

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

WAIKANAE ENE LIMITED (WENE)
NZBN: 9429047678293

Prepared by: Tara Gannon

Date audit commenced: 18 August 2023

Date audit report completed: 21 September 2023

Audit report due date: 25 September 2023

TABLE OF CONTENTS

Executive summary	4
Audit summary	5
Non-compliances	5
Recommendations	6
Issues	6
1. Administrative.....	7
1.1. Exemptions from Obligations to Comply with Code (Section 11).....	7
1.2. Structure of Organisation.....	7
1.3. Persons involved in this audit.....	7
1.4. Use of contractors (Clause 11.2A).....	8
1.5. Supplier list.....	8
1.6. Hardware and Software	8
1.7. Breaches or Breach Allegations.....	8
1.8. ICP and NSP Data	8
1.9. Authorisation Received	9
1.10. Scope of Audit	9
1.11. Summary of previous audit	10
2. Operational Infrastructure.....	11
2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1)) ..11	
2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2))	13
2.3. Removal or breakage of seals (Clause 48(1A) and 48(1B) of Schedule 10.7).....	13
2.4. Provision of information on dispute resolution scheme (Clause 11.30A).....	14
3. Creation of ICPs.....	15
3.1. Distributors must create ICPs (Clause 11.4).....	15
3.2. Participants may request distributors to create ICPs (Clause 11.5(3))	15
3.3. Provision of ICP Information to the registry manager (Clause 11.7)	16
3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule 11.1)	17
3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)	17
3.6. Connection of ICP that is not an NSP (Clause 11.17).....	18
3.7. Connection of ICP that is not an NSP (Clause 10.31).....	19
3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A)	19
3.9. Connection of NSP that is not point of connection to grid (Clause 10.30)	20
3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30A and 10.30B).....	21
3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1)	21
3.12. Loss category (Clause 6 Schedule 11.1).....	22
3.13. Management of “new” status (Clause 13 Schedule 11.1).....	22
3.14. Monitoring of “new” & “ready” statuses (Clause 15 Schedule 11.1).....	22
3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1)	23
3.16. Electrical connection of a point of connection (Clause 10.33A)	23
3.17. Electrical disconnection of a point of connection (Clause 10.30C and 10.31C)	24
3.18. Meter bridging (Clause 10.33C).....	24
4. Maintenance of registry information.....	26

4.1.	Changes to registry information (Clause 8 Schedule 11.1)	26
4.2.	Notice of NSP for each ICP (Clauses 7(1),(4) and (5) Schedule 11.1)	27
4.3.	Customer queries about ICP (Clause 11.31).....	28
4.4.	ICP location address (Clause 2 Schedule 11.1).....	28
4.5.	Electrically disconnecting an ICP (Clause 3 Schedule 11.1).....	29
4.6.	Distributors to Provide ICP Information to the Registry manager (Clause 7(1) Schedule 11.1)	29
4.7.	Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)	32
4.8.	GPS coordinates (Clause 7(8) and (9) Schedule 11.1)	33
4.9.	Management of “ready” status (Clause 14 Schedule 11.1)	33
4.10.	Management of “distributor” status (Clause 16 Schedule 11.1)	34
4.11.	Management of “decommissioned” status (Clause 20 Schedule 11.1)	34
4.12.	Maintenance of price category codes (Clause 23 Schedule 11.1).....	35
5.	Creation and maintenance of loss factors	36
5.1.	Updating table of loss category codes (Clause 21 Schedule 11.1)	36
5.2.	Updating loss factors (Clause 22 Schedule 11.1)	36
6.	Creation and maintenance of NSPs (including decommissioning of NSPs and transfer of ICPs).....	37
6.1.	Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1).....	37
6.2.	Provision of NSP information (Clause 26(1) and (2) Schedule 11.1)	38
6.3.	Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1)	38
6.4.	Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1)	39
6.5.	Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1)	39
6.6.	Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1)	40
6.7.	Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2)	40
6.8.	Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3))	40
6.9.	Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2)).....	41
6.10.	Obligations concerning change in network owner (Clause 29 Schedule 11.1)	42
6.11.	Change of MEP for embedded network gate meter (Clause 10.22(1)(b))	42
6.12.	Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2)	43
6.13.	Transfer of ICPs for embedded network (Clause 6 Schedule 11.2).....	43
7.	Maintenance of shared unmetered load	44
7.1.	Notification of shared unmetered load ICP list (Clause 11.14(2) and (4))	44
7.2.	Changes to shared unmetered load (Clause 11.14(5)).....	44
8.	Calculation of loss factors	45
8.1.	Creation of loss factors (Clause 11.2).....	45
Conclusion	46
Participant response	46

