

# ELECTRICITY INDUSTRY PARTICIPATION CODE RECONCILIATION PARTICIPANT AUDIT REPORT

For

## **POWER EDGE LIMITED**

Prepared by: Allan Borcoski - Borcoski Energy Services Ltd

Date audit commenced: 21 November 2023

Date audit report completed: 16 January 2024

Audit report due date: 17-Jan-24

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## EXECUTIVE SUMMARY

This reconciliation participant audit was performed at the request of Power Edge Limited (EDGE) to support their application for certification, in accordance with clauses 4 of Schedule 15.1 of The Code 2010. The relevant clauses audited are as required by the Guidelines for Reconciliation Participants Audits V 7.1 issued by the Electricity Authority.

Power Edge is currently responsible for 31 ICPs. 2 ICPs are reconciled as HHR and remaining ICPs as NHH. The company trades a number of ICPs as a tier 2 trader. Tier 2 trading is not covered by this audit. The company's market offering targets customers with embedded generation installed or intend to have it installed.

To verify the compliance of switching, registry updates, and the calculation of reconciliation submissions we conducted judgement based sampling by selecting typical examples of the population or identifying at examples of non-compliance within switching transactions.

The audit found 6 non-compliance issues.

It was observed in this audit that Power Edge accepted a significant number of move in switch event dates that were backdated by considerably. It should be noted this practice introduces additional challenges and risk to successful Registry information management and the reconciliation process.

The main issue noted in this audit was a continuation from the previous audit of providing inaccurate Average Daily Consumption values in the CS files. It is suggested that the use of information contained in the monthly submission summaries provided by John Candy Consulting would be helpful in calculating the average daily consumption values in future.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. Table 1 of the Guidelines for Reconciliation Participant audit provides some guidance on this matter. The Future Risk Rating score is 8.

We thank Power Edge staff and John Candy Consulting for their cooperation in this audit.

The audit period was 01/07/2022 to 30/11/2023.

## AUDIT SUMMARY

### NON-COMPLIANCES

| Subject  | Section | Clause                          | Non Compliance  | Controls | Audit Risk Rating | Breach Risk Rating | Remedial Action |
|--|---------|---------------------------------|---|----------|-------------------|--------------------|-----------------|
| Relevant information                                       | 2.1     | 10.6, 11.2, 15.2                | A small quantity of Registry information updates was late   | Moderate | Low               | 2                  | Identified      |
| Changes to the registry information                        | 3.3     | 10 Schedule 11.1                | 9 x Trader Information updates to the Registry were later than five business days                         | Moderate | Low               | 2                  | Identified      |
| Provision of information to the registry                   | 3.6     | Clause 9 (1(k) of Schedule 11.1 | 1 x ICP had its ANZSIC code incorrectly recorded in the Registry.   | Strong   | Low               | 1                  | Identified      |
| Losing trader must provide final information - switch move | 4.10    | 11 of Schedule 11.3             | 7 x ICP switch moves CS files (70% of sample) had inaccurate average daily consumption values identified. | Weak     | Low               | 3                  | Identified      |
| Future Risk Rating   |         |                                 |   |          |                   | <b>8</b>           |                 |

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

## 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 Electricity Authority (EA) website was checked, and this was discussed with Power Edge.

#### Audit commentary

Power Edge (EDGE) states it did not apply for any exemptions and does not have any exemptions granted to exempt them from compliance with all or any of the clauses.

### 1.2. Structure of Organisation

Roy Netzer is a director. The company employs one person.

### 1.3. Persons involved in this audit

| Name           | Title                                  | Company                      |
|----------------|--|------------------------------|
| Roy Netzer     | Director                               | Power Edge Ltd               |
| John Candy     | Director                               | J C Consulting Ltd           |
| Allan Borcoski | Electricity Authority Approved Auditor | Borcoski Energy Services Ltd |

### 1.4. Use of Agents (Clause 15.34)

#### Code reference

*Clause 15.34*

#### Code related audit information

*A reconciliation participant who uses an agent*

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

#### Audit observation

This was discussed with EDGE and JCC. EDGE uses JC Consulting (JCC) to create and submit files to the reconciliation manager.



## Audit commentary

As a part of this audit, work completed by JCC as EDGE's agent was audited. Details are in the relevant parts of this audit. EDGE are aware of their responsibilities in relation to this clause.

### 1.5. Hardware and Software

Power Edge does not use any specific software to perform tasks covered by this audit.

JCC uses the JC RM TOOL access database, which is backed up to the cloud using both Microsoft OneDrive and Dropbox.

Power Edge invoices their customers themselves using their billing system Ultimate.

### 1.6. Breaches or Breach Allegations

The EA Website indicates there were no breaches or breach allegations lodged against EDGE in the period covered by this audit.

### 1.7. ICP Data

| Metering Category | 13/12/2023 | 18/07/2023 | 09/08/2022 | 08/06/2021 |
|-------------------|------------|------------|------------|------------|
| 1                 | 27         | 28         | 79         | 17         |
| 2                 | 2          | 2          | 1          | 0          |
| 3                 | 0          | 0          | 0          | 0          |
| 4                 | 0          | 0          | 0          | 0          |
| 5                 | 0          | 0          | 0          | 0          |
| 9                 | 3          | 3          | 2          | 0          |

| Status   | ICPs<br>13/12/2023 | ICPs<br>18/07/2023 | ICPs<br>09/08/2022 | ICPs<br>08/06/2021 |
|--|--------------------|--------------------|--------------------|--------------------|
| Active (2,0)   | 22                 | 24                 | 77                 | 17                 |
| Inactive – new connection in progress (1,12)                     | 1                  | 1                  | 0                  | 0                  |
| Inactive – electrically disconnected vacant property (1,4)       | 0                  | 0                  | 0                  | 0                  |
| Inactive – electrically disconnected remotely by AMI meter (1,7) | 0                  | 0                  | 1                  | 0                  |
| Inactive – electrically disconnected at pole fuse (1,8)          | 0                  | 0                  | 0                  | 0                  |

|  |   |   |   |   |
|--|---|---|---|---|
| Inactive – electrically disconnected due to meter disconnected (1,9) | 5 | 5 | 0 | 0 |
| Inactive – electrically disconnected at meter box fuse (1,10)        | 0 | 0 | 0 | 0 |
| Inactive – electrically disconnected at meter box switch (1,11)      | 0 | 0 | 0 | 0 |
| Inactive – electrically disconnected ready for decommissioning (1,6) | 2 | 2 | 4 | 0 |
| Inactive – reconciled elsewhere (1,5)                                | 0 | 0 | 0 | 0 |
| Decommissioned (3)   | 2 | 2 | 0 | 0 |

### 1.8. Authorisation Received

EDGE made available all information required to complete the audit, EDGE also provided authorisation to Borcoski Energy Services Ltd permitting the collection of data from other parties for matters directly related to the audit.

### 1.9. Scope of Audit

This reconciliation participant audit was performed at the request of Power Edge Ltd to encompass the Authority's request for annual audits as required by clause 2 of Schedule 15.1 of the Code, to assure compliance with the Electricity Industry Participation Code 2010.

The audit was carried out between 13/12/2023 and 16/01/24 remotely by telecon and email.

| <b>Tasks Requiring Certification Under Clause 15.38(1) of Part 15</b>  | <b>Relevant to audit</b> | <b>Agents Involved in Performance of Tasks</b> |
|--|--------------------------|--|
| (a) - Maintaining registry information and performing customer and embedded generator switching                  | ✓                        |  |
| (b) – Gathering and storing raw meter data   | ✓                        |  |
| (c)(i) - Creation and management of HHR volume information   | ✗                        |  |
| (c)(ii) - Creation and management of NHH volume information  | ✗                        |  |
| (c)(ii) - Creation and management of HHR and NHH volume information  | ✓                        | JC Consulting                                  |
| (c)(iv) - Creation and management of dispatchable load information   | ✗                        |  |
| (d)(i) – Calculation and delivery of ICP days under clause 15.6  | ✓                        | JC Consulting                                  |
| (d)(ii) - delivery of electricity supplied information under clause 15.7   | ✓                        | JC Consulting                                  |
| (d)(iii) - delivery of information from retailer and direct purchaser half hourly metered ICPs under clause 15.8 | ✓                        | JC Consulting                                  |
| (e) – Provision of submission information for reconciliation   | ✓                        | JC Consulting                                  |

## 1.10. Summary of previous audit

| Subject  | Section | Clause              | Non Compliance   | Comment      |
|--|---------|---------------------|--|--------------|
| Audit Requirements   | 1.11    | 15.37A              | Audit report completed late  | Cleared      |
| Relevant information                                       | 2.1     | 10.6,11.2, 15.2     | Incorrect information in the registry for a small number of ICPs   | Still Exists |
| Changes to the registry information                        | 3.3     | 10 of Schedule 11.1 | 11 x trader information updates to the Registry were later than five business days   | Still Exists |
| Provision of information to the registry                   | 3.5     | 9 of Schedule 11.1  | 2 x Trader Information updates to the Registry were late   | Cleared      |
| Management of "inactive" status                            | 3.9     | 19 of Schedule 11.  | 1 x ICP made inactive - electrically disconnected ready for decommissioning (1,6) but records show consumption submitted for July 2022 | Cleared      |
| Losing trader must provide final information - switch move | 4.10    | 11 of Schedule 11.3 | 5 x ICP switch moves CS files (50% of sample) had inaccurate average daily consumption values identified.                              | Still Exists |

The previous audit was conducted by Allan Borcoski of Borcoski Energy Services in September 2022.

## 2. OPERATIONAL INFRASTRUCTURE

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

#### Code reference

Clause 10.6, 11.2, 15.2

#### Code related audit information

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

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

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

#### Audit observation

The LIS and EDA files were checked for the audit period, the Registry and Audit Compliance Summary Report for the audit period to assess compliance with code requirements.

