

ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT



For

COUNTIES ENERGY LIMITED  
NZBN:9429038874208

Prepared by: Steve Woods

Date audit commenced: 21 April 2023

Date audit report completed: 8 June 2023

Audit report due date: 28-Jun-23

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## EXECUTIVE SUMMARY

This distributor audit was performed at the request of **Counties Energy**, to encompass the Electricity Industry Participation Code requirement for an audit in accordance with clause 11.10 of part 11. The audit was carried out at Counties Energy's premises in Pukekohe on May 30<sup>th</sup>, 2023.

The audit was conducted in accordance with the Guideline for Distributor Audits version 7.2, which was produced by the Electricity Authority.

Counties Energy has once again demonstrated a high level of compliance in this audit period. Controls are generally strong and minor recommendations are made to further strengthen these which should result in discrepancies being resolved in a shorter period of time. There are some system issues being addressed where updates are not ending up in the registry and there is a minor transformer to NSP mapping issue.

Two interconnection points have been created but they are not yet electrically connected, and the metering is not yet certified, so these matters can be checked during the next audit.

This audit found six non-compliances. The non-compliances relate mainly to minor issues with registry accuracy and update timeliness.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The indicative audit frequency table indicates an audit frequency of 12 months. I have considered this in conjunction with Counties Energy responses I recommend that the next audit is in 18 months.

The matters raised are shown in the tables below:

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1) and 10.6(1)	Registry information not complete and accurate in all instances.	Moderate	Low	2	Identified
Timeliness of initial electrical connection date	3.5	7(2A) of Schedule 11.1	40 initial electrical connection dates not updated within ten business days.	Strong	Low	1	Identified
Timeliness of registry updates	4.1	8 of schedule 11.1	Some registry event updates backdated greater than three days.	Moderate	Low	2	Identified
Notice of NSP for each ICP	4.2	7(1) Schedule 11.1	Eight ICPs mapped to the incorrect NSP.	Strong	Low	1	Cleared
ICP location address	4.4	2 & 7 (1)(a) of schedule 11.1	211 ICPs with addresses that are not readily locatable.	Moderate	Low	2	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Distributor to provide ICP information	4.6	7(1) of Schedule 11.1	Distributed generation details not recorded for one ICP.  Four ICPs with an incorrect initial electrical connection date populated during the audit period.	Moderate	Low	2	Identified
Future Risk Rating						10	
Indicative Next Audit Frequency						12 months	

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	Next Action
Validation reports	2.1	Check all Power BI and audit compliance reports at least monthly.	
IECD updates	3.5	Create a report to identify ICPs where Navision has a field populated, but the registry update has not occurred.	

## ISSUES

Subject	Section	Issue	Next Action
		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 there are code exemptions in place.

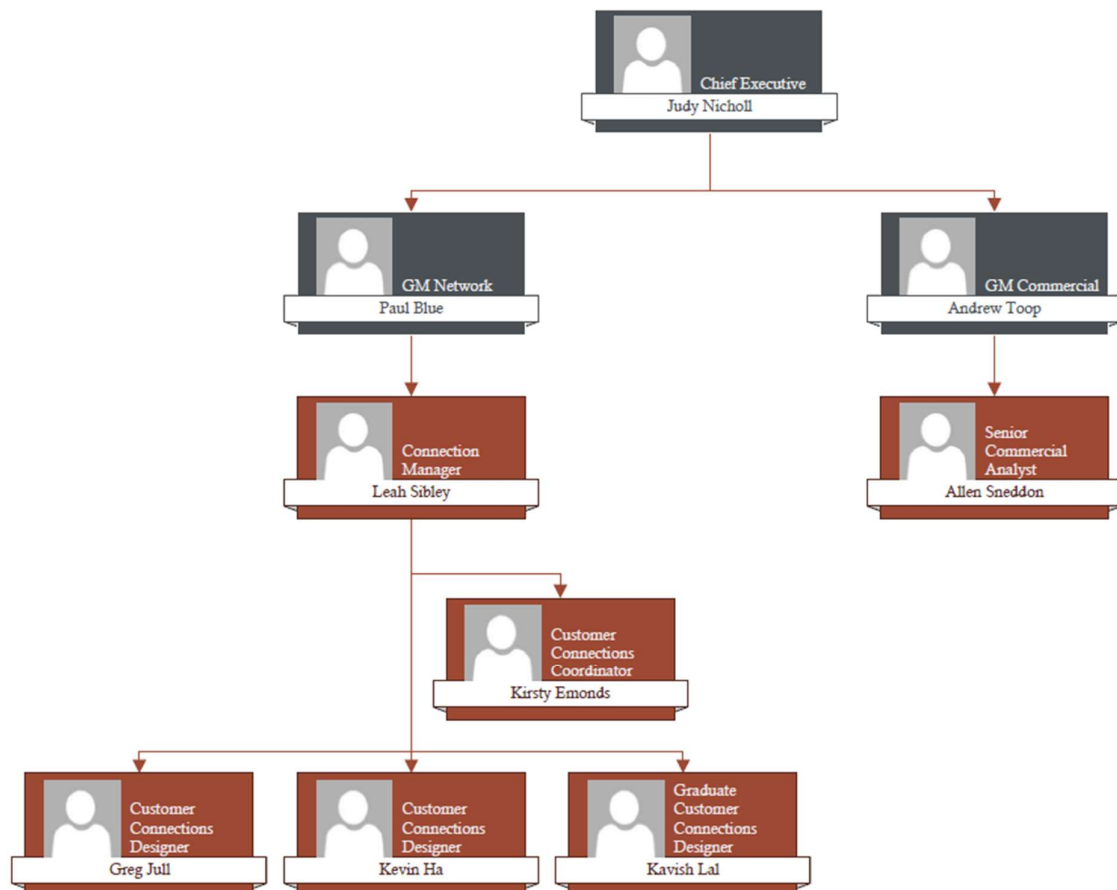
#### Audit commentary

Counties Energy have no exemptions in place that are relevant to the scope of this audit.