EXECUTIVE SUMMARY

This distributor audit was conducted at the request of **Waikanae ENE Limited (WENE)** 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 embedded network is managed by **Smart Power**, who assisted with this audit.

WENE is responsible for one embedded network in Waikanae. Most of WENE's compliance is reliant on the compliance of **TEG & Associates (TEG)**, as a contractor to WENE. Their audit report is to be submitted with this audit.

All registry and NSP table activity during the audit period was reviewed as part of this audit. The audit found five non-compliances relating to late registry updates, inaccurate registry information relating to initial electrical connection dates and event dates, and late creation of one ICP.

None of the non-compliances indicate significant or system issues. They largely appear to be caused by errors made when processing manual updates, and in some cases correcting data to match other parties before full investigation has occurred. All of the issues occurred early in the audit period with no issues identified after September 2021.

The audit risk rating of five recommends the next audit be in 24 months, and I agree with this recommendation.

The matters raised are detailed in the table 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)	ICP 0000000026WK614's initial electrical connection date was incorrectly updated to 9 September 2021. It should be 8 September 2021. ICP 0000000027WKA51's network event entered on 22 September 2021 has an incorrect event date. The network event attributes from 7 to 21 September 2021 incorrectly include the initial electrical connection date.	Strong	Low	1	Identified
Participants may request distributors to create ICPs	3.2	11.5(3)	ICP 0000000026WK614 was not created within three business days of a request being received by the trader.	Strong	Low	1	Identified
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Nine of the 25 new ICPs created and electrically connected during the audit period did not have their initial electrical connection date populated on the registry within ten business days of initial electrical connection.	Strong	Low	1	Identified
Changes to registry information	4.1	8 Schedule 11.1	Six late network updates.	Strong	Low	1	Identified
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	ICP 0000000026WK614's initial electrical connection date was incorrectly updated to 9 September 2021. It should be 8 September 2021. ICP 0000000027WKA51's network event entered on 22 September 2021 has an incorrect event date. The network event attributes from 7 to 21 September 2021 incorrectly include the initial electrical connection date.	Strong	Low	1	Identified
Future Risk Rating						5	

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

RECOMMENDATIONS

Subject	Section	Recommendation	Description
		Nil	

ISSUES

Subject	Section	Issue	Description
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

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

Audit commentary

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

1.2. Structure of Organisation

Smart Power provided an organisational structure for the purposes of the function being audited:

- Bruce Stubbing – Director, and
- Nick Oldham – GM Utility Solutions.

1.3. Persons involved in this audit

Auditor:

Name	Title	Organisation
Tara Gannon	Auditor	Provera

Personnel assisting in this audit were:

Name	Title	Organisation
Ewa Glowacka	Director	TEG and Associates
Nick Oldham	General Manager	Smart Power Limited T/A Energy Select

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

TEG carries out WENE's registry activities.

TEG does not complete all compliance activities on behalf of WENE. Specifically, TEG does not calculate loss factors but does load the loss factors provided by WENE onto the registry.

1.5. Supplier list

TEG carries out WENE's registry activities.

1.6. Hardware and Software

This is covered in TEG's audit report.

1.7. Breaches or Breach Allegations

The Authority confirmed that WENE has not had any alleged breaches during the audit period.

1.8. ICP and NSP Data

Review of the NSP table showed WENE had the following NSP as at 21 July 2023.

Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
WENE	WPH0011	Waipunahau Waikanae	PRM0331	ELEC	WPH0011WENEE	E	1 July 2020	34

Status	Number of ICPs (2023)	Number of ICPs (2020)
New (999,0)	-	-
Ready (0,0)	-	-
Active (2,0)	34	5
Distributor (888,0)	-	-

Inactive – new connection in progress (1,12)	3	-
Inactive – electrically disconnected vacant property (1,4)	-	-
Inactive – electrically disconnected remotely by AMI meter (1,7)	-	-
Inactive – electrically disconnected at pole fuse (1,8)	-	-
Inactive – electrically disconnected due to meter disconnected (1,9)	-	-
Inactive – electrically disconnected at meter box fuse (1,10)	-	-
Inactive – electrically disconnected at meter box switch (1,11)	-	-
Inactive – electrically disconnected ready for decommissioning (1,6)	-	-
Inactive – reconciled elsewhere (1,5)	-	-
Decommissioned (3)	1	-

1.9. Authorisation Received

A letter of authorisation was provided.

1.10. Scope of Audit

This distributor audit was performed at the request of WENE, 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.

During the audit analysis I examined a registry list, event detail report, meter installation details report, and AC020 distributor compliance report for 1 October 2020 to 21 July 2023.

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

Functions Requiring Audit Under Clause 11.10(4) of Part 11	Contractors Involved in Performance of Tasks
The creation of ICP identifiers for ICPs.	WENE provide new ICPs to TEG & Associates, who update the registry.
The provision of ICP information to the registry and the maintenance of that information.	TEG & Associates
The creation and maintenance of loss factors.	WENE calculate loss factors and TEG & Associates update the loss factor table with the values provided.

The most recent audit report for TEG will be submitted with this report. TEG confirmed that there have been no changes to their processes since their previous audit was conducted.

1.11. Summary of previous audit

The previous audit was conducted in August 2020 by Rebecca Elliot of Veritek Limited. The report recorded one non-compliance, and its status is shown in the table below.

Subject	Section	Clause	Non-compliance	Status
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	One new connection did not have an initial electrical connection date populated within 10 business days of electrical connection.	Still existing

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TEG agent audit report. The registry list, event detail report, and audit compliance report were reviewed to identify inaccurate or incomplete data.

Audit commentary

Compliance is recorded in the TEG agent audit report. Examination of the list file found all information populated as required and all practicable steps are taken to check this as part of the business-as-usual processes.

Registry information was checked for accuracy and the following discrepancies were identified:

Initial electrical connection dates

For ICP 0000000026WK614 the initial electrical connection date was originally correct, but then amended to match the trader's active date, which was later proven to be incorrect because energy was recorded by the meter from its installation date. TEG now ensures that the initial electrical connection date matches the date that the ICP began consuming energy.

ICP	Correct initial electrical connection date	Applied date	Issue
0000000026WK614	8 September 2021	9 September 2021	The initial electrical connection date was incorrectly updated from 8 to 9 September 2021.

Event dates

Event dates were found to be correct, except one registry update for ICP 0000000027WKA51. When adding the initial electrical connection date, the update was accidentally processed with the same event date as the previous network update instead of applying the initial electrical connection date as the event date. To resolve this issue, the original network event attributes (excluding initial electrical connection date) should be reinstated from 7 September 2021, and a separate record with the initial electrical connection date added should be effective from 22 September 2021.

Event date	Update date	Attributes	Record Status
7 September 2021	7 September 2021	WENE,WPH0011,EN,N,L,GENE,,,0,,,,,	Replaced

7 September 2021	22 September 2021	WENE,WPH0011,EN,N,L,GENE,,,0,,22/09/2021,,	Active
------------------	-------------------	--------------------------------------------	--------

