

ELECTRICITY INDUSTRY PARTICIPATION CODE
RECONCILIATION PARTICIPANT AUDIT REPORT

For

TENSOR NZ LIMITED (TTTL)
(NZBN # 9429046340467)

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EXECUTIVE SUMMARY

Tensor NZ Limited requested a reconciliation participant audit to support their certification application, as per clause 5 and 7 of Schedule 15.1 of the Code 2010. We audited the relevant clauses required by the Electricity Authority's Guidelines for Reconciliation Participants Audits V 7.2.

Tensor NZ is currently trading 6 ICPs in Auckland, focusing on residential customers (category 1 metering) on the Vector network. The company currently has no plans to actively seek out new customers.

A bespoke system, CHECKBOX, is used for registry updates, storing metering data, and reconciliation. The overall compliance level is very good. The company provided the process documentation which is of a high quality and covers aspects that are needed to meet compliance. The company has a good understanding of the Code and the market.

We found two instances of non-compliance due to using the "AA" switch response code instead of "AD" in three AN files. These two non-compliances do not affect the settlement outcomes.

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 Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 4 which results in an indicative audit frequency of 18 months.

Our recommendation is 24 months. Two non-compliances recorded in this report are a result of using "AA" switch response code instead "AD" in 3 AN files. It affects both the Standard Switch and Move In Switch. Therefore, it is recorded twice, resulting in a Future Risk Rating score of 4, which should be 2. There was no impact on settlement outcomes.

The audit period is 01/12/2021 to 15/04/2023.

We thank Tensor NZ staff for their 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
Losing trader response to switch request and event dates - standard switch	4.2	3 and 4 of Schedule 11.3	2 ANs had the AA (acknowledge and accept) code incorrectly applied because they had advanced metering. The AD (advanced metering) code was expected.	Moderate	2	Low	Identified
Losing trader provides information - switch move	4.8	10(1) of Schedule 11.3	1 AN had the AA (acknowledge and accept) code incorrectly applied because they had advanced metering. The AD (advanced metering) code was expected.	Moderate	2	Low	Identified
Future Risk Rating						4	

Future risk rating	0-1	1-3	4-15	16-40	41-55	56+
Indicative audit frequency	36 months	24 months	18 months	12months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Recommendation

ISSUES

Subject	Section	Description	Issue

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

TTTL does not have any exemptions granted to exempt them from compliance with all or any of the clauses.

Audit commentary

TTTL did not apply for any exemptions. We checked the Electricity Authority website and confirmed that there are no exemptions in place.

1.2. Structure of Organisation

The company is a registered company with Marcus Sin as the sole Director and operator.

1.3. Persons involved in this audit

Name	Title	Company
Marcus Sin	Managing Director	Tensor NZ Limited
Ewa Glowacka	Electricity Authority Approved Auditor	TEG & Associates

1.4. Use of Agents (Clause 15.34)

Code reference

Clause 15.34

Code related audit information

A reconciliation participant who uses an agent

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

Audit observation

TTTL does not use any agents to fulfil their obligations to obtain certification.

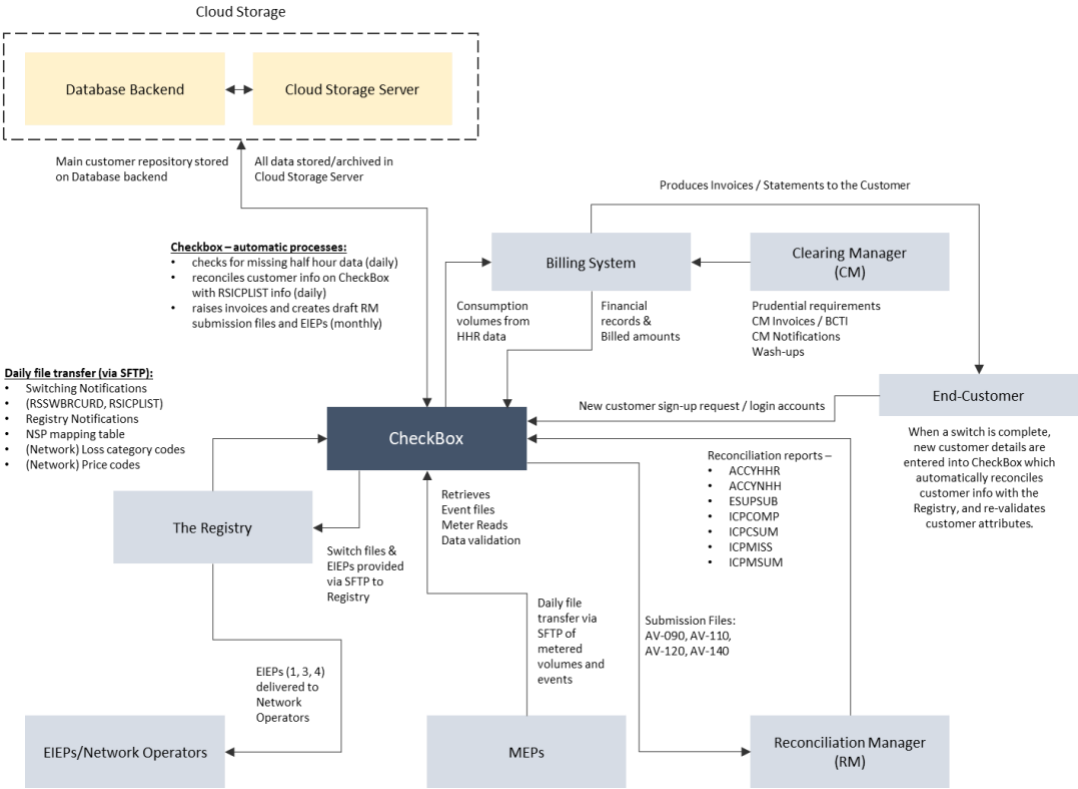
Audit commentary

TTTL does not use any agents. All functions are performed by TTTL's staff. Meter readings are received from MEPS.

1.5. Hardware and Software

TTL has its own bespoke system called CHECKBOX. This system processes metering files, interacts with the registry, and handles switching, reconciliation submission files, and EIEP files with network operators. It also includes data validation against the registry. CHECKBOX is developed with a PostgreSQL database backend and interacts with a cloud storage server through a Python-built user interface.

Xero software is utilized for billing purposes.



1.6. Breaches or Breach Allegations

There were no breaches lodged against TTL in the period covered by this audit.

1.7. ICP Data

Metering Category	(22/04/2023)	(2021)	(date)
1	6	4	
2	0	0	
3	0	0	
4	0	0	
5	0	0	
9	0	0	

Status	Number of ICPs (22/04/2023)	Number of ICPs (2021)	Number of ICPs (date)
Active (2,0)	6	4	
Inactive – new connection in progress (1,12)	0	0	
Inactive – electrically disconnected vacant property (1,4)	0	0	
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	0	
Inactive – electrically disconnected at pole fuse (1,8)	0	0	
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	
Inactive – electrically disconnected at meter box fuse (1,10)	0	0	
Inactive – electrically disconnected at meter box switch (1,11)	0	0	
Inactive – electrically disconnected ready for decommissioning (1,6)	0	0	
Inactive – reconciled elsewhere (1,5)	0	0	
Decommissioned (3)	0	0	

1.8. Authorisation Received

No authorisation letter was required.

1.9. Scope of Audit

This reconciliation participant audit was performed at the request of Tensor NZ Limited (TTTL) to support their application for certification, in accordance with clauses 5 and 7 of Schedule 15.1 of the Code 2010. The audit was carried out on 27 May 2023 in 30 Pollen street, Auckland.