#### Audit commentary

The following non compliances were identified and are detailed in the appropriate sections of this report:

| Section | Registry Discrepancy  |
|---------|---|
| 3.3     | 9 x Trader Information updates to the Registry were later than five business days.                        |
| 3.6     | 1 x ICP had its ANZSIC code incorrectly recorded in the Registry.   |
| 4.10    | 7 x ICP switch moves CS files (70% of sample) had inaccurate average daily consumption values identified. |

#### Audit outcome

Non-compliant

## NON-COMPLIANCE

| <b>Non-compliance</b>  | <b>Description</b>  |                        |                               |
|--|---|------------------------|-------------------------------|
| Audit Ref: 2.1<br><br>With: 10.6, 11.2, 15.2<br><br>From: 01-Jun-21<br>To: 30-Jun-22 | A small quantity of Registry information updates were late.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Once Previously<br>Controls: Moderate<br>Breach risk rating: 2   |                        |                               |
| <b>Audit risk rating</b>   | <b>Rationale for audit risk rating</b>  |                        |                               |
| Low  | The controls are rated as moderate. Some improvements can be made to ensure updates to the registry are completed in a timely manner. Negligible impact on settlement outcomes due to the small number of ICPs. Audit risk rating is low. |                        |                               |
| <b>Actions taken to resolve the issue</b>  |   | <b>Completion date</b> | <b>Remedial action status</b> |
| See Participant Response   |   |                        | Identified                    |
| <b>Preventative actions taken to ensure no further issues will occur</b>             |   | <b>Completion date</b> |                               |
| See Participant Response   |   |                        |                               |

## 2.2. Provision of information (Clause 15.35)

### Code reference

Clause 15.35

### Code related audit information

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

### Audit observation

EDGE made available process documentation, data files and reports as requested to complete the audit.

### Audit commentary

Compliance performance of obligations to provide information in accordance with part 15 was observed using the information provided and discussed in the relevant sections of this audit report.

#### **Audit outcome**

Compliant

### **2.3. Data transmission (Clause 20 Schedule 15.2)**

#### **Code reference**

*Clause 20 Schedule 15.2*

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. EDGE engage JCC as the agent for the submission of information to the reconciliation manager. Information delivery processes to the reconciliation manager were reviewed along with submission files for the audit period. The MEPs audit reports were also checked as appropriate.

#### **Audit commentary**

JCC downloads data from MEPs servers into the RM TOOL. Reconciliation files are submitted via the RM portal by JCC. JCC's systems use secure transmission functions such as SFTP and password protection for the transmission of all data. JCC provides EDGE with a copy of the metering data for customer billing.

The data transfer processes were reviewed and found to be compliant.

#### **Audit outcome**

Compliant

### **2.4. Audit trails (Clause 21 Schedule 15.2)**

#### **Code reference**

*Clause 21 Schedule 15.2*

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

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

*The audit trail must include details of information:*

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

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

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

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

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

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

### **Audit observation**

This was discussed with EDGE and JCC. Switching is performed by EDGE using the registry web interface which has audit trails included. The Registry was checked.

EDGE engage JCC as the agent for the submission of information to the reconciliation manager. Information delivery processes to the reconciliation manager were reviewed along with submission files for the audit period.

The audit trail for data gathering, validation, and processing functions carried out by JCC were reviewed along with communication logs.

### **Audit commentary**

JCC holds audit trails of downloaded metering via FileZilla. It was confirmed that audit trails for data gathering, validation, and processing functions carried out by JCC are recorded in the RM TOOL and appropriately archived.

The RM TOOL supports changes to data if required with logs created showing the date and time of the activity, an activity identifier, and the operator identifier.

The RM portal records the audit trail of reconciliation files submitted by JCC.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 10.4*

### **Code related audit information**

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

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

### **Audit observation**

The Terms and Conditions of Supply to Customers provided by EDGE were reviewed.

### **Audit commentary**

Checks confirm the Terms and Conditions of Supply to Customers provide the relevant information to meet this code requirement.

### **Audit outcome**

Compliant

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

### **Code reference**

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



### Code related audit information

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

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

*The trader must use its best endeavours to provide access:*

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

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

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

### Audit observation

The Terms and Conditions of Supply to Customers provided by EDGE were reviewed.

### Audit commentary

Checks confirm the Terms and Conditions of Supply to Customers provide the appropriate information for access arrangements to meet code requirements in sections 16 and 19.

### Audit outcome

Compliant

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

### Code reference

*Clause 10.35(1)&(2)*

### Code related audit information

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

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

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

### Audit observation

The LIS file for the audit period was reviewed. MEP agreements were also reviewed.

### Audit commentary

The LIS report reveals all the ICPs (metering category 1 and 2 only) EDGE were responsible for were metered and the MEPs recorded in the Registry. The agreements with the MEPs ensure the ICPs have appropriate and approved metering designs installed.

EDGE is not responsible for any ICPs using loss compensation factors.

### Audit outcome

Compliant

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

### Code reference

Clause 11.15B

### Code related audit information

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

- *the Authority to assign the rights and obligations of the trader under the contract to another trader if the trader commits an event of default under paragraph (a) or (b) or (f) or (h) of clause 14.41 (clause 11.15B(1)(a)); and*
- *the terms of the assigned contract to be amended on such an assignment to—*
- *the standard terms that the recipient trader would normally have offered to the customer immediately before the event of default occurred (clause 11.15B(1)(b)(i)); or*
- *such other terms that are more advantageous to the customer than the standard terms, as the recipient trader and the Authority agree (clause 11.15B(1)(b)(ii)); and*
- *the terms of the assigned contract to be amended on such an assignment to include a minimum term in respect of which the customer must pay an amount for cancelling the contract before the expiry of the minimum term (clause 11.15B(1)(c)); and*
- *the trader to provide information about the customer to the Authority and for the Authority to provide the information to another trader if required under Schedule 11.5 (clause 11.15B(1)(d)); and*
- *the trader to assign the rights and obligations of the trader to another trader (clause 11.15B(1)(e)).*

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

### Audit observation

The Terms and Conditions of Supply to Customers provided by EDGE were reviewed.

### Audit commentary

The Terms and Conditions of Supply to Customers provide the relevant information to meet code requirements.

Checks confirm the Terms and Conditions of Supply to Customers provide the appropriate arrangements to meet code requirements and permit assignment by the Authority in section 24.

### Audit outcome

Compliant

## 2.9. Connection of an ICP (Clause 10.32)

### Code reference

Clause 10.32

### Code related audit information

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS, EDA files and Registry were checked.

#### **Audit commentary**

EDGE do not currently accept new connections. Despite this it was noted that one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection. An MEP was nominated, and metering installed prior to the ICPs initial energisation.

The code requirements were met.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.33(1)*

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. EDGE do not currently accept new connections. The LIS, EDA files and Registry were checked.

#### **Audit commentary**

Checks identified one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection. An MEP was nominated, and metering installed prior to the ICPs initial energisation. The MEP was not authorised to temporarily electrically connect the ICP. EDGE do not currently accept new connections and don't expect to do so in future so consequently EDGE will not be authorising the temporary electrical connection of an ICP either.

#### **Audit outcome**

Compliant

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

### Code reference

Clause 10.33A(1)

### Code related audit information

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

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

### Audit observation

This was discussed with EDGE and JCC. EDGE do not currently accept new connections. The LIS, EDA files and Audit Compliance report were checked along with the Registry. The EDGE disconnection and reconnection process was reviewed.

### Audit commentary

Checks identified one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection. An MEP was nominated, and metering installed prior to the ICPs initial energisation. The MEP was not authorised to temporarily electrically connect the ICP. EDGE do not currently accept new connections and don't expect to do so in future so consequently EDGE will not be authorising the temporary electrical connection of an ICP either. Checks of the LIS file and Audit Compliance report all identified five ICPs disconnected at the meter events initiated by EDGE during this audit period. The Registry confirmed the five ICPs disconnected at the meter had current certification and none have subsequently been reconnected.

### Audit outcome

Compliant

## 2.12. Arrangements for line function services (Clause 11.16)

### Code reference

Clause 11.16

### Code related audit information

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

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

### Audit observation

The LIS file was reviewed to identify the networks EDGE traded and MEPs in place during the audit period. The line function services agreements were viewed for the traded networks.

#### **Audit commentary**

Checks confirm each ICP EDGE were responsible for during the audit period were appropriately supported by a line function services agreement with the network. The Registry recorded an MEP for each ICP.

#### **Audit outcome**

Compliant

### 2.13. Arrangements for metering equipment provision (Clause 10.36)

#### **Code reference**

*Clause 10.36*

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

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

#### **Audit observation**

The LIS file was reviewed to identify the MEPs for EDGE ICPs during the audit period. The ICP switching and MEP Nomination processes were reviewed.

#### **Audit commentary**

EDGE has MEPs assigned to all ICPs it is responsible for in the Registry. Checks confirm arrangements were in place with all MEPs. MEP agreements were in place with COUP, IHUB, AMS, SMCO, and FCLM.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.33B*

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

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

- *restore the disconnection, including removing any bypass and disconnecting using the same method the losing trader used*
- *reimburse the losing trader for any direct costs incurred*

#### **Audit observation**

This was discussed with EDGE and JCC. The switching process was reviewed, and the EDA files and Registry were checked.

#### **Audit commentary**

EDGE received twenty four NWs from losing traders during the audit period. All of them had the "active" status.

EDGE is aware of their obligations with respect to this clause.

Checks of the EDA file and Registry confirm code requirements were met.

#### **Audit outcome**

Compliant

### 2.15. Electrical disconnection of ICPs (Clause 10.33B)

#### **Code reference**

*Clause 10.33B*

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The EDA and LIS files and the Registry were checked.

#### **Audit commentary**

The LIS file identified five ICPs were made inactive - electrically disconnected due to meter disconnected (1,9) during the audit period. The Registry confirmed EDGE was the Trader recorded in the Registry at the time.

#### **Audit outcome**

Compliant

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

#### **Code reference**

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

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

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

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

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

- *ensure personal are qualified to remove the seal and perform the permitted work and they replace the seal in accordance with the Code*
- *replace the seal with its own seal*
- *have a process for tracing the new seal to the personnel*
- *update the registry (if the profile code has changed)*
- *notify the metering equipment provider*

### Audit observation

This was discussed with EDGE and JCC. The disconnection/reconnection procedure was checked.