### 1.2. Structure of Organisation

Counties Energy provided a copy of the relevant part of the organisation chart:

#### Counties Energy Organisation chart



### 1.3. Persons involved in this audit

Auditor:

**Steve Woods**

**Veritek Limited**

**Electricity Authority Approved Auditor**

Counties Energy personnel assisting in this audit were:

Name	Title
Leah Sibley	Connections Manager

### 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

Counties Energy were asked to provide the details of any sub-contractors authorised to perform electrical connection activities on their networks.

#### Audit commentary

Activities covered by the scope of this audit, including fieldwork and inspection are conducted by Counties Energy employees.

### 1.5. Supplier list

Counties Energy does not use any sub-contractors.

### 1.6. Hardware and Software

Counties Energy use the Microsoft Navision System for the management of ICPs and associated information. This updates directly to the registry on a regular basis. Counties Energy uses small world GIS and also Electric office (this offers a more user-friendly view of network assets). ICP requests and new connections are managed with Salesforce.

Counties Energy have a full disaster recovery plan in place. All systems are backed up to the cloud.

## 1.7. Breaches or Breach Allegations

The Electricity Authority confirmed that there have been no alleged breaches related to this audit scope for Counties Energy during the audit period.

## 1.8. ICP and NSP Data

Counties Energy has responsibility for the Counties district area, consisting of three NSPs and three interconnection points. The recently created interconnection points at OPH0111 and WHA0221 are not yet electrically connected and do not yet have certified metering installations. All NSPs have the same balancing area. This is discussed further in **section 4.6**.

The table below lists the relevant NSPs, and their associated balancing areas.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of Active ICPs
COUP	BOB0331	BOMBAY			BALAREACOUPG	G	1 May 2008	4,783
COUP	BOB1101	BOMBAY			BALAREACOUPG	G	1 May 2008	29,470
COUP	GLN0332	GLENBROOK			BALAREACOUPG	G	1 May 2008	11,906
COUP	MTG0111	MANGATANGI	BOB0331	COUP	BALAREACOUPG	I	1 May 2008	-
COUP	OPH0111	106 Opaheke Road Papakura	BOB0331	COUP	BALAREACOUPG	I	1 May 2023	-
COUP	WHA0221	461 East Coast Rd Whakatiwai	BOB0331	COUP	BALAREACOUPG	I	1 May 2023	-

There are no embedded networks connected on the Counties Energy network.

Counties Energy provided a list file of all ICPs as of 13 April 2023. A summary of this data by “ICP status” is as follows.



Status	Number of ICPs 2023	Number of ICPs 2022	Number of ICPs 2021	Number of ICPs 2019	Number of ICPs 2018
Distributor (888)	0	0	0	0	0
New (999)	2	19	8	7	100
Ready (000)	210	206	223	182	298
Active (2,0)	47,591	46,159	44,884	43,372	42,383
Inactive - new connection in progress (1,12)	170	171	181	96	30
Inactive – electrically disconnected vacant property (1,4)	727	705	701	683	687
Inactive – electrically disconnected remotely by AMI meter (1,7)	143	93	97	30	0
Inactive – electrically disconnected at pole fuse (1,8)	26	15	14	10	10
Inactive – electrically disconnected due to meter disconnected (1,9)	48	35	32	44	51
Inactive – electrically disconnected at meter box fuse (1,10)	5	5	5	7	6
Inactive – electrically disconnected at meter box switch (1,11)	3	3	7	4	0
Inactive – electrically disconnected ready for decommissioning (1,6)	6	10	4	1	6
Inactive – reconciled elsewhere (1,5)	0	0	0	0	0
Decommissioned (3)	4,794	4,588	4,446	4,263	3,972

### 1.9. Authorisation Received

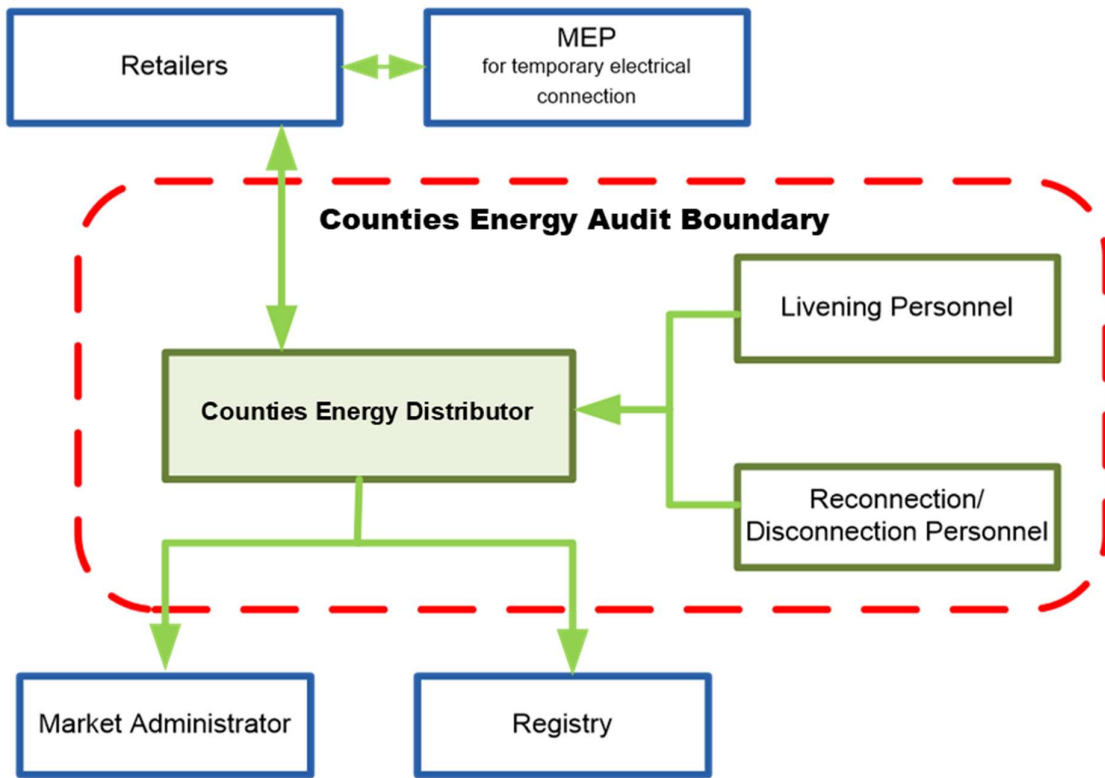
Counties Energy provided a letter of authorisation to Veritek, permitting the collection of data from other parties for matters directly related to the audit.

