

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

STRIDE INVESTMENT MANAGEMENT LTD
(DMFL)

NZBN: 9429042189435

Prepared by: Brett Piskulic

Date audit commenced: 2 May 2023

Date audit report completed: 20 June 2023

Audit report due date: 22 June 2023

TABLE OF CONTENTS

Executive summary	4
Audit summary	5
Non-compliances	5
Recommendations	5
Issues	5
1. Administrative	6
1.1. Exemptions from Obligations to Comply with Code (Section 11)	6
1.2. Structure of Organisation	6
1.3. Persons involved in this audit	7
1.4. Use of contractors (Clause 11.2A)	7
1.5. Supplier list	7
1.6. Hardware and Software	7
1.7. Breaches or Breach Allegations	8
1.8. ICP and NSP Data	8
1.9. Authorisation Received	9
1.10. Scope of Audit	10
1.11. Summary of previous audit	10
2. Operational Infrastructure	11
2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1)) ..	11
2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2))	11
2.4 Provision of information on dispute resolution scheme (Clause 11.30A)	12
3. Creation of ICPs	13
3.1. Distributors must create ICPs (Clause 11.4)	13
3.2. Participants may request distributors to create ICPs (Clause 11.5(3))	13
3.3. Provision of ICP Information to the registry manager (Clause 11.7)	14
3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule	14
11.1)	14
3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)	15
.....	15
3.6. Connection of ICP that is not an NSP (Clause 11.17)	16
3.7. Connection of ICP that is not an NSP (Clause 10.31)	17
3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A)	18
3.9. Connection of NSP that is not point of connection to grid (Clause 10.30)	18
3.10. Electrical connection of NSP that is not point of connection to grid (Clause 10.30A and	19
10.30B)	19
3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1)	20
3.12. Loss category (Clause 6 Schedule 11.1)	20
3.13. Management of “new” status (Clause 13 Schedule 11.1)	20
3.14. Monitoring of “new” & “ready” statuses (Clause 15 Schedule 11.1)	21
3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1)	21
3.16. Electrical connection of a point of connection (Clause 10.33A)	22
3.17. Electrical disconnection of a point of connection (Clause 10.30C and 10.31C)	22
3.18. Meter bridging (Clause 10.33C)	23
4. Maintenance of registry information	24

4.1.	Changes to registry information (Clause 8 Schedule 11.1)	24
4.2.	Notice of NSP for each ICP (Clauses 7(1),(4) and (5) Schedule 11.1)	25
4.3.	Customer queries about ICP (Clause 11.31).....	26
4.4.	ICP location address (Clause 2 Schedule 11.1).....	26
4.5.	Electrically disconnecting an ICP (Clause 3 Schedule 11.1).....	27
4.6.	Distributors to Provide ICP Information to the Registry manager (Clause 7(1) Schedule 11.1)	27
4.7.	Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)	29
4.8.	GPS coordinates (Clause 7(8) and (9) Schedule 11.1)	29
4.9.	Management of “ready” status (Clause 14 Schedule 11.1)	30
4.10.	Management of “distributor” status (Clause 16 Schedule 11.1)	30
4.11.	Management of “decommissioned” status (Clause 20 Schedule 11.1)	31
4.12.	Maintenance of price category codes (Clause 23 Schedule 11.1).....	31
5.	Creation and maintenance of loss factors	33
5.1.	Updating table of loss category codes (Clause 21 Schedule 11.1)	33
5.2.	Updating loss factors (Clause 22 Schedule 11.1)	33
6.	Creation and maintenance of NSPs (including decommissioning of NSPs and transfer of ICPs).....	34
6.1.	Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1)	34
6.2.	Provision of NSP information (Clause 26(1) and (2) Schedule 11.1)	35
6.3.	Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1)	35
6.4.	Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1) ...	36
6.5.	Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1)	36
6.6.	Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1)	37
6.7.	Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2)	37
6.8.	Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3))	37
6.9.	Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2)).....	39
6.10.	Obligations concerning change in network owner (Clause 29 Schedule 11.1)	40
6.11.	Change of MEP for embedded network gate meter (Clause 10.22(1)(b))	40
6.12.	Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2)	41
6.13.	Transfer of ICPs for embedded network (Clause 6 Schedule 11.2).....	41
7.	Maintenance of shared unmetered load	42
7.1.	Notification of shared unmetered load ICP list (Clause 11.14(2) and (4))	42
7.2.	Changes to shared unmetered load (Clause 11.14(5)).....	42
8.	Calculation of loss factors	43
8.1.	Creation of loss factors (Clause 11.2).....	43
	Conclusion	44
	Participant response	45