The table below shows the tasks under clause 15.38 of part 15 for which Tensor NZ requires certification.

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Relevant to audit	Agents Involved in Performance of Tasks
(a) - Maintaining registry information and performing customer and embedded generator switching	✓	
(b) – Gathering and storing raw meter data	✓	
(c)(i) - Creation and management of HHR volume information	✓	
(d)(i) – Calculation and delivery of ICP days under clause 15.6	✓	
(d)(ii) - delivery of electricity supplied information under clause 15.7	✓	
(d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8	✓	
(e) – Provision of submission information for reconciliation	✓	

1.10. Summary of previous audit

The previous audit was conducted by Ewa Glowacka of TEG & Associates in December 2021. One non-compliance was noted which was cleared during the audit.

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

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

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

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

Audit observation

To assess compliance with these clauses, we examined the process of validating information in the registry. We reviewed the LIS file dated 22/04/2023 to identify any inaccuracies. We also reviewed the Event Detail (EDA) file for the audit period and the Audit Compliance report to determine how quickly TTTL provided information to the registry and correct information identified as inaccurate and confirm that all information is correct and not misleading.

The process of finding and correcting incorrect information was examined. The registry validation process was discussed in detail.

Audit commentary

TTTL is aware of the requirements to ensure that the registry is populated, maintained and notifications from the registry are actioned accordingly. Process documentation covers all areas of registry functions.

To ensure accuracy, TTTL validate our customers' information against the LIS file every day using an automated system in CHECKBOX. If discrepancies are found, an operator is notified via email and conducts an investigation. All changes to our customers' information are recorded in an audit trail in TTTL databases.

Audit outcome

Compliant

2.2. Provision of information (Clause 15.35)

Code reference

Clause 15.35

Code related audit information

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

Audit observation

Processes for the provision of information were reviewed and observed throughout the audit. In addition, we examined the Audit Compliance report and the EDA file for the audit period.

Audit commentary

TTL adheres to the requirements of Part 15 in terms of timely and correctly formatted information. The company has provided numerous examples to support this claim.

No alleged breaches during the audit period were recorded.

Audit outcome

Compliant

2.3. Data transmission (Clause 20 Schedule 15.2)

Code reference

Clause 20 Schedule 15.2

Code related audit information

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

Audit observation

It was discussed during the audit. We examined the process of receiving data from MEPs to assess compliance with this clause. Data transmission was discussed during the audit.

Audit commentary

The company receives data from MEPs via SFTP. Half hour meter reads are retrieved daily every morning. Data is stored in CHECKBOX. It is a fully automated process. The diagram in **section 1.5** shows the flow of data.

Audit outcome

Compliant

2.4. Audit trails (Clause 21 Schedule 15.2)

Code reference

Clause 21 Schedule 15.2

Code related audit information

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

The audit trail must include details of information:

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

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

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

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

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

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

Audit observation

We checked the audit trail for all data gathering, validation, and correction.

TTTL sends and receives data to and from the registry. It is an automated process. The software records each upload.

Reconciliation files are uploaded via the reconciliation manager portal, which records the date, time and a participant's login details.

CHECKBOX automatically uploads metering data provided by MEPs. Once the data is uploaded, it is moved to an archive directory.

Audit commentary

CHECKBOX has built-in functionality to record a complete audit trail for all data gathering, validation, and processing data. TTTL provided three examples of metering files stored in CHECKBOX; the source file's name is recorded against each interval. We confirm that the data was correctly uploaded to CHECKBOX.

Audit outcome

Compliant

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

Code reference

Clause 10.4

Code related audit information

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

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

Audit observation

We reviewed TTTL's current customer Terms and Conditions.

Audit commentary

TTTL published their Terms and Conditions on their website. The document states that the agreement applies from the agreed date and to the date a customer applies to switch to another electricity supplier. The agreement covers any other participants such as MEPs or a distributor. The agreement was reviewed by the Authority and no changes were recommended.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

The trader must use its best endeavours to provide access:

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

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

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

Audit observation

We reviewed TTTL's current customer Terms and Conditions.

Audit commentary

TTTL terms and conditions include consent to access for authorised parties for the duration of the contract. TTTL will give at least 10 BD notice if they or their representative or the network company need to construct, upgrade, repair, or maintain any equipment. A notification will be provided in writing, text message or email.

Audit outcome

Compliant

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

Code reference

Clause 10.35(1)&(2)

Code related audit information

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

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

- a) if practical in the circumstances, ensure that the metering installation is located at a point of connection; or

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

Audit observation

The LIS and EDA files were reviewed.

Audit commentary

TTTL trades 6 ICPs of category 1 metering installations. All metering installations are located at a point of connection.

Audit outcome

Compliant

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

Code reference

Clause 11.15B

Code related audit information

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

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

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

Audit observation

We reviewed TTTL's current customer Terms and Conditions.

Audit commentary

The section titled "Transfer of this Agreement" of the Terms and Conditions covers a situation where TTTL commit a relevant event of default as defined under the Code. Compliance confirmed based on a review of the Terms and Conditions.

Audit outcome

Compliant

2.9. Connection of an ICP (Clause 10.32)

Code reference

Clause 10.32

Code related audit information

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

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

Audit observation

During the audit period, we thoroughly examined the EDA file to ensure that all new connections were identified and that process controls and compliance were confirmed.

Additionally, we had discussions with TTTL staff regarding the reconnection process.

Audit commentary

TTTL will not be taking on any customers who are new connections in the foreseeable future. This is part of the validation process during customer onboarding.

TTTL will only proceed with the reconnection process if the customer, distributor, and MEP have confirmed that it is safe to reconnect the domestic premises. If a Medically Dependent or Vulnerable Consumer is unintentionally disconnected, TTTL will prioritize their reconnection as soon as possible. If there is a reconnection fee, we will inform the customer of the charges before proceeding with the MEP and initiating the reconnection. Once the MEP confirms the reconnection, the company will update the registry with the reconnected status.

There were no reconnections reported during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.33(1)

Code related audit information

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

- *for a point of connection to the grid – the grid owner has approved the connection*
- *for an NSP that is not a point of connection to the grid - the relevant distributor has approved the connection.*
- *for a point of connection that is an ICP, but is not as NSP:*
 - o *the trader is recorded in the registry as the trader responsible for the ICP or has an arrangement with the customer and initiates a switch within 2 business days of electrical connection*
 - o *if the ICP has metered load, 1 or more certified metering installations are in place*

- *if the ICP has not previously been electrically connected, the relevant distributor has given written approval of the temporary electrical connection.*

Audit observation

During the audit period, we examined the EDA file to verify compliance and process controls, and identify any new connections.

Audit commentary

TTTL have no intention of conducting any new connections in the immediate future. TTTL did not receive any such requests from MEPS.

Audit outcome

Compliant

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

Code reference

Clause 10.33A(1)

Code related audit information

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

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

Audit observation

We reviewed the EDA file for the audit period to identify all new connections and confirm process controls and compliance. In addition, we reviewed and discussed the reconnection process with TTTL staff.

We examined the Audit Compliance report for the audit period to identify uncertified metering installations.

Audit commentary

After reviewing the Audit Compliance report, we can confirm that the company does not trade uncertified metering installations. We also assessed the reconnection process and found it to be compliant.

TTTL downloads the PR-220 report on the 7th, 14th, and 21st day of each month at 0600 to monitor compliance. The report checks for uncertified metering installations. It is archived in CHECKBOX. If any ICP is identified in it, TTTL will contact the responsible MEP.

