

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

NULITE ILLUMINATED SIGNS LTD AND
GENESIS ENERGY LTD
NZBN: 9429037706609

Supervising Auditor: Tara Gannon

Supporting Auditor: Brett Piskulic

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Date audit report completed: 4 December 2023

Audit report due date: 01-Jun-23

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EXECUTIVE SUMMARY

This audit covers the **Nulite Illuminated Signs Limited (Nulite)** DUML database and processes and was conducted at the request of **Genesis Energy Limited (Genesis)** in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

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

The Nulite DUML load consists of illuminated advertising signs installed at street intersections in East and South Auckland. Nulite also has a number of signs installed which are not included as part of the DUML load. These signs are reconciled as standard unmetered load with individual ICPs and are not included in the scope of this audit. There were 20 signs identified during the field audit which are reconciled as standard unmetered load.

Genesis reconciles the Nulite DUML load as NHH using the UNM profile. The total volume submitted is derived from the trader daily unmetered kWh details recorded on the registry. Genesis received a copy of the Nulite database prior to taking responsibility for these DUML ICPs on 1 April 2022. As Genesis has not received any further updates from Nulite the database has not been used for submission.

A field audit was conducted of all 41 items of load recorded in the database. The discrepancies found in the field indicate that the database is over reporting kWh by 23.64%. This is outside the allowable +/-5% threshold and will be resulting in an estimated annual over submission of 11,002.05 kWh if the database was used for submission.

This audit found seven non-compliances and makes no recommendations. The future risk rating indicates that the next audit be completed in three months. I have considered this in conjunction with Genesis' responses and recommend an audit period of six months to allow time for improvements to be made in the database management processes.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Distributed unmetered load audits	1.10	16A.26	Audit not completed within the timeframe specified by the Electricity Authority.	Strong	Low	1	Investigating
Deriving submission information	2.1	11(1) of Schedule 15.3	<p>Incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments.</p> <p>The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p>	Weak	Medium	6	Investigating
Location of each item of load	2.3	11(2)(b) of Schedule 15.3	One item of load with insufficient details to locate it.	Moderate	Low	2	Investigating
Description and capacity of load	2.4	11(2)(c) of Schedule 15.3	There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.	Moderate	Low	2	Investigating
All load recorded in the database	2.5	11(2A) of Schedule 15.3	Two additional lights found in the field.	Moderate	Low	2	Investigating

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Database accuracy	3.1	15.2 and 15.37B(b)	<p>The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p> <p>There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.</p>	Weak	Medium	6	Investigating
Volume information accuracy	3.2	15.2 and 15.37B(c)	<p>Incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments.</p> <p>The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p>	Weak	Medium	6	Investigating
Future Risk Rating						25	
Future risk rating	0	1-4	5-8	9-15	16-18	19+	
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months	

RECOMMENDATIONS

Subject	Section	Recommendation
		Nil

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

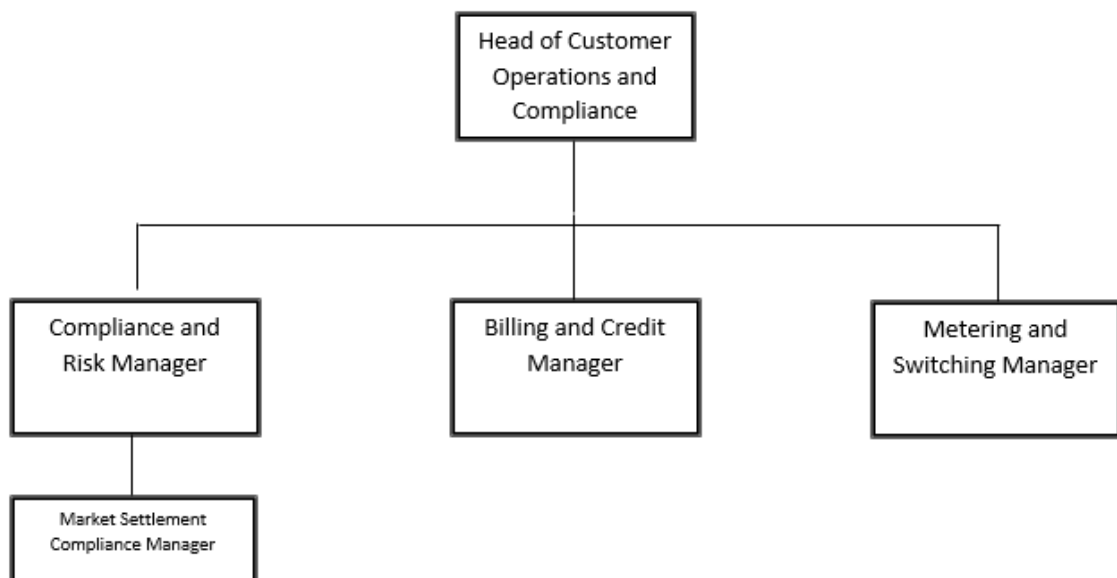
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

Genesis has no exemptions in place in relation to the ICPs covered by this audit report.