EXECUTIVE SUMMARY

This distributor audit was conducted at the request of **Stride Investment Management Ltd (DMFL)** to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

DMFL's compliance is reliant on the compliance of Tenco, as the contractor. In this report, I have only recorded those matters where issues were discovered or where specific analysis was undertaken.

Overall, the level of compliance was found to be high. This audit found five non-compliances and makes no recommendations. The five non-compliances relate to a small number of late registry updates and the late provision of certification information to the Reconciliation Manager after recertification of the metering installation at two NSPs.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The Future Risk Rating table provides some guidance on this matter and recommends an indicative audit frequency of 18 months. I agree with this recommendation.

The matters raised are set out in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	One ICPs was updated to "ready" status after initial electrical connection.	Strong	Low	1	Cleared
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	One ICP did not have the initial electrical connection date populated within ten business days of initial electrical connection.	Moderate	Low	2	Cleared
Connection of ICP that is not an NSP	3.6	11.17	One ICP was not updated to "ready" status prior to the initial electrical connection date, and the trader was not recorded as having accepted responsibility for the ICP in the registry.	Strong	Low	1	Cleared
Changes to registry information	4.1	8 Schedule 11.1	One late pricing update.	Strong	Low	1	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1) and 10.25(3)	Metering installation certification details were updated more than 20 business days after the certification date for WCW0111 and WQG0011.	Moderate	Low	2	Cleared
Future Risk Rating						7	

Future risk rating	0-1	2-5	6-8	9-20	21-29	30+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

ISSUES

Subject	Section	Issue	Description
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

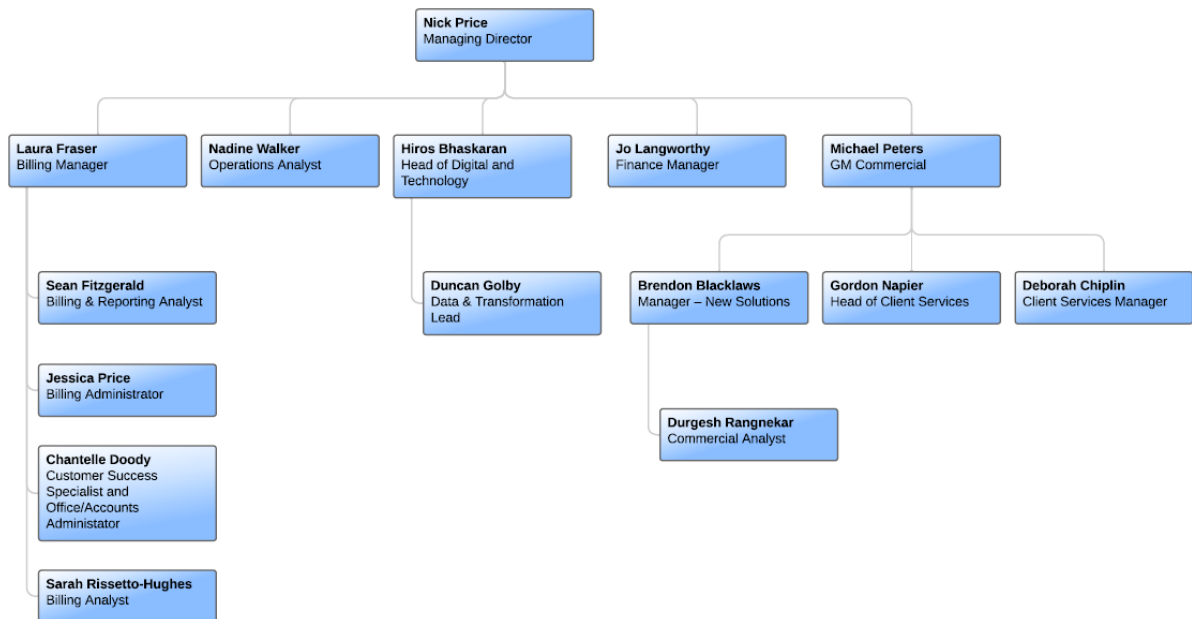
The Electricity Authority website was checked to determine whether DMFL has any Code exemptions in place.