### Audit commentary

EDGE does not carry out this activity. EDGE stated no meters at ICPs it was responsible for during the audit period were bridged or unbridged. EDGE will request the MEP of record to deal with any metering related issues.

### Audit outcome

Compliant

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

### Code reference

Clause 10.33C and 2A of Schedule 15.2

### Code related audit information

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

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

*If the trader bridges a meter, the trader must:*

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

*The trader must determine meter readings as follows:*

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

### Audit observation

This was discussed with EDGE and JCC. The disconnection/reconnection procedure was checked.

### Audit commentary

EDGE does not carry out this activity. EDGE stated no meters at ICPs it was responsible for during the audit period were bridged or unbridged. EDGE will request the MEP of record to deal with any metering related issues.

JCC has processes in place to identify potentially bridged (or faulty) metering. Checks confirmed no meters failed and subsequent meter reading data estimation was required during



the audit period. In the unlikely event of a bridged meter occurrence replacement volumes would be calculated and submitted to the reconciliation manager.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 11.30*

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. A sample invoice was provided and reviewed.

#### **Audit commentary**

Checks confirm the relevant ICP identifier is printed on every invoice.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 11.30A*

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. A sample invoice and Terms and Conditions were provided and reviewed.

#### **Audit commentary**

Checks confirm the Terms and Conditions ( section 15), PowerEdge website and invoice all display Utilities Disputes information.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 11.30B*



### **Code related audit information**

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

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

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

### **Audit observation**

This was discussed with EDGE and JCC. A sample invoice and the website were checked.

### **Audit commentary**

Checks confirm the emails, invoices and the PowerEdge website contain information about the PowerSwitch website.

### **Audit outcome**

Compliant

### 3. MAINTAINING REGISTRY INFORMATION

#### 3.1. Obtaining ICP identifiers (Clause 11.3)

##### Code reference

Clause 11.3

##### Code related audit information

*The following participants must, before assuming responsibility for certain points of connection on a local network or embedded network, obtain an ICP identifier for the point of connection:*

- a) *a trader who has agreed to purchase electricity from an embedded generator or sell electricity to a consumer*
- b) *an embedded generator who sells electricity directly to the clearing manager*
- c) *a direct purchaser connected to a local network or an embedded network*
- d) *an embedded network owner in relation to a point of connection on an embedded network that is settled by differencing*
- e) *a network owner in relation to a shared unmetered load point of connection to the network owner's network*
- f) *a network owner in relation to a point of connection between the network owner's network and an embedded network.*

*ICP identifiers must be obtained for points of connection at which any of the following occur:*

- *a consumer purchases electricity from a trader 11.3(3)(a)*
- *a trader purchases electricity from an embedded generator 11.3(3)(b)*
- *a direct purchaser purchases electricity from the clearing manager 11.3(3)(c)*
- *an embedded generator sells electricity directly to the clearing manager 11.3(3)(d)*
- *a network is settled by differencing 11.3(3)(e)*
- *there is a distributor status ICP on the parent network point of connection of an embedded network or at the point of connection of shared unmetered load. 11.3(3)(f)*

##### Audit observation

This was discussed with EDGE and JCC. EDGE do not currently accept new connections. The LIS, EDA files and Registry were checked.

##### Audit commentary

EDGE do not currently accept new connections. Despite this it was noted that one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection. An MEP was nominated, and metering installed prior to the ICPs initial energisation.

The code requirements were met.

##### Audit outcome

Compliant

#### 3.2. Providing registry information (Clause 11.7(2))

##### Code reference

Clause 11.7(2)

##### Code related audit information

*Each trader must provide information to the registry manager about each ICP at which it trades electricity in accordance with Schedule 11.1.*

##### Audit observation

This was discussed with EDGE and JCC. EDGE do not currently accept new connections. The LIS and EDA files were checked. Switching processes were reviewed.

**Audit commentary**

EDGE do not currently accept new connections. Despite this it was noted that one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection. An MEP was nominated, and metering installed prior to the ICPs initial energisation.

A check of the LIS file shows all required information about each ICP was provided to the Registry for each ICP EDGE trades electricity.

**Audit outcome**

Compliant

**3.3. Changes to registry information (Clause 10 Schedule 11.1)**

**Code reference**

*Clause 10 Schedule 11.1*

**Code related audit information**

*If information provided by a trader to the registry manager about an ICP changes, the trader must provide written notice to the registry manager of the change no later than 5 business days after the change.*

**Audit observation**

This was discussed with EDGE and JCC. The EDA and LIS files, the Registry and the Audit Compliance report for the audit period were checked.

**Audit commentary**

The following Registry update discrepancies were observed:

| <b>Discrepancy</b>         | <b>Business Days</b> | <b>Comment</b> |
|----------------------------|----------------------|----------------|
| Change Submission Type HHR | Range 19 to 27       | 2 x ICP        |
| Change Submission Type NHH | Range 19 to 27       | 2 x ICP        |
| Change Profile Type        | Range 8 to 48        | 4 x ICP        |
| Proposed MEP               | 63                   | 1 x ICP        |

**Audit outcome**

Non-compliant

## NON-COMPLIANCE

| Non-compliance  | Description  |                 |                        |
|---|--|-----------------|------------------------|
| Audit Ref: 3.3<br><br>With: 10 of Schedule 11.1<br><br>From: 01-Jul-22<br>To: 30-Nov-23 | 9 x Trader Information updates to the Registry were later than five business days.<br><br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Twice Previously<br>Controls: Moderate<br>Breach risk rating: 2                        |                 |                        |
| Audit risk rating   | Rationale for audit risk rating  |                 |                        |
| <b>Low</b>  | The controls are rated as moderate. Some improvements can be made to ensure updates to the registry are completed in a timely manner. There was minor impact on settlement outcomes due to the small number of ICPs. Audit risk rating is low. |                 |                        |
| Actions taken to resolve the issue  |  | Completion date | Remedial action status |
| See Participant Response  |  |                 | Identified             |
| Preventative actions taken to ensure no further issues will occur                       |  | Completion date |                        |
| See Participant Response  |  |                 |                        |

### 3.4. Trader responsibility for an ICP (Clause 11.18)

#### Code reference

Clause 11.18

#### Code related audit information

*A trader becomes responsible for an ICP when the trader is recorded in the registry as being responsible for the ICP.*

*A trader ceases to be responsible for an ICP if:*

- *another trader is recorded in the registry as accepting responsibility for the ICP (clause 11.18(2)(a)); or*
- *the ICP is decommissioned in accordance with clause 20 of Schedule 11.1 (clause 11.18(2)(b)).*
- *if an ICP is to be decommissioned, the trader who is responsible for the ICP must (clause 11.18(3)):*

- *arrange for a final interrogation to take place prior to or upon meter removal (clause 11.18(3)(a)); and*
- *advise the MEP responsible for the metering installation of the decommissioning (clause 11.18(3)(b)).*

*A trader who is responsible for an ICP (excluding UML) must ensure that an MEP is recorded in the registry for that ICP (clause 11.18(4)).*

*A trader must not trade at an ICP (excluding UML) unless an MEP is recorded in the registry for that ICP (clause 11.18(5)).*

#### **Audit observation**

This was discussed with EDGE and JCC. The EDA and LIS files, the Registry and the Audit Compliance report for the audit period were checked. The ICP Decommission and MEP Nomination processes were reviewed.

#### **Audit commentary**

LIS checks confirm all ICPs EGE were responsible for during the audit period had a valid MEP recorded in the Registry.

EDGE does not intend to trade UML, JCC however is able to identify UML and is able to appropriately process UML ICPs if a UML ICP is inadvertently switched in.

EDGE stated they are aware of their code requirements and obligations under this clause.

#### **Audit outcome**

Compliant

### **3.5. Provision of information to the registry manager (Clause 9 Schedule 11.1)**

#### **Code reference**

*Clause 9 Schedule 11.1*

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

*Each trader must provide the following information to the registry manager for each ICP for which it is recorded in the registry as having responsibility:*

- a) the participant identifier of the trader, as approved by the Authority (clause 9(1)(a))*
- b) the profile code for each profile at that ICP, as approved by the Authority (clause 9(1)(b))*
- c) the metering equipment provider for each category 1 metering or higher (clause 9(1)(c))*
- d) the type of submission information the trader will provide to the RM for the ICP (clause 9(1)(ea))*
- e) if a settlement type of UNM is assigned to that ICP, either:*
  - the code ENG if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*
  - in all other cases, the daily average kWh of unmetered load at the ICP (clause 9(1)(f)(ii)).*
  - the type and capacity of any unmetered load at each ICP (clause 9(1)(g))*
  - the status of the ICP, as defined in clauses 12 to 20 (clause 9(1)(j))*
  - except if the ICP exists for the purposes of reconciling an embedded network or the ICP has distributor status, the trader must provide the relevant business classification code applicable to the customer (clause 9(1)(k)).*

*The trader must provide information specified in (a) to (j) above within 5 business days of trading (clause 9(2)).*

*The trader must provide information specified in 9(1)(k) no later than 20 business days of trading (clause 9(3))*

### **Audit observation**

This was discussed with EDGE and JCC. The EDA and LIS files, the Registry and the Audit Compliance report for the audit period were checked.

### **Audit commentary**

This section was non-compliant at last audit.

EDGE does not currently nor intend to trade UML.

Checks confirm all ICPs EDGE are responsible for have the information required by this clause recorded in the Registry. Although several Trader information updates were late, and this was covered in section 3.3.

### **Audit outcome**

Compliant

## **3.6. ANZSIC codes (Clause 9 (1(k) of Schedule 11.1)**

### **Code reference**

*Clause 9 (1(k) of Schedule 11.1*

### **Code related audit information**

*Traders are responsible to populate the relevant ANZSIC code for all ICPs for which they are responsible.*

### **Audit observation**

This was discussed with EDGE and JCC. The LIS, Registry and Audit Compliance report were checked.

