

ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTOR AUDIT REPORT



For

UNISON NETWORKS LIMITED  
NZBN: 9429038928437

Prepared by: Rebecca Elliot, Veritek Limited

Date audit commenced: 4 December 2022

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Audit report due date: 04-Aug-23

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## EXECUTIVE SUMMARY

This distributor audit was performed at the request of **Unison Networks (Unison)**, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was carried out at Unison's premises in Hastings, on July 4<sup>th</sup>, 2023.

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

This audit was deferred due from May 2023 to August 2023 due to Cyclone Gabrielle. Unison's network was severely affected by this event and the recovery is ongoing. The audit period assessed covers from 6<sup>th</sup> September 2021 to 1<sup>st</sup> February 2023.

The audit found 12 non-compliances, makes five recommendations, and raises one issue.

Unison's processes are well established, and controls overall are robust.

This audit found one known IT issue which is causing delays to bulk updates getting to the registry and has impacted the timeliness of updates. Unison have an IT ticket lodged with Gentrack to get this fixed. The issue raised in the last audit in relation to the NSP accuracy is close to being resolved. This affects only a very small number of ICPs in the Rotorua area.

Due to the impact of Cyclone Gabrielle, resources have been stretched and some non-essential tasks have had to be deferred e.g., the checking of ICPs at "new" and "ready" status. The team remains focussed on doing the best job possible despite the difficult circumstances.

The next audit frequency table indicates that the next audit be due in 12 months. I have considered this in conjunction with Unison's comments and agree with this recommendation.

The matters raised are shown in the tables below.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Requirement to provide complete and accurate information	2.1	11.2(1)	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Strong	Low	1	Investigating
Removal or breakage of seals	2.3	48(1A) and 48(1B) of Schedule 10.7	Seal information is not recorded and is not traceable to the person fitting the seal.  MEPs are not notified when seals are broken.	Moderate	Low	2	Identified
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities Disputes information not provided via Facebook messenger.	Strong	Low	1	Cleared
Participants may request distributors to create ICPs	3.2	11.5(3)	One LE ICP not created or reason for delay not communicated within three business days.	Strong	Low	1	Identified
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Registry not updated prior to commencement of trading for two ICPs.	Strong	Low	1	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late population of the initial electrical connection date for 87 ICPs (5%).	Strong	Low	1	Identified
Monitoring of "new" & "ready" statuses	3.14	15 of Schedule 11.1	ICPs at "new" or "ready" for 24 months not confirmed as required in all instances.	Strong	Low	1	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were updated more than three business days after the event date.	Weak	Low	3	Investigating
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	Four ICPs with an incorrect NSP recorded.	Moderate	Low	2	Investigating
ICP location address	4.4	2 of Schedule 11.1	Six ICPs with duplicate addresses.	Moderate	Low	2	Identified
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	One ICP with distributed generation recorded where none is present.  Two ICPs with the incorrect unmetered load details recorded.  One ICP with the incorrect initial electrical connection date recorded.	Moderate	Low	2	Identified
Management of "decommissioned" status	4.11	20 Schedule 11.1	Six of sample of ten ICPs checked recorded with the incorrect decommission date.	Moderate	Low	2	Identified
Future Risk Rating						19	

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

## RECOMMENDATIONS

Subject	Section	Clause
Distributor must create ICPs	3.2	Review the LE ICP creation process.
Population of initial electrical connection dates	4.1	Review the wizard used to populate the initial electrical connection date to include the distributed generation details if present at the time of electrical connection.
ICP location address	4.4	Check addresses without property details such as Lot number or BTS included to prevent duplicate ICPs being created.
Distributed generation details	4.6	Check audit compliance reporting (AC020) to identify any distributed generation that has yet to be installed but has been populated to the registry.
Electrical connection of new streetlights		Review process of notification of electrical connection of new streetlights.

## ISSUES

Subject	Section	Issue
Streetlights connected to customer networks	4.6	Streetlights that are not connected to Unison network cannot be created as unmetered load and do not belong to the council so there is currently no way to record and reconcile these loads.

## 1. ADMINISTRATIVE

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

#### Code reference

Section 11 of Electricity Industry Act 2010.

#### Code related audit information

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

#### Audit observation

The Authority website was checked to determine whether there are any code exemptions in place.

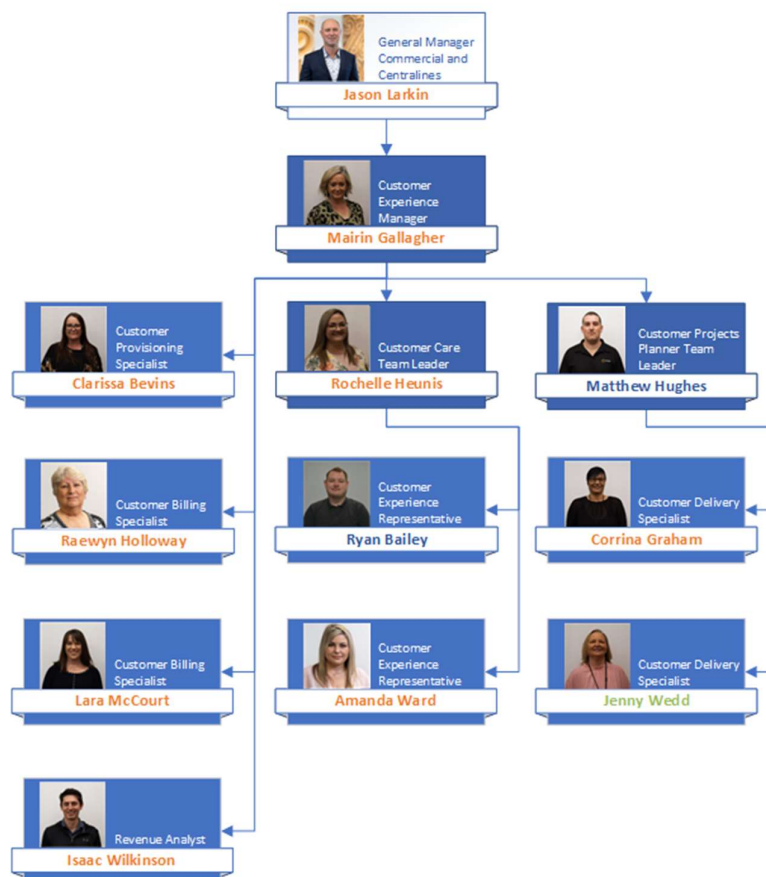
#### Audit commentary

Review of exemptions on the Authority website confirmed that there are no exemptions in place relevant to the scope of this audit.

### 1.2. Structure of Organisation

Unison provided a copy of the relevant parts of their organisational structure, which is shown below.

## Commercial Team Unison Networks Limited





### 1.3. Persons involved in this audit

Auditor:

**Rebecca Elliot**

**Veritek Limited**

**Electricity Authority Approved Auditor**

Unison Networks personnel assisting in this audit were:

Name	Title
Amanda Ward	Customer Experience Representative
Clarissa Bevins	Customer Provisioning Specialist
Corrina Graham	Customer Delivery Specialist
Issac Wilkinson	Revenue Analyst
Jason Larkin	General Manager Commercial
Jenny Wedd	Customer Delivery Specialist
Mairin Gallagher	Customer Experience Manager
Paul Jones	Faults Field Leader [UCSL]
Raewyn Holloway	Customer Billing Specialist
Rochelle Heunis	Customer Care Team Leader

### 1.4. Use of contractors (Clause 11.2A)

#### Code reference

*Clause 11.2A*

#### Code related audit information

*A participant who uses a contractor*

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

### Audit observation

All activities are completed directly by Unison.

#### 1.5. Supplier list

All activities are completed directly by Unison.

#### 1.6. Hardware and Software

Gentrack is used to create ICPs and interface with the registry. Unison's GIS is Small World, and ADMS is used for real time network monitoring.

System backups are conducted in accordance with Unison's Operational Security Standard which is reviewed by Audit NZ each year.

The frequency and extent of backups is determined by the importance of the information, potential impact of data loss/corruption, and risk management decisions by the system or data owner.

At a minimum, all on premise systems are backed up utilising snapshot technology daily:

- an incremental backup is daily (Monday to Thursday) with 14 days retention,
- a full backup is weekly (Friday) with four weeks retention, and
- a full backup is monthly (First Weekly Backup of Each Month) with seven years retention.

#### 1.7. Breaches or Breach Allegations

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

#### 1.8. ICP and NSP Data

Unison owns and operates the electricity networks in the Hawke's Bay, Taupo, and Rotorua regions.