### 1.10. Scope of Audit

This distributor audit was performed at the request of **Counties Energy**, to encompass the Electricity Industry Participation Code requirement for an audit in accordance with clause 11.10 of part 11. The audit was carried out at Counties Energy’s premises in Pukekohe on May 30<sup>th</sup>, 2023.

The audit was conducted in accordance with the Guideline for Distributor Audits version 7.2, which was produced by the Electricity Authority.

The scope of the audit is shown in the diagram below, with the Counties Energy audit boundary shown for clarity.



### 1.11. Summary of previous audit

Counties provided a copy of their previous audit report, conducted by Brett Piskulic of Veritek Limited in March 2022. This found nine non-compliances. The current status of these has been updated below:

#### **Table of Non-Compliance**

Subject	Section	Clause	Non-compliance	Status
Requirement to provide complete and accurate information	2.1	11.2(1) and 10.6(1)	Registry information not complete and accurate in all instances.	Still existing
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities Disputes information not provided with all communications to consumers.	Cleared
Provision of ICP Information to the registry manager	3.3	11.7	23 ICPs with missing initial electrical connection dates.	Still existing
Timeliness of initial electrical connection date	3.5	7(2A) of Schedule 11.1	16 initial electrical connection dates not updated within ten business days.	Still existing
Timeliness of registry updates	4.1	8 of schedule 11.1	Some registry event updates backdated greater than three days.	Still existing
Notice of NSP for each ICP	4.2	7(1) Schedule 11.1	Five ICPs mapped to the incorrect NSP.	Still existing
ICP location address	4.4	2 & 7 (1)(a) of schedule 11.1	486 ICPs with addresses that are not readily locatable.	Still existing
Distributor to provide ICP information	4.6	7(1) of Schedule 11.1	Distributed generation details not recorded for three ICPs.  Two ICPs with an incorrect initial electrical connection date populated during the audit period.  154 ICPs created prior to part 10 with an incorrect initial electrical connection date recorded.	Still existing
Provision of information to registry after the trading of electricity at the ICP commences	4.7	7(3) Schedule 11.1	Four late price code updates.	Still existing

#### **Table of Recommendations**

Subject	Section	Recommendation	Status
		Nil	

## 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

Counties Energy data management processes were examined. The list file as of 13 April 2023 and audit compliance report for the audit period of 1 April 2022 to 31 March 2023 were examined to confirm compliance.

#### Audit commentary

Counties Energy use their Power BI report dashboard to monitor and manage the registry updating processes. Critical information is monitored, and potential data discrepancies are identified. The reporting includes checks for missing initial electrical connection dates, ICPs at “new” or “ready” statuses for more than 24 months, duplicate addresses, status mismatches and distributed generation details. There were some examples identified where the identification and resolution of discrepancies was delayed. Some reports are checked regularly, and I recommend all Power BI reports and the audit compliance reports are checked at least once per month.

Description	Recommendation	Audited party comment	Remedial action
Validation reports	Check all Power BI and audit compliance reports at least monthly.	Counties Energy will continue to monitor the power BI report as well as making improvements to pick up data discrepancies outside of the audit requirements.	Identified

Analysis of the list file and the audit compliance report found information that was not complete and accurate. These are discussed further in **sections 4.2** and **4.6**. Specific examples are:

- eight ICPs mapped to the incorrect NSP,
- distributed generation details not recorded for one ICP, and
- four ICPs with an incorrect initial electrical connection date populated during the audit period.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 01-Apr-22 To: 31-Mar-23	Registry information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as most discrepancies are being identified. The risk rating is low as the number of discrepancies found were small in relation to the volume of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Rectified all errors found during audit investigation.		6/6/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor power BI report on a more regular basis as well as looking at creating a Navision/Registry comparison report.		30/09/3023	

## 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

Counties Energy data management processes were examined. The list file as of 13 April 2023 and audit compliance report for the audit period of 1 April 2022 to 31 March 2023 were examined to confirm compliance.

### Audit commentary

As described in **section 2.1**, Counties Energy have a robust reporting suite that checks for potential errors. Any errors identified are corrected as soon as practicable as is evident in the body of this report.

### 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 un-bridge 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 management of removal and breakage of seals was discussed.

#### Audit commentary

Counties Energy as a distributor do not undertake any work on metering installations which would require breakage or replacement of seals. Work on metering installations is conducted by ATHs on behalf of retailers.

#### 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 process to ensure that information on Utilities Disputes is provided to customers was discussed. Counties Energy's website, email footers, and Utilities Disputes messaging process were reviewed.

#### Audit commentary

Information about Utilities Disputes is prominently and cleared displayed on the Counties Energy website in the "complaints" page.

All email signatures have been updated to include Utilities Disputes information. Customer services staff are instructed to refer consumers to the “complaints” page on the website if issues cannot be resolved. Very few phone calls are from consumers, who are defined in the Code as “...a person who is supplied electricity for consumption.”

**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 was examined in detail and is described in **section 3.2**.

A diverse characteristics sample of 15 new connection applications of the 1,337 created between 1 April 2022 and 31 March 2023 were checked from the point of application through to when the ICPS were created. The sample included ICPS with:

- various meter categories (including category 3 and above),
- various proposed traders,
- various price categories,
- with and without distributed generation, and unmetered load,
- with and without unmetered load connected (no ICPS with shared unmetered load were created), and
- connected to different NSPs.

