following day. We sampled 30 ICPs the system contained in 5 files from different retailers and confirm that the registry was updated within 3 business days.

Decommissioning Status events

According to the Audit Compliance report the percentage of compliance was 41.46% and Average Business Days between the Status Inactive Event Date and the Status Event input date was 15.17 BD. In

the last audit period the percentage of compliance was 81.37%. Electra changed their process which was found non-compliant because they did not use the date of physical removal of the electrical installation associated with the ICP as the Event Date in the registry.

We observed that Electra changed their process and use the date of physical removal of the electrical installation associated with the ICP as the Effective Date in the registry.

We confirmed this by sampling 7 installations.

Network events

The Audit Compliance report lists ICPs where the network fields were changed in the registry later than 3 business days. The average business days records the average business days across all updates.

According to the Audit Compliance report the percentage of compliance was 97.67% and the average business days between Network Event Date and Network Event input date was 2.06 BD.

Distributed generation

According to the Audit Compliance report the percentage of compliance was 99.55 % and the average business days between Network Event Date and Network Event input date was 0.06 BD, which is not correct.

During the audit period, Electra received 341 applications for distributed generation, 9 applications were cancelled. Each application for solar, greater than 3kW 1PH, is individually evaluated. At the time of finalising this report, Electra have not received the COC or ROI for 105 applications.

Electra requires installers to provide CoC once an installation is commissioned. We sampled 20 Installations and observed that Electra is not using the CoC date in the registry as the date of distributed generation connection to the network. The Input Date is recorded as an Effective Date which is incorrect. It is noted as non-compliance.

Another issue in this area is that there are ICPs where the trader’s profile indicates generation is present, but the distributor’s field shows load only. The Audit Compliance report lists 83 ICPs with this situation. This is a problem Electra is currently working through and there is a process in place to capture these as they occur.

Change of NSP

There were no NSP changes.

Address events

The Audit Compliance Reports recorded that 88.56% of all Electra address updates were made on time with an average time to update the registry of 1.91 BD There were 652 late address updates. All late updates were related to adding GPS coordinates, which were backdated to the beginning of the month. This was an incorrect business decision which caused non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Oct-21	Registry event (address, distributed generation, decommissioning) updates backdated more than three business days Potential impact: Low Actual impact: Low Audit history: Multiple times

To: 15-Jan-23	Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as moderate because some historical information clean-ups appear to have resulted in late updates. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Cannot be resolved			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
When entering address information we will use the current date for data entry. This will ensure non compliance.			

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

Code reference

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

Code related audit information

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

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Electra has two NSPs on its network, PRM0331 and MHO0331. The NSP identifier is uploaded into the registry when ICPs are initially loaded into the registry with the status "Ready".

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

The distributor must advise a customer (or any person authorised by the customer) or embedded generator of the customer or embedded generator's ICP identifier within 3 business days after receiving a request for that information.

Audit observation

This was discussed with Electra during the audit.

Audit commentary

ICPs are requested by retailers, so customers rarely contact Electra directly.

Queries from electricians or retailers seeking ICP information or clarification are handled by the call centre initially and more difficult issues are dealt with by the GIS operators who manage the ICPs within Electra.

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

At the time of application, the retailer provides an installation address. Validation of the application includes checking for duplicate addresses. Electra’s ICP lifecycle process reflects that ICPs without accurate location information will not be issued.

The Audit Compliance report identified 24 ICPs with difficult to locate addresses as they contain no street number, unit number, property name, or the same GPS coordinates. It is still a Work in Progress to update historic information but all new ICPs have correct information. The number of non-compliant ICPs decreased by 10 in comparison with the last audit period..

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 01-Oct-21 To: 15-Jan-23	For 24 ICPs the address descriptions do not allow ICPs to be readily located Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Strong

	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. The company monitors the Audit Compliance report weekly to track the progress of the historical information clean-up project. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
	Actions taken to resolve the issue	Completion date	Remedial action status
	The remaining ICPS with non readily locatable addresses are very difficult to track down. Electra will try and determine these over the coming months.		Identified
	Preventative actions taken to ensure no further issues will occur	Completion date	
	All new ICP applications are checked for a valid address before being issued. This issue should not occur again for new ICPS.		

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

This was discussed with Electra during the audit.