The table below lists the relevant NSPs and their associated balancing area, and the number of active ICPs connected. No NSPs have been created or decommissioned during the audit period.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
HAWK	ATI0112	ATIAMURI	ROT0111	HAWK	TAUPROTHAWKG	NP	1 May 2008	0
HAWK	FHL0331	FERNHILL			MAGPIESHAWKG	G	1 May 2008	16,480
HAWK	OWH0111	OWHATA			TAUPROTHAWKG	G	1 May 2008	5,638
HAWK	RDF0331	REDCLYFFE			MAGPIESHAWKG	G	1 May 2008	23,476
HAWK	ROT0111	ROTORUA			TAUPROTHAWKG	G	1 May 2008	10,191
HAWK	ROT0331	ROTORUA			TAUPROTHAWKG	G	1 May 2008	13,043
HAWK	TRK0111	TARUKENGA			TAUPROTHAWKG	G	1 May 2008	3,381
HAWK	WRK0331	WAIRAKEI			TAUPROTHAWKG	G	1 May 2008	17,920
HAWK	WTU0331	WHAKATU			MAGPIESHAWKG	G	1 May 2008	25,818

Unison does not own any embedded networks but has three networks embedded connected to their network. TFR00011 was electrically connected on 2 June 2022. The embedded networks are detailed in the table below and are discussed in the relevant sections of this report.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date
SMRT	HPL0011	ST AUBYN ST EAST HASTINGS	WTU0331	HAWK	HPL0011SMRTE	E	1 December 2017
TENC	TFR0011	153 Pukehangi Road	ROT0111	HAWK	TFR0011TENCE	E	2 June 2022
TENC	TWQ0011	14 WEST QUAY AHURIRI NAPIER	RDF0331	HAWK	TWQ0011TENCE	E	1 August 2016

A list file detailing the ICP statuses was provided:

Status	Number of ICPs (2023)	Number of ICPs (2021)	Number of ICPs (2019)
New (999,0)	0	0	0
Ready (0,0)	344	261	247
Active (2,0)	115,947	114,276	112,199
Distributor (888,0)	3	2	2
Inactive – new connection in progress (1,12)	298	240	177
Inactive – electrically disconnected vacant property (1,4)	1,600	1,610	1,560
Inactive – electrically disconnected remotely by AMI meter (1,7)	514	386	430
Inactive – electrically disconnected at pole fuse (1,8)	29	23	18
Inactive – electrically disconnected due to meter disconnected (1,9)	54	46	39
Inactive – electrically disconnected at meter box fuse (1,10)	18	19	17
Inactive – electrically disconnected at meter box switch (1,11)	12	12	14
Inactive – electrically disconnected ready for decommissioning (1,6)	22	23	32
Inactive – reconciled elsewhere (1,5)	1	1	1
Decommissioned (3)	11,055	10,530	9,991

## 1.9. Authorisation Received

An authorisation email was provided.

### 1.10. Scope of Audit

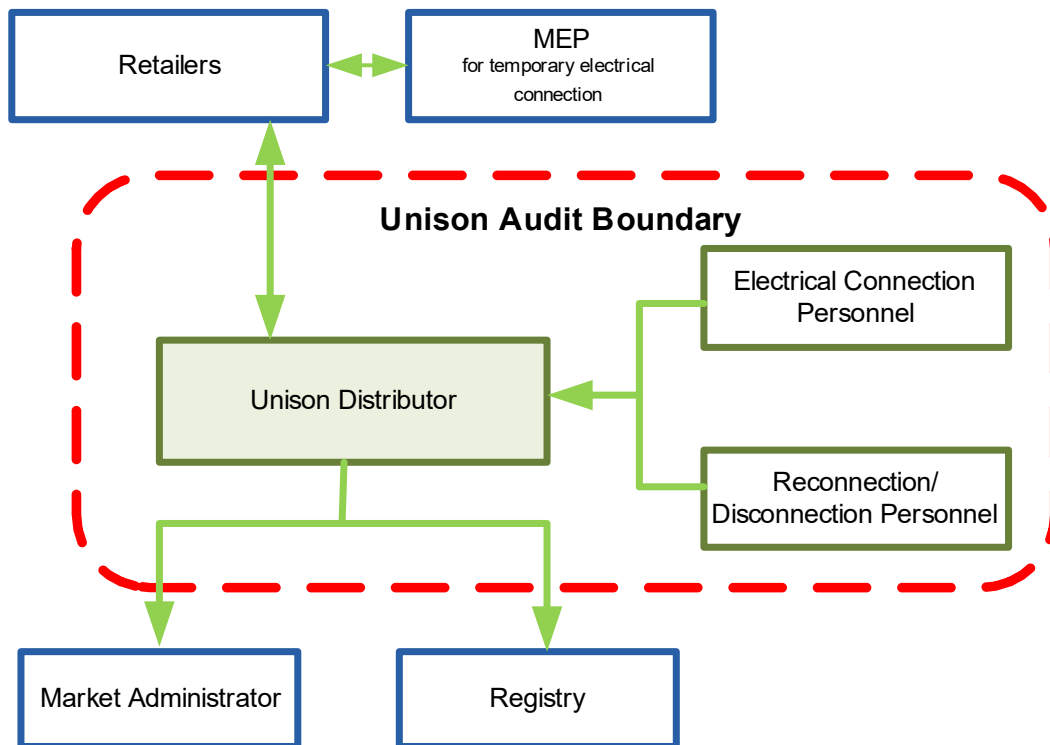
This distributor audit was performed at the request of Unison, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11.

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

The table below shows the tasks under clause 11.10(4) of Part 11, which Unison is responsible for. There are no other contractors who assist with these tasks:

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

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



### 1.11. Summary of previous audit

The October 2021 audit was completed by Steve Woods of Veritek Ltd. The audit found ten non-compliances and made no recommendations. The current status of compliance in relation to the relevant clause is detailed in the table below:

**Table of Non-compliance**

Subject	Section	Clause	Non-compliance	Status
Requirement to provide complete and accurate information	2.1	11.2(1)	Not all practicable steps are taken to ensure that the information provided is complete and accurate.	Still existing
Removal or breakage of seals	2.3	48(1A) and 48(1B) of Schedule 10.7	Seal information is not recorded and is not traceable to the person fitting the seal. MEPs are not notified when seals are broken.	Still existing
Provision of information on dispute resolution scheme	2.4	11.30A	Utilities Disputes information not provided during phone calls.	Still existing
Participants may request distributors to create ICPs	3.2	11.5(3)	Two ICPs not created within three business days and notification not provided to the participant.	Still existing
Timeliness of Provision of ICP Information to the registry manager	3.4	7(2) of Schedule 11.1	Registry not updated prior to commencement of trading for two ICPs.	Still existing
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Late population of the initial electrical connection date for 80 ICPs (4%).	Still existing
Connection of ICP that is not an NSP	3.6	11.17	One ICP connected prior to proposed trader being recorded in the registry.	Cleared
Connection of ICP that is not an NSP	3.7	10.31	One ICP connected without a request from a trader.	Cleared
Changes to registry information	4.1	8 Schedule 11.1	Some price, network, status, and address changes were updated more than three business days after the event date.	Still existing

Subject	Section	Clause	Non-compliance	Status
Notice of NSP for each ICP	4.2	7(1),(4) and (5) Schedule 11.1	10 ICPs with an incorrect NSP recorded.	Still existing

**Table of Recommendations**

Subject	Section	Clause	Recommendation	Status
Unmetered load	4.6	clause 7(1) Schedule 11.1	Check unmetered load details for ICPs 0000035631HR7FB, 0000036054HB907 and 0000036055HB542.	Cleared

## 2. OPERATIONAL INFRASTRUCTURE

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

#### Code reference

*Clause 11.2(1) and 10.6(1)*

#### Code related audit information

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

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

#### Audit observation

I walked through the process to ensure that registry information is complete, accurate and not misleading or deceptive, including viewing reports used to resolve discrepancies.

The audit compliance reports from 6 September 2021 to 1 February 2023 were examined to confirm compliance.

#### Audit commentary

Unison runs a set of registry discrepancy reports on a monthly basis. They also monitor the notification files coming back from the registry on a daily basis.

As recorded in **sections 4.2, 4.6 and 4.8**, some information on the registry was not complete and accurate.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) and 10.6(1)  From: 06-Sep-21 To: 01-Feb-23	Not all practicable steps are taken to ensure that the information provided is complete and accurate.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The registry discrepancies processes are robust, and the number of discrepancies was low.  The inaccurate information has a small impact on other participants and on settlement, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The four ICP's showing incorrect NSP's have now been corrected. The one ICP concerning distributed generation has been corrected. The two ICPs with the incorrect unmetered load are being corrected. The one ICP with the incorrect Initial Electrical connection date was corrected during the audit.		28/07/2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We will work with our information technology team to identify whether there are further automated controls that can be put in place.		To be determined based on complexity of any solution.	