There are no embedded networks on the Counties Energy network therefore there were no new LE ICPS created.

##### Audit commentary

Counties creates ICPS as required by clause 1 of schedule 11.1. The sample checked confirmed compliance.

##### Audit outcome

Compliant

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

##### Code reference

Clause 11.5(3)

##### Code related audit information

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

##### Audit observation

The new connection process was examined in detail. A diverse characteristics sample of 15 new connection applications of the 1,337 created between 1 April 2022 and 31 March 2023 were checked to determine whether the ICPS had been created within three business days of a request by a trader.



### Audit commentary

Counties Energy receives the majority of new connection applications from electricians or property owners with requests from retailers being a rare occurrence, and this clause only applies to those applications received from retailers.

Applications are received via an online form completed on the Counties Energy website. All ICPs are created at the “ready” status on receipt of an application. All applications are checked to confirm that an ICP does not already exist for the address, and the network capacity is checked prior to creation. Any new connections that require a network extension are not created until the network field work is completed. This is communicated to the applicant. An ICP is issued to the customer and notified at the same time to the nominated trader. Counties Energy have requested that all traders promptly advise if they are not going to accept a nomination. If this is the case, the applicant is contacted and requested to provide a new trader. The new trader is then updated to the registry and notified. To electrically connect the ICP, retailers send a service request for metering and electrical connection.

The sample of new connections checked were all requested by customers or electricians, but I note that all ICPs were created within three business days of the request or in three cases, the applicant was notified of the reasons the ICP would not be created within three business days.

### 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 for populating all required registry fields was examined. The list file for all ICPs created and the audit compliance report for the period from 1 April 2022 to 31 March 2023 were examined.

### Audit commentary

The process for updating the registry is automated for all fields and occurs on a nightly basis for new ICPs. There were 1,099 new connections electrically connected and all but one ICP had the required information provided. ICP 1099583455CN215 was “active” in the registry but had no initial electrical connection date recorded. The registry was updated prior to the on-site audit; therefore, this is recorded as non-compliance in **section 3.5** because the update was late.

Timeliness of provision of information is discussed in **sections 3.4** and **3.5** below.

### 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 new connection process was examined. The registry list for 13 April 2023 and the registry compliance audit report for 1 April 2022 to 31 March 2023 were examined to determine the timeliness of the provision of ICP information for new connections.

#### 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. Counties Energy continues to create all ICPs at the “ready” status. The audit compliance report confirmed that the 1,099 new ICPs electrically connected during the audit period were at “ready” prior to trading.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 7(2A) of Schedule 11.1*

#### Code related audit information

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

#### Audit observation

The registry list for 13 April 2023 and the registry compliance audit report for 1 April 2022 to 31 March 2023 were examined to determine the timeliness of the provision of ICP information for new connections.

#### Audit commentary

The initial electrical connection date is updated as part of the new connection process and as Counties Energy often act as the metering agent as well as the livening agent, the majority of ICPs electrically connected are known and updated accordingly. As detailed below there are sometimes delays when Counties Energy are not the MEP.

The audit compliance report identified 40 of the 1,337 new ICPs electrically connected during the audit period were not updated within ten business days (97% compliance). 10 were checked and found:

- seven were processed within 10 business days but an unidentified system error has caused a delay in updating the registry,
- one was not updated due to late information from the field, and it did not get identified in the Power BI report, because the trader’s active date wasn’t populated for several months and the report identifies missing IECD for active ICPs,

- one ICP did not have Counties Energy as the MEP so there was a delay receiving metering information, and
- one was updated in the registry within 10 business days, but an NSP change inadvertently removed the IECD.

Counties Energy intends to improve the Power BI reports to identify ICPs where Navision has been updated but the registry is not updated. I've recorded this as a recommendation to ensure visibility, and I've included all fields in the recommendation.

Description	Recommendation	Audited party comment	Remedial action
IECD updates	Create a report to identify ICPs where Navision has a field populated, but the registry update has not occurred.	Agree with this recommendation	Identified

The accuracy of initial electrical connection date is discussed further in **section 4.6**.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of schedule 11.1  From: 01-Apr-22 To: 31-Mar-23	40 initial electrical connection dates not updated within ten business days.  Potential impact: Low  Actual impact: Low  Audit history: multiple  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong as reporting is in place to identify this and this is monitored daily.  The risk rating is low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
An investigation has been completed into the late updates; it was found a majority of these where due to a delay in the initial metering installations. Some of these delays where due to late trader updates of the MEP		06/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor and utalise the reports that have been developed		06/06/2023	

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

#### Code reference

Clause 11.17

#### Code related audit information

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

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

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

#### Audit observation

The new connection process was examined in **section 3.2**.

The registry list for 13 April 2023 and the registry compliance audit report for 1 April 2022 to 31 March 2023 were examined to determine the timeliness of the provision of ICP information for new connections.

#### Audit commentary

As discussed in **section 3.2**, Counties Energy notify traders of ICP nominations and traders advise if they wish to reject. Review of the registry list confirmed that a trader is recorded for all “active” and “inactive” ICPs, and a proposed trader is recorded for all “ready” ICPs.

This clause requires that a distributor must not connect an ICP across which unmetered load is shared unless a trader is recorded in the registry as accepting responsibility for the shared unmetered load. Counties Energy does not allow or intend to allow any new shared unmetered load connections. Review of a registry list confirmed there is no shared unmetered load connected to any Counties Energy ICP.

As discussed in **section 3.4**, the audit compliance report confirmed that the 1,099 new ICPs electrically connected during the audit period were at “ready” prior to trading.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.31

#### Code related audit information

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

#### Audit observation

The new connection process was examined in **section 3.2**.

A diverse characteristics sample of 15 new electrically connected ICPs of the 1,099 electrically connected during the audit period were checked to determine if the ICPs were connected at the request of the trader.