### **Audit commentary**

All but one ICP EDGE are responsible for have relevant ANZSIC codes recorded in the Registry. The Audit Compliance report identified one ICP with a residential ANZSIC code populated in the Registry despite the ICP being a metering category 2 site. The incorrect ANZSIC code was recorded in the Registry at switch in. Further investigation established the Registry had been subsequently updated with a relevant code over fourteen months after it had been switched in.

### **Audit outcome**

Non-compliant

## NON-COMPLIANCE

| Non-compliance  | Description   |                 |                        |
|---|---|-----------------|------------------------|
| Audit Ref: 3.6<br><br>With: Clause 9 (1(k) of Schedule 11.1<br><br>From: 01-Jul-22<br>To: 30-Nov-23 | 1 x ICP had its ANZSIC code incorrectly recorded in the Registry.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None Previously<br>Controls: Strong<br>Breach risk rating: 1 |                 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |
| <b>Low</b>  | The controls are rated as strong. number of ICPs. Audit risk rating is low as the impact on settlement is minor.  |                 |                        |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |
| See Participant Response  |   |                 | Identified             |
| Preventative actions taken to ensure no further issues will occur                                   |   | Completion date |                        |
| See Participant Response  |   |                 |                        |

### 3.7. Changes to unmetered load (Clause 9(1)(f) of Schedule 11.1)

#### Code reference

Clause 9(1)(f) of Schedule 11.1

#### Code related audit information

*if a settlement type of UNM is assigned to that ICP, the trader must populate:*

*the code ENG - if the load is profiled through an engineering profile in accordance with profile class 2.1 (clause 9(1)(f)(i)); or*

*the daily average kWh of unmetered load at the ICP - in all other cases (clause 9(1)(f)(ii)).*

#### Audit observation

This was discussed with EDGE and JCC. EDGE do not currently accept new connections. The LIS, EDA files, Registry and Audit Compliance report were checked.

#### Audit commentary

EDGE does not currently trade UML and has no intention to do so.

Checks confirm that all information recorded in the registry is correct.

#### Audit outcome

Compliant

### 3.8. Management of “active” status (Clause 17 Schedule 11.1)

#### Code reference

Clause 17 Schedule 11.1

#### Code related audit information

*The ICP status of “active” is be managed by the relevant trader and indicates that:*

- *the associated electrical installations are electrically connected (clause 17(1)(a))*
- *the trader must provide information related to the ICP in accordance with Part 15, to the reconciliation manager for the purpose of compiling reconciliation information (clause 17(1)(b)).*

*Before an ICP is given the “active” status, the trader must ensure that:*

- *the ICP has only 1 customer, embedded generator, or direct purchaser (clause 17(2)(a))*
- *the electricity consumed is quantified by a metering installation or a method of calculation approved by the Authority (clause 17(2)(b)).*

#### Audit observation

This was discussed with EDGE and JCC. The LIS, EDA files, Registry and Audit Compliance report were checked. The disconnection/reconnection procedure was checked.

#### Audit commentary

EDGE do not currently accept new connections. Despite this it was noted that one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection. An MEP was nominated, and metering installed prior to the ICPs initial energisation.

Checks confirmed each ICP EDGE are responsible for with the status “active” are quantified by a metering installation and each has only one customer.

#### Audit outcome

Compliant

### 3.9. Management of “inactive” status (Clause 19 Schedule 11.1)

#### Code reference

Clause 19 Schedule 11.1

#### Code related audit information

*The ICP status of “inactive” must be managed by the relevant trader and indicates that:*

- *electricity cannot flow at that ICP (clause 19(a)); or*
- *submission information related to the ICP is not required by the reconciliation manager for the purpose of compiling reconciliation information (clause 19(b)).*

#### Audit observation

This was discussed with EDGE and JCC. The LIS, EDA files, Registry and Audit Compliance report were checked. The disconnection/reconnection procedure was checked.



## Audit commentary

This section was non-compliant at last audit . Subsequent checks during this audit found that this non-compliance was incorrect and the ICP in question was actually mistaken with one with the same distributor identifier and check sum.

The LIS file identified five ICPs were made inactive - electrically disconnected due to meter disconnected (1,9) by the MEP during the audit period. Checks confirm the ICPs remain Inactive at audit.

## Audit outcome

Compliant

### 3.10. ICPs at new or ready status for 24 months (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 "Ready" for 24 calendar months or more, the distributor must ask the trader whether it should continue to have that status and must decommission the ICP if the trader advises the ICP should not continue to have that status.*

#### Audit observation

This was discussed with EDGE and JCC. The LIS, EDA files, Registry and Audit Compliance report were checked.

#### Audit commentary

EDGE do not currently accept new connections. Despite this it was noted that one new ICP was accepted by EDGE at the request of the Network during the audit period. Checks demonstrated that the correct Registry transactions were made to execute the new connection.

#### Audit outcome

Compliant

## 4. PERFORMING CUSTOMER AND EMBEDDED GENERATOR SWITCHING

### 4.1. Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3)

#### Code reference

Clause 2 Schedule 11.3

#### Code related audit information

*The standard switch process applies where a trader and a customer or embedded generator enters into an arrangement in which the trader commences trading electricity with the customer or embedded generator at a non-half hour or unmetered ICP at which another trader supplies electricity, or the trader assumes responsibility for such an ICP.*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of a switch no later than 2 business days after the arrangement comes into effect and include in its advice to the registry manager that the switch type is TR and 1 or more profile codes associated with that ICP.*

#### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, Audit Compliance report and Registry were checked. A sample of seven NTTR files were checked.

#### Audit commentary

During the audit period EDGE sent 269 NT files 84% were TR and 16% MI. EDGE uses the Registry web interface to complete switching.

EDGE is aware of the requirements of the Fair-Trading Act 1986

Checks of the NTTR files confirmed compliance with the code requirements.

#### Audit outcome

Compliant

### 4.2. Losing trader response to switch request and event dates - standard switch (Clauses 3 and 4 Schedule 11.3)

#### Code reference

Clauses 3 and 4 Schedule 11.3

#### Code related audit information

*Within 3 business days after receiving notice of a switch from the registry manager, the losing trader must establish a proposed event date. The event date must be no more than 10 business days after the date of receipt of such notification, and in any 12 month period, at least 50% of the event dates must be no more than 5 business days after the date of notification. The losing trader must then:*

- *provide acknowledgement of the switch request by (clause 3(a) of Schedule 11.3):*
- *providing the proposed event date to the registry manager and a valid switch response code (clause 3(a)(i) and (ii) of Schedule 11.3); or*
- *providing a request for withdrawal of the switch in accordance with clause 17 (clause 3(c) of Schedule 11.3).*

*When establishing an event date for clause 4, the losing trader may disregard every event date established by the losing trader for an ICP for which when the losing trader received notice from the registry manager under clause 22(a) the losing trader had been responsible for less than 2 months.*

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, Audit Compliance report and Registry were checked.

#### **Audit commentary**

Two hundred and eighty AN files were sent by EDGE during the audit period, all used the appropriate response code and 98% of the proposed switch dates were within five business days.

#### **Audit outcome**

Compliant

### **4.3. Losing trader must provide final information - standard switch (Clause 5 Schedule 11.3)**

#### **Code reference**

*Clause 5 Schedule 11.3*

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

*If the losing trader provides information to the registry manager in accordance with clause 3(a) of Schedule 11.3 with the required information, no later than 5 business days after the event date, the losing trader must complete the switch by:*

- *providing event date to the registry manager (clause 5(a)); and*
- *provide to the gaining trader a switch event meter reading as at the event date, for each meter or data storage device that is recorded in the registry with accumulator of C and a settlement indicator of Y (clause 5(b)); and*
- *if a switch event meter reading is not a validated reading, provide the date of the last meter reading (clause 5(c)).*

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, Audit Compliance report and Registry were checked. A sample of seven CS files were checked

#### **Audit commentary**

Checks confirmed the seven CS files sampled were sent to the Registry within five business days and contained the correct information.

#### **Audit outcome**

Compliant

### **4.4. Retailers must use same reading - standard switch (Clause 6(1) and 6A Schedule 11.3)**

#### **Code reference**

*Clause 6(1) and 6A Schedule 11.3*

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

The losing trader and the gaining trader must both use the same switch event meter reading as determined by the following procedure:

- if the switch event meter reading provided by the losing trader differs by less than 200 kWh from a value established by the gaining trader, the gaining trader must use the losing trader's validated meter reading or permanent estimate (clause 6(a)); or
- the gaining trader may dispute the switch meter reading if the validated meter reading or permanent estimate provided by the losing trader differs by 200 kWh or more. (clause 6(b)).

If the gaining trader disputes a switch meter reading because the switch event meter reading provided by the losing trader differs by 200 kWh or more, the gaining trader must, within 4 calendar months of the registry manager giving the gaining trader written notice of having received information about the switch completion, provide to the losing trader a changed switch event meter reading supported by 2 validated meter readings.

- the losing trader can choose not to accept the reading, however, must advise the gaining trader no later than 5 business days after receiving the switch event meter reading from the gaining trader (clause 6A(a)); or
- if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 6A(b)).

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were also checked. Four sent standard switch RR files were checked.

#### **Audit commentary**

EDGE sent fourteen RR files, of which all were accepted. The files were sent within four calendar months. No standard switch RR files were received during the audit period.

JC Consulting processed the received RR files for Reconciliation purposes and checks confirmed code requirements were met.

#### **Audit outcome**

Compliant

### **4.5. Non-half hour switch event meter reading - standard switch (Clause 6(2) and (3) Schedule 11.3)**

#### **Code reference**

Clause 6(2) and (3) Schedule 11.3

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

If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry: and

- the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 6(2)(b));
- the gaining trader within 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading.

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, Audit Compliance report and Registry were also checked.

#### **Audit commentary**

No RR Files were sent or received by EDGE during the audit period relating to this clause.

#### **Audit outcome**

Compliant

### **4.6. Disputes - standard switch (Clause 7 Schedule 11.3)**

#### **Code reference**

*Clause 7 Schedule 11.3*

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

*A losing trader or gaining trader may give written notice to the other that it disputes a switch event meter reading provided under clauses 1 to 6. Such a dispute must be resolved in accordance with clause 15.29 (with all necessary amendments).*

#### **Audit observation**

This was discussed with EDGE and JCC.