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 2.1 With: 11.2(1)</p> <p>From: 22-Jan-21 To: 22-Sep-21</p>	<p>ICP 0000000026WK614's initial electrical connection date was incorrectly updated to 9 September 2021. It should be 8 September 2021.</p> <p>ICP 0000000027WKA51's network event entered on 22 September 2021 has an incorrect event date. The network event attributes from 7 to 21 September 2021 incorrectly include the initial electrical connection date.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because a small number of accuracies were identified. A process is now in place to ensure that initial electrical connection dates match the first day that electricity is consumed by the ICP.</p> <p>The audit risk rating is low because there is no direct impact on submission and one of the two ICPs has the correct initial electrical connection date currently recorded. No errors were identified after September 2021.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
These inconsistencies came to light as a result of this audit and where possible have been corrected.		22/09/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The event date issue was a one off error which is unlikely to occur again. The IECD date issue has resulted in a change of process to using the meter installation date (on the basis of current flowing to test the meter being the technical initial connection date).		ongoing	

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

The management of this process is discussed in the TEG agent audit report. The registry list, event detail report and audit compliance report were reviewed to identify inaccurate or incomplete data.

Audit commentary

Compliance is recorded in the TEG agent audit report. Examination of the list file found all information populated as required and all practicable steps are taken to check this as part of the business-as-usual processes.

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

Audit observation

The meter installation details report was examined to determine whether load control devices existed on the network.

Audit commentary

There are no load controls on the WENE network.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

The Disputes Resolution information for WENE was examined to determine compliance.

Audit commentary

The email signature for Smart Power provides information about Utilities Disputes, including the link to the Utilities Disputes website. A voice recording which includes information on Utilities Disputes is played for inbound calls. WENE is a very small network; they do not usually have any direct interactions with consumers as these are normally handled by the retailer.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPS (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The new connection process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. 28 new ICPS were created during the audit period as required by this clause.

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 management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. I checked a sample of five of the new ICPS created during the audit period, and found they were requested by the trader. Four ICPS were created within three business days of the request being received. ICP 0000000026WK614 was requested on 11 August 2021 but was not created on the registry until 2 September 2021 because the original request was missed. The ICP was created as soon as the trader followed up their request, and before the initial electrical connection date of 9 September 2021.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: 11.5(3) From: 11-Aug-21 To: 01-Sep-21	ICP 000000026WK614 was not created within three business days of a request being received by the trader. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. Most ICPs checked were created within three business days of being requested. The audit risk rating is low because the ICP was created before the initial electrical connection date.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was a rare event where an email request was missed; the ICP was created the same day it was followed up.		01/09/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Controls are correctly noted as strong and this is a rare event as the inbox is monitored every day.		ongoing	

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. All ICPs created during the audit period had the required information populated on the registry.

Nine of the 25 new ICPs created and electrically connected during the audit period did not have their initial electrical connection date populated on the registry within ten business days of initial electrical connection. This is recorded as non-compliance in **section 3.5**.

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 management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. All ICPs created during the audit period had address, proposed trader, network information, pricing information and “ready” status recorded on the registry prior to initial electrical connection.

Audit outcome

Compliant

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

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

Nine of the 25 new ICPs created and electrically connected during the audit period did not have their initial electrical connection date populated on the registry within ten business days of initial electrical connection. The late updates were made 12 to 52 business days after initial electrical connection.

I checked the five latest updates and found they were caused by late notification of the initial electrical connection date and/or corrections to initial electrical connection dates.

Audit outcome

Non-compliant

Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 15-Jan-21</p> <p>To: 04-Apr-23</p>	<p>Nine of the 25 new ICPs created and electrically connected during the audit period did not have their initial electrical connection date populated on the registry within ten business days of initial electrical connection.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are strong because initial electrical connection dates are closely monitored. Although 35% of updates were late, some late updates were corrections to ensure that accurate data is recorded on the registry.</p> <p>The audit risk rating is low because there is no direct impact on submission. Six of the late updates were made less than five business days late, and all late updates were completed within 52 business days of the event date. Retailers may use this information to check their active dates.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
This is an ongoing issue relating to the receipt of paperwork and the timeliness of other parties' updates. The information was added as soon as it became available.	Varies by ICP	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Most of these events were several years ago and generally measures we have put in place to get IECD information such as reminding inspectors of the need to send paperwork in a timely fashion, as well as the use of registry reports, has improved performance in this area.	ongoing	

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report. Review of the registry data confirmed that a trader is currently recorded for all active ICPs, and there is no known shared unmetered load on WENE's network.

