

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

TUIHANA NETWORKS LTD (TUIH)
NZBN: 9429032574357

Prepared by: Tara Gannon

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EXECUTIVE SUMMARY

This distributor audit was conducted at the request of **Tuihana Networks Ltd (TUIH)** 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.

TUIH is responsible for one embedded network in Papamoa. Most of TUIH's compliance is reliant on the compliance of **TEG & Associates (TEG)**, as a contractor to TUIH. TEG's most recent audit report dated 19 October 2021 will be submitted with this report, and TEG confirmed that the processes documented in their audit report still apply.

All registry and NSP table activity during the audit period was reviewed as part of this audit. The audit found three minor non-compliances:

- two relate to an error made when updating the registry affecting a historic record for one ICP, and
- the other relates to three late network updates.

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

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 0000001018UH7C3's network record effective from 1 April 2014 to 30 April 2023 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank. The current record from 1 May 2023 is correct.	Strong	Low	1	Identified
Changes to registry information	4.1	8 Schedule 11.1	Three late updates to distributed generation details.	Strong	Low	1	Identified
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	ICP 0000001018UH7C3's network record effective from 1 April 2014 to 30 April 2023 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank. The current record from 1 May 2023 is correct.	Strong	Low	1	Identified
Future Risk Rating						3	

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	Description	Recommendation
		Nil	

ISSUES

Subject	Section	Description	Issue
		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 TUIH has any Code exemptions in place.

Audit commentary

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

1.2. Structure of Organisation

Not applicable

1.3. Persons involved in this audit

Auditor:

Name	Role	Organisation
Tara Gannon	Auditor	Provera

Personnel assisting in this audit were:

Name	Title	Company
Roger Arnold	Director	Tuihana Networks Limited
Richard Green	Director	Business Engagement Ltd
Ewa Glowacka	Director	TEG & Associates

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 fulfillment 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 TUIH’s registry activities.

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

1.5. Supplier list

TEG carries out TUIH’s registry activities.

1.6. Hardware and Software

This is covered in TEG’s audit report.

1.7. Breaches or Breach Allegations

TUIH has not had any breach allegations relevant to this audit recorded by the Electricity Authority.

1.8. ICP and NSP Data

The NSP table was reviewed on 6 September 2023 to confirm the NSPs on the network. Active ICP numbers are as of 7 September 2023.

Distributor	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of ICPs
TUIH	GRE0111	TUIHANA	MTM0331	POCO	PAPAMOATUIHE	E	1 December 2008	583

Status	ICPs 2023	ICPs 2021	ICPs 2019	ICPs 2017
Distributor	-	-	-	-
New	-	-	-	-
Ready	-	-	-	-
Active (2,0)	583	581	580	568
Inactive - new connection in progress (1,12)	-	-	-	-
Inactive – vacant (1,4)	2	2	1	1
Inactive - reconciled elsewhere (1,5)	-	-	-	-
Inactive – AMI remote disconnection (1,7)	-	-	-	-
Inactive – de-energised due to meter disconnected (1,9)	-	-	-	-
Inactive – at pole fuse (1,8)	-	-	-	-
Inactive – de-energised at meter box switch (1,10)	-	-	-	-
Inactive - at meter box switch (1,11)	-	-	-	-
Inactive – ready for decommissioning (1,6)	-	-	-	-
Decommissioned (3)	4	3	3	3

1.9. Authorisation Received

A letter of authorisation was provided.

1.10. Scope of Audit

This distributor audit was performed at the request of TUIH, 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 V7.1, 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 December 2021 to 7 September 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.	TEG & Associates
The provision of ICP information to the registry and the maintenance of that information.	
The creation and maintenance of loss factors.	

The audit report for TEG & Associates will be submitted with this report.

1.11. Summary of previous audit

The previous audit was completed in October 2021 by Steve Woods of Veritek Limited. The report recorded one non-compliance and made no recommendations. The table below records their current status.

Subject	Section	Clause	Non-Compliance	Status
Changes to registry information	4.1	8 Schedule 11.1	Five late updates to registry.	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 reports were reviewed to identify inaccurate or incomplete data.

Audit commentary

Compliance is recorded in the TEG agent audit report.

All information reviewed during the audit was found to be correct, except one registry update for ICP 0000001018UH7C3.

When adding distributed generation for ICP 0000001018UH7C3 effective from 1 May 2023, the update was accidentally processed with the same event date as the previous network update and no generation capacity. Another record was entered from the correct date, with the correct generation details, within two minutes.