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

### Code reference

*Clause 11.2(2) and 10.6(2)*

### Code related audit information

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

### Audit observation

Unison's data management processes were examined. The registry list file as of 1 February 2023 and audit compliance reports from 6 September 2021 to 1 February 2023 were examined to confirm compliance.



### Audit commentary

Unison has processes in place to identify and resolve registry discrepancies as described in **section 2.1**. I saw evidence of incorrect information being corrected during the audit.

### Audit outcome

Compliant

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

### Code reference

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

### Code related audit information

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

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

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

### Audit observation

Processes for removal or breakage of seals were reviewed. I checked five recent examples.

### Audit commentary

When fault work is required during normal business hours, the normal process is that the trader's contractor conducts the necessary work, which may involve bridging of load control switches. Unison may be requested to conduct this work after hours, and as they fit their own seals, then notification is provided to the trader so they can arrange for the MEP to complete remedial actions and re-certify if required.

Whilst this is a long-standing process and appears to be an effective way of dealing with fault work, the Code now has additional requirements which are not met by this process. These requirements are:

- to have a process for tracing the new seal to the person fitting the seal - seal details are not currently recorded in the metering report, and
- to notify the MEP and the trader - the trader is notified but the MEP is not notified.

Unison is considering how the new requirements are best managed without adding cost and complication to the after-hours fault process.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.3 With: Clause 48(1A) and 48(1B) of Schedule 10.7 From: 01-Feb-21 To: 06-Feb-23	Seal information is not recorded and is not traceable to the person fitting the seal. MEPs are not notified when seals are broken. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because control devices are sealed, and notification is provided to the MEP via the trader.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not applicable		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will work on a way of keeping records of the seals which are broken. We will review our process of notifying the trader with a view to notifying the MEP also.		Within the next 3 months.	

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

##### Code reference

Clause 11.30A

##### Code related audit information

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

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

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

##### Audit observation

I checked all relevant communication methods to ensure compliance is achieved.

### Audit commentary

The website contains a page with the Utilities Disputes contact details. This page is accessed from a link on the home page.

Outbound email and addressed communications to consumers were checked and contained appropriate details.

The IVR messages contains reference to Utilities Disputes as expected.

The management of the Facebook and chat enquiries has recently moved to Customer Experience team. The Utilities Disputes service has not been promoted via this channel. This was added to all communications received via this channel during the audit.

### Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11.30A  From: 07-Sep-21 To: 01-Feb-23	Utilities Disputes service information not provided via Facebook messenger. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as this has been corrected. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
UDL service information is now present in automated response on Facebook Messenger.	04/07/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Not applicable	Not applicable	

### 3. CREATION OF ICPS

#### 3.1. Distributors must create ICPS (Clause 11.4)

##### Code reference

Clause 11.4

##### Code related audit information

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

##### Audit observation

The new connection process was examined in detail and is described in **section 3.2**.

A diverse characteristics sample of 30 new connection applications of the 2,397 created since 6 September 2021 were checked from the point of application through to when the ICPS were created.

##### Audit commentary

Unison creates ICPS as required by clause 1 of schedule 11.1.

##### Audit outcome

Compliant

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

##### Code reference

Clause 11.5(3)

##### Code related audit information

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

##### Audit observation

The new connection process was examined in detail. A diverse characteristics sample of 30 new connection applications of the 2,397 ICPS created since 6 September 2021 were checked from the point of application through to when the ICPS were created.

##### Audit commentary

The new connection process is unchanged since the last audit. Unison receives all applications for new connections from customers or their agents. All applications are completed online and are received via a dedicated inbox. Upon receipt of the application, it is reviewed and then forwarded to the nominated trader to accept the nomination. Once the application is processed, all associated documentation to the relevant ICP is held in Gentrack. Gentrack will not allow ICPS with duplicate addresses to be created. However, as noted in **section 4.4**, some duplicate addresses have been created as a property name was added which prevents Gentrack seeing these as duplicates. I have recommended an additional check to prevent this happening.

ICPs are created at the “ready” status unless there is network extension required. In these cases, they are created at the “new” status. The ICPs are not created until all the relevant details have been provided. New ICPs are electrically connected by a Unison approved connection agent engaged by the trader. Unison issues an authority to electrically connect the ICP to the agent, and a "certificate of livening" is returned to Unison by the livening agent. One instance of a temporary electrical connection was identified in **section 3.11**, where it appears that the MEP has not requested authority to temporarily electrically connect an ICP. Unison may want to follow up with the trader to ensure that the correct process is followed.

If an ICP cannot be created within three days of the request from a trader being received an email is sent advising of the reason for the delay.

I checked the records for 30 new connections. Only one was requested by a trader and the ICP was provided within three days of the request. All other applications were requested by the customer, or their agent and communication was provided if the ICP was not able to be provided within three business days.

One LE ICP was requested for the connection of an embedded network. The ICP was not created within three days of the request. These requests are infrequent, and the LE ICP creation process is unclear, especially in relation to who is communicated to. I recommend that this process is reviewed.

Description	Recommendation	Audited party comment	Remedial action
Distributor must create ICPs	Review the LE ICP creation process.	Recommendation noted – Unison will review this process.	Identified

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 11.5(3)  From: 16-Dec-21 To: 20-May-22	One LE ICP not created or reason for delay not communicated within three business days. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as strong overall as the process for standard ICP creation is well established and LE ICP requests are rare.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not Applicable		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Review LE ICP creation process, particularly in relation to who is contacted during the process.		Within the next 3 months.	

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

#### Code reference

Clause 11.7

#### Code related audit information

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

#### Audit observation

A diverse characteristics sample of 30 new connection applications of the 2,397 ICPs created since 6 September 2021 were checked from the point of application through to when the ICP was created, to confirm the process and controls worked in practice.

#### Audit commentary

The new connection application form is online and includes all the relevant fields to populate the registry including unmetered load details.

A review of the sample of new connections confirmed that the ICP information provided to the registry by Unison was complete, including unmetered load details.

#### Audit outcome

Compliant

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

#### Code reference

Clause 7(2) of Schedule 11.1

#### Code related audit information

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

#### Audit observation

The combined audit compliance report from 6 September 2021 to 1 February 2023 was examined to determine the timeliness of the provision of ICP information for new connections.

#### Audit commentary

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

2,401 ICPs were created since 6 September 2021. Of those, 1,826 have been completed and connected. I reviewed these completed new connections to identify ICPs where information was provided late. The audit compliance report identified two ICPs where the status change to “ready” occurred later than the electrical connection date:

ICP	Ready input date	Electrical connection date	Comments
0000053733HB147	4 November 2022	2 November 2022	The ICP was created at “new” to allow the MEP to issue CTs (the MEPs internal process requires an ICP to issue CTs). The ICP was then electrically connected without Unison’s knowledge or approval.
0000051975HB726	8 March 2022	3 March 2022	This was due to human error as the agent exited the ICP creation process prior to the pricing section being completed causing this ICP not be moved to “ready” as expected.

Unison has strong controls in place to ensure the new connections process operates as expected. They use a wizard in Gentrack that steps the agent through the creation process, and this ensures that all the required information is populated. This represents a 0.1% error rate.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 07-Sep-21 To: 01-Feb-23	Registry not updated prior to commencement of trading for two ICPs. 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 as there are robust controls in place. The audit risk rating is low as this affected only two ICPs and both were remedied as soon as they were brought to Unison's attention. .		
Actions taken to resolve the issue		Completion date	Remedial action status
We will request our authorised contractors to ensure that they are only living as per the authorisation at their next review.		Normally within the next two months	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

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

#### Code reference

*Clause 7(2A) of Schedule 11.1*

#### Code related audit information

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

#### Audit observation

The event detail report, combined audit compliance reports and the registry list for 6 September 2021 to 1 February 2023 were examined to determine the timeliness and accuracy of initial electrical connection dates for the 1,826 completed new connections. The 11 updates over 20 days were checked to determine the reasons for the delay.

The audit compliance report was checked for ICPs with an initial electrical connection date populated, where the status was not "active".



### Audit commentary

Unison expects a “certificate of livening” to be returned to them by the livening agent for each new connection. Once this is received the registry is updated. They also monitor the registry for any “active” status updates and there is an additional check as part of the registry discrepancy process.

1,826 new connections were completed. The audit compliance report recorded 87 late updates. 52 updates were over 20 days. The eight latest were incorrectly recorded in this report as these were NSP changes and not initial electrical connection date updates. I checked the next five latest and the five most recent late updates and found:

- the five latest were all corrections to the initial electrical connection date; all were updated as soon as Unison were made aware that the initial date populated was incorrect, and
- of the five most recent four were due to the company shut down over Christmas and one was a correction.