All 28 new ICPs created during the audit period had a proposed trader recorded prior to initial electrical connection. 25 of the ICPs were electrically connected during the audit period, and three remain at inactive new connection in progress status.

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 management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report. Review of the registry data confirmed that a trader is currently recorded for all active ICPs, and there is no known shared unmetered load on WENE's network.

All 28 new ICPs created during the audit period had a proposed trader recorded prior to initial electrical connection.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report. 25 ICPs were initially electrically connected during the audit period, and for 22 ICPs the connection occurred on the day that the meter was installed and certified.

Three ICPs had metering installed and certified prior to initial electrical connection. For all three ICPs the trader had claimed the ICP and nominated the MEP, and the MEP had accepted the nomination prior to the meter installation date.

There are no ICPs with shared unmetered load on the WENE network.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The management of this process is discussed in the TEG report. The NSP table was reviewed.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. No new NSPs were connected during the audit period.

Audit outcome

Compliant

3.10. Temporary 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

Compliance is recorded in the TEG audit report in relation to this clause. No new NSPs were connected during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

xxxxxxxxxxccc where:

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

Audit observation

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

Audit commentary

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

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 registry list was reviewed to determine compliance.

Audit commentary

All active ICPs have a single loss category, which clearly identifies the relevant loss factor.

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

The ICP creation process was reviewed as part of the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report. “New” status was not applied for any ICPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

Monitoring of “new” and “ready” status is discussed in the TEG report. The registry list, event detail report, and ACO20 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. ICPs at “new” or “ready” status for more than six months are followed up with the trader to determine whether they are still required. There are currently no ICPs at “new” or “ready” status.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

- *The loss category code must be unique; and*
- *The distributor must provide the following to the reconciliation manager:*
 - 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 was examined to determine compliance.

Audit commentary

Review of the registry list confirmed that no ICPs have embedded generation over 10 MW.

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

Sub-clause (4) states that no participant may electrically connect a point of connection without the permission of the Reconciliation Participant. The registry list was reviewed to determine compliance.

Audit commentary

WENE does not electrically connect any points of connection. This activity is undertaken by the trader. There are no unmetered streetlight ICPs which could have additional load added to on this network.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

under its contract with the consumer for that ICP.

Audit observation

Processes were examined for the disconnection and electrical disconnection of ICPs and NSPs. WENE requires all requests for disconnection to be sent to the trader.

Audit commentary

One ICP was disconnected by GENE during the audit period. No disconnections were performed by WENE.

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 one business day and include the date of bridging in its advice.

Audit observation

The WENE process for bridging control devices was examined. WENE requires all requests for meter bridging to be sent to the trader.

Audit commentary

No meters were bridged by WENE during the audit period.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

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

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

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

Audit observation

The management of this process is discussed in the TEG report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

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

The AC020 recorded eight late network updates, and no late address, pricing, or status updates.

One of the network updates was an initial update for a new connection, and was completed prior to initial electrical connection so is not considered to be late. The other seven late network updates were checked:

- four were additions of distributed generation details, made 12 to 19 business days after the event date, because distributed generation paperwork was provided late,
- one was a correction to the installation type for a distributed generation ICP, made one day late; the change was made the day after the other distributed generation details were added on time,
- one was a correction to the dedicated NSP flag, and
- one was an addition of an initial electrical connection date, which appeared backdated because the previous record's event date was applied instead of using the initial electrical connection date as the event date; the registry update physically occurred on the initial electrical connection date and the update was on time and compliance is recorded in this section because the update was on time, and non-compliance is recorded in **sections 2.1** and **4.6** for the incorrect event date.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 03-Feb-21 To: 29-Nov-22	Six late network updates. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because they are sufficient to ensure that the registry is updated within three business days most of the time, and updates are consistently made as soon as practicable after the event attributes are confirmed. The late updates were corrections or caused by late provision of paperwork. The audit risk rating is low. Only the dedicated NSP flag change had a direct impact on reconciliation, and all late updates were made in time for revision 14.		
Actions taken to resolve the issue		Completion date	Remedial action status
The non compliances in this area are mostly solar; information is added as soon as it becomes available.		Varies by ICP	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As noted above, controls are strong. Most of the noncompliance occurred in the early days of the development and there was some confusion with the parent network initially (incorrectly) issuing approvals. Education and familiarity have improved matters substantially.		ongoing	

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

Code reference

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

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TEG report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. Due to the nature of embedded networks, there is no uncertainty regarding the ICP and NSP relationships. All active ICPs are connected to WPH0011 and have the correct NSP assigned.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was examined.