#### **Audit commentary**

EDGE advised they did not have any disputes with any other Traders relating to this clause.

EDGE confirmed that they would not decline to accept another traders' validated meter reading or permanent estimate if they are reasonable and appropriate in the applicable circumstances. The company will also provide a reasonable explanation to the other participant where it does decline to accept their validated meter reading or permanent estimate.

#### **Audit outcome**

Compliant

### **4.7. Gaining trader informs registry of switch request - switch move (Clause 9 Schedule 11.3)**

#### **Code reference**

*Clause 9 Schedule 11.3*

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

*The switch move process applies where a gaining trader has an arrangement with a customer or embedded generator to trade electricity at an ICP using non half-hour metering or an unmetered ICP, or to assume responsibility for such an ICP, and no other trader has an agreement to trade electricity at that ICP, this is referred to as a switch move and the following provisions apply:*

*If the "uninvited direct sale agreement" applies, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*In the event of a switch move, the gaining trader must advise the registry manager of a switch and the proposed event date no later than 2 business days after the arrangement comes into effect.*

*In its advice to the registry manager the gaining trader must include:*

- a proposed event date (clause 9(2)(a)); and
- that the switch type is "MI" (clause 9(2)(b)); and
- one or more profile codes of a profile at the ICP. (clause 9(2)(c))

#### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA and Registry were checked. Nine NTMI files were checked.

#### Audit commentary

During the audit period EDGE sent nine NTMI. EDGE uses the Registry web interface to complete switching.

EDGE is aware of the requirements of the Fair-Trading Act 1986.

The Switch Breach History report contained a small number of discrepancies, further investigation confirmed the issues had been addressed by the retailers involved and appropriately corrected at the time.

Checks of the NTMI files sent confirmed the NT file contents met code requirements.

#### Audit outcome

Compliant

### 4.8. Losing trader provides information - switch move (Clause 10(1) Schedule 11.3)

#### Code reference

*Clause 10(1) Schedule 11.3*

#### Code related audit information

*10(1) Within 5 business days after receiving notice of a switch move request from the registry manager—*

- *10(1)(a) If the losing trader accepts the event date proposed by the gaining trader, the losing trader must complete the switch by providing to the registry manager:
 
  - o *confirmation of the switch event date; and*
  - o *a valid switch response code; and*
  - o *final information as required under clause 11; or**
- *10(1)(b) If the losing trader does not accept the event date proposed by the gaining trader, the losing trader must acknowledge the switch request to the registry manager and determine a different event date that—
 
  - o *is not earlier than the gaining trader's proposed event date, and*
  - o *is no later than 10 business days after the date the losing trader receives notice;*
  - or**
- *10(1)(c) request that the switch be withdrawn in accordance with clause 17.*

#### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked. A sample of Ten NTMI and related AN files were checked.

#### Audit commentary

EDGE received 310 NTMI files. Checks confirmed the ten sample AN files were sent to the Registry within five business days and contained the correct information.

#### Audit outcome

Compliant

#### 4.9. Losing trader determines a different date - switch move (Clause 10(2) Schedule 11.3)

##### Code reference

Clause 10(2) Schedule 11.3

##### Code related audit information

*If the losing trader determines a different date, then within 10 business days of receiving notice the losing trader must also complete the switch by providing to the registry manager as described in subclause (1)(a):*

- *the event date proposed by the losing trader; and*
- *a valid switch response code; and*
- *final information as required under clause 1.*

##### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked. A sample of Ten NTMI, related AN and CS files were checked.

##### Audit commentary

EDGE received 310 NTMI files. Checks confirmed the ten switch event dates proposed by gaining traders were accepted, the AN and CS files sent to the Registry were within the correct timeframes and contained the correct information.

##### Audit outcome

Compliant

#### 4.10. Losing trader must provide final information - switch move (Clause 11 Schedule 11.3)

##### Code reference

Clause 11 Schedule 11.3

##### Code related audit information

*The losing trader must provide final information to the registry manager for the purposes of clause 10(1)(a)(ii), including—*

- *the event date (clause 11(a)); and*
- *a switch event meter reading as at the event date for each meter or data storage device that is recorded in the registry with an accumulator type of C and a settlement indicator of Y (clause 11(b)); and*
- *if the switch event meter reading is not a validated meter reading, the date of the last meter reading of the meter or storage device. (clause (11(c)).*

##### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA file and Registry were checked along with the submission summaries. A sample of Ten CS files were checked.

##### Audit commentary

The format of the CS files met code requirements in all but one ICP sampled. However, when checking the average daily consumption for the ten samples seven of the values could not be validated using data provided. A summary as follows:

| ICP             | CS File Complete | Accuracy of Ave Daily Consumption | Issue  | Comment   |
|-----------------|------------------|-----------------------------------|--|---|
| 0005640015WEBE5 | Ok               | Could not be validated            | Average daily consumption provided in CS file couldn't be validated against previous meter readings.                                 | Math error  |
| 1001273408UNA84 | Ok               | Could not be validated            | Meter change at switch date. Average daily consumption provided in CS file couldn't be validated against any previous meter readings | Math error  |
| 1002163148LC8AE | Ok               | Could not be validated            | Average daily consumption provided in CS file can't be validated against any previous meter readings.                                | Meter replaced at 2PM with 118 final read and I estimated usage of 2kWh             |
| 0006964982RN867 | Ok               | Ok                                |  |   |
| 1002059299UNBBE | Ok               | Ok                                |  |   |
| 0658305001PCA5E | Ok               | Could not be validated            | Meter change at switch date. Average daily consumption provided in CS file can't be validated against any previous meter readings.   | Meter replaced at 11AM with 13630 + 52350 final reads and I Estimated usage of 6kWh |
| 0000107260HB112 | Ok               | Ok                                |  |   |
| 0000109706UN8A7 | Ok               | Could not be validated            | Average daily consumption provided in CS file can't be validated against any previous meter readings.                                |   |
| 0000124989UN7D5 | Ok               | Could not be validated            | Average daily consumption provided in CS file can't be validated against any previous meter readings.                                |   |
| 1002048450LC753 | Inaccurate       | Ok                                | The CS file provided the wrong last read date. Should be 19/02/2023 not 18/02/2023.  | Copied the Daily Consumption from previous retailer                                 |



|  |  |  |   |  |
|--|--|--|---|--|
|  |  |  | Reading also appears to be actual rather than estimate. |  |
|--|--|--|---|--|

The average daily consumption value should be calculated from actual readings from a previous reading period. It was found that 70% of the sample average daily consumption values did not meet the requirement.

It is suggested that EDGE use the actual validated meter readings contained in the monthly submission summaries provided by JCC to calculate the average daily consumption values.

### Audit outcome

Non-compliant

### NON-COMPLIANCE

| Non-compliance   | Description  |                 |                        |
|--|--|-----------------|------------------------|
| Audit Ref: 4.10<br><br>With: 11 of Schedule 11.3<br><br>From: 01-Jul-22<br>To: 30-Nov-23 | 7 x ICP switch moves CS files (70% of sample) had average daily consumption values that could not be validated.<br><br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Twice previously<br>Controls: Weak<br>Breach risk rating: 3 |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| <b>Low</b>   | The controls are rated as weak. This issue had been highlighted and discussed at last audit. There was minor impact on settlement outcomes due to low consumption volumes involved. Audit risk rating is low.                                    |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| See Participant Response   |  |                 | Identified             |
| Preventative actions taken to ensure no further issues will occur                        |  | Completion date |                        |
| See Participant Response   |  |                 |                        |

### 4.11. Gaining trader changes to switch meter reading - switch move (Clause 12 Schedule 11.3)

#### Code reference

Clause 12 Schedule 11.3

## Code related audit information

*The gaining trader may use the switch event meter reading supplied by the losing trader or may, at its own cost, obtain its own switch event meter reading. If the gaining trader elects to use this new switch event meter reading, the gaining trader must advise the losing trader of the switch event meter reading and the actual event date to which it refers as follows:*

- *if the switch meter reading established by the gaining trader differs by less than 200 kWh from that provided by the losing trader, both traders must use the switch event meter reading provided by the gaining trader (clause 12(2)(a)); or*
- *if the switch event meter reading provided by the losing trader differs by 200 kWh or more from a value established by the gaining trader, the gaining trader may dispute the switch meter reading. In this case, the gaining trader, within 4 calendar months of the date the registry manager gives the gaining trader written notice of having received information about the switch completion, must provide to the losing trader a changed validated meter reading or a permanent estimate supported by 2 validated meter readings and the losing trader must either (clause 12(2)(b) and clause 12(3)):*
- *advise the gaining trader if it does not accept the switch event meter reading and the losing trader and the gaining trader must resolve the dispute in accordance with the disputes procedure in clause 15.29 (with all necessary amendments) (clause 12(3)(a)); or*
- *if the losing trader notifies its acceptance or does not provide any response, the losing trader must use the switch event meter reading supplied by the gaining trader. (clause 12(3)(b)).*

*12(2A) If the losing trader trades electricity from a non-half hour meter, with a switch event meter reading that is not from an AMI certified meter flagged Y in the registry,*

- *the gaining trader will trade electricity from a meter with a half hour submission type in the registry (clause 12(2A)(b));*
- *the gaining trader no later than 5 business days after receiving final information from the registry manager, may provide the losing trader with a switch event meter reading from that meter. The losing trader must use that switch event meter reading. (clause 12(2B)).*

## Audit observation

This was discussed with EDGE and JCC. The switch process was reviewed along with Switch Breach History report for the audit period. The EDA and Registry were also checked. A random sample of three sent RR files were checked.

## Audit commentary

Four RR MI files were received during the audit period with three acceptances and one rejection sent, all responses were sent within five working days.

Eight RR MI files were sent during the audit period. Five of the RR files were accepted, three RR files were initially rejected but were eventually resolved via several additional transactions.

Checks also confirmed that switch event readings were used to calculate submission volumes.

