

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

HURUNUI DISTRICT COUNCIL
AND MERIDIAN ENERGY
NZBN: 9429037696863

Prepared by: Tara Gannon

Date audit commenced: 22 June 2023

Date audit report completed: 31 August 2023

Audit report due date: 28 November 2023

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EXECUTIVE SUMMARY

This audit of the **Hurunui District Council (HDC)** DUMML database and processes was conducted at the request of **Meridian Energy Limited (Meridian)**, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUMML audits version 1.1.

The database is remotely hosted by thinkproject New Zealand Ltd. The field work and asset data capture are conducted by Power Jointing Limited using Pocket RAMM. A monthly report from RAMM is provided to Meridian to calculate the kW value.

Meridian reconciles this DUMML load using the DST profile. Submissions are based on the database information, with on and off times derived from data logger information. Comparison of the submission information for May 2023 and the database extract provided confirmed the submission is accurate.

A field audit was undertaken of a statistical sample of 137 items of load on 17 August 2023. The field audit confirmed that the database accuracy is within the allowable +/-5% threshold. One additional light was found in the field, HDC confirmed that this was added to the database prior to finalising of the audit.

This audit found four non-compliances. The future risk rating of four indicates that the next audit be completed in 24 months. I have considered this in conjunction with Meridian's responses and agree with this recommendation.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum.	Strong	Low	1	Cleared
All load recorded in database	2.5	11(2A) of Schedule 15.3	One additional light was found in the field.	Strong	Low	1	Cleared
Database accuracy	3.1	15.2 and 15.37B(b)	One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum.	Strong	Low	1	Cleared
Volume information accuracy	3.2	15.2 and 15.37B(c)	One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum.	Strong	Low	1	Cleared
Future Risk Rating						4	

Future risk rating	0	1-4	5-8	9-15	16-18	19+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Recommendation
		Nil

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

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

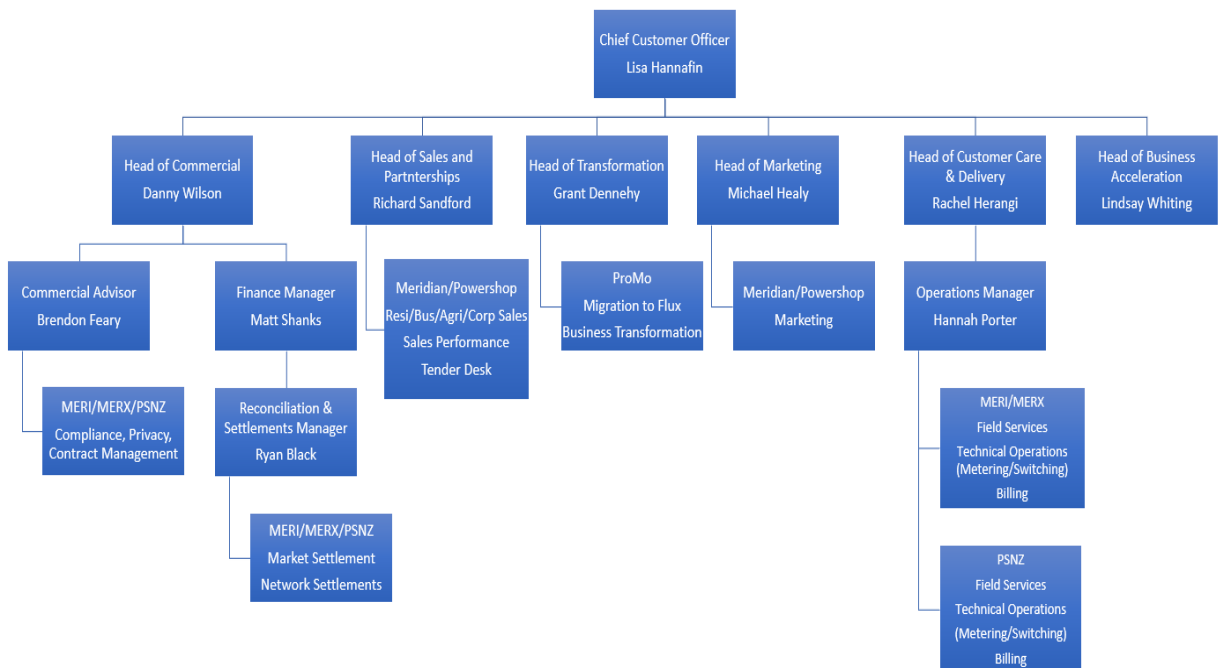
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Meridian provided the relevant organisational structure:



1.3. Persons involved in this audit

Auditors:

Name	Title	Company
Tara Gannon	Auditor	Provera
Brett Piskulic	Supporting Auditor	Provera

Other personnel assisting in this audit were:

Name	Title	Company
Kait Murray	Technical Assistant - Roading	Hurunui District Council
Amy Cooper	Compliance Officer	Meridian Energy
Melanie Matthews	Quality and Compliance Advisor	Meridian Energy

1.4. Hardware and Software

The SQL database used for the management of DUML is remotely hosted by thinkproject New Zealand Limited. The database is commonly known as "RAMM" which stands for "Road Assessment and Maintenance Management". The specific data used for DUML is held in the Streetlight tables. thinkproject New Zealand Limited backs up the database and assists with disaster recovery as part of their hosting service.

Access to the database is secure by way of password protection.

Systems used by the trader and their agent to calculate submissions are assessed as part of their reconciliation participant audits.

1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000366311MP08B	HURUNUI DISTRICT COUNCIL-WRP0331	WRP0331	DST	553	23,904.5
0000366312MPC4B	HURUNUI DISTRICT COUNCIL-CUL0331	CUL0331	DST	482	23,692.3
0000366313MP00E	HURUNUI DISTRICT COUNCIL-WRP0661	WRP0661	DST	119	3,592.9
0000700980MP704	STREETLIGHTS ASY0111 HDC	ASY0111	DST	8	368
Total				1,162	51,557.7

1.7. Authorisation Received

All information was provided directly by Meridian and HDC.

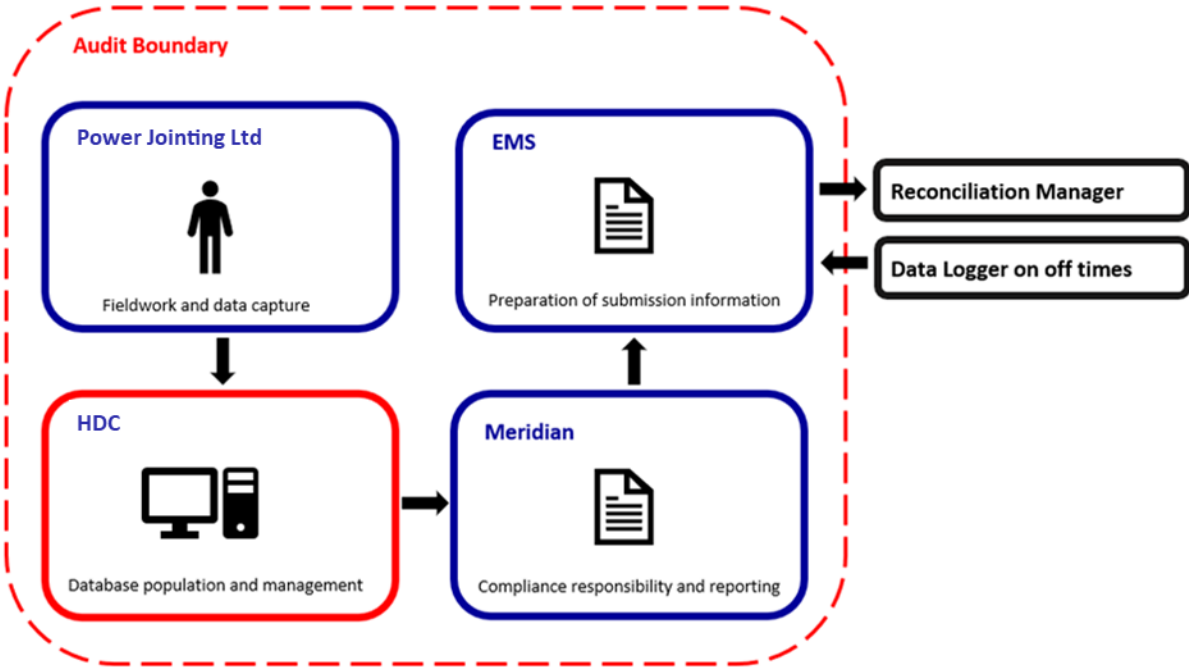
1.8. Scope of Audit

This audit of the Hurunui District Council (HDC) DUMML database and processes was conducted at the request of Meridian Energy Limited (Meridian), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUMML audits version 1.1.

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by HDC, who is Meridian's customer. Reporting is provided by HDC to Meridian on a monthly basis. The fieldwork and asset data capture are conducted by Power Jointing Limited. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting.

The diagram below shows the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 137 items of load on 17 August 2023.