Audit outcome

Compliant

2.12. Arrangements for line function services (Clause 11.16)

Code reference

Clause 11.16

Code related audit information

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

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

Audit observation

The LIS file was reviewed to identify all networks TTTL has traded on during the audit period.

Audit commentary

All ICPs traded by TTTL are located on the Vector network, and the agreement for trading on this network is in place and was sighted as part of this audit.

TTTL uses AMS and Intellihub as their MEP, and arrangements were in place that were sighted during the audit.

Audit outcome

Compliant

2.13. Arrangements for metering equipment provision (Clause 10.36)

Code reference

Clause 10.36

Code related audit information

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

Audit observation

During the audit, we reviewed the LIS file to identify the MEPs for TTTL ICPs. We also discussed with TTTL the process of ensuring that an arrangement is in place with the metering equipment provider before switching in an ICP.

Audit commentary

Before TTTL switch in a new ICP they ensure they have an existing agreement with the MEP, and that the metering installations are certified.

TTTL have arrangements in place with Intellihub/Metrix and AMS. These agreements were sighted and are up-to-date.

Audit outcome

Compliant

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

Code reference

Clause 10.33B

Code related audit information

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

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

Audit observation

This was discussed during the audit.

Audit commentary

TTTL is aware of their obligation and will meet their obligation.

We reviewed the EDA file and confirmed that such a situation did not occur.

Audit outcome

Compliant

2.15. Electrical disconnection of ICPs (Clause 10.33B)

Code reference

Clause 10.33B

Code related audit information

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

Audit observation

This was discussed during the audit.

Audit commentary

TTTL is aware of their obligation and will meet their obligation.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

A trader that removes or breaks a seal in this way must:

- *ensure personnel are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code*
- *replace the seal with its own seal*
- *have a process for tracing the new seal to the personnel*
- *update the registry (if the profile code has changed)*
- *notify the metering equipment provider*

Audit observation

This was discussed during the audit.

Audit commentary

According to TTTL's company policy, seals should never be removed or broken except by authorized MEPs or distributors.

An MEP or distributor must follow the proper communication and operational procedures if a seal is removed or broken.

Audit outcome

Compliant

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

Code reference

Clause 10.33C and 2A of Schedule 15.2

Code related audit information

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

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

If the trader bridges a meter, the trader must:

- *determine the quantity of electricity conveyed through the ICP for the period of time the meter was bridged*
- *submit that estimated quantity of electricity to the reconciliation manager*
- *within 1 business day of being advised that the meter is bridged, notify the MEP that they are required to reinstate the meter so that all electricity flows through a certified metering installation.*

The trader must determine meter readings as follows:

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

Audit observation

This was discussed during the audit.

Audit commentary

According to the company, Tensor won't be bridging meters. Only authorized distributors or MEPs can do so. Checking for bridged meters is part of the TTTL validation process. The process involves investigating any consecutive "0" readings from the MEP and analysing unusual patterns or missing data. If necessary, the company will take appropriate action, such as contacting the customer or talking to the relevant MEP.

TTTL actively monitor event logs on a daily basis (at around 5-6AM). MEPs are queried by TTTL if data trends or anomalies in event logs are detected. This includes bridged or bypassed metering that is deemed not fit for purpose.

Audit outcome

Compliant

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

Code reference

Clause 11.30

Code related audit information

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

Audit observation

This was discussed during the audit. TTTL to provide an invoice for verification.

Audit commentary

TTTL has provided an invoice and we can confirm that the ICP identifier has been included in it.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

- *on their website*
- *when responding to queries from consumers*

- *in directed outbound communications to consumers about electricity services and bills.*

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

Audit observation

This was discussed during the audit. We reviewed the TTTL website and correspondence with customers.

Audit commentary

We confirm that the company website contains the link to Utilities Dispute. It is also quoted during communication with the customer, as shown below:

Consumer Support

If you have a question, concern or complaint, please let us know straight away. We'll work with you to resolve things quickly and fairly. You can also contact Utilities Disputes at any time for a free and independent resolution service on 0800 223 340 or at utilitiesdisputes.co.nz

For a free and independent price comparison, visit powerswitch.org.nz

Audit outcome

Compliant

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

Code reference

Clause 11.30B

Code related audit information

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

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

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

Audit observation

This was discussed during the audit. We reviewed the TTTL website and correspondence with customers.

Audit commentary

We confirm that the company website contains the link to PowerSwitch. It is also quoted during communication with the customer, as shown below:

The screenshot below shows an email footer.

Consumer Support

If you have a question, concern or complaint, please let us know straight away. We'll work with you to resolve things quickly and fairly. You can also contact Utilities Disputes at any time for a free and independent resolution service on 0800 223 340 or at utilitiesdisputes.co.nz

For a free and independent price comparison, visit powerswitch.org.nz

Audit outcome

Compliant

3. MAINTAINING REGISTRY INFORMATION

3.1. Obtaining ICP identifiers (Clause 11.3)

Code reference

Clause 11.3

Code related audit information

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

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

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

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

Audit observation

The LIS and EDA files for the audit period were reviewed to identify all new connections and confirm process controls and compliance.

Audit commentary

During the audit period, TTTL did not make any new connections and has no plans to process any new connections in the near future.

The process for new connections is currently not documented.

Audit outcome

Compliant

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

Code reference

Clause 11.7(2)

Code related audit information

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

Audit observation

We reviewed the EDA file and Audit Compliance report for the audit period to ensure that the registry was updated correctly and that process controls and compliance were in place. It was discussed with TTTL staff.

Audit commentary

TTTL processes are designed to ensure that trader information is populated as required by this clause. No late registry updates were recorded.

Audit outcome

Compliant

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

Code reference

Clause 10 Schedule 11.1

Code related audit information

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

Audit observation

We examined the LIS and EDA files and the Audit Compliance report for the period covered by this audit. The process for updating the registry is documented.

Audit commentary

The analysis of the EDA file showed that there were no changes to the registry information. The only files posted to the registry were switching files and trader files. TTTL use the SFTP file transfer to make any changes to the registry. However, MEP nomination is the only exception when the registry web interface is used.

Audit outcome

Compliant

3.4. Trader responsibility for an ICP (Clause 11.18)

Code reference

Clause 11.18

Code related audit information

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

A trader ceases to be responsible for an ICP if:

- *another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or*
- *the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).*
- *if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):*

- *arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and*
- *advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).*

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

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

Audit observation

We reviewed the LIS and EDA files to find MEP nominations and any "Active" ICPs missing an MEP record in the registry.

Audit commentary

We have verified that all ICPs listed in the registry have a valid MEP recorded. One MEP nomination was made during the audit period.

MEP nominations only occur for existing connections (who are with an MEP who we have no agreement with) that have an AMI-capable meter in place.

It is the responsibility of TTTL to ensure the proper management of the ICPs as long as they are the recorded as a trader in the registry, until the ICP is decommissioned or switched out.

None of the ICPs were decommissioned during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 9 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The LIS file and the Audit Compliance report from the audit period were examined to assess compliance. This was discussed with TTTL staff.

Audit commentary

The Audit Compliance report did not identify any missing data. There were no late updates to the registry. After examining the registry files, it was confirmed that TTTL did not engage in any new connections during the audit period. All necessary information for their currently traded ICPs has been uploaded. It is TTTL's responsibility to ensure the accuracy and timeliness of their registry information. TTTL review the distributor and metering information recorded in the registry to ensure that it matches their records.