Audit commentary

The network connection application process is robust and well documented. The network connection process requires every proposed connection to the network (ICP) to be verified against the GIS to ensure it has a discrete disconnect point and connection to the network prior to an ICP being created.

There are no known situations where an ICP could not be de-energised without the de-energisation of another ICP. The company policy precludes such a situation.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

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

- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)*
- *the status of the ICP (Clause 7(1)(k) of Schedule 11.1)*
- *designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)*
- *if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):*
 - a) *the nameplate capacity of the generator; and*
 - b) *the fuel type*
- *the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).*

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

WindMil is populated with the required information provided by the retailer to establish a new ICP. Files from WindMil update the registry with the new ICP information, daily, and the registry assigns the status "Ready".

19 new ICPs were randomly selected and data checked. No issues were found with the new ICP information.

The analyses of registry files confirm the accuracy of ICP information uploaded to the registry by Electra. There are some exceptions in the area of UML, "LE" ICP flag in the registry, distributed generation and Initial Electrical Connection Date (IECD), where it was identified that some information was incorrect. Each type of network information category is analysed in the following separate sections.

Unmetered Load

An examination of the LIS file identified 390 UML ICPs for which Electra recorded information in the "Unmetered load details – distributor" field. One ICP (0110005695EL5A3) is not recorded as UML by traders.

The examination of the LIS file also identified 6 ICPs (0011240010EL364, 0011261010ELB09, 0014600268EL852, 0110006721ELDFF, 0110007700ELD4F, 0110009344ELA21) for which traders submit volumes to the RM but Electra does not have any information in the registry.

It was discussed with Electra, their comments are below:

- 011240010EL364 – was in our system, has been manually updated in the registry to match, not sure why update didn't work.
- 0011261010ELB09 – traffic cameras at Foxtan Beach, probably shouldn't be unmetered, need to have a discussion with the retailer.
- 0014600268EL852 – trusting retailer data and updating our system to match.

- 0110006721ELDFF – this is for a speed sign, need to check with retailer what the load is so we can assign correct code to it.
- 0110007700ELD4F – should be metered load. Need to tell retailer this and ask them for consumption so we can bill them.
- 0110009344ELA21 – missing from our system, updated from retailer details in registry.

Distributed Generation

The Audit Compliance report recorded 82 ICPs for which the profile used by traders indicate distributed generation installed, but no installed generation is recorded by Electra. The Audit Compliance report does not include ICPs with HHR profile, which could also have distributed generation installed.

A randomly chosen sample of 20 DG ICPs was examined. The results are shown below:

ICP	CoC date	Electra registry Event Date
0015789264ELA1C	27/10/2021	28/10/2021
0012507276EL629	28/01/2022	31/01/2022
0012498478EL97C	3/06/2022	7/06/2022
0110006469ELE4D	11/04/2022	12/04/2022
0012174476EL1C9	11/04/2022	27/04/2202
0015870056EL020	17/03/2022	21/03/2022
0015885460EL8EA	30/05/2022	26/08/2022
0110010721ELODE	12/04/2022	26/05/2022
0110010721ELODE	12/04/2022	26/05/2022
0015876268ELB84	20/06/2022	3/10/2022
0110004766EL1D0	17/06/2022	29/11/2022
0110006270ELCB7	22/08/2022	21/09/2022
0014624623EL76F	22/08/2022	29/11/2022
0110013012EL604	1/11/2022	2/11/2022
0014681029EL230	3/10/2022	4/10/2022
0012489536EL807	4/11/2022	12/12/2022
0012156395EL23C	16/12/2022	20/12/2022
0015897460EL34B	29/09/2022	6/10/2022
0110011151EL225	15/09/2022	28/09/2022

0110009750ELD87	9/11/2022	10/11/2022
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The Effective Date in the registry for DG installations is not representative of the date of CoC. The Event Date is the same as the Input Date (date when the registry was updated), which is incorrect.

Distributed generation

The review of the LIS file found 9 ICPs which have incorrect installation flag “L”. It was discussed during the audit. The table below shows the ICPs in question and Electra comment. The flag was correct for 6 ICPs because solar was removed.

