

ELECTRICITY INDUSTRY PARTICIPATION CODE RECONCILIATION PARTICIPANT AUDIT REPORT

For

BRICKWORKS APARTMENTS BODY CORPORATE 483436(BRCK)

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EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Brickworks Apartments Body Corporate (BRCK) to support their application for certification, in accordance with clause 5 and 7 of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.1 issued by the Electricity Authority.

BRCK is an embedded network owner. It is a requirement for the embedded network owner to be a certified reconciliation participant in accordance with clause 15.38.

BRCK's compliance is reliant on the compliance of Switch Utilities (SULN) and subsequently John Candy Consulting Ltd, as agents. Although SULN is the primary agent to BRCK, John Candy Consulting Ltd conducts all of the relevant activities. The functions performed by John Candy Consulting Ltd were audited throughout this audit. Data collection is conducted by EDM I as an agent to the MEP, FCLM, because data can only be sourced from FCLM's back office. The EDM I audit report dated 14/08/2023 was reviewed to assess compliance.

No non-compliances were identified during the audit period.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 0 which results in an indicative audit frequency of 36 months.

We agree with this recommendation however clause 7 of Schedule of 15.1 of the Code allows grant certification for no more than 24 months.

We thank Switch Utilities and John Candy Consulting Ltd Staff for their full and complete cooperation in this audit.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Future Risk Rating						0	
Next audit						36 months	

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

RECOMMENDATIONS

Subject	Section	Description	Recommendation
Nil	Nil	Nil	Nil

ISSUES

Subject	Section	Description	Issue
Nil	Nil	Nil	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

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

Audit commentary

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

1.2. Structure of Organisation

This is not applicable.

1.3. Persons involved in this audit.

Name	Title	Company
Richard Mackie	Network Operations Coordinator	Switch Utilities Ltd
John Candy	Director	John Candy Consulting Ltd
Allan Borcoski	Electricity Authority Approved Auditor	Borcoski Energy Services Ltd

1.4. Use of Agents (Clause 15.34)

Code reference

Clause 15.34

Code related audit information

A reconciliation participant who uses an agent

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

Audit observation

This was discussed with Switch Utilities. BRCK engages two agents, John Candy Consulting (JCC), to create and submit files to the reconciliation manager and EDMI, who provide data collection. We reviewed the EDMI audit report dated 14/08/2023 .

Audit commentary

Although Switch Utilities is the primary reconciliation agent to BRCK, John Candy Consulting (JCC) conducts all reconciliation activities. Details are in the relevant parts of this audit. BRCK understand their responsibilities in relation to this clause.

1.5. Hardware and Software

The main system is Access Database (RM TOOL) provided and run by John Candy Consulting (JCC) for reconciliation submissions. The company also use FileZilla and Microsoft Office 365.

1.6. Breaches or Breach Allegations

The Registry was checked. There were no breaches or breach allegations lodged against BRCK in the period covered by this audit.

1.7. NSP Data

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	MEP
BRCK	BCK0011	160 HOBSONVILLE POINT RD, AKL	HEN0331	UNET	BCK0011BRCKE	E	1/10/16	FCLM
BRCK	BCL0012	160 HOBSONVILLE POINT RD, AKL	HEN0331	UNET	BCK0012BRCKE	E	1/10/16	FCLM

1.8. Authorisation Received

Appropriate authorisation was provided by BRCK. BRCK and John Candy Consulting (JCC) provided all the required information directly.

1.9. Scope of Audit

This reconciliation participant audit was performed at the request of The Brickworks Apartments Body Corporate 483436 (BRCK) to support their application for certification, in accordance with clause 5 and 7 of Schedule 15.1 of The Code 2010.

The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V7.1 issued by the Electricity Authority.

BRCK is an embedded network operator and is therefore required to be a certified reconciliation participant in accordance with clause 15.38 of part 15. The audit was carried out by meeting with Switch Utilities on 20 September 2023, teleconference with John Candy Consulting (JCC) and email.