Audit commentary

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

1.2. Structure of Organisation

TENCO provided an organisation chart:



1.3. Persons involved in this audit

Auditor:

Brett Piskulic

Provera

Electricity Authority Approved Auditor

Personnel assisting in this audit were:

Name	Title	Organisation
Nick Price	Managing Director	TENCO
Nadine Walker	Operations Analyst	TENCO

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

TENCO performs all DMFL's responsibilities.

1.5. Supplier list

All activities covered by the scope of this audit are conducted by TENCO.

1.6. Hardware and Software

TENCO manages a database called END (Embedded Network Database), which contains all relevant embedded network data.

A spreadsheet is used to create ICP identifiers. The checksum is created by the "checksum" tool provided by Vector.

Salesforce hosts all the ICP information, and registry information is imported daily. A daily registry validation is performed within Salesforce and any discrepancies are managed using the salesforce dashboard.

Confluence is used to map processes.

1.7. Breaches or Breach Allegations

DMFL has not had any breach allegations relevant to this audit recorded by the Electricity Authority.

1.8. ICP and NSP Data

Review of the NSP table showed DMFL had the following NSPs as of April 2023. Active ICP numbers are as of 13 April 2023.

Dist	NSP POC	Description	Parent POC	Parent Ntwk	Balancing Area	Ntwk type	Start date	No of ICPs
DMFL	DCQ0011	33 CUSTOMHOUSE QUAY WGTN	KWA0111	CKHK	DCQ0011DMFLE	E	1 June 2018	10
DMFL	DGS0011	226 GREAT SOUTH RD AUCKLAND	TAK0331	VECT	DGS0011DMFLE	E	1 January 2017	10
DMFL	DMW0011	MT WELLINGTON SHOP CNTR AUCK	PEN0331	VECT	DMW0011DMFLE	E	1 June 2016	13
DMFL	DTT0011	22 THE TERRACE WELLINGTON	KWA0111	CKHK	DTT0011DMFLE	E	1 November 2015	12
DMFL	OPT0011	OPTIMATION HOUSE	KWA0111	CKHK	OPT0011DMFLE	E	1 February 2009	20
DMFL	WCW0011	WESTFEILD CHARTWELL	HAM0331	WAIK	WCW0011DMFLE	E	1 September 2016	104
DMFL	WCW0111	WESTFEILD CHARTWELL	HAM0331	WAIK	WCW0111DMFLE	E	1 September 2016	17
DMFL	WQG0011	WESTFIELD QUEENSGATE	MLG0331	CKHK	WQG0011DMFLE	E	1 October 2018	158
DMFL	WSG0011	NORTHWEST SHOPPING CENTRE	HEN0331	UNET	WSG0011DMFLE	E	16 April 2015	105
DMFL	WSG0012	NORTHWEST SHOP CENTRE AUCK	HEN0331	UNET	WSG0012DMFLE	E	1 August 2016	31

No NSPs were decommissioned during the audit period.

Two NSPs were transferred to other networks during the audit period.