The registry list as of 13 April 2023 was reviewed to confirm that all active ICPs had a trader recorded.

#### **Audit commentary**

As discussed in **section 3.2**, Counties Energy notify traders of ICP nominations and traders advise if they wish to reject.

Analysis the list file confirmed that all ICPs with “ready” status had a proposed retailer recorded.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.31A*

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

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

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

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

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

#### **Audit observation**

The new connection process was examined in **section 3.2**. The registry list for 13 April 2023 and the registry compliance audit report for 1 April 2022 to 31 March 2023 were examined to determine compliance.

#### **Audit commentary**

The majority of new connections are permanent connections. Analysis found that there were not any temporarily electrically connected sites and Counties Energy confirmed that there had not been any temporary connections.

#### **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 examined.

#### Audit commentary

No new embedded NSPs have been created by Counties Energy during the audit period. Two interconnection points between the Counties Energy and Vector networks have been created but neither of these have been connected or electrically connected and the metering is not yet certified.

#### Audit outcome

Compliant

### 3.10. Electrical connection of NSP that is not point of connection to grid (Clause 10.30(A) 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 embedded NSPs have been created by Counties Energy during the audit period. Two interconnection points between the Counties Energy and Vector networks have been created but neither of these have been connected or electrically connected and the metering is not yet certified.

**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 process for the creation of ICPs was examined.

**Audit commentary**

Counties Energy uses Navision to create ICP identifiers for connections on its networks. The ICP number is based on a sequential account number from Navision. Once the unique number is assigned to the customer, a two-letter code "CN" is added.

A diverse sample of 15 new ICPs were checked. All were created in the appropriate format.

The process for the creation of ICPs was examined, and all ICPs are created in the appropriate format.

**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 all active ICPs have a single loss category code.

**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 ICP creation process was reviewed. The registry list for 13 April 2022 was examined to determine compliance.

#### Audit commentary

ICPs are created at the “ready” status and the “new” status is not normally used by Counties Energy. Examination of the list file found two ICPs at the “new” status. One of these had been changed to “decommissioned - setup in error” prior to the on-site audit. The other ICP was changed back to “new” when the proposed trader reversed their claim, indicating they do not wish to be the trader for the ICP. The monitoring of ICPs at this status is discussed in **section 3.14**. The timeliness of updates to the registry are discussed in **section 3.4**.

#### Audit outcome

Compliant

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

#### Code reference

Clause 15 Schedule 11.1

#### Code related audit information

*If an ICP has had the status of “New” or has had the status of “Ready” for 24 months or more:  
the distributor must ask the trader who intends to trade at the ICP whether the ICP should continue to have that status (Clause 15(2)(a) of Schedule 11.1)  
the distributor must decommission the ICP if the trader advises that the ICP should not continue to have that status (Clause 15(2)(b) of Schedule 11.1).*

#### Audit observation

The process to monitor ICPs at “new” and “ready” status was reviewed. The registry list as of 13 April 2023 and the audit compliance report for 1 April 2022 to 31 March 2023 were examined to determine compliance.

#### Audit commentary

Counties Energy monitor the aging of ICPs at the “new” and “ready” status via the reporting dashboard. Traders are contacted to confirm if ICPs are still required.

The audit compliance report identified 14 ICPs that have been at the “ready” and one ICP that has been at the “new” status for more than 24 months. Further analysis of the ICPs at “ready” found three of these related to ICPs created as part of the on-going ICP deconsolidation project and are currently being investigated to determine if they are still required. Two have been identified as no longer required and



have been decommissioned. The remaining nine are being investigated to determine if they are still required. The one ICP at “new” has been decommissioned.

#### **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**

This requirement was discussed and the registry list as of 13 April 2023 was examined to determine compliance.

#### **Audit commentary**

Counties Energy has no embedded generation of greater than 10MW connected to its network. Counties Energy embedded generation application form has a field to record the capacity to ensure any new generation connections greater than 10MW are identified.

There has been no new embedded generation greater than 10MW added during the audit period.

#### **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 electrical connection of streetlight circuits which are a point of connection was examined.

#### **Audit commentary**

The process to connect streetlights has been reviewed. These are included in the developer's package. Field operations liaise directly with Auckland Transport, NZTA or the relevant council to confirm that the items of load are accepted and confirm which ICP the items of load are to be recorded against before streetlights are connected.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.30C and 10.31C*

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

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

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

#### **Audit observation**

The disconnection process was examined.

#### **Audit commentary**

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

#### **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**

Counties Energy do not bridge meters as a distributor.

#### **Audit commentary**

Counties Energy do not bridge meters as a distributor.

**Audit outcome**

Compliant

## 4. MAINTENANCE OF REGISTRY INFORMATION

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

#### Code reference

Clause 8 Schedule 11.1

#### Code related audit information

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

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

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

*If the change to the NSP identifier is for more than 10 business days, the notification must be provided no later than the 13<sup>th</sup> 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 three business days after the registry manager has advised the distributor that the ICP is ready to be decommissioned, or three business days after the distributor has decommissioned the ICP.*

#### Audit observation

The management of registry updates was reviewed.

The audit compliance reports and event detail report for 1 April 2022 to 31 March 2023 were reviewed to determine compliance.

The management of NSP changes was examined.

#### Audit commentary

Analysis of the audit compliance and event detail reports found:

#### Pricing Changes

All updates made are checked manually to confirm they have been applied from the correct event date. Counties Energy will continue to backdate pricing events, but only if it is found that the customer has been billed incorrectly.

The audit compliance reports identified 699 (12.38%) late pricing updates from a total of 5,648 pricing updates. A diverse sample of 20 updates was examined in detail and the following was found:

- nine examples of late nominations leading to late price category code updates as price category codes for new connections are sometimes changed once the metering and livening notification is received, but these updates can only occur if Counties Energy has been nominated as the MEP; if the MEP nomination is late, this leads to late price category code updates,
- four were backdated chargeable capacity updates following receipt of metering notifications,
- two were late metering notifications leading to late price category code updates,
- three were backdated at the request of the retailer, and
- two were processing delays.