ICPs	DG issue	Resolution
0010300176ELD5F	ICP had DG removed on the 10/03/2022, DG was initially installed on the 20/07/2021	Removed Generation Capacity and fuel type from registry
0010324436EL5B2	Customer removed DG on the 7/07/2021. Removed DG from ADMS on the 1/10/2021	Removed Generation Capacity and fuel type from registry
0010402500EL3C7	Customer have had their system removed on 29/03/2022	Removed Generation Capacity and fuel type from registry also removed EX price code from ICP
0012132398EL9BF	Install type L	Changed Install type to B
0014615072EL5A8	Install type L and no EX price code	Changed Install type to B updated price codes
0015729528EL24D	removed DG on the 21/05/2021	Removed Generation Capacity and fuel type from registry
0015855452EL3C6	Install type L and no EX price code	Changed Install type to B updated price codes
0110006777EL478	removed DG on the 4/11/2021	Removed Generation Capacity and fuel type from registry
0110011019ELB90	Customer have removed their system on 13/07/2022	Removed Generation Capacity and fuel type from registry

LE ICPs

The review of the LIS file found 5 ICPs which have incorrect Dedicated NSP “N”.

- 0110011663ELA5A
- 0110012507EL543
- 0110012508ELA9D
- 0110012509EL6D8
- 0110013275ELE39

Initial Electrical Connection Date (IECD)

The examination of the Audit Compliance report showed :

- No IECD for 81 ICPs electrically connected during this audit period
- No IECD for one historical ICP (prior 2021)

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 4.6 With: 7(1) of Schedule 11.1 From: 01-Oct-21 To: 15-Jan-23</p>	<ul style="list-style-type: none"> • 6 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 1 UML ICP information recorded by Electra but retailers do not submit volumes to RM • Effective Date in the registry for DG installation (sample of 20 ICPs) is not representative of the date of CoC • Incorrect Dedicated flag for 5 “LE” ICPs • Incorrect installation flag “L” for 3 ICPs • No IECD for 81 ICPs electrically connected during this audit period • No IECD for one ICP (historical, prior 2021) <p>Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls recorded as moderate as weekly monitoring introduced in June appears to be effective. Historical information clean-up is well advanced. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML ICPs have been modified to include UML codes. DG codes have been updated</p>			<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Process looked into so that when DG removed the correct codes get updated in the registry.</p> <p>Electra have a livening app for approved livening agents to notify us. Unfortunately, not all livenings are completed by these contractors. Electra frequently have discussions with retailers re their proposed livening agent and who actually lived. This is an ongoing problem and will need worked through with retailers and livening agents.</p>		
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4.7. Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Electra assigns the actual price category code to the ICP at the time an ICP identifier is created and uploaded to the registry. Electra's network charges are not based on chargeable capacity.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. It was discussed with Electra staff.

Audit commentary

Electra had started uploading GPS coordinates to the registry in May 2021. It is an on-going project. The LIS file dated 23/01/2023 showed that 10,340 active ICPs (22%) had GPS coordinates recorded. The format used by the company meets the NZTM2000 standard.

Audit outcome

Compliant

4.9. Management of “ready” status (Clause 14 Schedule 11.1)

Code reference

Clause 14 Schedule 11.1

Code related audit information

The ICP status of “Ready” must be managed by the distributor and indicates that:

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

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

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The new connection process documents were reviewed and discussed with Electra staff. A random sample of 19 new ICP connection records were checked.

Audit commentary

Once a new ICP connection application has been approved the new ICP will be created in WindMil along with the other information required to be uploaded to the registry via a 7 pm daily file. The ICP is created in the registry with all information which allows the registry to assign the status of “Ready”. A single Price Category Code is assigned.

19 new ICPs were randomly selected and data checked both in WindMil and the registry and no issues were found.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

The LIS files and the Audit Compliance reports were examined. The process was discussed with Electra's staff. Electra's policy is to not accept shared unmetered load.

Audit commentary

Electra has 5 ICPs with the distributor status. One ICP (0110013275ELE39) with the "distributor" status was created during the audit period. This ICP is related to WPH0011, it was created on 13/09/2022. It is the embedded network operated by Waikanae Ltd in Waikanae.

Audit outcome

Compliant

4.11. Management of "decommissioned" status (Clause 20 Schedule 11.1)

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The Audit Compliance Report, LIS and EDA files were checked. The disconnection process documents were reviewed and discussed with Electra staff. A random sample of 8 decommissioned ICP records were checked.