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

Tasks Requiring Certification Under Clause 15.38(1) of Part 15	Relevant to audit	Agents Involved in Performance of Tasks
(b) – Gathering and storing raw meter data	✓	EDMI
(c)(i) - Creation and management of HHR volume information	✓	John Candy Consulting
(e) – Provision of submission information for reconciliation	✓	John Candy Consulting

1.10. Summary of previous audit

BRCK provided a copy of the audit report from their previous audit. It was carried out in September 2021 by Ewa Glowacka of TEG & Associates Ltd. No non-compliances were recorded.

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 10.6, 11.2, 15.2

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

Gate meters ICPs are recorded in the registry but any changes to their information can only be made by Vector not by BRCK. No MEP, metering information, or retailer is recorded in the registry.

During the audit we reviewed the EDM I audit report and also audited JCC reconciliation functions relating to this audit. We did not observe any incorrect or misleading information. The company is in close communication with JCC who would deal with any matters that may arise.

Audit outcome

Compliant

2.2. Provision of information (Clause 15.35)

Code reference

Clause 15.35

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

The processes used to provide information to the reconciliation manager were reviewed and assessed throughout this document. JCC is engaged as the agent for BRCK to provide information in accordance with Part 15.

BRCK met their obligations described in clause 15.35. All information was provided in a timely manner to the reconciliation manager and other participants.

Audit outcome

Compliant

2.3. Data transmission (Clause 20 Schedule 15.2)

Code reference

Clause 20 Schedule 15.2

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

Metering data is provided monthly by EDMI via FCLM.

Meter readings are provided to JCC via FCLM SFTP server. JCC downloads data to the RM TOOL.

The transfer of reconciliation files is performed via the RM portal which provides its own audit trail.

The screenshot shows the FileZilla SFTP client interface. The top toolbar includes File, Edit, View, Transfer, Server, Bookmarks, and Help. The Host field is set to sftp://SUL@sftp.thelines.co.nz. The Username field is set to SUL. The Password field is empty. The Port field is empty. The Quickconnect button is highlighted. The Status window shows the following log:

```
Status: Listing directory /EIEPout
Status: Directory listing of "/EIEPout" successful
Status: Disconnected from server
Status: Disconnected from server
Status: Disconnected from server
Status: Connecting to sftp.thelines.co.nz...
Status: Using username "SUL".
Status: Connected to sftp.thelines.co.nz
Status: Retrieving directory listing...
Status: Listing directory /
Status: Directory listing of "/" successful
Status: Retrieving directory listing of "/SUL"...
Status: Listing directory /SUL
Status: Directory listing of "/SUL" successful
```

The Local site is Y:\UCC_SOHZ\EIEP4\ and the Remote site is /SUL. The Remote site directory listing is as follows:

Filename	Filesize	Filetype	Last mo
..			
FCLM_E_SWCH_ICPHH_202107_20210802_090254493.txt	108,422	Text Docu...	2/08/20
FCLM_E_SWCH_ICPHH_202107_20210802_090154743.txt	108,422	Text Docu...	2/08/20
FCLM_E_SWCH_ICPHH_202107_20210802_090056203.txt	108,422	Text Docu...	2/08/20
FCLM_E_SWCH_ICPHH_202107_20210802_085948507.txt	108,422	Text Docu...	2/08/20
FCLM_E_SWCH_ICPHH_202107_20210802_085848037.txt	108,422	Text Docu...	2/08/20
FCLM_E_SWCH_ICPHH_202107_20210802_085738733.txt	108,422	Text Docu...	2/08/20
FCLM_E_SWCH_ICPHH_202106_20210701_091251267.txt	104,927	Text Docu...	1/07/20
FCLM_E_SWCH_ICPHH_202106_20210701_091216260.txt	104,927	Text Docu...	1/07/20
FCLM_E_SWCH_ICPHH_202106_20210701_091138190.txt	104,927	Text Docu...	1/07/20
FCLM_E_SWCH_ICPHH_202106_20210701_091046783.txt	104,927	Text Docu...	1/07/20
FCLM_E_SWCH_ICPHH_202106_20210701_091004513.txt	104,927	Text Docu...	1/07/20
FCLM_E_SWCH_ICPHH_202106_20210701_090924407.txt	104,927	Text Docu...	1/07/20
FCLM_E_SWCH_ICPHH_202105_20210601_104342677.txt	93,542	Text Docu...	1/06/20
FCLM_E_SWCH_ICPHH_202105_20210601_104308547.txt	93,542	Text Docu...	1/06/20
FCLM_E_SWCH_ICPHH_202105_20210601_104233920.txt	93,542	Text Docu...	1/06/20
FCLM_E_SWCH_ICPHH_202105_20210601_104159807.txt	93,542	Text Docu...	1/06/20
FCLM_E_SWCH_ICPHH_202105_20210601_104124680.txt	93,542	Text Docu...	1/06/20
FCLM_E_SWCH_ICPHH_202105_20210601_104013593.txt	93,542	Text Docu...	1/06/20
SWCH		File folder	23/01/21