Audit outcome

Compliant

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

Code reference

Clause 9 (1)(k) of Schedule 11.1

Code related audit information

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

Audit observation

We reviewed the LIS file to ensure that the ANZSIC codes were accurate and valid. We also discussed this with the TTTL staff.

Audit commentary

We have verified the accuracy of the ANZSIC codes and can confirm their correctness. Whenever TTTL gains new ICPs, they always ensure to double-check the ANZSIC codes.

Audit outcome

Compliant

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

Code reference

Clause 9(1)(f) of Schedule 11.1

Code related audit information

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

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

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

Audit observation

We examined the LIS file, the Audit Compliance report, and the EDA file for the audit period.

Audit commentary

TTTL policy is to decline applications from customers who have unmetered load connections. After reviewing the LIS file, we did not identify any ICPs with unmetered load.

Audit outcome

Compliant

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

Code reference

Clause 17 Schedule 11.1

Code related audit information

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

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

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

- *the ICP has only 1 customer, embedded generator, or direct purchaser (clause 17(2)(a))*
- *the electricity consumed is quantified by a metering installation or a method of calculation approved by the Authority (clause 17(2)(b)).*

Audit observation

We reviewed the EDA file and the Audit Compliance report to identify any changes of status to "Active". TTTL has established processes to ensure that each ICP has only one customer and that all “Active” ICPs have an MEP.

Audit commentary

TTTL switching process includes the determination of the “Active” status. Where this is not the case, TTTL will investigate why the status is not “Active” and it will update the registry if it was Switch Move.

All ICPs traded by TTTL have the status "Active". During the switching process, TTTL checks the status of each ICP. If an ICP does not have the status "Active," TTTL will investigate.

Audit outcome

Compliant

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

Code reference

Clause 19 Schedule 11.1

Code related audit information

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

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

Audit observation

We reviewed the EDA file and the Audit Compliance report to identify any changes of status to "Inactive". during the audit period.

Audit commentary

There were no changes to ICPs status during the audit period.

Obligations under the medically dependent and vulnerable consumer guidelines have been taken into account in all disconnection processes. For any disconnection, the customer details will be viewed to ensure that the customer is not a MDVC. Prior to disconnecting any ICP notice will be given as required by those guidelines.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

Audit observation

It is a distributor's code obligation to monitor an ICP which has had the status of "New" or "Ready" for 24 calendar months or more. It is expected that a trader be able to respond to such queries from distributors. TTTL does not sign-up new connections.

Audit commentary

TTTL has no queries concerning "New" or "Ready" ICPs. We checked the registry LIS file, which confirmed there are no ICPs at "Ready" status, where TTTL is the proposed trader.

Audit outcome

Compliant

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

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

Code reference

Clause 2 Schedule 11.3

Code related audit information

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

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

A gaining trader must advise the registry manager of a switch no later than 2 business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and 1 or more profile codes associated with that ICP.

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Standard Switch process was examined and discussed with TTTL.

Audit commentary

TTTL processes are compliant with the requirements of the Fair Trading Act 1986.

The NT file is automatically sent by CHECKBOX within 2 business days of the date that the arrangement with the customer comes into effect.

TTTL sent 4 NTTR during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 3 and 4 Schedule 11.3

Code related audit information

Within 3 business days after receiving notice of a switch from the registry manager, the losing trader must establish a proposed event date. The event date must be no more than 10 business days after the date of receipt of such notification, and in any 12 month period, at least 50% of the event dates must be no more than 5 business days after the date of notification. The losing trader must then:

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Standard Switch process was examined and discussed with TTTL.

Audit commentary

TTTL recently lost two ICPs using the Standard Switch Process. TTTL responded to the notification from the registry manager within three business days. Upon reviewing the AN files, we identified that an incorrect response code, "AA," was used instead of the correct code, "AD," which should be used when smart meters are installed. This information was clearly outlined in a memo dated August 5, 2016.

Code	Description	Explanation of use
AA	Acknowledge and accept	Switch is accepted; there are no relevant issues.
CO	Contracted customer	Alerts that this customer has a fixed-term contract at the ICP. The current Trader may be contacting this customer, relative to a switch.
MP	Metering is pre-paid	Alerts that meter is pre-paid.
MU	Unmetered supply	Alerts supply is unmetered.
OC	Occupied premises	Advises that the existing customer has not yet advised they are moving out. The premises are occupied.
PD	Premises de-energised (disconnected)	Alerts that this site is de-energised (disconnected).
AD	Advanced Metering Infrastructure metering infrastructure	Alerts that meter is an advanced meter.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.2 With: 3 and 4 of Schedule 11.3 From: 01-Dec-21 To: 15-Apr-23	2 ANs had the AA (acknowledge and accept) code incorrectly applied because they had advanced metering. The AD (advanced metering) code was expected. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. The participant was not aware that a code used by them was not correct. There is no potential/actual impact because the presence of AMI metering is recorded separately and the AN file is not typically used to confirm the presence of a smart meter by traders. Audit Risk Rating is recorded as low as the impact on settlement and participants is none		
Actions taken to resolve the issue		Completion date	Remedial action status
Preventative actions taken to ensure no further issues will occur		Completion date	
Not applicable – no action required.		1 June 2023	Identified
The participant has acknowledged that the incorrect code was being used, and have indicated the relevant correct codes to use in their process documentation for any future switches.		1 June 2023	

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

Code reference

Clause 5 Schedule 11.3

Code related audit information

If the losing trader provides information to the registry manager in accordance with clause 3(a) of Schedule 11.3 with the required information, no later than 5 business days after the event date, the losing trader must complete the switch by:

- providing event date to the registry manager (clause 5(a)); and

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Standard Switch process was examined and discussed with TTTL.

Audit commentary

TTTL lost two ICPs using the Standard Switch process. Switch Breach report did not record any non-compliances.

The accuracy of the content of the CS files was confirmed by checking 3 CS files. The content checked included:

- correct identification of meter readings and correct date of last meter reading
- accuracy of meter readings
- accuracy of average daily consumption - methodology used to calculate it was correct
- read type flag

We found it compliant.

Audit outcome

Compliant

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

Code reference

Clause 6(1) and 6A Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Standard Switch process was examined and discussed with TTTL. The management of RR files was examined and discussed with TTTL.

Audit commentary

TTTL neither received nor sent RR files.

The company validates the switch event readings against data received from MEPs. We checked two switches and confirm compliance.

We confirm that TTTL used reading from CS files in the reconciliation process.

Audit outcome

Compliant

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

Code reference

Clause 6(2) and (3) Schedule 11.3

Code related audit information

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

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b));*
- *the gaining trader within 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading.*

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The standards process was examined and discussed with TTTL.

Audit commentary

TTTL trades HHR ICPs only. This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 7 Schedule 11.3

Code related audit information

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

Audit observation

There were no disputes with a losing trader. If such a situation arises in the future it would be resolved in accordance with this clause.

Audit commentary

TTTL has stated that they will accept validated meter readings or permanent estimates from other traders as long as they are reasonable and appropriate in the relevant circumstances. However, if they do decline to accept such readings or estimates, the company will provide a plausible explanation to the other participant involved.

Audit outcome

Compliant

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

Code reference

Clause 9 Schedule 11.3

Code related audit information

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

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

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

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

- a proposed event date (clause 9(2)(a)); and*
- that the switch type is "MI" (clause 9(2)(b)); and*
- one or more profile codes of a profile at the ICP. (clause 9(2)(c))*

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Switch Move process was examined and discussed with TTTL.