## **Address events**

85.56% of all address updates were made on time with an average time to update the registry of 2.02 days. There were 241 late address updates. A sample of 15 was checked and found that the address update is undertaken at the same time as the metering paperwork is loaded to the ICP. In 14 cases delays in loading the metering information led to the late address updates. One ICP had the details loaded in Navision, but the registry update did not occur. Counties Energy is investigating the reason for this.

## **Network Events**

The network events evaluated excluded those relating to the population of the initial electrical connection dates (discussed in **section 3.5**), NSP changes (discussed below), distributed generation updates (discussed below) and the initial network events relating to the creation of ICPs. There were no late updates identified.

## **Distributed Generation**

The distributed generation process is described in **section 4.6**. 85.82% of all distributed generation network updates were made on time with an average time to update the registry of 4.13 days. There were 40 late updates, of which 20 were checked. Counties Energy updates the distributed generation details when the metering paperwork is returned, in all 20 cases delays in receiving or processing the metering paperwork caused the late network updates.

## **NSP Changes**

I checked the list file with history and found there were 526 NSP changes during the audit period. The audit compliance report found no late NSP changes.

## **Decommissioning Status Events**

There were 143 status updates to decommissioned identified, 135 (94.44%) were updated within three business days. Eight ICPs were updated later than three days after the event. All eight late updates were examined, and the following was found:

- three were updated in Navision but the registry update did not occur, possibly because the decommission reason field was not populated, and
- five were due to processing delays by Counties.

## **Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Apr-22 To: 31-Mar-23	Some registry event updates backdated greater than three days. Potential impact: Medium Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as controls are sufficient to mitigate risk most of the time but there is room for errors to occur. The risk rating is low as these events have no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Investigation made into the backdates where found to be retailer request or an update to the chargeable capacity.		06/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required.		06/06/2023	

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

##### Code reference

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

##### Code related audit information

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

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

##### Audit observation

The process to determine the correct NSP was examined. The audit compliance reporting identified 13 active ICPs where 10% or fewer ICPs on a street have a different NSP and there are fewer than three ICPs with a different NSP. All 13 ICPs were examined.

##### Audit commentary

For all new ICPs the transformer is identified from the GIS system. The transformer is then selected in Navision which then assigns the NSP based on this, it is not possible for the operator to select the NSP.

The sample checked found that five were correctly mapped. The remaining eight were found to have been incorrectly mapped. The incorrect mapping of the NSPs was due to a transformer to NSP mapping issue

for seven ICPs and the registry update did not occur for one ICP. All eight were corrected at the time of the audit.

The incorrect NSP allocation for the eight ICPs sampled is recorded as non-compliance.

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.2 With: Clause 7(1) Schedule 11.1  From: 01-Apr-22 To: 31-Mar-23	Eight ICPs mapped to the incorrect NSP. Potential impact: Low Actual impact: None Audit history: Three times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong as has robust controls in place to mitigate risk. The risk rating is low as Counties Energy has one balancing area and therefore an incorrect NSP has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Reviewed and updated		06/06/2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Job logged to have mass update of GXP against the Feeders to ensure all data is accurate.		31/07/2023	

**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**

Counties Energy does receive direct requests for ICP identifiers, and these are 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 and the audit compliance report was examined.

**Audit commentary**

As detailed in **section 3.2**, Navision will flag if an ICP already exists at an address. The reporting dashboard monitors ICP duplication and any addresses which do not have either a street number or property name.

The audit compliance report identified 211 active ICPs with duplicate or insufficient address details. All are historic and Counties Energy has continued to work through these reducing the total number from 497 in the last audit. Counties Energy will keep working on this list to eliminate the issue.

**Audit outcome**

Non-compliant

Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Apr-22 To: 31-Mar-23	211 ICPs with addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
We continue to investigate and correct as and when we can.	06/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further immediate action taken.	06/06/2023	



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

##### Code reference

Clause 3 Schedule 11.1

##### Code related audit information

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

##### Audit observation

This was examined as part of the new connection process and proof of process was checked as part of the sample of 15 new connections examined.

##### Audit commentary

This requirement is well understood by personnel involved in livening and there are no known instances of shared service mains on the Counties Energy network.

New connection applications are reviewed to ensure that this requirement is met.

##### Audit outcome

Compliant

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

##### Code reference

Clause 7(1) Schedule 11.1

##### Code related audit information

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

- *the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)*
- *the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)*
- *the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)*
- *the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)*
- *the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):*
  - a) *the unique loss category code assigned to the ICP,*
  - b) *the ICP identifier of the ICP*
  - c) *the NSP identifier of the NSP to which the ICP is connected,*
  - d) *the plant name of the embedded generating station*

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

**Audit observation**

The management of registry information was reviewed. The registry list as of 13 April 2023 and the audit compliance report for the audit period from 1 April 2022 to 31 March 2023 were reviewed to determine compliance. A typical sample of data discrepancies were checked.

### **Audit commentary**

Registry data validation processes are discussed in **section 2.1**. All ICP information was checked and confirmed compliant unless discussed below:

#### Distributed Generation

Customers apply to Counties Energy for all distributed generation via an online form. These are passed to the metering group to process the application. Only those inverters on the approved list will be approved. Once approved the customer is notified, a note of the application is made on the customer's account in Navision. Distributed generation is not installed until the service request is received from the trader to change the metering. Once this is complete the registry is updated. The timeliness of the updates to the registry is detailed in **section 4.1**.

Examination of the list file found 1,515 ICPs with generation capacity recorded. All had an installation type of "B" and the fuel type and generation capacity recorded.