1.9. Summary of previous audit

The previous audit was completed in April 2022 by Steve Woods of Veritek Limited. This audit found four non-compliances and one recommendation was made. The current statuses of the audit findings are detailed below:

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	The data used for submission does not track changes at a daily basis and is provided as a snapshot.	Cleared
			One item of load has the incorrect wattage applied in the DUML database which would result in the minor under submission of 4.27 kWh per annum.	Still existing
			Two items of load do not have wattage recorded which would result in an estimated under submission of 282 kWh per annum.	Cleared
Description and capacity of load	2.4	11(2)(c) (d) of Schedule 15.3	Lamp make and model is not recorded for two lamps.	Cleared

Subject	Section	Clause	Non-compliance	Status
All load recorded in database	2.5	11(2A) of Schedule 15.3	Two additional lights found in the field.	Still existing
Database accuracy	3.1	15.2 and 15.37B(b)	One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum. Two items of load do not have wattage recorded which would result in an estimated under submission of 282 kWh per annum.	Still existing Cleared
Volume information accuracy	3.2	15.2 and 15.37B(c)	The data used for submission does not track changes at a daily basis and is provided as a snapshot. One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum. Two items of load do not have wattage recorded which would result in an estimated under submission of 282 kWh per annum	Cleared Still existing Cleared

Table of recommendations

Subject	Section	Recommendation	Status
		Nil	

1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUMML database audits are completed:

1. *by 1 June 2018 (for DUMML that existed prior to 1 June 2017)*
2. *within three months of submission to the reconciliation manager (for new DUMML)*
3. *within the timeframe specified by the Authority for DUMML that has been audited since 1 June 2017.*

Audit observation

Meridian have requested Provera to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database.

Audit outcome

Compliant

2. DUMML DATABASE REQUIREMENTS

2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- *DUMML database is up to date*
- *methodology for deriving submission information complies with Schedule 15.5.*

Audit observation

The process for calculation of consumption was examined.

Audit commentary

Meridian reconciles this DUMML load using the DST profile. I compared the database provided to the capacity information Meridian supplied to EMS for the month of May 2023 and I confirm the submission is accurate.

The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian's reconciliation participant audit and the EMS agent audit. Compliance was confirmed for both parties.

The field audit confirmed that the database accuracy is within the allowable +/-5% threshold.

One item of load has the incorrect wattage applied in the DUMML database resulting in an estimated minor under submission of 4.27 kWh per annum. HDC confirmed that the incorrect wattage had been corrected in the database prior to finalising of the audit. This is detailed in **section 3.1**.

On 18 June 2019, the Electricity Authority issued a memo confirming that the code requirement to calculate the correct monthly load must:

- take into account when each item of load was physically installed or removed, and
- wash up volumes must take into account where historical corrections have been made to the DUMML load and volumes.

The monthly report from HDC to Meridian includes the dates of any changes or additions made and Meridian accounts for the changes which have happened in each month on a daily basis.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Apr-22 To: 17-Aug-23	One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum. Potential impact: Low Actual impact: Low Audit history: three times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, the small number of exceptions indicated that controls are sufficient to ensure that all lamps are recorded in the database most of the time. The impact on settlement and participants is low; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Hurunui District Council were advised of the inaccuracies during a meeting. Hurunui District Council have confirmed the inaccuracies have since been corrected.		29/08/23	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUMML database must contain:

- *each ICP identifier for which the retailer is responsible for the DUMML*
- *the items of load associated with the ICP identifier.*

Audit observation

The database was checked to confirm an ICP was recorded against each item of load.

Audit commentary

An ICP is recorded for all items of load.

Audit outcome

Compliant

2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

The DUMML database must contain the location of each DUMML item.

Audit observation

The database was checked to confirm the location is recorded for all items of load.

Audit commentary

The database contains the nearest street address, location in metres on street, pole numbers and Global Positioning System (GPS) coordinates for most items of load, and users in the office and field can view these locations on a mapping system.

Twelve items of load do not have GPS co-ordinates recorded, however there is sufficient information recorded in the address field to be able to locate these lamps.

Audit outcome

Compliant

2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

Code reference

Clause 11(2)(c) and (d) of Schedule 15.3

Code related audit information

The DUMML database must contain:

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that all items of load were recorded.

Audit commentary

The database contains fields to record the lamp make, model, wattage and gear wattage. All items of load have a lamp model and lamp wattage populated.

The accuracy of lamp descriptions, wattages and ballasts is recorded in **section 3.1**.

Audit outcome

Compliant

2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

The retailer must ensure that each item of DUMML for which it is responsible is recorded in this database.