The Local site directory listing is as follows:

Filename
..
SOHZ_E_VECT_CUSIN_202108_20210812_3871.csv
SOHZ_E_VECT_CUSIN_202108_20210804_5396.csv

Selected 1 file. Total size: 364 bytes

18 files and 1 directory. Total size: 1,841,346 bytes

Checks confirmed compliance with this clause.

Audit outcome

Compliant

2.4. Audit trails (Clause 21 Schedule 15.2)

Code reference

Clause 21 Schedule 15.2

Code related audit information

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

The audit trail must include details of information:

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

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

JCC downloads data from the FCLM server and creates reconciliation files. The RM TOOL used by JCC contains a detailed audit trail for data gathering, validation, and correction. It was reviewed during this audit and found compliant.

The software has the functionality to store and show the original data (nulls), the corrected data, the date the correction occurred, and the technique used. In addition, there is a worksheet containing a copy of all of this information, including a graph showing that the correction matches the consumption on either side.

Checks confirmed compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 10.4

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

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

The trader must use its best endeavours to provide access:

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

Access to metering installations will be provided when requested. Health and Safety regulations must be met. No requests to access metering installations have been received during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.35(1)&(2)

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The Registry was checked along with metering certification documentation.

Audit commentary

Switch Utilities confirmed the BRCK embedded network gateway metering is located at:

Network	NSP POC	Description	Parent POC	Parent Distributor	Balancing Area	Type	Start date	MEP
BRCK	BCK0011	160 HOBSONVILLE POINT RD, AKL	HEN0331	UNET	BCK0011BRCKE	E	1/10/16	FCLM
BRCK	BCL0012	160 HOBSONVILLE POINT RD, AKL	HEN0331	UNET	BCK0012BRCKE	E	1/10/16	FCLM

The embedded network is supplied through 3 ICPs:

- 1001293872UNC39 category 2 metering installation certificate expiry date 20/07/2026
- 1001293876UN033 category 2 metering installation certificate expiry date 20/07/2026
- 1001293875UN1F3 category 2 metering installation certificate expiry date 20/07/2026

The metering installations have no loss compensation factors required.

Audit outcome

Compliant

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

Code reference

Clause 11.15B

Code related audit information

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

- the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and
- the terms of the assigned contract to be amended on such an assignment to—
- the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

2.9. Connection of an ICP (Clause 10.32)

Code reference

Clause 10.32

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 10.33(1)

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 10.33A(1)

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

2.12. Arrangements for line function services (Clause 11.16)

Code reference

Clause 11.16

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

2.13. Arrangements for metering equipment provision (Clause 10.36)

Code reference

Clause 10.36

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. The NSP Mapping table in the Registry was reviewed.

Audit commentary

Switch Utilities confirmed they have an appropriate arrangement with FCLM to provide MEP services. The MEP is not recorded in the registry.

The gate meters were fully certified by WELLS.