Audit commentary

TTTL processes are compliant with the requirements of the Fair Trading Act 1986.

The NT file is automatically sent by CHECKBOX within 2 business days of the date that the arrangement with the customer comes into effect

TTL sent 3 NTMI files.

Audit outcome

Compliant

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

Code reference

Clause 10(1) Schedule 11.3

Code related audit information

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Switch Move process was examined and discussed with TTTL.

Audit commentary

TTTL received one NTMI from a gaining trader. The company responded sending AN file in prescribed time. The proposed Event Date was accepted. TTTL responded to the registry manager next day.

We checked the AN content file and identified the response code was incorrect . TTTL used “AA” response, it should be “AD” as smart meters are installed.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 01-Dec-21 To: 15-Apr-23	<p>1 AN had the AA (acknowledge and accept) code incorrectly applied because they had advanced metering. The AD (advanced metering) code was expected.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate. The participant was not aware that a code used by them was not correct. There is no potential/actual impact because the presence of AMI metering is recorded separately and the AN file is not typically used to confirm the presence of a smart meter by traders.</p> <p>Audit Risk Rating is recorded as low as the impact on settlement and participants is none</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Not applicable – no action required.		1 June 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The participant has acknowledged that the incorrect code was being used, and have indicated the relevant correct codes to use in their process documentation for any future switches.		1 June 2023	

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

Code reference

Clause 10(2) Schedule 11.3

Code related audit information

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Switch Move process was examined and discussed with TTTL.

Audit commentary

TTTL lost one customer using the Switch Move process. The company accepted the proposed Event Date by a gaining trader.

Audit outcome

Compliant

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

Code reference

Clause 11 Schedule 11.3

Code related audit information

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Switch Move process was examined and discussed with TTTL.

Audit commentary

TTTL lost one ICP using the Switch Move process.

The Switch Breach report did not identify any non-compliances.

The accuracy of the content of the CS files was confirmed by checking The content checked included:

- correct identification of meter readings and correct date of last meter reading
- accuracy of meter readings
- accuracy of average daily consumption – methodology used to calculate it was correct
- read type flag

Audit outcome

Compliant

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

Code reference

Clause 12 Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The Standard Switch process was examined and discussed with TTTL. The management of RR files was examined and discussed with TTTL.

Audit commentary

TTTL neither received nor sent RR files.

The company validates the switch event readings against data received from MEPs. We checked one switch and confirm compliance.

We confirm that TTTL used reading from CS files in the reconciliation process.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.3

Code related audit information

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

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

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

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

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

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

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

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

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The gaining trader switch process was examined and discussed with TTTL.

Audit commentary

No HH switches occurred in the period covered by this audit.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.3

Code related audit information

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

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The gaining trader switch process was examined and discussed with TTTL.

Audit commentary

No HH switches occurred in the period covered by this audit.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.3

Code related audit information

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

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

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

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

Audit observation

To assess compliance, we analysed the EDA file for the period covered by this audit and Switch Breach Report for the same period. The gaining trader switch process was examined and discussed with TTTL.

Audit commentary

No HH switches occurred in the period covered by this audit.

Audit outcome

Compliant

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

Code reference

Clauses 17 and 18 Schedule 11.3

Code related audit information

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

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

- for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):
 - o the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and
 - o the withdrawal advisory code published by the Authority. (clause 18(c)(ii))
- within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal. (clause 18(d))
- on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c). All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request. (clause 18(e))
- if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16. (clause 18(f))

Audit observation

The EDA file and Switch Breach Report for the period covered by this audit was analysed to assess compliance. The switch withdrawal process was analysed and discussed with TTTL staff.

Audit commentary

TTTL received a single NW file and responded within the allotted time.

Audit outcome

Compliant

4.16. Metering information (Clause 21 Schedule 11.3)

Code reference

Clause 21 Schedule 11.3

Code related audit information

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

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

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

Audit observation

Meter readings are received from MEPs. TTTL relies on MEPs to provide accurate readings but as is described in relevant sections, extensive validation is conducted upon uploading readings to CHECKBOX.

Audit commentary

All meter readings used in the switching process are validated meter readings or permanent estimates. The cost of additional interrogation is covered in a commercial agreement between TTTL and MEPs.

Audit outcome

Compliant

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

Code reference

Clause 11.15AA to 11.15AC

Code related audit information

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

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

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

Audit observation

This was discussed during the audit.

Audit commentary

TTTL have noted in their document that no win back processes are applied. The company is aware that no win backs or certain communications are to be made for 180 days.

Audit outcome

Compliant

5. MAINTENANCE OF UNMETERED LOAD

5.1. Maintaining shared unmetered load (Clause 11.14)

Code reference

Clause 11.14

Code related audit information

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

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

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

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

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

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

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

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

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

Audit observation

The LIS file was reviewed to assess if TTTL trades shared unmetered load. The process to identify and monitor shared unmetered load was discussed.

Audit commentary

It is not the intention of TTTL to take on SUML ICPs. However, during the customer acceptance validation process, SUML association is checked. If a customer is found to be associated with SUML at a later date, the company will request them to switch to a different trader.

Audit outcome

Compliant

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

Code reference

Clause 10.14 (2)(b)

Code related audit information

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

Audit observation

The LIS file was reviewed to assess if TTTL trades unmetered load. The process to identify and monitor unmetered load was discussed.

Audit commentary

TTTL has no intention of trading unmetered load ICPs. During the customer validation process, if a customer has an unmetered load, they may be asked to try another trader or to have their usage metered.

Audit outcome

Compliant

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

Code reference

Clause 10.14 (5)

Code related audit information

If the unmetered load limit is exceeded the retailer must:

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

Audit observation

The LIS file was reviewed to assess if TTTL trades shared unmetered load. The process to identify and monitor unmetered load was discussed.

Audit commentary

There are no plans to trade unmetered load ICPs in the foreseeable future.

Audit outcome

Not applicable

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

Code reference

Clause 11 Schedule 15.3, Clause 15.37B

Code related audit information

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

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

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

Audit observation

The LIS file was reviewed to assess if TTTL trades distributed unmetered load.

Audit commentary

The review of registry files showed that TTTL has not been trading distributed unmetered load. There are no plans to trade distributed unmetered load ICPs in the foreseeable future.

This clause is not applicable.

Audit outcome

Not applicable

6. GATHERING RAW METER DATA

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

Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

Code related audit information

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

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

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

- *there is 1 or more metering installations*
- *all electricity conveyed is quantified in accordance with the Code*
- *it does not use subtraction to determine submission information for the purposes of Part 15.*

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

Audit observation

I reviewed the LIS and EDA files and discussed them with TTTL staff.

Audit commentary

All ICPs marked as "Active" have a recorded MEP in the registry.

Submission information is not determined using subtraction.

No new connections were made during the audit period.

TTTL did not trade ICPs with embedded generation during this time. For sites with embedded generation, TTTL policy is to follow up with the customer and inform them that service cannot be provided for DG. TTTL notify the reconciliation manager and a customer won't be receiving payments.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least 3 months for the grid owner to review and comment on the design*

- *respond within 3 business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

The participant responsible for the metering installation must:

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

Audit observation

TTTL is not responsible for any metering connection connected to the grid.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

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

Audit observation

The LIS file was reviewed to identify which profiles are used for reconciliation purposes to determine if any used profiles require certification of any control devices.

Audit commentary

TTTL does not use any profiles requiring control devices. TTTL uses only the HHR profile.