I checked all currently active ICPs created since the requirement to record an initial electrical connection date was introduced, and found they had all had initial electrical connection dates recorded.

The audit compliance report identified two ICPs where an initial electrical connection date populated, where the status was not “active”. Both ICPs have been updated to active by the trader for the same initial electrical connection date.

### Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 08-Sep-21 To: 01-Feb-23	Late population of the initial electrical connection date for 87 ICPs (5%). Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as there are robust controls in place to ensure these are populated on time and correctly. The potential impact is low as the number of late updates is low as proportion of the total ICPs electrically connected.	
Actions taken to resolve the issue		Completion date
We will reinforce with the livening agents the importance of providing the appropriate paperwork in a timely fashion. .		Normally within the next two months
Preventative actions taken to ensure no further issues will occur		Completion date
As above		As above
		Remedial action status
		Identified

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

#### Code reference

Clause 11.17

#### Code related audit information

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

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

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

#### Audit observation

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

The event detail file and registry list were examined to determine compliance.

#### Audit commentary

The new connection process requires applications for new connections to be submitted by traders.

Review of the registry list confirmed that a trader is currently recorded for all active and inactive ICPs, and no shared unmetered load is recorded on Unison's network.

I reviewed the 1,826 completed new connections and all ICPs had a proposed trader populated prior to connection.

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.31

#### Code related audit information

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

#### Audit observation

The new connection process was examined in **section 3.2**. A diverse characteristics sample of 30 new connection applications of the 1,826 created and completed new connections since 6 February 2021 were checked to determine if the ICPs were connected at the request of the trader.

#### Audit commentary

The new connection process requires acceptance of applications for new connections from traders prior to the creation of the ICP.

I checked a diverse sample of 30 ICPs and confirmed trader approval was obtained prior to the initial electrical connection date.

### Audit outcome

Compliant

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

### Code reference

Clause 10.30

### Code related audit information

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

*The distributor must, within five business days of connecting the NSP that is not a point of connection to the grid, advise the reconciliation manager of the following in the prescribed form:*

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

### Audit observation

The NSP table was reviewed.

### Audit commentary

No new NSPs were created by Unison during the audit period.

### Audit outcome

Compliant

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

### Code reference

Clause 10.30A and 10.30B

### Code related audit information

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

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

*A distributor may only electrically connect an NSP if:*

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

### Audit observation

The NSP table was reviewed.

### Audit commentary

No new NSPs were created by Unison during the audit period.

### Audit outcome

Compliant

## 3.10. Definition of ICP identifier (Clause 1(1) Schedule 11.1)

### Code reference

*Clause 1(1) Schedule 11.1*

### Code related audit information

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

*xxxxxxxxxxxccc where:*

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

### Audit observation

The process for the creation of ICPs was examined.

### Audit commentary

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

### Audit outcome

Compliant

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

### Code reference

*Clause 10.31A*

### Code related audit information

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

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

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

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

### Audit observation

The new connection process was examined in **section 3.2**. The event detail file, registry list and the audit compliance reporting for 6 September 2021 to 1 February 2023 were examined to determine compliance.

### Audit commentary

An ICP will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP. Any ICPs that are temporarily electrically connected follow the same process as all other new connections. The date of temporarily electrical connection should be recorded as the initial electrical connection date on the registry.

The audit compliance report identified 12 ICPs where the meter certification date was earlier than the initial electrical connection date. These were examined and found:

- that the livening paperwork confirmed that Unison's initial electrical connection date was correct in ten instances; seven of these are on the same site and the metering agent and livening agent were the same party in all instances - the trader has corrected their "active" dates to match Unisons and the metering certification dates are incorrect in these instances,
- the livening paperwork provided for ICP 0000053282HBAB5 was incorrect and Unison have amended the electrical connection date to match the meter certification and first active date; this is recorded as non-compliance in **section 4.6**, and
- ICP 0000052993HR656 has a meter certification date of 15 September 2022, the trader has made it "active" from 30 November 2022 and the initial connection date is recorded as 14 November 2022; I reviewed the livening paperwork received by Unison and confirmed the 14 November 2022 date so I requested the metering certification paperwork, which confirmed that the meter was certified on 15 September 2022 - this is being investigated by Unison to confirm when the ICP was first electrically connected.

Unison has not temporarily electrically connected any ICPs during the audit period. As detailed in **section 3.11**, it appears that the MEP has not requested authority to temporarily electrically connect an ICP. Unison may want to follow up with the trader to ensure that the correct process is followed.

### Audit outcome

Compliant

## 3.12. Loss category (Clause 6 Schedule 11.1)

### Code reference

*Clause 6 Schedule 11.1*

### Code related audit information

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

### Audit observation

The process of allocation of the loss category was examined.

The list file as of 3 February 2023 was examined to confirm all active ICPs have a single loss category code.

### Audit commentary

Loss factors are determined from the information provided on application for a new connection.

The registry list was examined and all active and inactive ICPs have a single loss category code. Each loss category code clearly identifies the relevant loss factor.

### Audit outcome

Compliant

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

#### Code reference

Clause 13 Schedule 11.1

#### Code related audit information

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

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

#### Audit observation

The ICP creation process was reviewed. The registry list for 1 February 2023 was examined to determine compliance.

#### Audit commentary

Unison creates all ICPs at “ready”, unless they know a network extension is needed.

Five ICPs had the “new” status recorded. These were examined and found:

- one is now active,
- one has been claimed and is a new connection in progress,
- one has been made ready, and
- two ICPs (0000054520HB94D and 0000054521HB508) are correctly at “new”.

Monitoring of ICPs with the “new” and “ready” status is discussed below in **section 3.14**.

#### Audit outcome

Compliant

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

#### Code reference

Clause 15 Schedule 11.1

#### Code related audit information

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

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

#### Audit observation

The process to monitor ICPs at “new” and “ready” status was reviewed. The audit compliance report for 6 September 2021 to 1 February 2023 was examined to determine compliance.

All ICPs with “new” or “ready” status for more than 24 months were investigated to confirm whether the correct status was applied, and whether compliance is achieved.

### Audit commentary

ICPs at the “new” and “ready” statuses are checked periodically and an email is sent to each trader to request confirmation the ICP is still required.

Examination of the registry list found:

Status	Number of ICPs at status as of 1 February 2023	Number of ICPs at status for more than 12 months	Number of ICPs at status for more than 24 months
New (999,0)	5	-	-
Ready (0,0)	344	49	44

An extreme sample of the ten oldest ICPs at “ready” status for more than 24 months were checked. The oldest creation date was 21 February 2018 and I found none have been contacted within the last year to confirm if these are still required. The recent Cyclone Gabrielle has further delayed these checks being completed. The sample checked have now been followed up and this found four were duplicate ICPs as the use of the property name field didn’t identify that an ICP had already been created. These have been decommissioned set up in error. I recommend in **section 4.4** that an additional check be added prior to the creation of an ICP to prevent duplicates being created.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.14 With: Clause 15 of Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	ICPs at “new” or “ready” for 24 months not confirmed as required in all instances. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong as the process is robust but hasn’t been able to be actioned due to mitigating circumstances. The potential impact is assessed to be low as the number of ICPs that have been at “new” and “ready” for 24 months is relatively low.		
Actions taken to resolve the issue		Completion date	Remedial action status
These were corrected with the necessary changes made. Additional resources have been made available to support this activity.		28/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional checks will be implemented in the process.		Within the next 2 months	

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

#### Code reference

Clause 7(6) Schedule 11.1

#### Code related audit information

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

- The loss category code must be unique; and
- The distributor must provide the following to the reconciliation manager:
  - o the unique loss category code assigned to the ICP,
  - o the ICP identifier of the ICP,
  - o the NSP identifier of the NSP to which the ICP is connected,
  - o the plant name of the embedded generating station.

#### Audit observation

The registry list for 1 February 2023 was examined to determine compliance.

#### Audit commentary

No new embedded generation stations with capacity greater than 10 MW were connected during the audit period.

Unison supplies two embedded generation stations with a capacity of 10 MW or more. Both have individual loss categories, which were not assigned to any other ICPs during the period.

ICP	Generation start date	Loss Category
0000018218HRB13	21 August 2009	CBTPO
0000962306TU084	1 April 2007	RKTPO

#### Audit outcome

Compliant

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

#### Code reference

Clause 10.33A(4)

#### Code related audit information

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

#### Audit observation

Sub-clause (4) states that no participant may electrically connect a point of connection without the permission of the Reconciliation Participant. The electrical connection of streetlight circuits, which are a point of connection, was examined.