- 1001293872UNC39 - category 2 metering installation certificate expiry date 20/07/2026
- 1001293876UND33 - category 2 metering installation certificate expiry date 10/08/2026
- 1001293875UN1F3 - category 2 metering installation certificate expiry date 23/07/2026

Audit outcome

Compliant

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

Code reference

Clause 10.33B

Code related audit information

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

- *restore the disconnection, including removing any bypass and disconnecting using the same method the losing trader used*

- *reimburse the losing trader for any direct costs incurred*

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

2.15. Electrical disconnection of ICPs (Clause 10.33B)

Code reference

Clause 10.33B

Code related audit information

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

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

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

- *ensure 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*
- *update the registry (if the profile code has changed)*
- *notify the metering equipment provider*

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 10.33C and 2A of Schedule 15.2

Code related audit information

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

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

If the trader bridges a meter, the trader must:

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

The trader must determine meter readings as follows:

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 11.30

Code related audit information

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 11.30B

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

3. MAINTAINING REGISTRY INFORMATION

- 3.1. Obtaining ICP identifiers (Clause 11.3)
- 3.2. Providing registry information (Clause 11.7(2))
- 3.3. Changes to registry information (Clause 10 Schedule 11.1)
- 3.4. Provision of information to the registry manager (Clause 9 Schedule 11.1)
- 3.5. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1)
- 3.6. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)
- 3.7. Management of “active” status (Clause 17 Schedule 11.1)
- 3.8. Management of “inactive” status (Clause 19 Schedule 11.1)
- 3.9. ICPs at new or ready status for 24 months (Clause 15 Schedule 11.1)

Audit observation

This was discussed with Switch Utilities and JCC. The Registry was checked.

Audit commentary

These clauses are not applicable.

Audit outcome

Not applicable

4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

- 4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)
- 4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)
- 4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)
- 4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)
- 4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)
- 4.6. Disputes - standard switch (Clause 7 Schedule 11.3)
- 4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)
- 4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)
- 4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)
- 4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)
- 4.11. Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)
- 4.12. Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)
- 4.13. Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)
- 4.14. Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)
- 4.15. Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)
- 4.16. Metering information (Clause 21 Schedule 11.3)
- 4.17. Switch protection (Clause 11.15AA to 11.15AB)

Audit observation

This was discussed with Switch Utilities and JCC. The Registry was checked.

Audit commentary

These clauses are not applicable.

Audit outcome

Not applicable

5. MAINTENANCE OF UNMETERED LOAD

- 5.1. Maintaining shared unmetered load (Clause 11.14)
- 5.2. Unmetered threshold (Clause 10.14 (2)(b))
- 5.3. Unmetered threshold exceeded (Clause 10.14 (5))
- 5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)

Audit observation

This was discussed with Switch Utilities and JCC. The Registry was checked.

Audit commentary

These clauses are not applicable.

Audit outcome

Not applicable

6. GATHERING RAW METER DATA

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

Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

Code related audit information

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

BRCK is not an embedded generator.

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least 3 months for the grid owner to review and comment on the design*
- *respond within 3 business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

The participant responsible for the metering installation must:

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

BRCK is not responsible for any GIPs.

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

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

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The reconciliation files were examined.

Audit commentary

Checks showed that BRCK submits volumes to the reconciliation manager using the HHR profile. This profile is not reliant on certified control devices. The company has never approached FCLM asking for a control device to be certified.

Audit outcome

Compliant

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

Code reference

Clause 10.43(2) and (3)

Code related audit information

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

- *advise the MEP*
- *include in the advice all relevant details.*

Audit observation

This was discussed with Switch Utilities and JCC. The process for identifying defective metering was examined during the audit.

We reviewed the EDMI audit report dated 14/08/2023 .

Audit commentary

Metering files are downloaded from the FCLM server by JCC on behalf of BRCK. After files are uploaded to the RM TOOL, validation is conducted by running a number of reports which assist to identify defective metering. The reports “look for” ICPs with too high or too low consumption, zero readings (not advancing registers). If a defective meter were to be identified, JCC would notify BRCK, who would then ask the MEP to investigate. No examples of defective metering were identified during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 2 Schedule 15.2

Code related audit information

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

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

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

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

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

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

2(6) – The interrogation systems must record:

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

The gate meters are interrogated by EDMI, which is an agent, and data is passed to FCLM.