Audit outcome

Compliant

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

Code reference

Clause 10.43(2) and (3)

Code related audit information

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

- *advise the MEP*

- include in the advice all relevant details.

Audit observation

We examined the process regarding faulty installations, and TTTL is aware of the need to monitor data and event logs to address this issue

Audit commentary

No defective meters have been identified during the period covered by this audit.

Defective installations are identified through a meter reading validation process conducted by CHECKBOX or notified by MEPs.

This process also addresses bridged metering. If any issues arise, an SR will be raised to prompt an investigation and potential meter replacement. If data trends or anomalies are detected in event logs, TTTL queries MEPs. This includes bridged or bypassed metering that is considered unfit for purpose.

Audit outcome

Compliant

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

Code reference

Clause 2 Schedule 15.2

Code related audit information

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

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

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

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

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

- a) ensure the system is to within +/- 5 seconds of NZST or NZDST*
- b) compare the meter time to the system time*
- c) determine the time error of the metering installation*
- d) if the error is less than the maximum permitted error, correct the meter's clock*
- e) if the time error is greater than the maximum permitted error then:*
 - i) correct the metering installation's clock*
 - ii) compare the metering installation's time with the system time*
 - iii) correct any affected raw meter data.*
- f) download the event log.*

2(6) – The interrogation systems must record:

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

Audit observation

Meter readings are collected by MEPs. Interrogation requirements and clock synchronisations were reviewed as part of MEP audits.

Audit commentary

The interrogation systems requirements were examined as part of the MEP audits and found to be compliant.

The MEPs provide clock synchronisation and event reports which are reviewed.

Audit outcome

Compliant

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

Code reference

Clause 3(1), 3(2) and 5 Schedule 15.2

Code related audit information

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

All validated meter readings must be derived from meter readings.

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

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 6 Schedule 15.2

Code related audit information

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 7(1) and (2) Schedule 15.2

Code related audit information

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 8(1) and (2) Schedule 15.2

Code related audit information

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 9(1) and (2) Schedule 15.2

Code related audit information

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 10 Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 11(1) Schedule 15.2

Code related audit information

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

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

Audit observation

HHR data is provided by MEPs. Compliance with this clause was assessed as part of their MEP audits.

Audit commentary

MEPs are responsible for collecting HHR data, and their audit reports document compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 11(2) Schedule 15.2

Code related audit information

The following information is collected during each interrogation:

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

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

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

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

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

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

Audit observation

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits.

Audit commentary

MEPs are responsible for collecting HHR data, and their audit reports document compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 11(3) Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

HHR data is provided by MEPs. Compliance was assessed as part of their MEP audits.

Audit commentary

MEPs are responsible for collecting HHR data, and their audit reports document compliance with this clause.

Audit outcome

Compliant

7. STORING RAW METER DATA

7.1. Trading period duration (Clause 13 Schedule 15.2)

Code reference

Clause 13 Schedule 15.2

Code related audit information

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

Audit observation

HHR data is provided by MEPs. Trading period duration was reviewed as part of MEPs audits.

Audit commentary

MEPs are accountable for ensuring compliance with this clause, which is assessed during their audits. We have examined the data submitted by MEPs and verified that the trading period lasts for 30 minutes.

Audit outcome

Compliant

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

Code reference

Clause 18 Schedule 15.2

Code related audit information

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

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

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

Audit observation

MEPs keep a record of raw meter data and compliance is evaluated during their audits. The TTL methods for storing and archiving this data were reviewed.

Audit commentary

When the meter reads files are downloaded by TTL servers, they are stored in their original and unaltered form as RAW files. These files are downloaded daily at 5-6 AM and checked against a validation checklist before being uploaded into the databases. After the half-hour, midnight reads, or register reads data is imported into the database, CHECKBOX then archives the raw data files from the MEP into their AWS cloud storage server.

Compliant

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

Code reference

Clause 21(5) Schedule 15.2

Code related audit information

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

Audit observation

TTL only uses the HHR profile for reconciliation submissions. Processes to record non-metering information were discussed. No external control equipment is used.

Audit commentary

No non-metering information is collected by TTL.

This clause is not applicable.

Audit outcome

Not applicable

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

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

Code reference

Clause 19(1) Schedule 15.2

Code related audit information

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

19(1)(a) - confirm the original meter reading by carrying out another meter reading

19(1)(b) – replace the original meter reading the second meter reading (even if the second meter reading is at a different date)

19(1A) if a reconciliation participant detects errors while validating non half hour meter readings, but the reconciliation participant cannot confirm the original meter reading or replace it with a meter reading from another interrogation, the reconciliation participant must:

- *substitute the original meter reading with an estimated reading that is marked as an estimate; and*
- *subsequently replace the estimated reading in accordance with clause 4(2)*

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 19(2) Schedule 15.2

Code related audit information

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

19(2)(a) - if the relevant metering installation has a check meter or data storage device, substitute the original meter reading with data from the check meter or data storage device; or

19(2)(b) - if the relevant metering installation does not have a check meter or data storage device, substitute the original meter reading with data from another period provided:

- (i) *The total of all substituted intervals matches the total consumption recorded on a meter, if available; and*
- (ii) *The reconciliation participant considers the pattern of consumption to be materially similar to the period in error*

Audit observation

We reviewed the process for correcting HHR metering information and found it to be sound. Additionally, the process for validating and estimating data is well-documented.

Audit commentary

If TTTL discovers any errors while validating half-hour meter readings, they will inform the MEP.

If MEPs fail to provide any data, TTTL will estimate the data using the following process:

- If register reads are unavailable, consumption will be estimated based on ICP's consumption history.
- If there is no profile history, the residual profile shape will be used.
- If register reads are available, intervals will be estimated so that the total kWh matches the difference between register reads, and the profile for the intervals will be the same as the same day of the previous week.

During the audit period, no corrections were made to HHR data.

Audit outcome

Compliant

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

Code reference

Clause 19(3) Schedule 15.2

Code related audit information

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

Audit observation

Error and loss compensation was discussed during the audit.

Audit commentary

TTTL does not trade any installation for which error compensation and loss compensation needs to be applied to determine accurate data.

Audit outcome

Compliant

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

Code reference

Clause 19(4) and (5) Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

Raw meter data is held by MEPs, and compliance is recorded in their MEP audits.

TTTL will only correct working data if needed and will maintain an audit trail. It is important to note that MEP data is never overwritten.

Audit outcome

Compliant

9. ESTIMATING AND VALIDATING VOLUME INFORMATION

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

Code reference

Clause 3(3) Schedule 15.2

Code related audit information

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

Audit observation

The estimation processes and interval identification were examined during this audit.

Audit commentary

Flags of read types are recorded correctly in CHECKBOX. We checked 2 examples to confirm compliance. TTTL stores read type flag against each interval as provided by MEPS.

Audit outcome

Compliant

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

Code reference

Clause 3(4) Schedule 15.2

Code related audit information

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

3(4)(a) - validated meter readings

3(4)(b) - estimated readings

3(4)(c) - permanent estimates.

Audit observation

All readings received from the MEPS are validated upon upload to CHECKBOX.

Audit commentary

TTTL generate reconciliation files using HHR readings provided by the MEP. If data is not provided by MEPS, it can be estimated by CHECKBOX. The volumes are calculated from actual or estimated meter readings.

No data was estimated during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 3(5) Schedule 15.2

Code related audit information

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

Audit observation

TTTL provided 2 examples of data from AMS and IHUB to demonstrate compliance.