Audit commentary

Customers/contractors request ICP decommission via their retailer. Retailers arrange the physical decommission of ICPs using approved Electra contractors that are authorised by Electra to carry out decommission work on the network. Retailers notify Electra with the completion date and other information about the decommission work completed and request the ICP status in the registry be changed to decommissioned.

A random sample of 7 decommissioned ICP records were provided by Electra staff and were checked .

We observed that Electra changed their process and use the date of physical removal of the electrical installation associated with the ICP as the Effective Date in the registry.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

Each entry must specify the date on which each price category code takes effect, which must not be earlier than 2 months after the date the code is entered in the table.

A price category code takes effect on the specified date.

Audit observation

The Price Code table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Six new price category codes (BA, DDA, DNA, NOA, XTB, and XTNO) were uploaded to the registry during the audit period. The effective date was 01/04/2021, the registry was notified on 01/02/2022 and 31/01/2022.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 Schedule 11.1

Code related audit information

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

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

A loss category code takes effect on the specified date.

Audit observation

The Loss Factor table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

No new loss category codes were uploaded to the registry during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

Each loss category code must have a maximum of 2 loss factors per calendar month. Each loss factor must cover a range of trading periods within that month so that all trading periods have a single applicable loss factor.

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

Audit observation

The Loss Factor table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Loss factor codes have a single value for all trading periods for a year. There are no seasonal loss factor codes for summer or winter. Electra did change loss factor "1" codes during the audit period. It was changed on 24/03/2022, it was replaced from 1.076 to 1.081. The start date of the updated loss factor is 01/06/2022.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

If the distributor is creating or decommissioning an NSP that is an interconnection point between 2 local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.

If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between 2 embedded networks, the embedded network owner must give written notice to the reconciliation manager of the creation or decommissioning.

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

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

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

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

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

Audit observation

The NSP mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Based on an examination of the NSP mapping table in the registry it was confirmed that no new NSP was created during the audit period.

No NSP was decommissioned during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

The request must be made at least 10 business days before the NSP is electrically connected, in respect of an NSP that is an interconnection point between 2 local networks. In all other cases, the request must be made at least 1 month before the NSP is electrically connected or the ICP is transferred.

Audit observation

The NSP mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Based on an examination of the NSP mapping table in the registry it was confirmed that no new NSP was created and no NSP was decommissioned since the last audit.

This clause does not apply to Electra. Compliance was not assessed

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

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

Audit observation

The NSP mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Based on an examination of the NSP mapping table in the registry it was confirmed that no new NSP was created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

If a participant notifies the creation of an NSP, or the transfer of an ICP to an NSP that is a point of connection between a network and an embedded network owned by the distributor, the distributor must give notice to the reconciliation manager at least 1 month before the creation or transfer of:

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

Audit observation

This was discussed with Electra staff.

Audit commentary

Electra staff confirm that Electra do not own any embedded networks and did not establish any embedded network that they are responsible for since the last audit.

This clause does not apply to Electra. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

The distributor must give written notice to the reconciliation manager of any change to balancing areas associated with an NSP supplying the distributor's network. The notification must specify the date and trading period from which the change takes effect, and be given no later than 3 business days after the change takes effect.

Audit observation

The NSP mapping table in the registry was examined and this was also discussed with Electra staff.

Audit commentary

Electra has two balancing areas, MHO0331ELECGN and PRM0331ELECGN. There were no changes to the balancing areas.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least 1 month before the transfer.

Audit observation

This was discussed with Electra staff.

Audit commentary

Electra Staff confirmed that Electra did not transfer an ICP which resulted in an ICP becoming an NSP, at which an embedded network connected to a network or an ICP became an NSP that is an interconnection point.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

If the distributor wishes to transfer an ICP, the distributor must give written notice to the Authority in the prescribed form, no later than 3 business days before the transfer takes effect.

Audit observation

This was discussed with Electra staff.

Audit commentary

Electra staff stated that Electra did not transfer any ICPs during the audit period. Electra Staff advise they are aware of the code requirements.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

During this audit period Electra did not have any NSPs which they are responsible for that are not connections to the grid.