The audit compliance report identified two ICPs where the trader's profile indicates distributed generation is present, but Counties Energy has none recorded. Counties Energy had also identified these two ICPs by monitoring the same information. A detailed check of these two ICPs found the following:

- ICP 1099564320CNC18 has an approved application for the connection of distributed generation, and the PV1 profile was added on 15 March 2023 but was then removed back to that date following a switch to another trader and the trader has been asked why this occurred (the high-risk database does not include solar generation for this ICP),
- ICP 1099567847CNFCC had the PV1 profile added on 16 December 2021 and the high-risk database has an entry for 22 December 2021; this seems to confirm that solar generation is installed, however Counties Energy has not received any confirmation from the field that the installation has been connected and this has also been followed up with the trader.

Non-compliance is recorded for ICP 1099564320CNC18 with no distributed generation details recorded in the registry by Counties Energy.

#### Initial Electrical Connection Date

1,099 ICPs have had the initial electrical connection date updated between 1 April 2022 and 31 March 2023. The audit compliance report identified 16 ICPs with date inconsistencies between the initial electrical connection date, the active date and the meter certification date. Further investigation of the Counties Energy information found the following:

- four ICPs where the incorrect initial electrical connection date was recorded by Counties Energy due to processing errors; I have recorded non-compliance for these ICPs, and
- 12 ICPs where the trader has incorrectly recorded the active status date.

The audit compliance reports identified one ICPs that was not yet "active", but Counties Energy have an initial electrical connection date recorded. This is a streetlight ICP created in error, and it will be decommissioned.

154 ICPs that were created pre-Part 10 coming into effect (29 August 2013) have had an initial electrical connection date populated where this is not required. This date is not used by any other party given its historic nature and it has been recorded as non-compliance in previous audit reports.

The timeliness of provision of information on initial electrical connection date is discussed in **section 3.5**.

The incorrect population of initial electrical connection dates is recorded as non-compliance below.

Unmetered Load

Counties Energy allows standard unmetered load but does not allow shared unmetered connections to their network. Review of the registry list confirmed that there was no shared unmetered load and there are 136 ICPs with unmetered load. All 136 ICPs have loads recorded in the recommended format and the “Unmetered load details - Distributor” field aligns with the “Unmetered load details - Retailer” field load.

The previous two audits identified that there was one unmetered load ICP (ICP 1099580653CNB7D) connected that had no “Unmetered load details - Distributor” field details recorded by Counties Energy. A check of the ICP application found that the connected load is streetlights which should have been added to a distributed unmetered load ICP rather than a new unmetered load ICP. This ICP is still active, and the matter will be raised with the trader.

Dedicated vs non-dedicated flag

I checked the list file with history and found 519 ICPs with NSP changes during the audit period which had the dedicated flag set to “Y”. Counties confirmed that the changes were permanent and related to reconfiguration of the network, so the flag was correctly set.

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1  From: 01-Apr-22 To: 31-Mar-23	Distributed generation details not recorded for one ICP.  Four ICPs with an incorrect initial electrical connection date populated during the audit period.  Potential impact: Low Actual impact: Unknown Audit history: Multiple Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.  The risk rating is low as the errors found will have either no or a small impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICP corrected at time of audit.		06/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor using the reports we have in place and any new reports.		06/06/2023	

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

**Code reference**

Clause 7(3) Schedule 11.1

**Code related audit information**

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

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

**Audit observation**

The management of registry information was reviewed. The registry list and audit compliance report for 1 April 2022 to 31 March 2023 were reviewed to determine compliance.

**Audit commentary**

Counties Energy can confirm these details in most cases prior to electrical connection of the ICP. If any changes are required these are updated as soon as possible. The audit compliance report did not identify any late price category code updates following electrical connection.

**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 reviewed to determine compliance.

**Audit commentary**

Counties Energy do not populate GPS co-ordinates.

**Audit outcome**

Compliant

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

##### Code reference

Clause 14 Schedule 11.1

##### Code related audit information

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

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

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

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

##### Audit observation

The registry list showed 210 ICPs currently at “ready” status, 14 have been at “ready” status for more than two years. This is discussed further in **section 3.14**.

All ICPs at “ready” status had a single price category assigned and proposed trader identified.

##### Audit commentary

Counties Energy’s Navision system will only allow one price category; therefore, the requirement to ensure that an ICP has a single price category will always be met. This was confirmed by checking the list file. The application form requires the Price Category to be specified, no ICPs are created without a Price Category.

Traders have been advised to reject any ICPs that they do not wish to accept. If this is the case, the applicant is contacted and requested to provide a new trader. The new trader is then updated to the registry and notified. To electrically connect the ICP, retailers send a service request for metering and electrical connection to Counties Energy to action.

ICPs at the “ready” status for more than 24 months are discussed in **section 3.14**.

The timeliness of updates to “ready” is discussed in **section 3.4**.

##### 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

Processes to manage the “distributor” status were reviewed.

The registry list and event detail report for 1 April 2022 to 31 March 2023 were reviewed to identify ICPs at the “distributor” status and check compliance.

#### **Audit commentary**

Examination of the Counties Energy list file found no ICPs with an ICP status of “distributor as there are no embedded networks or any shared unmetered load connected on the Counties Energy network.

#### **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 registry list as of 13 April 2023 was reviewed to identify ICPs at the “decommissioned” or “ready for decommissioning” status.

I also examined the ten ICPs at “ready for decommissioning” status.

#### **Audit commentary**

Requests for decommissioning are received from the property owner and sometimes directly from traders. A site verification process is followed to ensure that electrical installations associated with ICPs are physically removed before the decommissioned status is used.

Examination of the list file found six ICPs pending decommissioning. Analysis of these ICPs found that three have now been decommissioned and three are part of a larger project at one location where there are configuration changes that will result in some ICPs being decommissioned but not until the project is completed.

The timeliness of updates to the registry is discussed in **section 4.1** above.

#### **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.

##### **Audit commentary**

Counties Energy keeps the price category table up to date and has not created any new price category codes since 1 April 2019.

##### **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.

#### Audit commentary

Counties Energy keep the loss category table up to date and have not created 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.