Audit commentary

TTTL provided 2 examples of metering files provided by MEPS. The files are stored in CHECKBOX. Metering data is neither rounded nor truncated upon uploading to CHECKBOX.

Audit outcome

Compliant

9.4. Half hour estimates (Clause 15 Schedule 15.2)

Code reference

Clause 15 Schedule 15.2

Code related audit information

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

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

Audit observation

The HHR estimate process was examined and discussed with TTTL. The process is well documented.

Audit commentary

CHECKBOX estimates the missing data rows using one of three methods. In order of priority:

- The first method estimates the data row based on midnight reads on either side:
 - i. Values are taken from the Midnight Reads for the day before (ex-ante, offset by -1 day) and the day after (ex-post, offset by +1 day)
 - ii. The midpoint is defined by taking the linear interpolation of the two points of data on either side – this defines the total daily consumption of the present day
 - iii. All dates and times are converted to local time to account for any daylight savings changes
 - iv. The total number of intervals for the present day is calculated by taking the total number of seconds in the day, divided by 30-minute intervals (this can be 46, 48 or 50 intervals depending on DST)
 - v. Any missing interval data is estimated as the midpoint (in 2 above) divided by the total number of intervals (in 4 above).
- Second method – this is the same approach as the first method, but values are taken from Register Reads if Midnight Reads on either side are not available

- The third method estimates the data row based on the most recent interval read:
 1. If no Midnight or Register Reads on either side of the date is available, an estimate is derived based on the most recent half hour read of the same weekday
 2. The data is filtered by:
 - i. the same day of the week (e.g., Monday, Tuesday etc.)
 - ii. the same metering configuration (e.g., meter serial number, channel number, register content code, energy flow direction etc.)
 - iii. the same hour, minute and second of the day
 - iv. the same ICP number.
 3. The most recent half hour read is taken from the filtered query above

If there is no HHR data available for an ICP, which is a new switch, TTTL will estimate the consumption volume amount using the "average daily consumption" field of the latest CS file for the ICP.

Once the actual HHR data is received, a revision file will be sent on the 13th business day of the reconciliation month with the corrected/updated consumption values.

No estimation was performed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 17 Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

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

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

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

Audit observation

The HHR data validation was examined and discussed with TTTL staff. The process is well documented.

Audit commentary

TTTL servers store downloaded files as RAW files in their original and unaltered form. These files are downloaded daily at 5-6 AM and undergo validation checks before being uploaded into the databases.

The validation process ensures that the meter readings are consistent; there are no invalid dates and times, unexpected zeros, abnormal trends, negative values, or missing data.

TTTL also reviews log files provided by NGCM and INTELLUHUB.

Audit outcome

Compliant

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

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

Code reference

Clause 13.136

Code related audit information

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

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

Audit observation

TTL is neither a generator nor embedded generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 13.137

Code related audit information

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

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

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

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

Audit observation

TTL is neither a generator nor embedded generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 13.138

Code related audit information

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

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

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

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

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

Audit observation

TTL is neither a generator nor embedded generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 13.140

Code related audit information

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

Audit observation

TTL is neither a generator nor embedded generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

11.1. Buying and selling notifications (Clause 15.3)

Code reference

Clause 15.3

Code related audit information

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

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

Audit observation

We reviewed submission files provided by the company. TTTL only uses the HHR profile for reconciliation submissions.

Audit commentary

TTTL uses the HHR profile, which does not require a trading notification. We confirmed by checking the LIS file and submission files for November 2022 to March 2023.

Audit outcome

Compliant

11.2. Calculation of ICP days (Clause 15.6)

Code reference

Clause 15.6

Code related audit information

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

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

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

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

Audit observation

The process for the calculation of ICP days was examined by checking 2 NSPs to confirm the AV110 ICP days calculation was correct.

We also reviewed the GR-100 report provided by the reconciliation manager.

Audit commentary

There were no differences between ICPDAYS calculated by the registry and TTTL.

Audit outcome

Compliant

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

Code reference

Clause 15.7

Code related audit information

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

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

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

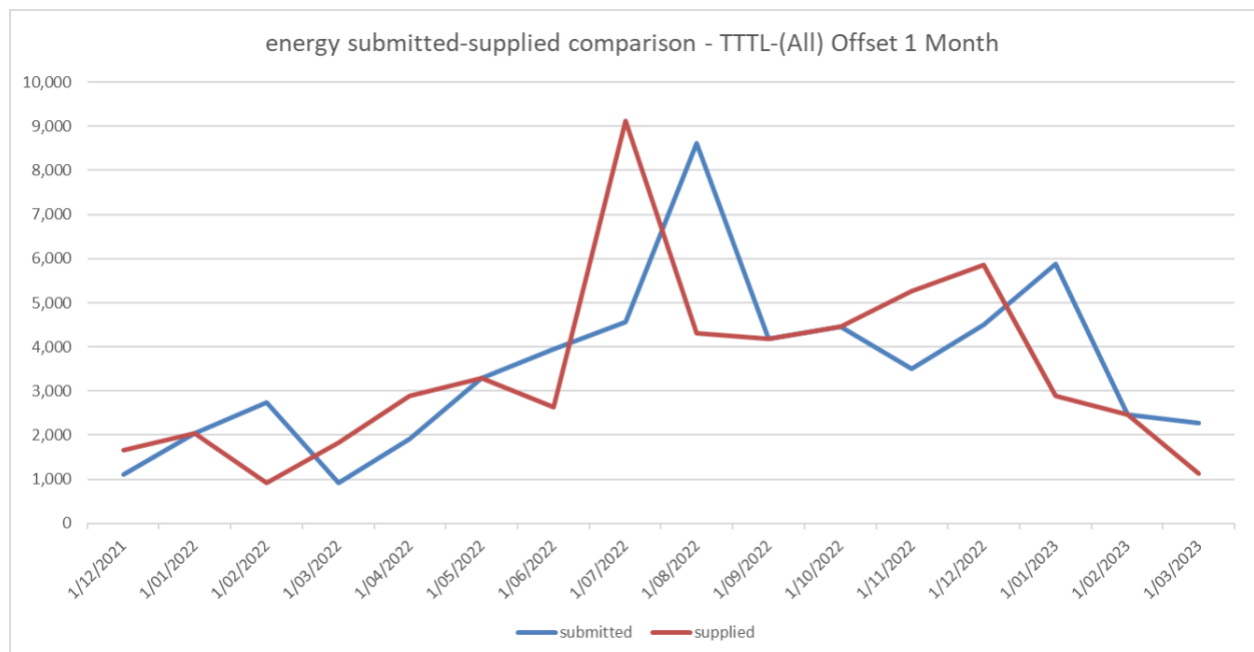
Audit observation

TTL submits AV-120 monthly. The process for the calculation of “as billed” volumes was examined.

BILLED files are based on Xero invoice amounts.

Audit commentary

The table below shows a comparison between volumes submitted and supplied (billed).



Audit outcome

Compliant

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

Code reference

Clause 15.8

Code related audit information

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

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

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

Audit observation

We examined the process for the calculation and aggregation of HHR data. We compared HHRAGGR with the HHRVOLS files for four submissions. The process was discussed with TTTL staff.

The GR-090 "ICP missing" files were examined for 5 months.

Audit commentary

We have analysed the volumes in HHRVOLS and HHRAGGR from October 2022 to March 2023. We have found that there are only minor differences in the volume between the files or no differences at all.