The record that is now present on 1 October 2014 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank.

Event date	Update date	Dedicated NSP	Install type	Generation Capacity	Fuel Type	Record Status
18 February 2010	1 February 2010	Y	L	0		Active
1 October 2014	3 October 2014	N	L	0		Replaced
1 October 2014	12 June 2023	N	B Should be L	0	Solar Should be blank	Active
1 May 2023	12 June 2023	N	B	8.2	solar	Active

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 01-Oct-14 To: 01-May-23	ICP 0000001018UH7C3's network record effective from 1 April 2014 to 30 April 2023 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank. The current record from 1 May 2023 is correct. 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. This was an accident when processing an update, which was corrected by adding a new record but the incorrect record was not replaced. The audit risk rating is low because the current record is correct.		
Actions taken to resolve the issue		Completion date	Remedial action status
Two minor 'one off' errors occurred that are both regrettable and were promptly corrected.		1 May 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Distributor and Registry Agent will scrutinise incoming data to minimise future occurrence.		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. All information reviewed during the audit was found to be correct, except one registry update for ICP 0000001018UH7C3 which is recorded as non-compliance in **section 2.1**.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

Audit observation

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

Audit commentary

TUIH did not complete any disconnections, reconnections or break meter seals during the audit period. Disconnections and reconnections are expected to be arranged by the trader.

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 TUIH was examined to determine compliance. TUIH is a very small network with very minor interactions with consumers, they were only able to provide one example of correspondence to a consumer.

Audit commentary

The one example of correspondence to a consumer provided information about Utilities Disputes for the consumer, including the link to the Utilities Disputes website.

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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent audit report. Two 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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent audit report. I checked the two new ICPS created during the audit period. One was requested by the trader and created the day the application was received, and one was requested by the customer's electrician and created within three business days of the application.

Audit outcome

Compliant

3.3. Provision of ICP Information to the registry (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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent audit report. The two new ICPs had “ready” status, address, pricing, network, and proposed trader information populated on the registry prior to initial electrical connection, and the initial electrical connection date populated on the registry within ten business days of initial electrical connection.

Audit outcome

Compliant

3.4. Timeliness of Provision of ICP Information to the registry (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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent audit report. The two new ICPs had “ready” status, address, pricing, network, and proposed trader information populated on the registry prior to initial electrical connection, and as soon as practicable after the information was provided.

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 sub-clause (1)(p) to the registry no later than ten business days after the date on which the ICP is initially energised.

Audit observation

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

Audit commentary

Compliance is recorded in the TEG audit report. The two new ICPs had the initial electrical connection date populated on the registry within ten business days of initial electrical connection.

Audit outcome

Compliant

3.6. Connection of ICPs (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.

Audit observation

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

Audit commentary

Compliance is recorded in the TEG audit report. 583 active ICPs are supplied and all have a trader and metering or unmetered load details recorded. There is no shared unmetered load on the TUIH network.

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.

- *reconciliation participant responsible for ensuring there is a metering installation.*

Audit observation

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

Audit commentary

Compliance is recorded in the TEG audit report. The two new ICPs connected during the audit period had a trader recorded in the registry as accepting responsibility, and were metered from the initial electrical connection date. There is no shared unmetered load on the TUIH network.

Audit outcome

Compliant

3.8. Electrical connection of ICP that is not an NSP (Clause 10.31)

Code reference

Clause 10.31

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.*

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report. The two new ICPs were indicated to be “active” from the date of meter installation, and no temporary electrical connections were identified.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

The NSP table was reviewed.

Audit observation

No new NSPs have been electrically 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

No new NSPs have been electrically 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:

yyyyyyyyyyxxccc where:

- *yyyyyyyyyy 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 market administrator.*

Audit observation

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

Audit commentary

Compliance is recorded in the TEG audit report.

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

Loss factor TUILV1 applies to all ICPs on the network. Each ICP has a single loss factor assigned.

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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report. The two new ICPs created during the audit period moved to “ready” status on the day they were created because they were ready for electrical connection. No ICPs are currently at “new” status.

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 AC020 distributor compliance reports 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

No embedded generation stations with capacity greater than 10 MW are connected to TUIH's network.

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

TUIH requires approval from the trader before electrically connecting ICPs. No new unmetered load connections have been completed during the audit period.

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.

Audit commentary

No ICPs were disconnected or electrically disconnected by TUIH during the audit period.