Audit commentary

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

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The process to determine correct and unique addresses was examined during the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

The AC020 report did not record any active ICPs where addresses were duplicates or could not be readily located.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process was examined.

Audit commentary

WENE confirmed that all ICPs comply with this clause. They have a good understanding of this requirement, and as this network was created post this requirement, this scenario is unlikely to arise.

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 this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report.

Distributed generation

The registry list identified ten ICPs with distributed generation recorded. All had a non-zero generation capacity and a fuel type recorded, and the trader had recorded a generation compatible profile. The changes to distributed generation details during the audit period were confirmed to be accurate.

Initial electrical connection dates

Three of the 28 new ICPs were created during the audit period had initial electrical connection dates which were inconsistent with the meter certification date and/or the trader's active status date. All were checked and I confirmed that the initial electrical connection dates applied by WENE were correct.

A further five initial electrical connection date updates were checked. For ICP 0000000026WK614 the initial electrical connection date was originally correct, but then amended to match the trader's active date, which was later proven to be incorrect because energy was recorded by the meter from its installation date. TEG now ensures that the initial electrical connection date matches the date that the ICP began consuming energy.

ICP	Correct initial electrical connection date	Applied date	Issue
0000000026WK614	8 September 2021	9 September 2021	The initial electrical connection date was incorrectly updated from 8 to 9 September 2021.

Unmetered load

No ICPs have unmetered load recorded by the trader or distributor.

Event dates

Event dates were found to be correct, except one registry update for ICP 0000000027WKA51. When adding the initial electrical connection date, the update was accidentally processed with the same event date as the previous network update instead of applying the initial electrical connection date as the event date. To resolve this issue, the original network event attributes (excluding initial electrical connection date) should be reinstated from 7 September 2021, and a separate record with the initial electrical connection date added should be effective from 22 September 2021.

Event date	Update date	Attributes	Record Status
7 September 2021	7 September 2021	WENE,WPH0011,EN,N,L,GENE,,,0,,,,,	Replaced
7 September 2021	22 September 2021	WENE,WPH0011,EN,N,L,GENE,,,0,,22/09/2021,,	Active

Other information

No other inaccurate information was identified.

Audit outcome

Non-compliant

Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: 7(1) Schedule 11.1</p> <p>From: 07-Sep-21</p> <p>To: 22-Sep-21</p>	<p>ICP 0000000026WK614's initial electrical connection date was incorrectly updated to 9 September 2021. It should be 8 September 2021. ICP 00000000027WKA51's network event entered on 22 September 2021 has an incorrect event date. The network event attributes from 7 to 21 September 2021 incorrectly include the initial electrical connection date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong because a small number of accuracies were identified. A process is now in place to ensure that initial electrical connection dates match the first day that electricity is consumed by the ICP. The audit risk rating is low because there is no direct impact on submission and one of the two ICPs has the correct initial electrical connection date currently recorded. No errors were identified after September 2021.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
As part of this audit we became aware of having used the ROI date versus the meter installation date and that this was not technically correct. This has been updated, as well as a change in process noted.	22/9/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Moving forward we will ensure that the meter installation date is used as the IECD on the basis that current flowed in order to test the meter.	ongoing	

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TEG report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. All new ICPs created during the audit period had pricing information added before the initial electrical connection date.

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 was examined to confirm compliance.