Dist	NSP POC	Description	Parent POC	Parent Ntwk	Balancing Area	Ntwk type	Start date	End date
DMFL	DTE0011	25 TEED ST AUCKLAND	PEN0331	VECT	DTE0011DMFLE	E	1 June 2016	31 May 2022
DMFL	FSH0011	FANSHAWE STREET	PEN1101	VECT	FSH0011DMFLE	E	1 May 2008	30 November 2022

ICP status

DMFL's ICPs are summarised by status in the table below:

Status	Number of ICPs (2023)	Number of ICPs (2021)	Number of ICPs (2019)	Number of ICPs (2017)	Number of ICPs (2016)
New (999,0)	-	-	1	-	-
Ready (0,0)	-	-	2	-	26
Active (2,0)	480	510	513	500	180
Distributor (888,0)	-	-	-	-	-
Inactive – new connection in progress (1,12)	-	1	1	1	-
Inactive – electrically disconnected vacant property (1,4)	13	8	7	10	3
Inactive – electrically disconnected remotely by AMI meter (1,7)	-	1	3	-	-
Inactive – electrically disconnected at pole fuse (1,8)	-	-	-	-	-
Inactive – electrically disconnected due to meter disconnected (1,9)	2	3	2	1	-
Inactive – electrically disconnected at meter box fuse (1,10)	1	1	-	-	-
Inactive – electrically disconnected at meter box switch (1,11)	-	-	-	-	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-	-	-	-	-
Inactive – reconciled elsewhere (1,5)	-	-	-	-	-
Decommissioned (3)	47	44	36	28	8

1.9. Authorisation Received

A letter of authorisation was provided.

1.10. Scope of Audit

This distributor audit was performed at the request of DMFL, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

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

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

The audit report for TENCO contractor will be submitted with this audit.

1.11. Summary of previous audit

I reviewed the previous audit conducted in June 2021 by Rebecca Elliot of Veritek Limited. The audit recorded two non-compliances described in the table below and made no recommendations. The current status of the non-compliances is listed below.

Subject	Section	Clause	Non-compliance	Status
Changes to registry information	4.1	8 Schedule 11.1	One ICP not decommissioned within three days it being updated to being ready to decommission.	Cleared
Responsibility for metering information for NSP that is not a POC to the grid	6.8	10.25(1) and 10.25(3)	Meter certification details were updated more than 20 business days after the certification date for DTT0011 and WQQ0011.	Still existing

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO contractor report. The list file as of 13 April 2023 and the combined registry compliance audit reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

Compliance is recorded for TENCO.

Audit outcome

Compliant

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

Processes to provide information were reviewed and observed throughout the audit, and as part of TENCO's agent audit.

Audit commentary

Processes are in place to identify and resolve registry discrepancies. Incorrect information is normally corrected daily, or as soon as possible upon discovery.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

Audit observation

The TENCO process for bridging control devices was examined. The PR-255 file was examined to determine whether load control devices were installed on the network.

Audit commentary

There were no load control devices installed on the DMFL network.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

The TENCO website and the email signatures from TENCO staff were reviewed to confirm compliance.

Audit commentary

TENCO have a reference on their website to the Utilities Disputes and include a reference in their email signature to the Utilities Disputes for all staff.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process is discussed in the TENCO audit report.

The registry list as of 13 April 2023 and event detail report for 1 June 2021 to 13 April 2023 were reviewed to identify all new connections during the period and check that ICPs were created as required by this clause.

Audit commentary

Compliance is recorded in the TENCO audit report in relation to this clause. Examination of the registry list found four ICPs were created during the report period. ICPs were created in accordance with this clause for all new connections.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

The new connection process is discussed in the TENCO audit report. ICP requests are made by embedded network management or traders. If the request is not made by a trader this rule does not apply.

The four new connections were checked to confirm compliance.

Audit commentary

All of the new connections checked were requested by the customer, not the trader.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The new connection process is discussed in the TENCO report.