## Audit outcome

Compliant

4.12. Gaining trader informs registry of switch request - gaining trader switch (Clause 14 Schedule 11.3)

## Code reference

Clause 14 Schedule 11.3

### Code related audit information

*The gaining trader switch process applies when a trader has an arrangement with a customer or embedded generator to trade electricity at an ICP at which the losing trader trades electricity with the customer or embedded generator, and one of the following applies at the ICP:*

- *the gaining trader will trade electricity through a half hour metering installation that is a category 3 or higher metering installation; or*
- *the gaining trader will trade electricity through a non-AMI half hour metering installation and the losing trader trades electricity through a non-AMI non half hour metering installation; or*
- *the gaining trader will trade electricity through a non-AMI non half hour metering installation and the losing trader trades electricity through a non-AMI half hour metering installation*

*If the uninvited direct sale agreement applies to an arrangement described above, the gaining trader must identify the period within which the customer or embedded generator may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986. The arrangement is deemed to come into effect on the day after the expiry of that period.*

*A gaining trader must advise the registry manager of the switch and expected event date no later than 3 business days after the arrangement comes into effect.*

*14(2) The gaining trader must include in its advice to the registry manager:*

- a) *a proposed event date; and*
- b) *that the switch type is HH.*

*14(3) The proposed event date must be a date that is after the date on which the gaining trader advises the registry manager, unless clause 14(4) applies.*

*14(4) The proposed event date is a date before the date on which the gaining trader advised the registry manager, if:*

*14(4)(a) – the proposed event date is in the same month as the date on which the gaining trader advised the registry manager; or*

*14(4)(b) – the proposed event date is no more than 90 days before the date on which the gaining trader advises the registry manager, and this date is agreed between the losing and gaining traders.*

### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, LIS files and Registry were also checked.

### Audit commentary

EDGE did not use this switch type during this audit period.

### Audit outcome

Compliant

## 4.13. Losing trader provision of information - gaining trader switch (Clause 15 Schedule 11.3)

### Code reference

Clause 15 Schedule 11.3

### Code related audit information

*Within 3 business days after the losing trader is informed about the switch by the registry manager, the losing trader must:*

15(a) - provide to the registry manager a valid switch response code as approved by the Authority; or

15(b) - provide a request for withdrawal of the switch in accordance with clause 17.

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, LIS files and Registry were also checked.

#### **Audit commentary**

Edge was not involved in any switch's using this switch type during the audit period.

#### **Audit outcome**

Compliant

### **4.14. Gaining trader to advise the registry manager - gaining trader switch (Clause 16 Schedule 11.3)**

#### **Code reference**

Clause 16 Schedule 11.3

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

*The gaining trader must complete the switch no later than 3 business days, after receiving the valid switch response code, by advising the registry manager of the event date.*

*If the ICP is being electrically disconnected, or if metering equipment is being removed, the gaining trader must either-*

*16(a)- give the losing trader or MEP for the ICP an opportunity to interrogate the metering installation immediately before the ICP is electrically disconnected or the metering equipment is removed; or*

*16(b)- carry out an interrogation and, no later than 5 business days after the metering installation is electrically disconnected or removed, advise the losing trader of the results and metering component numbers for each data channel in the metering installation.*

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed along with Switch Breach History report for the audit period. The EDA, LIS files and Registry were also checked.

#### **Audit commentary**

EDGE was not involved in any switch's using this switch type during the audit period.

#### **Audit outcome**

Compliant

### **4.15. Withdrawal of switch requests (Clauses 17 and 18 Schedule 11.3)**

#### **Code reference**

Clauses 17 and 18 Schedule 11.3

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

*A losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 2 calendar months after the event date of the switch.*

*If a trader requests the withdrawal of a switch, the following provisions apply:*

- for each ICP, the trader withdrawing the switch request must provide the registry manager with (clause 18(c)):
  - o the participant identifier of the trader making the withdrawal request (clause 18(c)(i)); and
  - o the withdrawal advisory code published by the Authority. (clause 18(c)(ii))
- within 5 business days after receiving notice from the registry manager of a switch, the trader receiving the withdrawal must advise the registry manager that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the trader who received the withdrawal. (clause 18(d))
- on receipt of a rejection notice from the registry manager, in accordance with clause 18(d), a trader may re-submit the switch withdrawal request for an ICP in accordance with clause 18(c). All switch withdrawal requests must be resolved within 10 business days after the date of the initial switch withdrawal request. (clause 18(e))
- if the trader requests that a switch request be withdrawn, and the resolution of that switch withdrawal request results in the switch proceeding, within 2 business days after receiving notice from the registry manager in accordance with clause 22(b), the losing trader must comply with clauses 3,5,10 and 11 (whichever is appropriate) and the gaining trader must comply with clause 16. (clause 18(f))

### Audit observation

This was discussed with EDGE and JCC. The Switch process was reviewed. The EDA file and Registry were checked. All NW files and a sample of ten AW files were checked.

### Audit commentary

EDGE sent 15 NW notifications during the audit period:

- CX x 3
- CE x 3
- MI x 5
- WS x 1
- DF x 3

Checks confirmed NW notifications met code requirements, three were initially rejected and resolved appropriately. The remainder were accepted.

The Switch Breach History report contained a small number of discrepancies, further investigation confirmed the issues had been addressed by the retailers involved and appropriately corrected at the time.

Twenty four AW notifications were sent. Sample checks confirmed AW notifications met code requirements.

### Audit outcome

Compliant

## 4.16. Metering information (Clause 21 Schedule 11.3)

### Code reference

Clause 21 Schedule 11.3

### Code related audit information

For an interrogation or validated meter reading or permanent estimate carried out in accordance with Schedule 11.3:

*21(a)- the trader who carries out the interrogation, switch event meter reading must ensure that the interrogation is as accurate as possible, or that the switch event meter reading is fair and reasonable.*

*21(b) and (c) - the cost of every interrogation or switch event meter reading carried out in accordance with clauses 5(b) or 11(b) or (c) must be met by the losing trader. The costs in every other case must be met by the gaining trader.*

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process and related meter reading was reviewed. The EDA, Switch Breach History files and Registry were checked. A sample of ten CS meter readings were checked.

#### **Audit commentary**

Meter reads are received from MEPs. Meter readings used in the switching process were validated meter readings or estimates. The sample confirmed code requirements were met.

EDGE are aware of the code requirements and understands the obligations with respect to costs.

#### **Audit outcome**

Compliant

### 4.17. Switch protection (Clause 11.15AA to 11.15AB)

#### **Code reference**

*Clause 11.15AA to 11.15AC*

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

*A losing retailer (including any party acting on behalf of the retailer) must not initiate contact to save or win back any customer who is switching away or has switched away for 180 days from the date of the switch.*

*The losing retailer may contact the customer for certain administrative reasons and may make a counteroffer only if the customer initiated contact with the losing retailer and invited the losing retailer to make a counteroffer.*

*The losing retailer must not use the customer contact details to enable any other retailer (other than the gaining retailer) to contact the customer.*

#### **Audit observation**

This was discussed with EDGE.

#### **Audit commentary**

EDGE states it does not undertake win back activities and is aware of code requirements.

#### **Audit outcome**

Compliant

## 5. MAINTENANCE OF UNMETERED LOAD

### 5.1. Maintaining shared unmetered load (Clause 11.14)

#### Code reference

Clause 11.14

#### Code related audit information

*The trader must adhere to the process for maintaining shared unmetered load as outlined in clause 11.14:*

*11.14(2) - The distributor must give written notice to the traders responsible for the ICPs across which the unmetered load is shared, of the ICP identifiers of the ICPs.*

*11.14(3) - A trader who receives such a notification from a distributor must give written notice to the distributor if it wishes to add or omit any ICP from the ICPs across which unmetered load is to be shared.*

*11.14(4) - A distributor who receives such a notification of changes from the trader under (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.*

*11.14(5) - If a distributor becomes aware of any 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 as soon as practicable after that change or decommissioning.*

*11.14(6) - Each trader who receives such a notification must, as soon as practicable after receiving the notification, adjust the unmetered load information for each ICP in the list for which it is responsible to ensure that the entire shared unmetered load is shared equally across each ICP.*

*11.14(7) - A trader must take responsibility for shared unmetered load assigned to an ICP for which the trader becomes responsible as a result of a switch in accordance with Part 11.*

*11.14(8) - A trader must not relinquish responsibility for shared unmetered load assigned to an ICP if there would then be no ICPs left across which that load could be shared.*

*11.14(9) - A trader can change the status of an ICP across which the unmetered load is shared to inactive status, as referred to in clause 19 of Schedule 11.1. In that case, the trader is not required to give written notice to the distributor of the change. The amount of electricity attributable to that ICP becomes UFE.*

#### Audit observation

This was discussed with EDGE and JCC. The EDA, LIS, Audit Compliance report and Registry were checked.

#### Audit commentary

EDGE stated it has not traded shared unmetered load (SUMML) or UML of any kind during this audit period. Checks of the LIS and EDA files confirm this.

JCC carries out a weekly check to confirm Networks haven't entered any historic Shared UML or UML. This would be reconciled if it was found.

#### Audit outcome

Compliant



## 5.2. Unmetered threshold (Clause 10.14 (2)(b))

### Code reference

Clause 10.14 (2)(b)

### Code related audit information

*The reconciliation participant must ensure that unmetered load does not exceed 3,000 kWh per annum, or 6,000 kWh per annum if the load is predictable and of a type approved and published by the Authority.*

### Audit observation

This was discussed with EDGE and JCC. The EDA,LIS, Audit Compliance report and Registry were checked.

### Audit commentary

EDGE stated they did not trade any Shared UML or UML during this this audit period, checks confirm this.

### Audit outcome

Compliant

## 5.3. Unmetered threshold exceeded (Clause 10.14 (5))

### Code reference

Clause 10.14 (5)

### Code related audit information

*If the unmetered load limit is exceeded the retailer must:*

- *within 20 business days, commence corrective measure to ensure it complies with Part 10*
- *within 20 business days of commencing the corrective measure, complete the corrective measures*
- *no later than 10 business days after it becomes aware of the limit having been exceeded, advise each participant who is or would be expected to be affected of:*
  - o *the date the limit was calculated or estimated to have been exceeded*
  - o *the details of the corrective measures that the retailer proposes to take or is taking to reduce the unmetered load.*

### Audit observation

This was discussed with EDGE and JCC. The EDA,LIS, Audit Compliance report and Registry were checked.