JCC uploads monthly data from the FCLM server.

The review of the EDMI audit report confirmed compliance with this clause.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

All validated meter readings must be derived from meter readings.

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 6 Schedule 15.2

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 7(1) and (2) Schedule 15.2

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 8(1) and (2) Schedule 15.2

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 9(1) and (2) Schedule 15.2

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 10 Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 11(1) Schedule 15.2

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

The gate meters are interrogated by EDM I an agent for BRCK, and data is passed to FCLM.

JCC uploads monthly data from the FCLM server.

The review of the EDM I audit report confirmed compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 11(2) Schedule 15.2

Code related audit information

The following information is collected during each interrogation:

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

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

The gate meters are interrogated by EDM I an agent for BRCK, and data is passed to FCLM.

JCC uploads monthly data from the FCLM server.

The review of the EDMI audit report confirmed compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 11(3) Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

The gate meters are interrogated by EDMI an agent for BRCK, and data is passed to FCLM.

JCC uploads monthly data from the FCLM server.

The review of the EDMI audit report confirmed compliance with this clause.

Audit outcome

Compliant

7. STORING RAW METER DATA

7.1. Trading period duration (Clause 13 Schedule 15.2)

Code reference

Clause 13 Schedule 15.2

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

Data is collected by EDM I and supplied by FCLM as the MEP.

Checks on data provided by FCLM and confirm that the trading period duration is 30 minutes.

Review of the EDM I audit report confirmed compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 18 Schedule 15.2

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

Meters are interrogated by EDM I, who archives raw meter data. JCC keeps a copy of all HHR data.

The processes to store and archive raw meter data were reviewed during the EDM I audit.

Review of the EDM I audit report confirmed compliance with this clause.

Audit outcome

Compliant

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

Code reference

Clause 21(5) Schedule 15.2

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

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

Code reference

Clause 19(1) Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 19(2) Schedule 15.2

Code related audit information

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Volume submission files were checked. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

The correction of HHR readings, if it were necessary, would be completed by JCC.

JCC conducts very thorough HHR data validation to detect possible data inaccuracies. As an additional check, data for each gate meter ICP is validated visually.

JCC confirmed no HHR corrections were made during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 19(3) Schedule 15.2

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

The metering installations at ICPs BRCK are responsible for have no loss compensation factors required.

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 19(4) and (5) Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering Data files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

BRCK receives a copy of raw data which is never overwritten. If data is corrected, a journal is created.

JCC only receives a copy of raw meter data. Retention of raw meter data is the responsibility of EDMI. This was covered in the EDMI audits and found compliant.

The correction of HHR readings, if it were necessary, would be completed by JCC. JCC conducts very thorough HHR data validation to detect possible data inaccuracies. As an additional check, data for each gate meter ICP is validated visually.

JCC confirmed no HHR metering data corrections were made to during this audit period.

Audit outcome

Compliant

9. ESTIMATING AND VALIDATING VOLUME INFORMATION

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

Code reference

Clause 3(3) Schedule 15.2

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data files were checked. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

Estimated readings were clearly identified as required.

JCC only receives a copy of raw meter data. Retention of raw meter data is the responsibility of EDM I. This was covered in the EDM I audit and found compliant.

The correction of HHR readings, if it were necessary, would be completed by JCC. JCC conducts very thorough HHR data validation to detect possible data inaccuracies. As an additional check, data for each gate meter ICP is validated visually. RMTOOL identifies estimated readings as required.

JCC confirmed no HHR metering data corrections were made to during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 3(4) Schedule 15.2

Code related audit information

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

3(4)(a) - validated meter readings

3(4)(b) - estimated readings

3(4)(c) - permanent estimates.

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

Data is collected by EDM I and supplied by FCLM as the MEP. JCC uploads monthly data from the FCLM server.

We checked the source of volume information and compared the contents of a raw metering data file with the NSPVOLS file to ensure they matched.

Checks confirmed volume information was derived from a copy of raw meter data supplied by the MEP.