The registry list file as of 13 April 2023 and the combined registry compliance audit reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

Information was provided as required by this clause for all four ICPs created during the report period.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

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

The audit compliance report confirmed that three of the four ICPs were populated to the registry prior to electricity being traded at the ICP. One ICP, 0002290011DF871, was not updated to “ready” status prior to the initial electrical connection date. The ICP was electrically connected on 30 November 2021 and the change to “ready” occurred on 3 December 2021.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 30-Nov-21 To: 03-Dec-21	One ICPs was updated to “ready” status after initial electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to prevent late updates most of the time. The audit risk rating is low as only one event was updated late during the audit period.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP status was updated to ‘Ready’ as soon as we were informed that the meter had been installed.		During audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
ICP’s are now created with a status of ‘Ready’ unless we are aware that construction is still in progress and livening some time away.		Ongoing	

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

All four new ICPs created during the report period were electrically connected.

The audit compliance report confirmed that three of the four ICPs had the initial electrical connection date updated to the registry within the required timeframe. One ICP, 0002290010DF434, had the initial electrical connection date updated after 24 business days.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 10-Aug-22 To: 30-Aug-22	One ICP did not have the initial electrical connection date populated within ten business days of initial electrical connection. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as they are sufficient to ensure that initial electrical connection dates are updated on time most of the time. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy had incorrectly claimed this ICP. Once this was reversed and a subsequent claim made by Mercury, we were able to update the IED, albeit late.		During audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Where we find ICP's have been incorrectly claimed, we notify the effected retailers immediately to request corrective action.		Ongoing	

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The new connection process is discussed in the TENCO report.

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

As discussed in the TENCO agent audit report, the new connection process requires applications for new connections to be approved by traders.

Review of the registry list confirmed that a trader is currently recorded for all active ICPs, and there is no known shared unmetered load on DMFL’s network.

Three of the four new connections during the period had proposed trader recorded prior to the initial electrical connection.

One ICP, 0002290011DF871, was not updated to “ready” status prior to the initial electrical connection date, and the trader was not recorded as having accepted responsibility for the ICP in the registry.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.6 With: Clause 11.17 From: 30-Nov-21 To: 03-Dec-21	One ICP was not updated to “ready” status prior to the initial electrical connection date, and the trader was not recorded as having accepted responsibility for the ICP in the registry. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to prevent late updates most of the time. The audit risk rating is low as only one event was updated late during the audit period.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP status was updated to ‘Ready’ as soon as we were informed that the meter had been installed.		During audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
ICP’s are now created with a status of ‘Ready’ unless we are aware that construction is still in progress and livening some time away.		Ongoing	

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

The new connection process is discussed in the TENCO report.

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

DMFL will not electrically connect an ICP without a reconciliation participant accepting responsibility. Examination of the list file and the combined audit compliance reports confirmed this.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

advising all traders would impose a material cost on the distributor, and

in the distributor's reasonable opinion, advice would not result in any material benefit to any of the traders.

Audit observation

The new connection process is discussed in the TENCO report.

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

All electrically connected ICPs had certified meters on their initial electrical connection date. No temporary electrical connections were identified.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

No new NSP's were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

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

A distributor may only electrically connect an NSP if:

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

Audit observation

The NSP table was reviewed.

Audit commentary

No new NSPs were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

xxxxxxxxxxxccc where:

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

Audit observation

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

Audit commentary

Compliance is recorded for TENCO. ICPs are created in a spreadsheet. The spreadsheet is used to create unique numbering sets for each network. Each network has its own numbering convention, usually with tenancy or shop numbers incorporated into the ICP number.

The checksum is added manually from the “Checksum” system supplied by Vector for where a group of ICPs is created. For the creation of a single ICP, TENCO uses the checksum facility available on the registry.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The list file as of 13 April 2023 was examined to confirm whether all active ICPs have a single loss category.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

The event detail file, and the registry list for 1 June 2021 to 13 April 2023 were examined to determine compliance.

The ICP creation process was reviewed as part of the TENCO agent audit.

Audit commentary

Compliance is recorded for TENCO. All ICPs were created at the “ready” status. The “new” status was not used during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

Monitoring of “new” and “ready” status is discussed in the TENCO report. The list file as of April 2023 was examined.