### Audit commentary

The connection of streetlight circuits was discussed. Unison requires the new connection process to be used for newly electrically connected streetlight circuits. The process identifies the relevant ICP and includes approval from the trader. I checked a recent example to confirm the process was robust and was used correctly. The notification to the relevant parties, once these are electrically connected, is discussed in **section 4.6**.

### Audit outcome

Compliant

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

### Code reference

*Clause 10.30C and 10.31C*

### Code related audit information

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

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

### Audit observation

The disconnection process was examined.

### Audit commentary

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

### Audit outcome

Compliant

## 3.18. Meter bridging (Clause 10.33C)

### Code reference

*Clause 10.33C*

### Code related audit information

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

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

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

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

### Audit observation

Processes for meter bridging were reviewed. Two recent examples were checked.

### **Audit commentary**

Unison bridge meters very rarely and only after all the conditions detailed above are met. In the rare instance when this occurs, the trader is advised of the bridging via email with all the relevant details as part of the work being closed out. In both cases checked, the meters were faulty and were bridged to ensure consumers were not disadvantaged. Traders were notified the next day.

### **Audit outcome**

Compliant

## 4. MAINTENANCE OF REGISTRY INFORMATION

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

#### Code reference

*Clause 8 Schedule 11.1*

#### Code related audit information

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

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

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

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

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

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

#### Audit observation

The management of registry updates was reviewed.

The event detail report and combined audit compliance reports for 6 September 2021 to 1 February 2023 were reviewed to determine compliance. A diverse sample of 77 backdated events were reviewed to determine the reasons for the late updates.

#### Audit commentary

Changes to the registry are completed in Gentrack and are written to the registry via a batch process each day. Wizards are used to step the agents through the required fields and ensure the correct fields are entered.

The event detail reports were examined to identify backdated event updates. I have added a table below that details the quantity and compliance of the registry updates:

Update	Date	Late	% Compliant	Average days
Address	2021	3	99.95%	-
	<b>2023</b>	<b>10,016</b>	<b>51.51</b>	<b>4.47</b>
Price codes	2021	6,234	27%	-
	<b>2023</b>	<b>6,343</b>	<b>88.55%</b>	-
Status	2021	40	92.98%	2.21
	<b>2023</b>	<b>73</b>	<b>78.57%</b>	<b>2.79</b>
Network (excl. new connection & Distributed Generation)	2021	3	N/A	-
	<b>2023</b>	<b>7</b>	<b>N/A</b>	<b>32</b>
Distributed Generation	2021	26	97.64%	0.55
	<b>2023</b>	<b>14</b>	<b>98.83%</b>	<b>0.73</b>
NSP changes	2021	0	100%	-
	<b>2023</b>	<b>12,619</b>	<b>N/A</b>	-

#### Address events

The increase in the number of late address updates was due to a bulk update to 10,014 addresses that were backdated nine days. A typical sample of five ICPs were checked. All related to GPS co-ordinate changes. The late updates were caused by a known Gentrack issue. It appears that the file creation process has changed unexpectedly. Files of updates to Gentrack are created with a maximum of 200 records. If there are more than 200 records to be sent on a day another file is created. Now, no more than nine files of 200 records (1,800 records) can be sent on a day. This file limitation caused the large volume of late address changes. An IT ticket has been raised with Gentrack to investigate and resolve.

#### Pricing events

The code was changed on 30 November 2021. From this date distributors can backdate price code changes more than three days from the event date if agreed with the trader. These updates must be made within three days from the date the change is agreed with the trader.

55,433 pricing updates were identified. 6,343 of these were updated more than three business days after the event. Of these 774 were made prior to the code change and are therefore non-compliant.

The remaining 5,569 pricing updates were made post the code change. I checked a sample of 20 ICPs. Ten were an extreme sample and the other ten were a typical sample. This found all were backdated in agreement with the trader and are compliant.

#### **Status events**

Unison is notified of ICPs ready for decommissioning via requests received from traders. This is now submitted to Unison via an electronic form. The work is then issued to an approved contractor. Once the paperwork has been received back from the contractor, Unison requests the trader to move the ICP to “inactive - ready for decommissioning” status and will decommission the ICP once it is at that status. Unison expects traders to notify them once the status has been changed. They also monitor ICPs being moved to the “inactive - ready for decommissioning” status and follow up with the trader if an ICP is moved to this status and no request to decommission has been received.

There has been an increase in the number of backdated decommission status updates. The average time cycle time is similar to the last audit findings. I checked a sample of 20 ICPs. Ten were an extreme sample and the other ten were a typical sample. This found:

- eight were updated late due to the Christmas shut down,
- eight were due to late notification from the field,
- two were missed from the report due to human error, and
- two were delayed due to waiting for a subsequent event made by another participant to be reversed before Unison could action the status event update.

#### **Network events (excluding new connections, NSP changes & Distributed Generation)**

There were seven late network events, excluding the population of the initial electrical connection date, NSP and DG changes. These were the removal of unmetered load details for under verandah lights. Unison owned these assets, and they were wired into the streetlight circuit and were recorded as standard unmetered load against the shop ICP. These lights have been removed from the streetlight circuit and are now either disconnected or have been wired into the metered shop. These were backdated in agreement with the trader to align with the date of the field work being completed.

#### **Network events (Distributed Generation only)**

The distributed generation process is described in **section 4.6**.

I checked a typical sample of five late update and found:

- two (ICPs 0000649626HB867 and 0000031019HB099) were due to the incorrect year being entered and have been corrected,
- two were due to the initial electrical connection date event stripping out the distributed generation event and these had to be repopulated; this occurs if the distributed generation is installed at the same time as the electrical connection - I recommend that the wizard used to load the initial electrical connection date is reviewed so that if distributed generation is already present that these details are included in the update, and
- ICP 0001413475HB5FD was affected by the file upload limitation described in the address updates and was uploaded as soon as it was identified.

Description	Recommendation	Audited party comment	Remedial action
Population of initial electrical connection dates	Review the wizard used to populate the initial electrical connection date to include the distributed generation details if present at the time of electrical connection.	We are aware of this issue and will create a job for IT to look into fixing wizard.	Identified

**Change of NSP**

Reporting is in place for NSP changes, which shows differences between the “advanced data management system” and Gentrack. This reporting shows the number of days the difference is present to ensure registry updates occur on time.

This audit found 12,619 late NSP changes. A typical sample of 20 late NSP changes were reviewed and found all were caused by the same known file limitation issue described in the address update and caused the large volume of NSP changes to be sent late to the registry.

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 06-Sep-21 To: 01-Feb-23	10,016 late address updates. 774 late price updates. 73 late decommissioning status updates. Seven late network event updates. 14 late distributed generation updates. 12,619 late NSP changes. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as weak as the Gentrack issue where the file upload size is limited is causing delays in bulk updates getting to the registry. The impact on settlement and participants has a potential to be medium but is rated as low as NSP changes are generally within in the same balancing area.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not applicable		Not applicable	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Create a job with Information Technology to investigate the issue with Gentrack Wizard.		Within the next 2 months.	

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

##### Code reference

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

##### Code related audit information

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

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

##### Audit observation

The process to determine the correct NSP was examined. The audit compliance report was checked, and 54 outliers were checked where the other ICPs on the same road were recorded against a different NSP.

### Audit commentary

As reported in the last audit, each ICP application is checked in the GIS and the correct transformer is selected in Gentrack based on the geographical connection point. Sometimes transformers are not set up in Gentrack and the incorrect transformer is therefore selected. There is a known issue with how the two Rotorua GXPs are mapped in the ADMS system. This is the system that the Control Room uses which in turn populates the GIS system and this is where the connectivity comes from. This only affects new ICPs being created against some transformers. Unison believe they have identified a solution that will ensure that the correct NSP is assigned going forward.

I compared the list of 54 potential discrepancies against the findings from the last audit and I eliminated 40 ICPs, leaving 14 to be checked. Ten were confirmed as being on the correct NSP. The remaining four were on the Rotorua NSPs and have been corrected. The NSPs are in the same balancing area so this has no direct impact on reconciliation.

### Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	Four ICPs with an incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate but are expected to move to strong once the mapping issue for new ICPs in Rotorua is resolved. The audit risk rating is low as only four ICPs were found to be mis-mapped and none were in the incorrect balancing areas.	
Actions taken to resolve the issue	Completion date	Remedial action status
All the incorrect entries have now been corrected	28/07/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with our IT department to resolve issues going forward.	Not applicable	



#### 4.3. Customer queries about ICP (Clause 11.31)

##### **Code reference**

*Clause 11.31*

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

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

##### **Audit observation**

The management of customer queries was examined.