Audit observation

The field audit was undertaken of 137 lights on 17 August 2023 using the statistical sampling methodology.

Audit commentary

The field audit discrepancies found are detailed in the table below:

Street	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
Greenwood PI	3	4	+1	-	1x additional 45W LED found in the field.
Total	137	138	+1	-	

The field audit found one additional lamp in the field that was not recorded in the database. This is recorded as non-compliance below.

HDC confirmed that the additional light had been added to the database prior to finalising of the audit.

The database accuracy is discussed in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: Unknown To: 17-Aug-23	One additional light was found in the field. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong overall as there are robust processes in place ensure that the database is kept up to date. The impact is assessed to be low as only one additional light was found in the field.	
Actions taken to resolve the issue		Completion date
Hurunui District Council were advised of the inaccuracies during a meeting. Hurunui District Council have confirmed the inaccuracies have since been corrected.		29/08/2023
Preventative actions taken to ensure no further issues will occur		Completion date
		Remedial action status
		Cleared

2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

The DUMML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

Audit observation

The process for tracking of changes in the database was examined.

Audit commentary

The RAMM database functionality achieves compliance with the code.

Audit outcome

Compliant

2.7. Audit trail (Clause 11(4) of Schedule 15.3)

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

The DUMML database must incorporate an audit trail of all additions and changes that identify:

- *the before and after values for changes*
- *the date and time of the change or addition*
- *the person who made the addition or change to the database.*

Audit observation

The database was checked for audit trails.

Audit commentary

RAMM records audit trail information of changes made.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

3.1. Database accuracy (Clause 15.2 and 15.37B(b))

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

Audit observation

A database extract was provided, and I assessed the accuracy of this by using the DUML Statistical Sampling Guideline. The table below shows the survey plan.

Plan Item	Comments
Area of interest	Hurunui DC region
Strata	The database contains items of load in Hurunui, excluding NZTA. The area has three distinct sub regions, split by NSP. The processes for the management of Hurunui DC items of load are the same, but I decided to place the items of load into three strata, as follows: <ul style="list-style-type: none"> • HDC A-CL, • HDC CO-LU, and • HDC LY- Z.
Area units	I created a pivot table of the roads in each, and I used a random number generator in a spreadsheet to select a total of 36 sub-units (roads).
Total items of load	137 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority against the database or in the case of LED lights against the LED light specification.

The change management process and timeliness of database updates was evaluated.

Audit commentary

Field Audit Findings

A field audit was conducted of a statistical sample of 137 items of load. The “database auditing tool” was used to analyse the results, which are shown in the table below.

Result	Percentage	Comments
The point estimate of R	100.9	Wattage from survey is higher than the database wattage by 0.9%
R _L	100	With a 95% level of confidence, it can be concluded that the error could be between 0.0% and 4.6%.
R _H	104.6	

These results were categorised in accordance with the “Distributed Unmetered Load Statistical Sampling Audit Guideline”, effective from 1 February 2019. The table below shows that Scenario A (detailed below) applies, and the best available estimate indicates that the database is accurate within $\pm 5.0\%$.

In absolute terms the installed capacity is estimated to be equal to the database.

There is a 95% level of confidence that the installed capacity is up to 2 kW higher than the database.

In absolute terms, total annual consumption is estimated to be 1,900 kWh higher than the DUML database indicates.

There is a 95% level of confidence that the annual consumption is up to 10,100 kWh p.a. higher than the database indicates.

Scenario	Description
A - Good accuracy, good precision	<p>This scenario applies if:</p> <p>(a) R_H is less than 1.05; and</p> <p>(b) R_L is greater than 0.95</p> <p>The conclusion from this scenario is that:</p> <p>(a) the best available estimate indicates that the database is accurate within $\pm 5\%$; and</p> <p>(b) this is the best outcome.</p>
B - Poor accuracy, demonstrated with statistical significance	<p>This scenario applies if:</p> <p>(a) the point estimate of R is less than 0.95 or greater than 1.05</p> <p>(b) as a result, either R_L is less than 0.95 or R_H is greater than 1.05.</p> <p>There is evidence to support this finding. In statistical terms, the inaccuracy is statistically significant at the 95% level</p>
C - Poor precision	<p>This scenario applies if:</p> <p>(a) the point estimate of R is between 0.95 and 1.05</p> <p>(b) R_L is less than 0.95 and/or R_H is greater than 1.05</p> <p>The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within $\pm 5\%$</p>

Lamp description and capacity accuracy

I checked the wattages being applied in the database and found that one lamp had a discrepancy when compared to the standardised wattage table. This is detailed in the table below:

Lamp Type	Database Total Lamp Wattage	EA Standardised Total Wattage	Variance	Database Quantity	Estimated Annual kWh effect on consumption
125W Mercury Vapour	137	136	+1	1	4.27

The incorrect capacity will be resulting in an estimated minor under submission of 4.27 kWh per annum (based on annual burn hours of 4,271 as is detailed in the DUMML database auditing tool). HDC confirmed that the incorrect wattage had been corrected in the database prior to finalising of the audit.