1.2. Structure of Organisation

Genesis provided an organisational structure:



1.3. Persons involved in this audit

Auditors:

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

Other personnel assisting in this audit were:

Name	Title	Company
Alysha Majury	Unmetered Account Specialist	Genesis

1.4. Hardware and Software

The streetlight data for Nulite is held in an excel spreadsheet by Genesis. This is backed up in accordance with standard industry procedures. Access to the spreadsheet is restricted by way of user log into the computer drive.

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

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Customer	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0136264797LC7C9	NULITE	BULK UML NU LITE SIGNS	PAK0331	UNM	17	5,684
0586086117LC9FB		BULK UML NULITE SIGNS	WIR0331	UNM	13	4,276
0825228433LCE38		BULK UML NULITE SIGNS	TAK0331	UNM	6	1,992
0987953192LC3D8		NULITE BULK UML	PAK0331	UNM	5	1,520
TOTAL					41	13,472

1.7. Authorisation Received

All information was provided directly by Genesis.

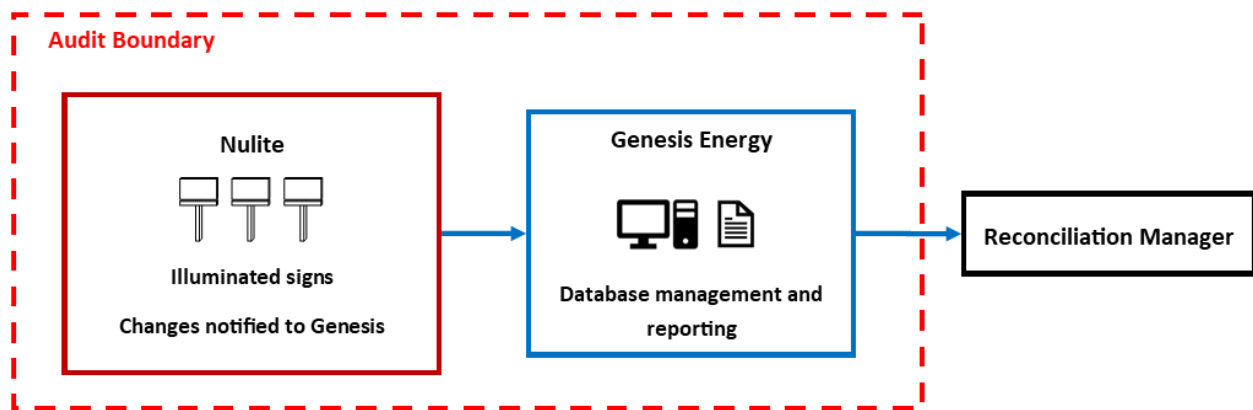
1.8. Scope of Audit

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

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

The Nulite DUMML load consists of illuminated advertising signs installed at street intersections in East and South Auckland. Nulite also has a number of signs installed which are not included as part of the DUMML load. These signs are reconciled as standard unmetered load with individual ICPs and are not included in the scope of this audit. There were 20 signs identified during the field audit which are reconciled as standard unmetered load.

A spreadsheet is maintained by Genesis and the customer is expected to advise Genesis of any changes that occur.



The 100% field audit of all 41 items of load was carried out on 31st October 2023.

1.9. Summary of previous audit

The previous audit was completed in January 2022 by Steve Woods of Veritek Limited. The current status of that audit's findings is detailed below:

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Location of each item of load	2.3	11(2)(b) of Schedule 15.3	One item of load with insufficient details to locate it.	Still existing
Description and capacity of load	2.4	11(2)(c) of Schedule 15.3	There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.	Still existing
All load recorded in the database	2.5	11(2A) of Schedule 15.3	One additional light found in the field.	Still existing
Database accuracy	3.1	15.2 and 15.37B(b)	One item of load with insufficient details to locate it. There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.	Still existing

Table of Recommendations

Subject	Section	Recommendation	Status
Tracking of changes	3.2	Populate the "effective from date" and "end date" in the spreadsheet for changes.	Cleared

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Genesis has requested Provera to undertake this DUML audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database. Genesis was unable to complete this audit by the required timeframe as they were not able to obtain information from Nulite to update the spreadsheet prior to the due date.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 From: 01-Jun-23 To: 04-Dec-23	Audit not completed within the timeframe specified by the Electricity Authority. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, as the delay was outside of the control of Genesis. The impact is assessed to be low, as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	

2. DUMML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

The process for calculation of consumption was examined and the application of profiles was checked. The database was checked for accuracy.