#### Audit commentary

Counties Energy does not have any loss category codes with more than one loss factor. No loss factors have been changed since 1 April 2011. The loss factor review process is discussed in **section 8.1**.

#### Audit outcome

Compliant

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

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

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

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

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

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

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

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

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

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

#### Audit observation

The NSP table was examined.

#### Audit commentary

There are two recently created interconnection points at OPH0111 and WHA0221, which are not yet electrically connected and do not yet have certified metering installations. Notification to the reconciliation manager was more than 30 days in advance.

#### Audit outcome

Compliant

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

### Code reference

*Clause 26(1) and (2) Schedule 11.1*

### Code related audit information

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

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

### Audit observation

The NSP table was examined.

### Audit commentary

There are two recently created interconnection points at OPH0111 and WHA0221, which are not yet electrically connected and do not yet have certified metering installations. Notification to the reconciliation manager was more than 30 days in advance.

### Audit outcome

Compliant

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

### Code reference

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

### Code related audit information

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

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

### Audit observation

The NSP table was reviewed.

### Audit commentary

There are two recently created interconnection points at OPH0111 and WHA0221, which are not yet electrically connected and do not yet have certified metering installations. Notification to the reconciliation manager was more than 30 days in advance and included advice of the balancing area.

### Audit outcome

Compliant

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

##### Code reference

Clause 26(4) Schedule 11.1

##### Code related audit information

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

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

##### Audit observation

The NSP table was reviewed.

##### Audit commentary

Counties Energy has not created any new embedded networks 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 was reviewed.

##### Audit commentary

No balancing area changes have occurred 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 1 month before the transfer.

**Audit observation**

The NSP table was reviewed.

**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 3 business days before the transfer takes effect.*

**Audit observation**

I checked if any ICPs had been transferred during the audit period.

**Audit commentary**

No ICP transfers have occurred within the audit period.

**Audit outcome**

Compliant

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

**Code reference**

*Clause 10.25(1) and 10.25(3)*

**Code related audit information**

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

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

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

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

**Audit observation**

The NSP supply point table was examined.

**Audit commentary**

There are two recently created interconnection points at OPH0111 and WHA0221, which are not yet electrically connected and do not yet have certified metering installations. Notification to the reconciliation manager was more than 30 days in advance. Notification of metering certification details can be checked during the next audit.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.25(2)*

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

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

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

#### **Audit observation**

The NSP supply point table was reviewed.

#### **Audit commentary**

There are two recently created interconnection points at OPH0111 and WHA0221, which are not yet electrically connected and do not yet have certified metering installations. Notification to the reconciliation manager was more than 30 days in advance. Notification of metering certification details can be checked during the next audit.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 29 Schedule 11.1*

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

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

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

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

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

**Audit observation**

The NSP supply point table was reviewed.

**Audit commentary**

Counties Energy have not initiated any changes of network owner.

**Audit outcome**

Compliant

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

**Code reference**

*Clause 10.22(1)(b)*

**Code related audit information**

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

**Audit observation**

The NSP supply point table was examined.

**Audit commentary**

Counties Energy do not own any embedded networks therefore there have been no changes of MEP for embedded gate meters.

**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**

I checked if any ICPs had been transferred during the audit period.

**Audit commentary**

No ICP transfers have occurred during the audit 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 supply point table was reviewed.

**Audit commentary**

Counties Energy has not initiated the transfer of any ICPs during the audit period.

**Audit outcome**

Compliant



## 7. MAINTENANCE OF SHARED UNMETERED LOAD

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

#### Code reference

*Clause 11.14(2) and (4)*

#### Code related audit information

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

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

#### Audit observation

The registry list for 1 April 2022 to 31 March 2023 was reviewed to identify any ICPs with shared unmetered load connected.

#### Audit commentary

Counties Energy does not intend to allow any new shared unmetered load connections. Review of the registry list confirmed there is no shared unmetered load connected to any Counties Energy ICPs.

#### 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 April 2022 to 31 March 2023 was reviewed to identify any ICPs with shared unmetered load connected.

#### Audit commentary

Review of a registry list confirmed there is no shared unmetered load connected to any Counties Energy ICPs.

#### 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 “Guidelines on the calculation and the use of loss factors for reconciliation purposes” was published on 26 June 2018. I have assessed Counties Energy’s process and compliance against the guideline’s recommended thresholds.

I reviewed correspondence and documentation relating to the loss factor review.

#### Audit commentary

Counties Energy provided a copy of their documented loss factor process which was being reviewed at the time of the audit. The Counties Energy process follows the “Guidelines on the calculation and the use of loss factors for reconciliation purposes”. As recorded in **section 5.1**, no loss factors have been changed since 1 April 2011.

The following UFE graph was downloaded from the Authority’s website, indicating that losses for Counties Energy are running within the +/- 1% threshold.



#### Audit outcome

Compliant

## CONCLUSION

Counties Energy has once again demonstrated a high level of compliance in this audit period. Controls are generally strong and minor recommendations are made to further strengthen these which should result in discrepancies being resolved in a shorter period of time. There are some system issues being addressed where updates are not ending up in the registry and there is a minor transformer to NSP mapping issue.

Two interconnection points have been created but they are not yet electrically connected, and the metering is not yet certified, so these matters can be checked during the next audit.

This audit found six non-compliances. The non-compliances relate mainly to minor issues with registry accuracy and update timeliness.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The indicative audit frequency table indicates an audit frequency of 12 months. I have considered this in conjunction with Counties Energy responses I recommend that the next audit is in 18 months.

## PARTICIPANT RESPONSE

Counties Energy has reviewed this report and have provided the necessary commentary around the non-compliances outlined.

We shall continue to monitor the current Power BI report however, we will start to do this on a more regular occurrence to ensure discrepancies are highlighted sooner. We are also looking at creating a Navision/Registry comparison report to find any anomalies that may be there.

Overall Counties Energy agrees with all the findings and shall continue to look at ways to improve on our current rating.