Audit outcome

Compliant

12. SUBMISSION COMPUTATION

12.1. Daylight saving adjustment (Clause 15.36)

Code reference

Clause 15.36

Code related audit information

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

Audit observation

HHR data is provided by MEPs. Data provided by MEPs are already adjusted for NZDT.

Audit commentary

Daylight savings processes for the MEPs were reviewed as part of their audits and found to be compliant.

Audit outcome

Compliant

12.2. Creation of submission information (Clause 15.4)

Code reference

Clause 15.4

Code related audit information

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

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

Audit observation

TTTL provided reconciliation data for the audit period.

We checked for alleged breaches regarding late files.

Audit commentary

No breaches had been recorded for late provision of submission information.

We confirmed that TTTL submits volume information on day 4. On the 13th business day of each reconciliation period TTTL will submit revision files as per schedule.

As a part of assessing compliance, we reviewed reconciliation files HHRAGGR, HHRVOLS, and ICPDAYS and corresponding RM files GR-100, GR-090 and GR-170 HHR for November 2022 to March 2023.

Audit outcome

Compliant

12.3. Allocation of submission information (Clause 15.5)

Code reference

Clause 15.5

Code related audit information

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

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

Audit observation

The process for the allocation of submission volumes to the NSPs indicated in the registry was examined and discussed with TTTL staff.

Audit commentary

The LIS file is downloaded daily from the registry.

TTTL have a procedure for comparing data recorded in the registry with data stored in CHECKBOX during the month and before each reconciliation run.

Audit outcome

Compliant

12.4. Grid owner volumes information (Clause 15.9)

Code reference

Clause 15.9

Code related audit information

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

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

Audit observation

A review of the NSP table confirmed that TTTL is not a grid owner.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

12.5. Provision of NSP submission information (Clause 15.10)

Code reference

Clause 15.10

Code related audit information

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

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

Audit observation

The review of registry file confirmed that TTTL does not own any local or embedded network.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

12.6. Grid connected generation (Clause 15.11)

Code reference

Clause 15.11

Code related audit information

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

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

Audit observation

A review of the NSP table confirmed that TTTL is not a generator.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

12.7. Accuracy of submission information (Clause 15.12)

Code reference

Clause 15.12

Code related audit information

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

Audit observation

TTTL provided reconciliation data submitted for the audit period. We analysed HHRVOLS and GR170HHR for November 2022 to March 2023.

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

Audit commentary

TTTL have a procedure for comparing data recorded in the registry with data stored in CHECKBOX during the month and before each reconciliation runs. As a result, CHECKBOX will identify any changes to previous submissions, including new estimates based on more recent data or updated reads with actual data.

Audit outcome

Compliant

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

Code reference

Clause 4 Schedule 15.2

Code related audit information

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

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 2 Schedule 15.3

Code related audit information

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

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

Audit observation

TTTL provided submission files submitted for the audit period. The company submitted HHRVOLS, HHRAGGR, and ICPDAYS. No NHHVOLS were submitted because TTTL did not trade any NHH ICPs.

Audit commentary

We assessed compliance with this clause and confirm as follows:

- all metered ICPs are submitted as HHR
- no profiles requiring a certified control device were used
- no loss or compensation arrangements were required
- no UML ICPs were traded
- aggregation of HHRAGGR and HHRVOLS is compliant

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 15.3

Code related audit information

For each ICP that has a non-half hour metering installation, volume information derived from validated meter readings, estimated readings, or permanent estimates must be allocated to consumption periods using the following techniques to create historical estimates and forward estimates. (clause 3(1))

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 4 and 5 Schedule 15.3

Code related audit information

The methodology outlined in clause 4 of Schedule 15.3 must be used when preparing historic estimates of volume information for each ICP when the relevant seasonal adjustment shape is available.

If a seasonal adjustment shape is not available, the methodology for preparing an historical estimate of volume information for each ICP must be the same as in clause 4, except that the relevant quantities kWh_{Px} must be prorated as determined by the reconciliation participant using its own methodology or on a flat shape basis using the relevant number of days that are within the consumption period and within the period covered by kWh_{Px} .

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

12.12. Forward estimate process (Clause 6 Schedule 15.3)

Code reference

Clause 6 Schedule 15.3

Code related audit information

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

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

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

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

Code reference

Clause 7 Schedule 15.3

Code related audit information

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

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

Audit observation

Submission files were reviewed. Volumes for all ICPs were submitted using the HHR profile.

Audit commentary

There was no profile change during the audit period.

Audit outcome

Compliant

13. SUBMISSION FORMAT AND TIMING

13.1. Provision of submission information to the RM (Clause 8 Schedule 15.3)

Code reference

Clause 8 Schedule 15.3

Code related audit information

For each category 3 of higher metering installation, a reconciliation participant must provide half hour submission information to the reconciliation manager.

For each category 1 or category 2 metering installation, a reconciliation participant must provide to the reconciliation manager:

- *Half hour submission information; or*
- *Non half hour submission information; or*
- *A combination of half hour submission information and non half hour submission information*

However, a reconciliation participant may instead use a profile if:

- *The reconciliation participant is using a profile approved in accordance with clause Schedule 15.5; and*
- *The approved profile allows the reconciliation participant to provide half hour submission information from a non half hour metering installation; and*
- *The reconciliation participant provides submission information that complies with the requirements set out in the approved profile.*

Half hour submission information provided to the reconciliation manager must be aggregated to the following levels:

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *trading period*

The non half hour submission information that a reconciliation participant submits must be aggregated to the following levels:

- *NSP code*
- *reconciliation type*
- *profile*
- *loss category code*
- *flow direction*
- *dedicated NSP*
- *consumption period or day*

Audit observation

We reviewed the submission file for December 2021 to March 2023.

TTTL trades category 1 metering installations. All ICPs are reconciled as HHR.

Audit commentary

Every month TTTL submits HHRAGGR and HHRVOLS files to the reconciliation manager.

Submission information is provided to the reconciliation manager in the appropriate format and is aggregated to the following level:

- NSP code
- reconciliation type • profile
- loss category code • flow direction
- dedicated NSP
- consumption period

Audit outcome

Compliant

13.2. Reporting resolution (Clause 9 Schedule 15.3)

Code reference

Clause 9 Schedule 15.3

Code related audit information

When reporting submission information, the number of decimal places must be rounded to not more than 2 decimal places.

If the unrounded digit to the right of the second decimal place is greater than or equal to 5, the second digit is rounded up, and

If the digit to the right of the second decimal place is less than 5, the second digit is unchanged.

Audit observation

As part of our aggregation checks, we examined the data rounding in the HHRAGGR and HHRVOLS files.

Audit commentary

Submission information for HHR is rounded to two decimal places. It was discussed with the company how submission information was calculated. The company has clarified that this is done, at the end of calculations, using a specific method outlined in a clause

Audit outcome

Compliant

13.3. Historical estimate reporting to RM (Clause 10 Schedule 15.3)

Code reference

Clause 10 Schedule 15.3

Code related audit information

By 1600 hours on the 13th business day of each reconciliation period the reconciliation participant must report to the reconciliation manager the proportion of historical estimates per NSP contained within its non half hour submission information.

The proportion of submission information per NSP that is comprised of historical estimates must (unless exceptional circumstances exist) be:

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*

- *100% for revised data provided at the month 14 revision. (clause 10(3)(c))*

Audit observation

We reviewed the LIS and EDA files, and it was confirmed that TTTL only trades HHR ICPs.

Audit commentary

This clause is not applicable. Compliance was not assessed.

Audit outcome

Not applicable

CONCLUSION

PARTICIPANT RESPONSE