Audit commentary

Electra Staff confirm that Electra did not have any NSPs which they are responsible for that are not connections to the grid. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 10.25(2)

Code related audit information

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

- *assume responsibility for being the metering equipment provider (Clause 10.25(2)(a)(i)); or*
- *contract with a metering equipment provider to be the MEP (Clause 10.25(2)(a)(ii)); and*
- *no later than 20 business days after identifying the MEP advise the reconciliation manager in the prescribed form of the reconciliation participant for the NSP (Clause 10.25(2)(b)); and*
- *no later than 5 business days after the date of certification of each metering installation, advise the reconciliation manager of*
 - a) the MEP for the NSP (Clause 10.25(2)(c)(i)); and*
 - b) the NSP of the certification expiry date (Clause 10.25(2)(c)(ii)).*

Audit observation

During this audit period Electra did not have any NSPs which they are responsible for that are not connections to the grid.

Audit commentary

Electra Staff confirm that Electra did not have any NSPs which they are responsible for that are not connections to the grid. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

At least 1 month notification is required before the acquisition (Clause 29(2) of Schedule 11.1).

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

Audit observation

The LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra Staff confirm that Electra did not acquire all or part of a new network during this audit period. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra Staff confirm that Electra do not own any embedded networks and did not establish any embedded network since the last audit. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra does not have any and is not responsible for any embedded network. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra does not have any and is not responsible for any embedded network. This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

A distributor who receives notification from a trader relating to a change under Clause 11.14(3) must give written notice to the registry manager and each trader responsible for any of the ICPs across which the unmetered load is shared of the addition or omission of the ICP.

Audit observation

The Audit Compliance Report, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra has no shared unmetered load on its network. The company policy is not to allow the installation of shared unmetered load.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The Audit Compliance Report, LIS and EDA reports were checked. This was also discussed with Electra staff.

Audit commentary

Electra has no shared unmetered load on its network. The company policy is not to allow the installation of shared unmetered load.

This clause does not apply to Electra. Compliance was not assessed.

Audit outcome

Not applicable

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

This was discussed with Electra Staff, and the Asset management Plans, Information Disclosure documents and Loss Factor information on the Electra website were reviewed.

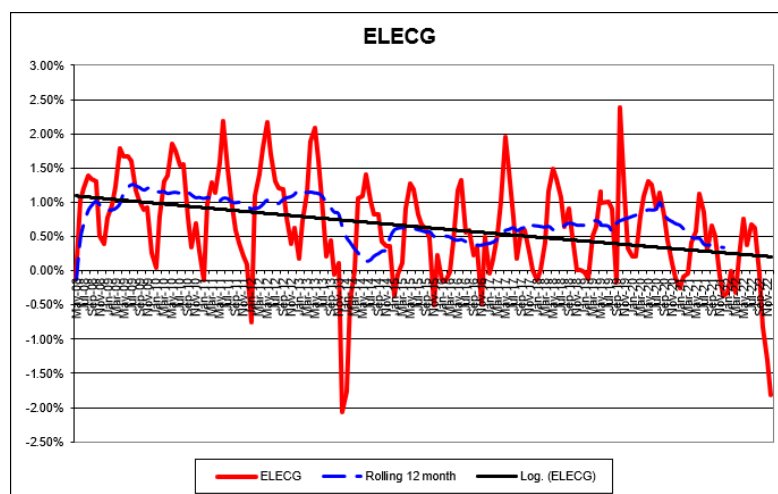
Audit commentary

The loss factor is published on the Electra web site. The loss factor is calculated as a difference between the delivered units as reported by Transpower and units submitted by retailers to the reconciliation manager, which is classed as reconciliation loss. Electra uses rolling losses calculated over the last 12 months.

It was confirmed that Electra published the loss factor and network losses on their website (in the pricing schedule). Electra's network losses are published as 7.48% with a loss factor of 1.081 (valid from 01/02/2022).

In 2008 the Authority published "The Guidelines on the calculation and use of loss factors for reconciliation purposes" (draft). According to the Guidelines distributors should review Reconciliation Loss Factors (RFL) every two years or if a 12-month UFE trend is outside $\pm 1\%$.

The EA provided the UFE graphs for the Electra network which shows that UFE (blue line), it is below 0.5%.



Audit outcome

Compliant

CONCLUSION

PARTICIPANT RESPONSE

Electra have worked hard over the last 14 months to update and manage our processes. IECD's are the only input that consistently cause issues, due to either the retailer providing us incorrect information, or an unauthorised contractor livening the property. Tracking these down is a time consuming and resource intensive process.

All other processes are working well and timelines for new information are being met.