### Audit commentary

EDGE stated they did not trade any Shared UML or UML during this this audit period, checks confirm this.

### Audit outcome

Compliant



## 5.4. Distributed unmetered load (Clause 11 Schedule 15.3, Clause 15.37B)

### Code reference

*Clause 11 Schedule 15.3, Clause 15.37B*

### Code related audit information

*An up-to-date database must be maintained for each type of distributed unmetered load for which the retailer is responsible. The information in the database must be maintained in a manner that the resulting submission information meets the accuracy requirements of clause 15.2.*

*A separate audit is required for distributed unmetered load data bases.*

*The database must satisfy the requirements of Schedule 15.5 with regard to the methodology for deriving submission information.*

### Audit observation

This was discussed with EDGE and JCC. The EDA,LIS, Audit Compliance report and Registry were checked.

### Audit commentary

EDGE stated they did not trade any Shared UML or distributed UML during this this audit period, checks confirm this.

This clause is not applicable. Compliance was not assessed.

### Audit outcome

Not applicable

## 6. GATHERING RAW METER DATA

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

#### Code reference

Clause 10.13, Clause 10.24 and Clause 15.13

#### Code related audit information

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

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

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

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

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

#### Audit observation

This was discussed with EDGE and JCC. The LIS file, submission files and Registry were checked.

#### Audit commentary

All installations traded by EDGE are metered. EDGE does not use subtraction to determine volume information.

EDGE's market proposition is to offer services to those customers with installed embedded generation, mainly solar.

Submission files were checked and confirmed that embedded generation (solar) volumes were submitted.

#### Audit outcome

Compliant

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

#### Code reference

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

#### Code related audit information

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

- *provide to the grid owner a copy of the metering installation design (before ordering the equipment)*
- *provide at least 3 months for the grid owner to review and comment on the design*

- *respond within 3 business days of receipt to any request from the grid owner for additional details or changes to the design*
- *ensure any reasonable changes from the grid owner are carried out.*

*The participant responsible for the metering installation must:*

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file was checked.

#### **Audit commentary**

EDGE stated it does not have any connections to the grid.

Checks confirm this.

This clause is not applicable. Compliance was not assessed.

#### **Audit outcome**

Not applicable

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

#### **Code reference**

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS, EDA files and Registry were checked.

#### **Audit commentary**

Checks confirm EDGE submits volumes to the Reconciliation Manager using the RPS, RPS PV1 and HHR profiles . Control Devices are not required for Reconciliation purposes.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10.43(2) and (3)*

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

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

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

### Audit observation

This was discussed with EDGE and JCC.

### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs and ATH Wells. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's servers and validates the information using RM TOOL. Reports are run which will identify defective metering if present, such as high/low consumption, or zero readings/non advancing registers.

If a defective metering installation were to be identified EDGE will be notified by JCC. According to the process EDGE will approach the relevant MEP asking them to investigate and for appropriate action to be taken.

EDGE has not identified any defective metering installations which could be not fit for purpose during this audit period.

### Audit outcome

Compliant

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

### Code reference

*Clause 2 Schedule 15.2*

### Code related audit information

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

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

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

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

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

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

*2(6) – The interrogation systems must record:*

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file, MEP Audit Reports were checked.

#### **Audit commentary**

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings Raw meter data is collected by the MEPs and ATH Wells. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

The MEP audit reports confirm compliance with this clause.

JCC collects metering information from the MEP's servers and validates the information using RM TOOL and checks the event and interrogation logs.

JCC did not identify any discrepancies from the validation process during the audit period that required action by the MEP under this clause.

#### **Audit outcome**

Compliant

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

#### **Code reference**

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

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

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

*All validated meter readings must be derived from meter readings.*

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file, MEP Audit Reports were checked.

#### **Audit commentary**

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings Raw meter data is collected by the MEPs and ATH Wells. JCC

is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and Wells servers and validates the information using RM TOOL and checks the event and interrogation logs.

JCC did not identify any discrepancies from the validation process during the audit period that required action by the MEP or Wells under this clause.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 6 Schedule 15.2*

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The Switch process and related meter reading was reviewed. The EDA, JCC submission summaries and Registry were checked. A random sample of 10 x CS meter readings were checked end to end.

#### **Audit commentary**

The switch event read from the CS file is used as a start read for gained ICPs. Successive readings from MEPs were used from 0000hrs on the day after the last meter interrogation up to and including 2400hrs on the day of the meter interrogation.

The sample checks confirmed code compliance

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 7(1) and (2) Schedule 15.2*

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

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

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

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

### **Audit observation**

This was discussed with EDGE and JCC. The Switch process was reviewed. The EDA, Switch Breach History files, JCC submission summaries and Registry were checked. A sample of ten x switched ICP's meter readings were checked end to end.

### **Audit commentary**

305 ICPs were switched out during the audit period.

Checks confirmed a validated meter reading was obtained at least once during the period of supply.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 8(1) and (2) Schedule 15.2*

### **Code related audit information**

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

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

### **Audit observation**

This was discussed with EDGE and JCC. The JCC Submission Summary Reports and the Meter Frequency Reports for the audit period were checked.

### **Audit commentary**

JCC provides Meter Frequency Reports to the EA monthly on behalf of EDGE.

Checks confirm the code requirement was met.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 9(1) and (2) Schedule 15.2*

### **Code related audit information**

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The JCC Submission Summary Reports and the Meter Frequency Reports for the audit period were checked.

#### **Audit commentary**

JCC provides Meter Frequency Reports to the EA monthly on behalf of EDGE.

Checks confirm the code requirement was met.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10 Schedule 15.2*

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

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

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file, MEP Audit Reports were checked.

#### **Audit commentary**

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs and ATH Wells. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and Wells servers and validates the information using RM TOOL and checks the event and interrogation logs.

Checks of the MEP audit reports confirmed code compliance.

JCC did not identify any discrepancies from the validation process during the audit period that required action by the MEPs or Wells under this clause.

#### **Audit outcome**

Compliant

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

#### **Code reference**



Clause 11(1) Schedule 15.2

### Code related audit information

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

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

### Audit observation

This was discussed with EDGE and JCC. MEP Audit Reports were checked.

### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and validates the information using RM TOOL.

Checks of the MEP audit reports confirmed code compliance.

### Audit outcome

Compliant

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

### Code reference

Clause 11(2) Schedule 15.2

### Code related audit information

*The following information is collected during each interrogation:*

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

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

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

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

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

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

### Audit observation

This was discussed with EDGE and JCC. MEP Audit Reports were checked.

### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and validates the information using RM TOOL.

Checks of the MEP audit reports confirmed code compliance.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 11(3) Schedule 15.2*

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

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

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

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

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

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. MEP Audit Reports were checked.

#### **Audit commentary**

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and validates the information using RM TOOL.

Checks of the MEP audit reports confirmed code compliance.

#### **Audit outcome**

Compliant

## 7. STORING RAW METER DATA

### 7.1. Trading period duration (Clause 13 Schedule 15.2)

#### Code reference

*Clause 13 Schedule 15.2*

#### Code related audit information

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

#### Audit observation

This was discussed with EDGE and JCC. MEP Audit Reports were checked.

#### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and validates the information using RM TOOL.

Reviews of the MEP audit reports and data checks confirmed the trading period duration is 30 minutes.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 18 Schedule 15.2*

#### Code related audit information

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

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

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

#### Audit observation

This was discussed with EDGE and JCC. MEP Audit Reports were checked.

#### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. Raw meter data is retained by MEPs.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and validates the information using RM TOOL.

All meter reading data is archived by JCC for at least 48 months. JCC Consulting RM TOOL's audit trails ensure that reads cannot be modified without an audit trail being created. Access to the system to modify readings is restricted.

Reviews of the MEP audit reports and data checks confirmed they retain raw meter data.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 21(5) Schedule 15.2*

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file, Audit Compliance report and Registry were checked.

#### **Audit commentary**

Checks confirmed EDGE submits volumes to the Reconciliation Manager using the RPS, RPS PV1 and HHR profiles. Control Devices are not required for Reconciliation purposes. Control Devices, operation logs or other profile determination are not used.

This clause is not applicable. Compliance was not assessed

#### **Audit outcome**

Compliant

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

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

#### Code reference

Clause 19(1) Schedule 15.2

#### Code related audit information

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

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

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

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

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

#### Audit observation

This was discussed with EDGE and JCC. The JCC Submission Summary Reports and were checked.

#### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX and Wells ATH to provide metering installations and meter readings. Raw meter data is collected by the MEPs and Wells. Raw meter data is retained by MEPs and Wells as appropriate.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Correction of NHH readings, if necessary, would be completed by JCC in consultation with EDGE. Corrections would be carried out in RM TOOL with changes audit trailed.

EDGE and JCC confirmed there were no corrections of NHH meter reading data required during this audit period.

#### Audit outcome

Compliant

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

#### Code reference

Clause 19(2) Schedule 15.2

#### Code related audit information

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

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

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

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

### **Audit observation**

This was discussed with EDGE and JCC. The JCC Submission Summary Reports were checked.

### **Audit commentary**

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. Raw meter data is retained by MEPs.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Correction of HHR readings, if necessary, would be completed by JCC in consultation with EDGE. Corrections would be carried out in RM TOOL with changes audit trailed.

EDGE and JCC confirmed there were no corrections of HRR meter reading data required during this audit period.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 19(3) Schedule 15.2*

### **Code related audit information**

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

### **Audit observation**

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only. The JCC Submission Summary Reports, MEP Audit Reports and Registry were checked.

### **Audit commentary**

EDGE stated it does not trade any ICPs requiring error or loss compensation.

Checks confirm this.