Audit commentary

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

Examination of the list file showed no ICPs at “new” or “ready” status.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

- *The loss category code must be unique; and*
- *The distributor must provide the following to the reconciliation manager:*

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

Audit observation

The registry list as of 13 April 2023 was examined to determine compliance.

Audit commentary

The list file was examined. There is no embedded generation on the DMFL network that has a generation capacity greater than 10MW.

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

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

The registry list as of 13 April 2023 was reviewed to determine compliance.

Audit commentary

DMFL obtains permission from the trader before electrically connecting ICPs.

Review of the registry list confirmed that no unmetered load is connected. DMFL does not intend to connect any other unmetered load to the network in the future.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

Processes to manage this are discussed in the TENCO agent report.

Audit commentary

Compliance is confirmed for the process detailed in the TENCO agent report.

DMFL only conduct disconnection where ICPs are to be decommissioned and they obtain permission from the trader prior to decommissioning.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

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

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

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

Audit observation

The TENCO process for bridging control devices was examined.

Audit commentary

TENCO confirmed no meters were bridged during the audit period.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

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

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

In the case of a change to price category codes, where the change is backdated, no later than 3 business days after the distributor and the trader responsible for the ICP agree on the change.

Audit observation

The management of this process is discussed in the TENCO report. I examined the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 to identify late changes to registry information during the audit period.

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

Audit commentary

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

Address events

One address update not relating to initial population of address data for new connections was identified. The update was made within three business days of the event date.

Network events

There were no late network updates during the audit period; all were updated within three business days.

Pricing events

There were 22 pricing events. All the updates were made within three business days of the event date with the exception of one at ICP 0002290000DFE99, which was backdated by 282 days.

Status events

There was one ICP decommissioned during the audit period, the registry was updated within the required timeframe.

NSP changes

There were no late NSP changes made during the audit period.

Distributed Generation Changes

These are unlikely to occur on DMFL embedded networks as these are mostly high-rise buildings and none were identified.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 01-Jan-22 To: 24-Feb-23	One late pricing update. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to prevent late updates most of the time. The audit risk rating is low as only one event was updated late during the audit period.		
Actions taken to resolve the issue		Completion date	Remedial action status
This occurred due to the parent network backdating a loss category update for the LE ICP. All EN ICP's required backdated loss code updates as a result. We chose 01/01/22 to coincide with R14 washup for following month.		During the audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We monitor all parent network price code updates and effect downstream EN ICP updates within three business days.		Ongoing	

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

Code reference

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

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TENCO report. The audit compliance reporting was examined for any NSP discrepancies.

Audit commentary

These were examined and confirmed to be correctly mapped.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was examined.

Audit commentary

DMFL does not receive direct requests for ICP identifiers, but if they were received these would be provided immediately.

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The process to determine correct and unique addresses was examined during the TENCO agent audit. The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

Review of the registry list and audit compliance reports did not identify any duplicate or difficult to locate addresses.

Audit outcome

Distributor audit report V16

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded for TENCO.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)*
- *the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)*
- *the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)*
- *the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)*
- *the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):*
 - a) *the unique loss category code assigned to the ICP,*
 - b) *the ICP identifier of the ICP,*
 - c) *the NSP identifier of the NSP to which the ICP is connected,*
 - d) *the plant name of the embedded generating station,*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)*

- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):*
 - a) *a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity,*
 - b) *a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period,*
 - c) *if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-*
 - (i) no capacity value recorded in the registry field for the chargeable capacity; and*
 - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded*
 - d) *if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-*
 - (i) the annual capacity value recorded in the registry field for the chargeable capacity; and*
 - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded*
 - e) *the actual chargeable capacity of the ICP in any other case*
- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1)*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1)*
- *the status of the ICP (Clause 7(1)(k) of Schedule 11.1)*
- *designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1)*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1)*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1)*
- *if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):*
 - a) *the nameplate capacity of the generator; and*
 - b) *the fuel type,*
- *the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).*

Audit observation

Processes to ensure information is accurate were examined during the TENCO agent audit.