##### **Audit commentary**

Unison seldom receives direct requests for ICP identifiers. ICP identifiers can be provided immediately on request once the address has been confirmed.

##### **Audit outcome**

Compliant

#### 4.4. ICP location address (Clause 2 Schedule 11.1)

##### **Code reference**

*Clause 2 Schedule 11.1*

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

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

##### **Audit observation**

The process to determine correct and unique addresses was examined. The registry list as of 1 February 2023 was reviewed to determine compliance for all active and inactive ICPs.

## Audit commentary

### Duplicate addresses

A check is performed in GIS and Gentrack to confirm that duplicate ICPs are not created. As detailed in **section 3.14**, three of the ten ICPs at “new” and “ready” for more than 24 months were found to be duplicated. This has occurred due to the addition of property descriptions which prevented Gentrack from recognising these as duplicates:

Property Description	Address	ICP	Status
BTS	147A Meeanee Road, Meeanee	0000043989HBF8E	Ready
	147A Meeanee Road, Meeanee	0000043990HBB72	Active
BTS	60 Sunnex Road, Kaharoa	0000051503HR75D	Active
	60 Sunnex Road, Kaharoa	0000044581HRD53	Ready
Lot 2	15A Grey Street, Glenholme	0000050398HR1C8	Active
	15A Grey Street, Glenholme	0000046225HR804	Ready

The duplicate ICPs have been “decommissioned - set up in error”. I recommend that all new ICP address checks are done without property descriptions in the first instance.

Description	Recommendation	Audited party comment	Remedial action
ICP Location address	Check addresses without property details such as Lot number or BTS included to prevent duplicate ICPs being created.	Will check addresses for a double up and will not use a property description going forward.	Identified

Analysis of the registry list did not identify any active ICPs with duplicate addresses.

### Not readily locatable

119 ICPs do not have GPS coordinates. All had sufficient address details to be readily locatable.

## Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 07-Sep-21 To: 01-Feb-23	Six ICPs with duplicate addresses. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as there is room for improvement with the ICP creation process. The audit risk rating is low as no active ICPs were found with duplicate addresses.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICP's that have been created as double up have been deleted on the Registry with the Status – Deleted as account set up in error.		28/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Questions will need to be asked of the customer or Electrician if an application is submitted for a connection at the same address of an ICP that has already been created as to whether it is a duplicate or if it is for a different lot at the same address. Checks are being conducted across 2 teams before ICP is created.		Ongoing task.	

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

##### Code reference

Clause 3 Schedule 11.1

##### Code related audit information

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

##### Audit observation

The management of this process was discussed.

##### Audit commentary

For new connections, this clause is well understood and there are no shared service mains on the Unison network.

## Audit outcome

Compliant

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

#### Code reference

Clause 7(1) Schedule 11.1

#### Code related audit information

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

- the location address of the ICP identifier (Clause 7(1)(a) of Schedule 11.1)
- the NSP identifier of the NSP to which the ICP is usually connected (Clause 7(1)(b) of Schedule 11.1)
- the installation type code assigned to the ICP (Clause 7(1)(c) of Schedule 11.1)
- the reconciliation type code assigned to the ICP (Clause 7(1)(d) of Schedule 11.1)
- the loss category code and loss factors for each loss category code assigned to the ICP (Clause 7(1)(e) of Schedule 11.1)
- if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (Clause 7(1)(f) of Schedule 11.1):
  - a) the unique loss category code assigned to the ICP,
  - b) the ICP identifier of the ICP,
  - c) the NSP identifier of the NSP to which the ICP is connected,
  - d) the plant name of the embedded generating station,
- the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (Clause 7(1)(g) of Schedule 11.1)
- if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (Clause 7(1)(h) of Schedule 11.1):
  - a) a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity,
  - b) a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period,
  - c) if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-
    - (i) no capacity value recorded in the registry field for the chargeable capacity; and
    - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded,
  - d) if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-
    - (i) the annual capacity value recorded in the registry field for the chargeable capacity; and
    - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded,

- e) *the actual chargeable capacity of the ICP in any other case,*
- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (Clause 7(1)(i) of Schedule 11.1),*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (Clause 7(1)(j) of Schedule 11.1),*
- *the status of the ICP (Clause 7(1)(k) of Schedule 11.1),*
- *designation of the ICP as "Dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under Clause 7(1)(b) of Schedule 11.1, or the ICP is a point of connection between a network and an embedded network (Clause 7(1)(l) of Schedule 11.1),*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (Clause 7(1)(m) of Schedule 11.1),*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (Clause 7(1)(n) of Schedule 11.1),*
- *if the ICP is capable of generating into the distributors network (Clause 7(1)(o) of Schedule 11.1):*
  - a) *the nameplate capacity of the generator; and*
  - b) *the fuel type,*
- *the initial electrical connection date of the ICP (Clause 7(1)(p) of Schedule 11.1).*

#### **Audit observation**

The management of registry information was reviewed. The registry list as of 1 February 2023 was reviewed to determine compliance.

A typical sample of data discrepancies were checked.

#### **Audit commentary**

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

#### **NSPs**

Assignment of NSPs was reviewed in **section 4.2**.

#### **Installation type and generation details**

The distributed generation process has not changed during the audit period. Unison requires an application from any customers wanting to connect distributed generation. The application has a proposed connection date, which is entered into Gentrack. This is updated to the registry once the expected installation date has passed. Once installation is complete, Unison receives paperwork back from the field and Gentrack is expected to be updated if the date is different to that proposed. As noted in **section 4.1**, paperwork can be slow in being returned. Unison runs a monthly check of all ICPs that have a distributed generation profile where Unison has no distributed generation recorded. Additional to this the EIEP files are monitored to identify any ICPs where generation is recorded but where Unison has no distributed generation is recorded. All such instances are investigated. All pending applications are managed on an aging basis to ensure these are being updated as soon as possible.

Analysis of the registry list confirmed there are 3,476 ICPs with generation capacity recorded, an increase from the 2,456 recorded in the last audit. All ICPs with generation capacity have a fuel type and installation type of “B” or “G” recorded on the registry.

There were 21 ICPs with a generation profile and no generation capacity recorded by Unison; these were examined, and found:

- solar applications have not been received for eight ICPs and the EIEP files do not indicate generation is present,
- seven ICPs have had their solar installations removed,
- four have since had their solar installations installed and details have been added,
- ICP 0000104890HB9EF solar installation was cancelled, and
- ICP 0000029588HB3DF has no grid connected generation. They have only solar for hot water.

The list file was analysed and identified 404 ICPs where Unison has distributed generation recorded, but the trader’s profile does not indicate that distributed generation is present. 302 of these ICPs are with Mercury Energy. It was identified in the latest Mercury Energy reconciliation participant audit for those with the MEEN participant code that the profile is incorrectly recorded as RPS. A sample of the ten most recent ten ICPs of the remaining 102 ICPs were examined and found:

- distributed generation was confirmed as being installed for nine ICPs, and
- ICP 0000053632HB406 does not yet have the distributed generation installed but as Unison load these to Gentrack with an expected installation date this sends to the registry once the installation date has passed; if this is delayed, then the details will incorrectly be loaded in the registry so I recommend that the audit compliance reporting is reviewed periodically to identify these instances and the details are removed from the registry and loaded once distributed generation is installed.

Description	Recommendation	Audited party comment	Remedial action
Distributed generation details	Check audit compliance reporting (AC020) to identify any distributed generation that has yet to be installed but has been populated to the registry.	Reporting will be done on a regular basis to identify any errors or exceptions.	Identified

**Unmetered load**

Part 11 states the distributors must provide unmetered load type and capacity of the unmetered load to the registry “if known”.

Review of the registry list identified 32 active ICPs with unmetered load recorded by the trader and no unmetered load recorded by Unison, a decrease from 173 identified during the previous audit. These are all historic. Unison is populating these in the recommended format if the load can be confirmed.

For all active ICPs with unmetered load recorded by Unison, the trader also has unmetered load details populated.

I checked the accuracy of the unmetered load details recorded by Unison against the trader’s unmetered load details for the 879 ICPs where Unison’s field was populated in the recommended format.

12 ICPs had a difference greater than  $\pm 0.1$  kWh. These were all checked and found:

- seven require further investigation as the wattage or burn hours vary between the trader and Unison's figures,
- Unison's figure was correct for four ICPs, and
- two ICPs (0000370012TU028 and 0005000846HB39C) had the incorrect details and are being corrected.

#### DUML

As detailed in **section 3.16**, new streetlight connections require an application to Unison to connect new load. The bucket ICP is required to be provided as part of this application. The trader is requested to accept the new load. The notification when the load is electrically connected is not always reaching the correct party and I recommend that this process is reviewed.