Audit outcome

Compliant

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

Code reference

Clause 3(5) Schedule 15.2

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

We checked the file provided by FCLM against the NSPVOLS file to determine where and when rounding occurred.

Data provided by EDMI is not rounded or truncated during upload to the RM TOOL. Submission volumes are rounded to two decimal places.

The comparison between the EDMI data and reconciliation files showed that the original data was multiplied as follows:

ICP	Meter serial number	Multiplier
1001293872UNC39	215193500	50
1001293875UN1F3	215193499	30
1001293876UND33	215193501	100

Checks of the raw metering data file against the NSPVOLS file and the EDMI audit report confirmed compliance with this clause.

Audit outcome

Compliant

9.4. Half hour estimates (Clause 15 Schedule 15.2)

Code reference

Clause 15 Schedule 15.2

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDML audit report dated 14/08/2023 was reviewed.

Audit commentary

The estimation method (if required) used by JCC depends on how many intervals need to be estimated.

If reads are available spanning the missing period, then the RM tool has the functionality to gap fill using the average profile for the last 7 days scaled to fit the missing volume. (Preferred method)

If there is not enough HHR data available estimation is completed via a spreadsheet tool using a sampled profile for the required periods factored to fit the missing volume.

If none of that is possible (if for example due to a meter failure or no readings available), then a similar period is used to fit the missing period.

Checks confirmed BRCK did not have any HHR data estimated during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 15.2

Code related audit information

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 17 Schedule 15.2

Code related audit information

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

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

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

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

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

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

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

Gate meters are metered by FCLM MEP and read remotely by EDMI. The EDMI audit report outlined the HHR data validations performed prior to metering data being made available to participants. EDMI also provides notification of metering events which are related to the integrity of metering data and require further investigation.

In addition, JCC performs validation checks on all meter data downloaded to the RM TOOL including initially for invalid dates and times. Queries are also run to identify “unexpected 0 values” (registers that do not advance), missing reads etc prior to submission files being created.

Compliance with this clause has been demonstrated by EDMI as part of their agent audit and additional data checks of the sample raw meter data and NSPVOLS files from the audit period.

Audit outcome

Compliant

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

These clauses are not applicable.

Audit outcome

Not applicable

11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

11.1. Buying and selling notifications (Clause 15.3)

11.2. Calculation of ICP days (Clause 15.6)

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

These clauses are not applicable.

Audit outcome

Not applicable

12. SUBMISSION COMPUTATION

12.1. Daylight saving adjustment (Clause 15.36)

Code reference

Clause 15.36

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDM I audit report dated 14/08/2023 was reviewed.

Audit commentary

HHR data is collected by EDM I. According to the EDM I audit report, the company uses the “trading period run on” technique for daylight saving adjustment. We checked BRCK’s files for the change to and from daylight savings.

Compliance with this clause has been demonstrated by EDM I as part of their agent audit and data checks of the sample raw meter data and NSPVOLS files from the audit period.

Audit outcome

Compliant

12.2. Creation of submission information (Clause 15.4)

Code reference

Clause 15.4

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. This audit is for NSPVOLS only.

There were no late files submitted by JCC on behalf of BRCK.

This clause is not applicable.

Audit outcome

Not applicable

12.3. Allocation of submission information (Clause 15.5)

Code reference

Clause 15.5

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. This audit is for NSPVOLS only.

This clause is not applicable.

Audit outcome

Not applicable

12.4. Grid owner volumes information (Clause 15.9)

Code reference

Clause 15.9

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

12.5. Provision of NSP submission information (Clause 15.10)

Code reference

Clause 15.10

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

JCC submits NSPVOLS for three gate meters on behalf of BRCK. The company provided for review files submitted during the audit period.

Meters are read by EDMI and passed to FCLM. JCC downloads them from the FCLM server. Metering data is validated by the RM TOOL. Before the files are submitted to the reconciliation manager they are graphed and reviewed to assess consistency.

Switch Utilities stated there were no late files submitted by JCC on behalf of BRCK during this audit period.