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

Meter bridging was examined.

Audit commentary

TUIH do not bridge meters, and did not bridge any meters during the audit period. Where a contractor is required to do this on the TUIH network, it would be as a result of a service request sent by the trader directly to the contractor.

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 14 days, the time within which notification must be effected in accordance with Clause 8(3) of Schedule 11.1 begins on the 15th day after 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 reports were examined to determine compliance.

Audit commentary

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

Review of the combined audit compliance reports confirmed that all address, pricing, and status updates were made on time.

Three late network updates were made relating to addition of distributed generation details.

ICP Identifier	Network Event Date	Network Event input date	Business days	Reason for late update
0000001018UH7C3	1 October 2014	12 June 2023	2167	When adding distributed generation for ICP 0000001018UH7C3 effective from 1 May 2023 on 12 June 2023, the update was accidentally processed with the same event date as the previous network update and no generation capacity. Another record was entered from the correct date, with the correct generation details, within two minutes. The record that is now present on 1 October 2014 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank.
0000016185WEE87	16 September 2022	16 November 2022	41	The delays were caused by late notification of the required change and updated as soon as confirmation of the correct event attributes was received.
0000001097UHD57	13 July 2022	19 July 2022	4	

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 19-Jul-22 To: 12-Jun-23	Three late updates to distributed generation details. Potential impact: Low Actual impact: Low Audit history: Multiple 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. The latest update was not genuinely late, and occurred by accident because the event date was not updated before saving. An updated record was processed within two minutes. The audit risk rating is low as the discrepancies identified have little or no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Two minor 'one off' errors corrected promptly, as noted above.		1 May 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Regards late notification in 3 instances, it is an improvement over the previous audit. TUIH will work to obtain DG information from 3rd party - customer appointed electrical contractors in a timely manner.		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 reports were examined to determine compliance. TUIH has one NSP and there have been no NSP changes.

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 ICPs correctly have the GRE0111 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

TUIH does not usually receive direct requests for ICP identifiers, but if they were received the ICP number 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 and AC020 distributor compliance report were examined to determine compliance.

Audit commentary

A check of TUIH's list file and AC020 report found that all ICPs have unique addresses with sufficient information to allow the ICPs to 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

TUIH confirmed that all ICPs comply with this clause. They have a good understanding of this requirement. 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 from metering information,*
- c) *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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent report.

Distributed generation

TUIH maintains a spreadsheet of ICPs with distributed generation installed which is provided to TEG to update the registry. TEG monitors TUIH ICPs with a profile or metering installation with an injection channel to identify ICPs with distributed generation installed and not notified to TUIH.

The registry list identified 33 ICPs with distributed generation recorded. All had a non-zero generation capacity and a fuel type recorded.

The AC020 report identified one ICP which had a generation profile recorded by the distributor and no generation recorded by TUIH. I confirmed that this was a timing difference and generation details were added from the same date that generation metering was installed and the trader changed their profile after the report was run.

When adding distributed generation for ICP 0000001018UH7C3 effective from 1 May 2023, the update was accidentally processed with the same event date as the previous network update and no generation

capacity. Another record was entered from the correct date, with the correct generation details within two minutes.

The record that is now present on 1 October 2014 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank.

Event date	Update date	Dedicated NSP	Install type	Generation Capacity	Fuel Type	Record Status
18 February 2010	1 February 2010	Y	L	0		Active
1 October 2014	3 October 2014	N	L	0		Replaced
1 October 2014	12 June 2023	N	B Should be L	0	Solar Should be blank	Active
1 May 2023	12 June 2023	N	B	8.2	solar	Active

Initial electrical connection dates

The two new ICPs created during the audit period had initial electrical connection dates consistent with the meter certification date and the trader's active status date.

Unmetered load

Four ICPs have unmetered load indicated, and the trader and distributor unmetered load details are consistent.

Event dates

No incorrect event dates were identified.

Other information

No other inaccurate information was identified.

Audit outcome

Non-compliant

Non-compliance	Description
<p>Audit Ref: 4.6 With: 7(1) Schedule 11.1</p> <p>From: 01-Oct-14 To: 01-May-23</p>	<p>ICP 0000001018UH7C3's network record effective from 1 April 2014 to 30 April 2023 contains an incorrect installation type which should be L, and incorrect fuel type which should be blank. The current record from 1 May 2023 is correct.</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	Controls are rated as strong. This was an accident when processing an update, which was corrected by adding a new record, but the incorrect record was not replaced. The audit risk rating is low because the current record is correct.		
Actions taken to resolve the issue		Completion date	Remedial action status
Two minor 'one off' errors corrected promptly, as noted above		1 May 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Regards late notification in 3 instances, it is an improvement over the previous audit. TUIH will work to obtain DG information from 3rd party - customer appointed electrical contractors in a timely manner.		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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. The two new ICPs created during the audit period had pricing populated on the registry prior to initial electrical connection.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The registry list was examined to confirm compliance.