Description	Recommendation	Audited party comment	Remedial action
Electrical connection of new streetlights	Review process of notification of electrical connection of new streetlights.	Process will be reviewed pertaining to communication with parties involved.	Identified

DUML audits for streetlight databases on Unison's network were reviewed to determine whether there were any issues relating to distributor unmetered load records as detailed below.

Database	Last audit date	Comment
Taupo District Council	1 April 2022	Recommendation was made process of notification of new streetlights being electrically being connected be reviewed - detailed above.
Hastings District Council	31 August 2022	No issues noted.
Waka Kotahi Hawkes Bay	12 May 2022	No issues noted.
Napier City Council	10 March 2023	113 of the lights are in rest homes, council flats or commercial premises and could be the responsibility of the owner of the customer network, depending on how they are connected. If they are connected to a customer network, then there is an issue with how these are recorded as they are not connected to Unison network so cannot be created as unmetered load and do not belong to the council. This has been raised as issue below.  Compliance is recorded for Unison.
Rotorua Lakes District Council	20 December 2020	No issues noted.
Tauranga City Council Parks and Reserves	25 May 2022	No issues noted.

The issue of streetlight load connected to customer networks is still to be resolved. I raise it as an issue for the Electricity Authority to provide direction on how these are to be managed:

Issue	Description	Audited party comment	Auditor comment
Streetlights connected to customer networks	Streetlights that are not connected to Unison network cannot be created as unmetered load and do not belong to the council so there is currently no way to record and reconcile these loads.	Awaiting response from EA on how to proceed with these.	With the EA to provide direction.

### Initial Electrical Connection date

The importance of this information has been communicated to Unison' approved livening agents as part of regular roadshows.

The audit compliance report identified 60 ICPs with discrepancies between the initial electrical connection date and trader active date or metering certification. These were examined and found:

Exception	Qty	Qty incorrect	Comment
IECD = active date and IECD ≠ MCD	27	1	11 if these ICPs are potentially temporarily electrically connected as the meter certification is earlier than the first active and initial electrical connection date. Unison's date was confirmed in as correct for ten of these. ICP 0000053282HBAB5 had the incorrect initial electrical connection date. This is being corrected.  I checked an extreme sample of ten of the remaining 16 ICPs and found the livening paperwork provided to Unison confirmed the date was correct.
IECD ≠ active date and IECD = MCD	5		I checked all five ICPs and found the livening paperwork provided to Unison confirmed the date was correct.
IECD ≠ active date and MCD	28	-	ICP 0000052993HR656 has a meter certification date that is earlier than the initial electrical connection date and is being investigated as detailed in <b>section 3.8</b> .  I checked an extreme sample of ten of the remaining 27 ICPs and found that livening paperwork provided to Unison confirmed the date was correct. The trader has taken the meter certification dates as the first active date incorrectly in these instances.
<b>Total</b>	<b>60</b>	<b>1</b>	<b>The exception was corrected as soon as it was identified during the audit.</b>

The list file was checked since part ten came into effect for any active ICPs that have no initial electrical connection date recorded. No examples were identified.

### Audit outcome

Non-compliant



Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1  From: 06-Sep-21 To: 01-Feb-23	One ICP with distributed generation recorded where none is present. Two ICPs with the incorrect unmetered load details recorded. One ICP with the incorrect initial electrical connection date recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate overall. The process to populate distributed generation with the expected connection date ensures these get to the registry on time but the correct event date is not recorded in all instances, and I recommend a process improvement above.  The impact on settlement and participants is assessed to be low as overall the information populated to the registry has a high level of accuracy.		
Actions taken to resolve the issue		Completion date	Remedial action status
Necessary changes were made for relevant ICPs.		28/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting regularly for distributed generation ICP's. Review processes regarding communication with customers and streetlighting, and external contractors as part of the new connection process.		Not applicable	

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

**Code reference**

*Clause 7(3) Schedule 11.1*

**Code related audit information**

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

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

### Audit observation

The management of registry information was reviewed. The event detail report and audit compliance report for 6 September 2021 to 1 February 2023 were reviewed to determine compliance.

### Audit commentary

The price category and chargeable capacity (if any) are known at the time of the ICP being created therefore these are recorded correctly in the first instance.

I reviewed all completed new connections in the audit compliance report and found all had a pricing category entered within ten days of being electrically connected.

### Audit outcome

Compliant

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

### Code reference

*Clause 7(8) and (9) Schedule 11.1*

### Code related audit information

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

### Audit observation

The registry list as of 1 February 2023 was reviewed to determine compliance. GPS coordinates were mapped for a sample of 50 ICPs to determine their accuracy.

### Audit commentary

All but 119 ICPs have GPS coordinates recorded. I checked a random sample of 50 active ICPs and confirmed they were accurate. ICP location address is discussed in **section 4.4**.

### Audit outcome

Compliant

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

### Code reference

*Clause 14 Schedule 11.1*

### Code related audit information

*The ICP status of "ready" must be managed by the distributor and indicates that:*

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

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

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

### Audit observation

The processes to manage the ready status were reviewed.

The registry list as of 1 February 2023 was reviewed to identify and check ICPs at the “ready” status. A diverse sample of ten ICPs at “ready” status were checked.

### Audit commentary

Unison creates all ICPs at the “ready” status, unless they know a network extension is needed.

The registry list showed 344 ICPs currently at “ready” status, 49 of those have been at “ready” status for more than two years and are discussed further in **section 3.14**. All had a single price category assigned and proposed trader identified.

### Audit outcome

Compliant

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

### Code reference

*Clause 16 Schedule 11.1*

### Code related audit information

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

### Audit observation

The registry list as of 1 February 2023 was reviewed to identify ICPs at distributor status. All ICPs with distributor status were reviewed.

### Audit commentary

Unison supplies three ICPs with distributor status; they are points of connection between the embedded networks and Unison’s network. All have an LE ICP recorded on the registry.

There is no shared unmetered load recorded in the registry.

### Audit outcome

Compliant

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

##### Code reference

Clause 20 Schedule 11.1

##### Code related audit information

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

*Decommissioning only occurs when:*

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

##### Audit observation

The registry list as of 3 February 2023 was reviewed to identify ICPs at “decommissioned” and “ready for decommissioning” status. All 22 ICPs at “ready for decommissioning”, and 16 “decommissioned” ICPs were checked.

##### Audit commentary

The decommissioning process is discussed in **section 4.1**. Reporting is in place to identify ICPs at the “inactive - ready to be decommissioned” status and this is checked regularly to identify any ICPs that traders have moved to this status but for which Unison have received no request.

The following table shows a breakdown of ICPs by year.

Ready for decommissioning since	ICP count
2015	2
2022	13
2023	7

Analysis of the 22 ICPs at the “ready for decommissioning” status found the following:

- 19 are now decommissioned,
- two are awaiting completion paperwork, and
- one has been returned to “active” by the trader.

Late updates to decommissioned status are recorded as non-compliance in **section 4.1**.

The code requires:

*Event dates should reflect the date from which the attribute values for the event apply.*

A sample of ten decommissioned ICPs were checked and found that the date of update was used as the date of decommissioning for six of the ten sampled. This is recorded as non-compliance.

##### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.11 With: Clause 20 Schedule 11.1  From: 06-Sep-21 To: 01-Feb-23	Six of sample of ten ICPs checked recorded with the incorrect decommission date.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate as there is room for improvement.  The impact is assessed to be low as this is information is post the ICP being traded so has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not applicable		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
More checks will be put in place to ensure the correct date is used. This has no direct impact on reconciliation. Mindful that Retailers also can contribute to a date discrepancy.		Within the next 2 months.	

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

##### Code reference

Clause 23 Schedule 11.1

##### Code related audit information

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

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

*A price category code takes effect on the specified date.*

##### Audit observation

The price category code table on the registry was examined.

##### Audit commentary

No new price category codes were created during the audit period.

##### Audit outcome

Compliant

## 5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

#### Code reference

Clause 21 Schedule 11.1

#### Code related audit information

*The distributor must keep the registry up to date with the loss category codes that may be assigned to ICPs on the distributor's network.*

*The distributor must specify the date on which each loss category code takes effect.*

*A loss category code takes effect on the specified date.*

#### Audit observation

The loss category code table on the registry was examined.

#### Audit commentary

No new loss category codes have been created during the audit period.

#### Audit outcome

Compliant

### 5.2. Updating loss factors (Clause 22 Schedule 11.1)

#### Code reference

Clause 22 Schedule 11.1

#### Code related audit information

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

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

#### Audit observation

The loss category code table on the registry was examined.

#### Audit commentary

The following loss category codes had their consumption loss factor adjusted effective from 1 April 2023:

- CBTPO,
- H3H,
- H3L,
- H3M,
- R3M,
- R3I
- R3L,
- R3M
- R3N, and
- RKTPO.