Audit commentary

Submission process and accuracy

Genesis reconciles the Nulite DUMML load as NHH using the UNM profile. The total volume submitted is derived from the trader daily unmetered kWh details recorded on the registry. Genesis received a copy of the Nulite database prior to taking responsibility for the ICPs on 1 April 2022. As Genesis has not received any further updates from Nulite the database has not been used for submission.

I checked the Nulite database against the latest submission totals supplied by Genesis and found the following differences:

ICP	kWh value submitted	Calculated kWh value from database	Differences
0136264797LC7C9	3,379	1,854.09	-1,524.91
0586086117LC9FB	1,936.88	1,394.81	-542.07
0825228433LCE38	464.38	649.78	185.40
0987953192LC3D8	543.12	495.81	-47.31
Total kWh variance			-1,928.89

The incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.

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

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

Reporting of alterations is not being provided to Genesis by Nulite; submission is based on a historical snapshot and does not consider changes or adjustments.

Database accuracy

The field audit findings are detailed in **section 2.5**. The discrepancies found in the field indicate that the database is over reporting kWh by 23.64%. This is outside the allowable +/-5% threshold and will be resulting in an estimated annual over submission of 11,002.05 kWh if the database was used for submission.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 31-Oct-23</p>	<p>Incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments.</p> <p>The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as weak as changes in load are not being reported to Genesis and neither the database nor submission information reflect the true load installed in the field.</p> <p>The impact is assessed to be medium due to the impact on submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The spreadsheet was checked to confirm an ICP was recorded for all items of load.

Audit commentary

The spreadsheet contains a sheet per ICP. All items of load have an ICP associated with them.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The spreadsheet contains the road intersection for each sign. The location for one light is incorrectly recorded. The database records the light is at the intersection of East Tamaki Rd and Ti Rakau Drive, these roads do not intersect so I was unable to locate this light.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 03-Feb-20 To: 31-Oct-23	One item of load with insufficient details to locate it. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	The controls are rated as moderate as this issue was first identified in 2020 but has not been rectified. The impact is assessed to be low as only one item of load is affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	

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

Code reference

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

Code related audit information

The DUMML database must contain:

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

Audit observation

The spreadsheet was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

Audit commentary

The spreadsheet contains a "Lamp Type/Description" field and all lamps are recorded as Fluorescent tubes. There are three wattage fields, "Wattage", "Ballast" and "Total". The "Wattage" fields are populated for all lamps and the "Ballast" and "Total" fields are all blank. There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description
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Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3 From: 01-Jun-17 To: 31-Oct-23	There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as moderate as ballast information has not been provided. The impact is assessed to be low as the volume of lights associated with this database are small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

A field audit was undertaken of all 41 items of load.

Audit commentary

The findings from the field audit are detailed below:

ICP	Database Count	Field Count	Field count differences	Wattage differences	Comments
0136264797LC7C9 Pakuranga	17	17	+1/-1	-	1 x additional sign at CNR Ti Rakau and Harris Rd. No sign at CNR Harris Rd and Nandina Ave.
0987953192LC3D8 East Tamaki	5	2	-3	-	No sign at CNR Springs Rd and Smales Rd. No sign at CNR Kerwyn Ave and Arwen Pl. Unable to locate sign at intersection of Ti Rakau Dr and East Tamaki Rd, these roads do not intersect.
0825228433LCE38 Manurewa Takanini	3	4	+1	-	1 x extra sign CNR Gt South and Spartan Rd, this was recorded as removed in the database.
0586086117LC9FB Wiri	12	11	-1	-	No sign at CNR of Gt South Rd & Ryan Pl.
TOTAL	41	38	7(+2, -5)	-	

Two extra lights were found in the field. The additional lights found in the field are recorded as non-compliance below. The accuracy of the database is detailed in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 01-Jun-17 To: 31-Oct-23	Two additional lights found in the field. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls in place are rated as moderate as there is room for improvement in the management of the database. The impact is assessed to be low, based on the kWh differences.	
Actions taken to resolve the issue		Completion date
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024
		Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The spreadsheet contains a separate tab for each ICP. Details of the dates of any additions and removals are recorded in the “Comments” field within each tab. Compliance is recorded in this section but non-compliance is recorded in **sections 2.1, 3.1 and 3.2** as whilst the spreadsheet has the ability for changes to be recorded, it has not been updated since April 2022.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The spreadsheet was checked for audit trails.

Audit commentary

The spreadsheet contains a separate tab for each ICP. Details of the dates of any additions and removals are recorded in the “Comments” field within each tab. Compliance is recorded in this section but non-compliance is recorded in **sections 2.1, 3.1 and 3.2** as whilst the spreadsheet has the ability for changes to be recorded, it has not been updated since April 2022.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

A full field audit of all 41 items of load was undertaken to confirm the accuracy of the spreadsheet.