Audit observation

TUIH do not populate GPS co-ordinates on the registry; compliance was not assessed.

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 reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. The two new ICPs were created at “ready” with a nominated retailer and single price code category code, as required by this clause.

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 reports were examined to determine compliance.

Audit commentary

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

It is unlikely that TUIH 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. No ICPs have “distributor” status applied.

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 decommissioned during the audit period at the trader’s request, and compliance is confirmed.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

The price category code table on the registry was examined.

Audit commentary

TUIH has not created any new price category codes 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

TUIH has not created any new loss category codes during the audit period.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

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

If the distributor wishes to replace an existing loss factor on the table on 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

TUIH updated the loss factor value for TUILV1 twice during the audit period in accordance with this clause.

Loss Factor	Loss Factor Consumption	Start Date	Update date
TUILV1	1.0304	1 June 2022	2 March 2022 3:03:00 PM
TUILV1	1.0294	1 May 2023	26 February 2023 8:32:00 PM

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 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 (a "transfer"), the distributor must:

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

Audit observation

The NSP table was examined.

Audit commentary

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 examined.

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 examined.

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 1 month before the creation or transfer of:

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

Audit observation

The NSP table was reviewed.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

The NSP table was reviewed.

Audit commentary

TUIH has only one NSP. No balancing area changes were made during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

If a transfer of an ICP results in an ICP becoming an NSP at which an embedded network connects to a network, or in an ICP becoming an NSP that is an interconnection point, in respect of the distributor's network, the distributor must give written notice to any trader trading at the ICP of the transfer at least 1 month before the transfer.

Audit observation

The NSP table was reviewed.

Audit commentary

No existing ICPs became NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

The NSP table and registry list were reviewed.

Audit observation

No ICPs were transferred during the audit period.

Audit outcome

Compliant

6.8. Compliant 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, and notifications relating to the certification expiry date change were provided.

Audit commentary

TEG monitors meter certification expiry dates for all of the networks they act as the registry agent for. Compliance is recorded in the TEG agent report.

The NSP table was reviewed on 5 September 2023 and I found that the meter certification expiry date has been updated during the audit period from 13 June 2023 to 17 September 2026.

Notification of the change of certification was provided on time, and the certification details provided matched the physical certificate.

Distributor	NSP POC	Description	MEP	Certification Expiry
TUIH	GRE0111	TUIHANA	AMCI	17 September 2026

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 table on the registry was examined.

Audit commentary

No NSPs were created 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 table on the registry was examined.

Audit commentary

TUIH 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 management of this process is discussed in the TEG agent report. The event detail report for the period from 1 March 2019 to 31 August 2021 was examined to determine whether there have been any MEP changes during the audit period.

Audit commentary

Compliance is recorded in the TEG agent report. 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 observation

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 observation

No ICPs have been transferred 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 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

TUIH has uses one loss factor for its low voltage network, TUILV1. It is derived from the loss factor which the Powerco parent network applies to the TUIH network gateway ICP 1000517667PC5A1 (TGA11), and the loss factor for low voltage ICPs on Powerco's network similar to TUIH's ICPs (TLV3 or TGA).

This ensures that the overall loss factor applied for TUIH ICPs are consistent with the loss factor for similar ICPs on the parent network as shown below:

$$\text{TUIH TUILV1 loss factor} \times \text{Powerco TGA11 LE ICP loss factor} = \text{Powerco TLV3 or TGA loss factor}$$

The calculations for the loss factor applied from 1 May 2023 were checked and confirmed to be correct, and consistent with the formula above and TUIH and Powerco's published loss factors.

Audit outcome

Compliant

CONCLUSION

All registry and NSP table activity during the audit period was reviewed as part of this audit. The audit found three minor non-compliances:

- two relate to an error made when updating the registry affecting a historic record for one ICP, and
- the other relates to three late network updates.

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

PARTICIPANT RESPONSE

TUIH welcomes the opportunity for its distributor processes to be independently audited.