The generation loss factors were updated for R3N and RKTPO.

In all cases, notification was provided on 17 January 2023 and only one loss factor applied per month.

**Audit outcome**

Compliant

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

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

#### Code reference

*Clause 11.8 and Clause 25 Schedule 11.1*

#### Code related audit information

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

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

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

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

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

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

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

#### Audit observation

The NSP table was examined.

#### Audit commentary

No NSPs have been created or decommissioned during the audit period.

#### Audit outcome

Compliant



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

### Code reference

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

### Code related audit information

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

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

### Audit observation

The NSP table was reviewed.

### Audit commentary

No NSPs have been created or decommissioned during the audit period.

### Audit outcome

Compliant

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

### Code reference

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

### Code related audit information

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

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

### Audit observation

The NSP table was reviewed.

### Audit commentary

No balancing area changes have occurred during the audit period.

### Audit outcome

Compliant

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

##### Code reference

Clause 26(4) Schedule 11.1

##### Code related audit information

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

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

##### Audit observation

The NSP table was reviewed.

##### Audit commentary

Unison has not created any new embedded networks during the audit period.

##### Audit outcome

Compliant

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

##### Code reference

Clause 24(2) and (3) Schedule 11.1

##### Code related audit information

*The distributor must give written notice to the reconciliation manager of any change to balancing areas associated with an NSP supplying the distributor's network. The notification must specify the date and trading period from which the change takes effect and be given no later than 3 business days after the change takes effect.*

##### Audit observation

The NSP table was reviewed.

##### Audit commentary

No balancing area changes have occurred during the audit period for Unison's NSPs.

##### Audit outcome

Compliant

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

##### Code reference

Clause 27 Schedule 11.1

##### Code related audit information

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

##### Audit observation

The NSP table was reviewed.

##### Audit commentary

No existing ICPs became NSPs during the audit period.

##### Audit outcome

Compliant

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

##### Code reference

Clause 1 to 4 Schedule 11.2

##### Code related audit information

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

##### Audit observation

The NSP table was reviewed.

##### Audit commentary

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

##### Audit outcome

Compliant

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

##### Code reference

Clause 10.25(1) and 10.25(3)

##### Code related audit information

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

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

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

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

**Audit observation**

The NSP supply point table was examined, along with evidence of all updates made to the Reconciliation Manager via the portal.

**Audit commentary**

The NSP supply point table was reviewed, and it showed the following interconnection point certification expiry has not changed.

Distributor	NSP POC	Description	MEP	Old certification Expiry	New certification expiry
HAWK	ATI0112	ATIAMURI	MRPL	26 July 2023	-

The certification expiry date is correct.

**Audit outcome**

Compliant

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

**Code reference**

Clause 10.25(2)

**Code related audit information**

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

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

**Audit observation**

The NSP supply point table was reviewed.

**Audit commentary**

Unison have not connected any new NSPs during the audit period.

**Audit outcome**

Compliant

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

### Code reference

Clause 29 Schedule 11.1

### Code related audit information

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

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

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

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

### Audit observation

The NSP supply point table was reviewed.

### Audit commentary

Unison have not initiated any changes of network owner.

### Audit outcome

Compliant

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

### Code reference

Clause 10.22(1)(b)

### Code related audit information

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

### Audit observation

The NSP supply point table was reviewed.

### Audit commentary

There have been no changes to the MEP during the audit period.

### Audit outcome

Compliant

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

### Code reference

*Clauses 5 and 8 Schedule 11.2*

### Code related audit information

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

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

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

### Audit observation

The NSP supply point table was reviewed.

### Audit commentary

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

### Audit outcome

Compliant

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

### Code reference

*Clause 6 Schedule 11.2*

### Code related audit information

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

### Audit observation

The NSP supply point table was reviewed.

### Audit commentary

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

### Audit outcome

Compliant

## 7. MAINTENANCE OF SHARED UNMETERED LOAD

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

#### Code reference

*Clause 11.14(2) and (4)*

#### Code related audit information

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

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

#### Audit observation

The registry list as of 1 February 2023 was reviewed to identify any ICPs with shared unmetered load connected.

#### Audit commentary

A review of the registry list confirmed there is no shared unmetered load connected to any Unison ICP.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 11.14(5)*

#### Code related audit information

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

#### Audit observation

The registry list as of 1 February 2023 was reviewed to identify any ICPs with shared unmetered load connected.

#### Audit commentary

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

#### Audit outcome

Compliant

## 8. CALCULATION OF LOSS FACTORS

### 8.1. Creation of loss factors (Clause 11.2)

#### Code reference

Clause 11.2

#### Code related audit information

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

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

#### Audit observation

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

Unison provided their CM2002 Loss Factors Methodology and Disclosure document dated 31 January 2023. The loss factor table on the registry was reviewed.

#### Audit commentary

Unison provided their documented loss factor processes. These follow the “Guidelines on the calculation and the use of loss factors for reconciliation purposes v2.1”.

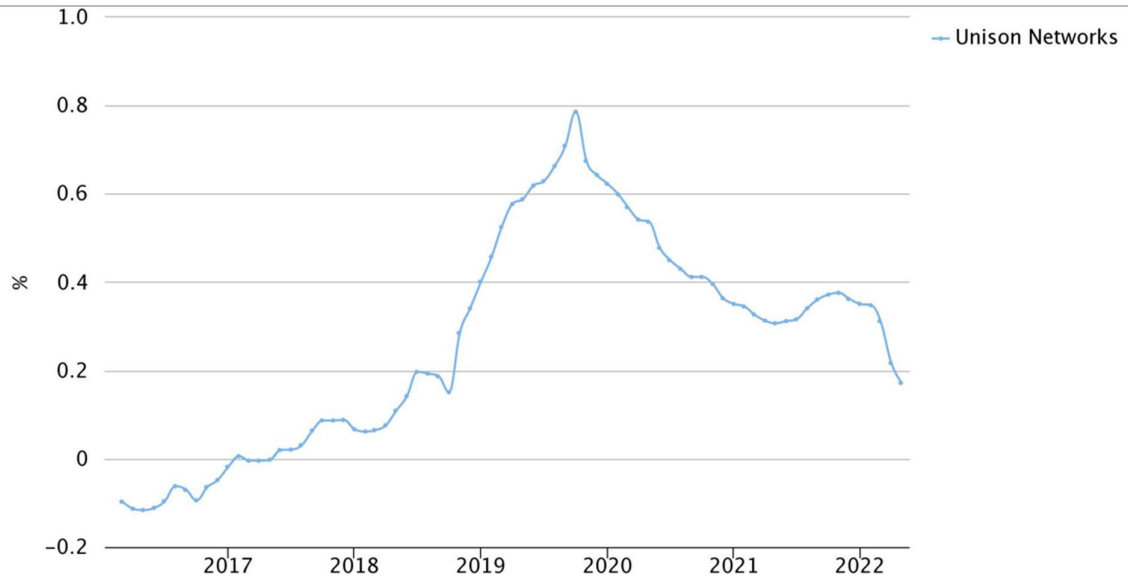
The following loss category codes had their consumption loss factor adjusted effective from 1 April 2023:

- CBTPO,
- H3H,
- H3L,
- H3M,
- R3M,
- R3I
- R3L,
- R3M
- R3N, and
- RKTPO.

The generation loss factors were updated for R3N and RKTPO.



The UFE graph below indicates losses are tracking within the +/- 1% threshold indicated in the guideline.



emi.ea.govt.nz/r/riz1b

**Audit outcome**

Compliant

## CONCLUSION

This audit was deferred due from May 2023 to August 2023 due to Cyclone Gabrielle. Unison's network was severely affected by this event and the recovery is ongoing. The audit period assessed covers from 6<sup>th</sup> September 2021 to 1<sup>st</sup> February 2023.

The audit found 12 non-compliances, makes five recommendations and raises one issue.

Unison's processes are well established, and controls overall are robust.

This audit found one known IT issue which is causing delays to bulk updates getting to the registry and has impacted the timeliness of updates. Unison have an IT ticket lodged with Gentrack to get this fixed. The issue raised in the last audit in relation to the NSP accuracy is close to being resolved. This affects only a very small number of ICPs in the Rotorua area.

Due to the impact of Cyclone Gabrielle, resources have been stretched and some non-essential tasks have had to be deferred e.g., the checking of ICPs at "new" and "ready" status. The team remains focussed on doing the best job possible despite the difficult circumstances.

The next audit frequency table indicates that the next audit be due in 12 months. I have considered this in conjunction with Unison's comments and agree with this recommendation.

## PARTICIPANT RESPONSE

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