Change management process findings

Maintenance of streetlights is conducted by the field contractor Power Jointing Limited (PJL). Any changes made by PJL are updated directly in RAMM using Pocket RAMM. An annual condition assessment of all lights is conducted by PJL, and any discrepancies identified are updated when found. Outage patrols are not undertaken as the majority of lights are now LED. Outages are notified by residents and service requests are issued to PJL to resolve.

Developers provide lighting plans for new subdivisions to the HDC planning department and an application for the new connection is made with Mainpower. The lighting plans are shared with the roading department who have responsibility for streetlighting and maintain the RAMM database, a copy is also sent to PJL who provide technical advice as required. The lights are initially loaded into RAMM with a status of “proposed” and are not assigned to an ICP until they are connected. A field visit is conducted by HDC or PJL prior to connection to confirm the lights installed match the lighting plans submitted. PJL advises HDC of the planned connection date prior to connection and HDC remove the “proposed” status and add the ICP in RAMM on the planned date.

Private Lights

No private lights have been identified in the HDC database.

Festive Lights

HDC confirmed with Mainpower that there are no festive lights installed.

Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Apr-22 To: 17-Aug-23	One item of load has the incorrect wattage applied in the DUMML database which would result in the minor under submission of 4.27 kWh per annum. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact is assessed to be low, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status

Hurunui District Council were advised of the inaccuracies during a meeting. Hurunui District Council have confirmed the inaccuracies have since been corrected.	29/08/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- *volume information for the DUML is being calculated accurately*
- *profiles for DUML have been correctly applied.*

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that all ICPs have the correct profile and submission flag, and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Meridian reconciles this DUML load using the DST profile. I compared the database provided to the capacity information Meridian supplied to EMS for the month of March 2022 and I confirm the submission is accurate.

The on and off times are derived from a data logger read by EMS and are used to create a shape file. Meridian supplies EMS with the capacity information and EMS calculates the kWh figure for each ICP and includes this in the relevant AV080 file. This process was audited during Meridian's reconciliation participant audit and the EMS agent audit. Compliance was confirmed for both parties.

The field audit confirmed that the database accuracy is within the allowable +/-5% threshold.

As recorded in **section 3.1**, one item of load has the incorrect wattage applied in the DUML database resulting in an estimated minor under submission of 4.27 kWh per annum (based on annual burn hours of 4,271 as is detailed in the DUML database auditing tool). HDC confirmed that the incorrect wattage had been corrected in the database prior to finalising of the audit.

On 18 June 2019, the Electricity Authority issued a memo confirming that the code requirement to calculate the correct monthly load must:

- take into account when each item of load was physically installed or removed, and
- wash up volumes must take into account where historical corrections have been made to the DUML load and volumes.

The monthly report from HDC to Meridian includes the dates of any changes or additions made and Meridian accounts for the changes which have happened in each month on a daily basis.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Apr-22 To: 17-Aug-23	One item of load has the incorrect wattage applied in the DUML database which would result in the minor under submission of 4.27 kWh per annum. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is low; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Hurunui District Council were advised of the inaccuracies during a meeting. Hurunui District Council have confirmed the inaccuracies have since been corrected.		29/08/2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

CONCLUSION

The database is remotely hosted by thinkproject New Zealand Ltd . The field work and asset data capture are conducted by Power Jointing Limited using Pocket RAMM. A monthly report from RAMM is provided to Meridian to calculate the kW value.

Meridian reconciles this DUML load using the DST profile. Submissions are based on the database information, with on and off times derived from data logger information. Comparison of the submission information for May 2023 and the database extract provided confirmed the submission is accurate.

A field audit was undertaken of a statistical sample of 137 items of load on 17 August 2023. The field audit confirmed that the database accuracy is within the allowable +/-5% threshold. One additional light was found in the field, HDC confirmed that this was added to the database prior to finalising of the audit.

This audit found four non-compliances. The future risk rating of four indicates that the next audit be completed in 24 months. I have considered this in conjunction with Meridian's responses and agree with this recommendation.

PARTICIPANT RESPONSE

Meridian have reviewed this audit and their comments are recorded in the report. No further comments were provided.