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

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

Audit commentary

Field Audit Findings

The field audit findings are detailed in **section 2.5**. The discrepancies found in the field indicate that the database is over reporting kWh by 23.64%:

ICP	Database Wattage (Watts)	Field Wattage (Watts)	Wattage difference (Watts)	Annualised variance kWh
0136264797LC7C9 Pakuranga	5,684	5,392	292	1247.13
0987953192LC3D8 East Tamaki	1,520	584	936	3997.66
0825228433LCE38- Takanini	1,992	1,348	644	2750.52
0586086117LC9FB Wiri	4,276	3,572	704	3006.74
Sub totals	13,472	10,896	2,576	11,002
TOTAL ANNUALISED OVER SUBMISSION				11,002.05

This is outside the allowable +/-5% threshold and will be resulting in an estimated annual over submission of 11,002.05 kWh if the database was used for submission. Non-compliance is recorded.

Light description and capacity accuracy

The check of database wattage alignment with the standardised wattage table was unable to be confirmed as there is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.

This is recorded as non-compliance in **section 2.4** and below.

Change Management

Nulite is expected to provide Genesis with the details of any changes made in the field so that the spreadsheet can be kept up to date. Genesis advised that there have been no updates received since they took responsibility for the ICPs on 1 April 2022 which has led to the database inaccuracies detailed above.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: 15.2 and 15.37B(b) From: Unknown To: 31-Oct-23	The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission. There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls in place are rated as weak as there have been no updates to the database since 1 April 2022. The impact is assessed to be medium, based on the kWh differences identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

- checking the registry to confirm that the ICP has the correct profile and submission flag, and
- checking the expected kWh against the submitted figure to confirm accuracy.

Audit commentary

Submission process and accuracy

Genesis reconciles the Nulite DUML load as NHH using the UNM profile. The total volume submitted is derived from the trader daily unmetered kWh details recorded on the registry. Genesis received a copy of the Nulite database prior to taking responsibility for the ICPs on 1 April 2022. As Genesis has not received any further updates from Nulite the database has not been used for submission.

I checked the Nulite database against the latest submission totals supplied by Genesis and found the following differences:

ICP	kWh value submitted	Calculated kWh value from database	Differences
0136264797LC7C9	3,379	1,854.09	-1,524.91
0586086117LC9FB	1,936.88	1,394.81	-542.07
0825228433LCE38	464.38	649.78	185.40
0987953192LC3D8	543.12	495.81	-47.31
Total kWh variance			-1,928.89

The incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.

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

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

Reporting of alterations is not being provided to Genesis by Nulite, submission is based on a historical snapshot and does not consider changes or adjustments.

The last audit included a recommendation that the dates of changes are recorded in the spreadsheet. I have recorded this as cleared as the spreadsheet has the ability for changes to be recorded as detailed in **sections 2.6 and 2.7**.

Database accuracy

The field audit findings are detailed in **section 2.5**. The discrepancies found in the field indicate that the database is over reporting kWh by 23.64%. This is outside the allowable +/-5% threshold and will be resulting in an estimated annual over submission of 11,002.05 kWh if the database was used for submission.

Audit outcome

Non-compliant

Non-compliance	Description	
Audit Ref: 3.2 With: Clauses 15.2 and 15.37B(c) From: Unknown To: 31-Oct-23	Incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum. Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments. The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as weak as changes in load are not being reported to Genesis and neither the database nor submission information reflect the true load installed in the field. The impact is assessed to be medium due to the impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	

CONCLUSION

The Nulite DUML load consists of illuminated advertising signs installed at street intersections in East and South Auckland. Nulite also has a number of signs installed which are not included as part of the DUML load. These signs are reconciled as standard unmetered load with individual ICPs and are not included in the scope of this audit. There were 20 signs identified during the field audit which are reconciled as standard unmetered load.

Genesis reconciles the Nulite DUML load as NHH using the UNM profile. The total volume submitted is derived from the trader daily unmetered kWh details recorded on the registry. Genesis received a copy of the Nulite database prior to taking responsibility for these DUML ICPs on 1 April 2022. As Genesis has not received any further updates from Nulite the database has not been used for submission.

A field audit was conducted of all 41 items of load recorded in the database. The discrepancies found in the field indicate that the database is over reporting kWh by 23.64%. This is outside the allowable +/-5% threshold and will be resulting in an estimated annual over submission of 11,002.05 kWh if the database was used for submission.

This audit found seven non-compliances and makes no recommendations. The future risk rating indicates that the next audit be completed in three months. I have considered this in conjunction with Genesis' responses and recommend an audit period of six months to allow time for improvements to be made in the database management processes.

PARTICIPANT RESPONSE

Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.

Once we have established key contact persons the next agenda will be obtaining an up-to-date data set and highlighting what was found in field. We agree with the recommended next review date.