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance for the population of all required information and its alignment with the trader where appropriate e.g., distributed generation, unmetered load, and shared unmetered load.

Audit commentary

Compliance is recorded in the TENCO contractor report. All ICP information was checked and confirmed compliant.

Audit outcome

Compliant

4.7. Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

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

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

The management of this process is discussed in the TENCO contractor report.

Pricing information was updated on the registry before trading of electricity commenced for all ICPs created and electrically connected during the audit period, examination of the audit compliance report confirmed this.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The registry list as of 13 April 2023 was examined.

Audit commentary

DMFL does not record GPS coordinates on the registry.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

Processes to manage ICPs at “ready” status were reviewed as part of the TENCO agent audit.

The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

Compliance is recorded for TENCO.

The registry list did not have any ICPs currently at “ready” status. All ICPs that were at “ready” status during the audit period had a nominated trader and price category recorded.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

It is unlikely that DMFL will deal with any ICPs with a “distributor” status because they do not deal with shared unmetered load, and there are no embedded networks connected to existing embedded networks.

The registry list file for was examined in relation to the use of the distributor status.

Audit commentary

The distributor status was not used at all during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The management of this process is discussed in the TENCO report. The registry list file as of 13 April 2023 and the combined registry audit compliance reports covering the period from 1 June 2021 to 13 April 2023 were examined to confirm compliance.

Audit commentary

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

One ICP was decommissioned during the report period, and the registry was updated in accordance with this clause. The timeliness of updates to decommissioned status are discussed in **section 4.1**.

There are no ICP’s at “ready for decommissioning” status.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

The price category code table on the registry was examined to determine compliance.

Audit commentary

No price categories were created or amended during the audit period.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 Schedule 11.1

Code related audit information

The distributor must keep the registry up to date with the loss category codes that may be assigned to ICPs on the distributor's network. The distributor must specify the date on which each loss category code takes effect. A loss category code takes effect on the specified date.

Audit observation

The loss category code table on the registry was examined to determine compliance.

Audit commentary

DMFL did not create any new loss category codes during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

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

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

Audit observation

The loss category code table on the registry was examined to determine compliance.

Audit commentary

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

Distributor	Loss Code	Loss Factor	Start Date	Updated
DMFL	DMFL03	1.0119	1 April 2022	24 January 2022
DMFL	DMFL03	1.0132	1 April 2023	31 January 2023
DMFL	DMFL12	1.0105	1 April 2022	24 January 2022
DMFL	DMFL12	1.0157	1 April 2023	31 January 2023

There was a maximum of one loss factor per loss factor category code per month, and all trading periods had a single applicable loss factor.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

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

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

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

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

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

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

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

Audit observation

The process for the creation and decommissioning of NSPs was reviewed as part of the TENCO agent audit.

The NSP table was examined, and notifications were reviewed.

Audit commentary

Compliance is recorded for TENCO.

No NSPs were created or decommissioned during the audit period.

As recorded in **section 1.8** two NSPs transferred to other networks during the audit period, DTE0011 and FSH0011.

No ICPS transferred from other networks to DMFL during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No NSPs were created by or transferred to DMFL during the audit period.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No balancing areas were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table and the registry list for 1 June 2021 to 13 April 2023 were examined to determine compliance.

Audit commentary

No NSPs were created during the audit period, and no ICPs had a change of NSP during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No balancing areas were changed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No existing ICPs became NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

DMFL has not acquired any new networks.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TENCO report. The NSP supply point table was examined.

Audit commentary

Compliance is recorded for TENCO.