Audit outcome

Compliant

12.6. Grid connected generation (Clause 15.11)

Code reference

Clause 15.11

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause is not applicable.

Audit outcome

Not applicable

12.7. Accuracy of submission information (Clause 15.12)

Code reference

Clause 15.12

Code related audit information

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

A review of alleged breaches confirmed that no reconciliation submissions were made late.

We checked the process for revisions. Every month volumes are submitted, as expected, by a schedule.

The RM TOOL has a functionality which recalculates submission volumes if a more accurate reading is obtained. JCC confirmed that no revision files were submitted on behalf of BRCK as no data has been changed or amended during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 4 Schedule 15.2

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

Audit commentary

Gate meters are metered by FCLM MEP and read remotely by EDMI. The EDMI audit report outlined the HHR data validations performed prior to metering data being made available to participants. EDMI also provides notification of metering events which are related to the integrity of metering data and require further investigation.

In addition, JCC performs validation checks on all meter data downloaded to the RM TOOL including initially for invalid dates and times. Queries are also run to identify “unexpected 0 values” (registers that do not advance), missing reads etc prior to submission files being created.

JCC confirmed FCLM provided actual reads used for submissions. HHR data files were not estimated during this audit period.

Audit outcome

Compliant

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

Code reference

Clause 2 Schedule 15.3

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. BRCK only supplies NSPVOLS.

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 3 Schedule 15.3

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. BRCK only supplies NSPVOLS.

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 4 and 5 Schedule 15.3

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. BRCK only supplies NSPVOLS.

This clause is not applicable.

Audit outcome

Not applicable

12.12. Forward estimate process (Clause 6 Schedule 15.3)

Code reference

Clause 6 Schedule 15.3

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. BRCK only supplies NSPVOLS.

This clause is not applicable.

Audit outcome

Not applicable

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

Code reference

Clause 7 Schedule 15.3

Code related audit information

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

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

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. BRCK only supplies NSPVOLS.

This clause is not applicable.

Audit outcome

Not applicable

13. SUBMISSION FORMAT AND TIMING

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

Code reference

Clause 8 Schedule 15.3

Code related audit information

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

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

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

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

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

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

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDML audit report dated 14/08/2023 was reviewed.

Audit commentary

JCC provided submission files for the audit period. NSPVOLS are submitted on behalf of BRCK.

We confirm that the format for submissions files is compliant. The RM TOOL has the functionality to store all ICP's recorded in the registry. Gate meters metering data does not require the application of multipliers.

Compliance with this clause has been demonstrated by EDMI as part of their agent audit and additional data checks of the sample raw meter data and NSPVOLS files from the audit period.

Audit outcome

Compliant

13.2. Reporting resolution (Clause 9 Schedule 15.3)

Code reference

Clause 9 Schedule 15.3

Code related audit information

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

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

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

Audit observation

This was discussed with Switch Utilities and JCC. Metering data and NSPVOLS files were checked. The EDMI audit report dated 14/08/2023 was reviewed.

We checked the format of the NSPVOLS files for 6 months.

Audit commentary

We checked the format of the NSPVOLS files for 6 months.

The data supplied by FCLM has three decimals (since June 2021), then it is multiplied by 100, 50 and 30. NSPVOLS submission information does not have more than 2 decimal places.

Audit outcome

Compliant

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

Code reference

Clause 10 Schedule 15.3

Code related audit information

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

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

- *at least 80% for revised data provided at the month 3 revision (clause 10(3)(a))*
- *at least 90% for revised data provided at the month 7 revision (clause 10(3)(b))*
- *100% for revised data provided at the month 14 revision. (clause 10(3)(c))*

Audit observation

This was discussed with Switch Utilities and JCC.

Audit commentary

This clause refers to ICPs. BRCK only supplies NSPVOLS.

This clause is not applicable.

Audit outcome

Not applicable

CONCLUSION

See Executive Summary

PARTICIPANT RESPONSE

Switch Utilities (SULN) agree with the findings of this report and have no further comments to add.

Richard Mackie

Network Operations Coordinator