Audit commentary

WENE's ICPs do not have GPS coordinates recorded on the registry.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

Processes to manage ICPs at "ready" status were reviewed as part of the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. All ICPs are generally created at “ready” status once the details of the proposed trader details have been provided to TEG. “Ready” status was correctly applied to ICPs as part of the new connection process.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

Processes to manage ICPs at “distributor” status were reviewed as part of the TEG agent audit. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

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

It is unlikely that WENE will deal with any ICPs with a “distributor” status because they do not deal with shared unmetered load, and there are no embedded networks connected to the existing embedded network. The “distributor” status was not used during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The management of this process is discussed in the TEG agent report. The registry list, event detail report, and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report. One ICP was compliantly decommissioned during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

The management of this process is discussed in the TEG agent report. The price category code table on the registry was examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report. No price category changes have occurred 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 management of this process is discussed in the TEG agent report. The loss category code table on the registry was examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report. No loss factor codes have been added or changed 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 management of this process is discussed in the TEG agent report. The loss category code table on the registry was examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report. No loss factor codes or loss factor values have been added or changed during the audit period. There was only one loss factor per category code 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 two 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 management of this process is discussed in the TEG agent report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No NSPs were 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 management of this process is discussed in the TEG agent report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No NSPs were created 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 management of this process is discussed in the TEG agent report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No balancing areas were created or changed 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 (cause 26(4)(c)).*

Audit observation

The management of this process is discussed in the TEG agent report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No NSPs were created or transferred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG agent report. The NSP table was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No balancing areas were created or changed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG agent report. The NSP table was reviewed.

Audit commentary

Compliance is recorded in the TEG agent report. 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 management of this process is discussed in the TEG agent report. The NSP table and registry list were reviewed.

Audit commentary

Compliance is recorded in the TEG agent report. No ICPs were transferred 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 management of this process is discussed in the TEG agent report. The NSP supply point table was examined.

Audit commentary

Compliance is recorded in the TEG agent report. TEG monitors meter certification expiry dates for all of the networks they act as the registry agent for, and compliance is recorded in their agent report. Review of the NSP table confirmed that the NSP has current meter certification, and the certification expiry date has not changed during the audit period.

Distributor	NSP POC	Description	MEP	Certification Expiry
WENE	WPH0011	Waipunahau Waikanae	AMCI	1 June 2030

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 management of this process is discussed in the TEG agent report. The NSP table on the registry was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No NSPs were created or transferred 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 (cause 29(3) of Schedule 11.1).

Audit observation

The management of this process is discussed in the TEG agent report. The NSP table on the registry was examined.

Audit commentary

Compliance is recorded in the TEG agent report. WENE has not acquired any networks.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

The MEP change process was reviewed as part of the TEG agent audit. The NSP table was examined.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. There have been no MEP changes during the audit period.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

The ICP transfer process was reviewed as part of the TEG agent audit. The NSP table and the registry list were examined.

Audit commentary

Compliance is recorded in the TEG agent report. No ICPs have been transferred 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 ICP transfer process was reviewed as part of the TEG agent audit. The registry list was examined.

Audit commentary

Compliance is recorded in the TEG agent report. No ICP transfers were initiated by WENE 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

The registry list file was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list was examined to determine compliance

Audit commentary

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

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The calculation of loss factors was reviewed.

Audit commentary

There have been no changes to loss factors during the audit period. The loss factor of 1.000 when multiplied by the LE ICP loss factor on the parent network, will ensure that WENE ICPs have loss factors consistent with the parent network applied.

Audit outcome

Compliant

CONCLUSION

All registry and NSP table activity during the audit period was reviewed as part of this audit. The audit found five non-compliances relating to late registry updates, inaccurate registry information relating to initial electrical connection dates and event dates, and late creation of one ICP.

None of the non-compliances indicate significant or system issues. They largely appear to be caused by errors made when processing manual updates, and in some cases correcting data to match other parties before full investigation has occurred. All of the issues occurred early in the audit period with no issues identified after September 2021.

The audit risk rating of five recommends the next audit be in 24 months, and I agree with this recommendation.

PARTICIPANT RESPONSE

Smartpower have reviewed this report on behalf of WENE and their comments are made within its body.