The NSP table was reviewed:

Network participant	NSP POC	Description	MEP	Certification expiry
DMFL	DCQ0011	33 Customhouse Quay Wellington	AMCI	1 June 2028
DMFL	DGS0011	226 GREAT SOUTH RD AUCKLAND	AMCI	30 November 2026
DMFL	DMW0011	MT WELLINGTON SHOPPING CNTR AUCK	AMCI	1 February 2026
DMFL	DTT0011	22 THE TERRACE WELLINGTON	AMCI	1 December 2031
DMFL	OPT0011	OPTIMATION HOUSE	AMCI	17 May 2023
DMFL	WCW0011	WESTFEILD CHARTWELL	AMCI	15 November 2023
DMFL	WCW0111	WESTFEILD CHARTWELL	AMCI	11 July 2024
DMFL	WQG0011	WESTFIELD QUEENSGATE	AMCI	7 November 2023
DMFL	WSG0011	NORTHWEST SHOPPING CENTRE	AMCI	17 January 2025
DMFL	WSG0012	NORTHWEST SHOPPING CENTRE AUCK	AMCI	19 August 2026

All NSPs have certified metering installations. DTT001, WCW0011 and WQG0011 had meter certification details updated during the audit period. Details of the updates are included in the table below.

NSP POC	Description	Certification date	Date RM advised
DTT0011	22 THE TERRACE WELLINGTON	1 December 2021	13 December 2021
WCW0111	WESTFEILD CHARTWELL	10 March 2016	1 November 2022
WQG0011	WESTFIELD QUEENSGATE	7 November 2018	2 February 2023

DTT0011's metering installation certification details were updated on time.

WCW0111 and WQG0011's metering installation certification details were updated more than 20 business days after re-certification.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.8 With: Clause 10.25(1) and 10.25(3) From: 11-Apr-16 To: 2-Feb-23	Metering installation certification details were updated more than 20 business days after the certification date for WCW0111 and WQG0011. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate, as there is room for improvement. The impact is low as the metering installations were certified at all times.		
Actions taken to resolve the issue		Completion date	Remedial action status
We updated new metering certification details on the same day that we received the certification paperwork from the metering equipment provider, for both NSP's.		During the audit period	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Meter certification paperwork is often sent to us outside of the required update period. We have no control over this. We generate a list of all outstanding paperwork and distribute monthly.		Ongoing	

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

No NSPs were created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

DMFL has not acquired any networks.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The management of this process is discussed in the TENCO report. The NSP table was examined to determine whether there have been any MEP changes during the audit period.

Audit commentary

There have been no MEP changes during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The NSP table on the registry was examined.

Audit commentary

DMFL has not acquired any networks during the period.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table on the registry was examined.

Audit observation

DMFL has not acquired any networks.

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit

The registry list for 1 June 2021 to 13 April 2023 was examined to determine compliance.

Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list for 1 June 2021 to 13 April 2023 was examined to determine compliance.

Audit commentary

Examination of the registry list confirmed that no shared unmetered load is connected.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The calculation of loss factors is discussed in the TENCO report.

Audit commentary

Compliance is recorded for TENCO.

TENCO derives loss factors for loss category codes from the published parent network loss factors for similar installations. It is expected that ICPs on embedded networks will have the same loss factor as a similar type of connection on the parent network.

To do this, TENCO determines the gateway loss factor from the LE ICP's loss factor, then determines the local network loss factor which would be likely to apply to the embedded network ICPs if they were connected to the local network. TENCO then calculates the overall loss factor and multiplies this by the local network loss factor to determine the value for each embedded network loss factor code. I checked the calculations for the loss factors that are applied and confirm that they are being calculated correctly.

Audit outcome

Compliant

CONCLUSION

DMFL's compliance is reliant on the compliance of TENCO, as the contractor. In this report, I have only recorded those matters where issues were discovered or where specific analysis was undertaken.

Overall, the level of compliance was found to be high. This audit found five non-compliances and makes no recommendations. The five non-compliances relate to a small number of late registry updates and the late provision of certification information to the Reconciliation Manager after recertification of the metering installation at two NSPs.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The Future Risk Rating table provides some guidance on this matter and recommends an indicative audit frequency of 18 months. I agree with this recommendation.

PARTICIPANT RESPONSE

Tenco on behalf of DMFL have reviewed the above audit report on the 9th of June 2023 and are in agreement with the findings contained within it.