This clause is not applicable. Compliance was not assessed

## Audit outcome

Not applicable

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

### Code reference

Clause 19(4) and (5) Schedule 15.2

### Code related audit information

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

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

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

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

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

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

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

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

### Audit observation

This was discussed with EDGE and JCC. The JCC Submission Summary Reports and MEP Audit Reports were checked.

### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. Raw meter data is retained by MEPs and not overwritten.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL. Metering information collected from MEPs is not overwritten in RM TOOL

Correction of NHH or HHR readings, if necessary, would be completed by JCC in consultation with EDGE. Corrections would be carried out in RM TOOL on working data sets with changes audit trailed.

EDGE and JCC confirmed there were no corrections of HRR meter reading data required during this audit period.

### Audit outcome

Compliant

## 9. ESTIMATING AND VALIDATING VOLUME INFORMATION

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

#### Code reference

*Clause 3(3) Schedule 15.2*

#### Code related audit information

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

#### Audit observation

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only The JCC Submission Summary Reports, MEP Audit Reports and switching files were checked. A sample of ten ICPs were checked.

#### Audit commentary

Meter reading information collected from MEPs is actual and is labelled as such in RM TOOL. If Estimated Readings are required they are labelled appropriately as estimated in RM TOOL.

Checks confirmed code requirement was met.

#### Audit outcome

Compliant

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

#### Code reference

*Clause 3(4) Schedule 15.2*

#### Code related audit information

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

*3(4)(a) - validated meter readings*

*3(4)(b) - estimated readings*

*3(4)(c) - permanent estimates.*

#### Audit observation

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only The JCC Submission Summary Reports, MEP Audit Reports switching files were checked. A sample of ten ICPs were checked.

#### Audit commentary

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Volume information provided to the reconciliation manager was calculated by JCC. Checks of reconciliation submission files for the audit period demonstrated volume information was derived from validated meter readings or estimates.

#### Audit outcome

Compliant



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

#### Code reference

Clause 3(5) Schedule 15.2

#### Code related audit information

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

#### Audit observation

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only The JCC Submission Summary Reports, Reconciliation submission files and MEP Audit Reports were checked. Raw meter reading data files from MEPs were reviewed.

#### Audit commentary

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Checks confirmed MEPs retain raw meter reading data and data is not rounded or truncated on import to RM TOOL.

#### Audit outcome

Compliant

### 9.4. Half hour estimates (Clause 15 Schedule 15.2)

#### Code reference

Clause 15 Schedule 15.2

#### Code related audit information

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

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

#### Audit observation

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only The JCC Submission Summary Reports, Reconciliation submission files and GR-170 files were checked.

#### Audit commentary

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Volume information provided to the reconciliation manager was calculated by JCC. HHR estimates are created by JCC.

Missing data requiring estimation is identified through JCC's pre submission checks. JCC creates estimates where required and communicates these to EDGE via email, for example if HHR data has not been received prior to the deadline for volume submission.

Checks confirmed the HHR estimation process met code requirement.

## Audit outcome

Compliant

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

#### Code reference

Clause 16 Schedule 15.2

#### Code related audit information

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

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

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

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

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

#### Audit observation

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only The JCC Submission Summary Reports, Reconciliation submission files and MEP Audit Reports were checked.

#### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs and ATH Wells.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Validation and exception reports are run which will identify defective metering if present such as high/low consumption, consumption detected >10% of rollover quantity, zero readings/non advancing registers, consumption on de energised sites, missing reads and negative consumption. JCC can identify bridged meters using these reports and event logs are reviewed. If there were an issue identified JCC would advise EDGE and the MEP.

Checks confirm code requirement was met.

## Audit outcome

Compliant

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

#### Code reference

Clause 17 Schedule 15.2

#### Code related audit information

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

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

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

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

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

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

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

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. EDGE trade category 1 and 2 ICPs only The JCC Submission Summary Reports, Reconciliation submission files and MEP Audit Reports were checked.

#### **Audit commentary**

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager. JCC collects metering information from the MEP's and validates the information using RM TOOL.

Validation and exception reports are run which will identify defective metering if present such as high/low consumption, consumption detected >10% of rollover quantity, zero readings/non advancing registers, consumption on de energised sites, missing reads and negative consumption. JCC can identify bridged meters using these reports and event logs are reviewed. If there were an issue identified JCC would advise EDGE and the MEP.

EDGE advised and JCC confirmed there were no metering data integrity issues identified during the audit period.

Checks confirm code requirement was met.

#### **Audit outcome**

Compliant

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

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

#### Code reference

Clause 13.136

#### Code related audit information

*The generator (and/or embedded generator) must provide to the grid owner connected to the local network in which the embedded generator is located, half hour metering information in accordance with clause 13.138 in relation to generating plant that is subject to a dispatch instruction:*

- *that injects electricity directly into a local network; or*
- *if the meter configuration is such that the electricity flows into a local network without first passing through a grid injection point or grid exit point metering installation.*

#### Audit observation

This was discussed with EDGE and JCC. The LIS file and JCC Submission Summary Reports were checked.

#### Audit commentary

EDGE trade category 1 and 2 ICPs only.

EDGE stated it does not operate any Generation.

Checks confirm this.

This clause is not applicable. Compliance was not assessed

#### Audit outcome

Not applicable

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

#### Code reference

Clause 13.137

#### Code related audit information

*Each generator must provide the relevant grid owner half-hour metering information for:*

- *any unoffered generation from a generating station with a point of connection to the grid 13.137(1)(a)*
- *any electricity supplied from an intermittent generating station with a point of connection to the grid. 13.137(1)(b)*

*The generator must provide the relevant grid owner with the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of that generator's volume information. (clause 13.137(2))*

*If such half-hour metering information is not available, the generator must provide the pricing manager and the relevant grid owner a reasonable estimate of such data. (clause 13.137(3))*

#### Audit observation

This was discussed with EDGE and JCC. The LIS file and JCC Submission Summary Reports were checked.

### **Audit commentary**

EDGE trade category 1 and 2 ICPs only.

EDGE stated it does not operate any Generation.

Checks confirm this.

This clause is not applicable. Compliance was not assessed

### **Audit outcome**

Not applicable

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

### **Code reference**

*Clause 13.138*

### **Code related audit information**

*The generator must provide the information required by clauses 13.136 and 13.137,*

*13.138(1)(a)- adjusted for losses (if any) relative to the grid injection point or, for embedded generators the grid exit point, at which it offered the electricity*

*13.138(1)(b)- in the manner and form that the pricing manager stipulates*

*13.138(1)(c)- by 0500 hours on a trading day for each trading period of the previous trading day.*

*The generator must provide the half-hour metering information required under this clause in accordance with the requirements of Part 15 for the collection of the generator's volume information.*

### **Audit observation**

This was discussed with EDGE and JCC. The LIS file and JCC Submission Summary Reports were checked.

### **Audit commentary**

EDGE trade category 1 and 2 ICPs only.

EDGE stated it does not operate any Generation.

Checks confirm this.

This clause is not applicable. Compliance was not assessed

### **Audit outcome**

Not applicable

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

### **Code reference**

*Clause 13.140*

### **Code related audit information**

*If the generator provides half-hourly metering information to a grid owner under clauses 13.136 to 13.138, or 13.138A, it must also, by 0500 hours of that day, advise the relevant grid owner.*

**Audit observation**

This was discussed with EDGE and JCC. The LIS file and JCC Submission Summary Reports were checked.

**Audit commentary**

EDGE trade category 1 and 2 ICPs only.

EDGE stated it does not operate any Generation.

Checks confirm this.

This clause is not applicable. Compliance was not assessed

**Audit outcome**

Not applicable

## 11. PROVISION OF SUBMISSION INFORMATION FOR RECONCILIATION

### 11.1. Buying and selling notifications (Clause 15.3)

#### Code reference

Clause 15.3

#### Code related audit information

*Unless an embedded generator has given a notification in respect of the point of connection under clause 15.3, a trader must give notice to the reconciliation manager if it is to commence or cease trading electricity at a point of connection using a profile with a profile code other than HHR, RPS, UML, EG1, or PV1 at least five business days before commencing or ceasing trader.*

*The notification must comply with any procedures or requirements specified by the reconciliation manager.*

#### Audit observation

This was discussed with EDGE and JCC. The LIS file and JCC Submission Summary Reports were checked.

#### Audit commentary

Checks confirm JCC as agent for EDGE submits volume submissions to the Reconciliation Manager using the RPS, PV1 and HHR Profiles.

EDGE did not give Notice to the Reconciliation Manager for this clause as it is not required for these profiles.

#### Audit outcome

Compliant

### 11.2. Calculation of ICP days (Clause 15.6)

#### Code reference

Clause 15.6

#### Code related audit information

*Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of:*

*15.6(1)(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.6(1)(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

*The ICP days information must be calculated using the data contained in the retailer or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.*

#### Audit observation

This was discussed with EDGE and JCC. The LIS, reconciliation submission files and GR- 100 files for the audit period were checked.

#### Audit commentary

The ICP days are reported to the reconciliation manager by JCC as EDGE’s agent. ICP Days submitted and GR-100 files for the audit period were reviewed, there were minor discrepancies identified in the sample as summarised below.

| Month  | Sum of Edge ICP Days Submitted R0 | Sum of Edge ICP Days Submitted R1 | Sum of GR 100 ICP Days R0 | Sum of GR 100 ICP Days R1 | Difference % |
|--------|-----------------------------------|-----------------------------------|---------------------------|---------------------------|--------------|
| Aug-22 | 2398                              | 2398                              | 2398                      | 2398                      | 0            |
| Jun-23 | 846                               | 794                               | 846                       | 846                       | 6.20%        |
| Jan-23 | 4211                              | 4180                              | 4251                      | 4180                      | 0.94%        |

The discrepancies appear to be due to backdated switch’s to MERX as EDGE moved ICPs to their tier 2 operation.

**Audit outcome**

Compliant

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

**Code reference**

Clause 15.7

**Code related audit information**

*A retailer must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each NSP, aggregated by invoice month, for which it has provided submission information to the reconciliation manager, including revised submission information for that period as non- loss adjusted values in respect of:*

*15.7(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.7(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

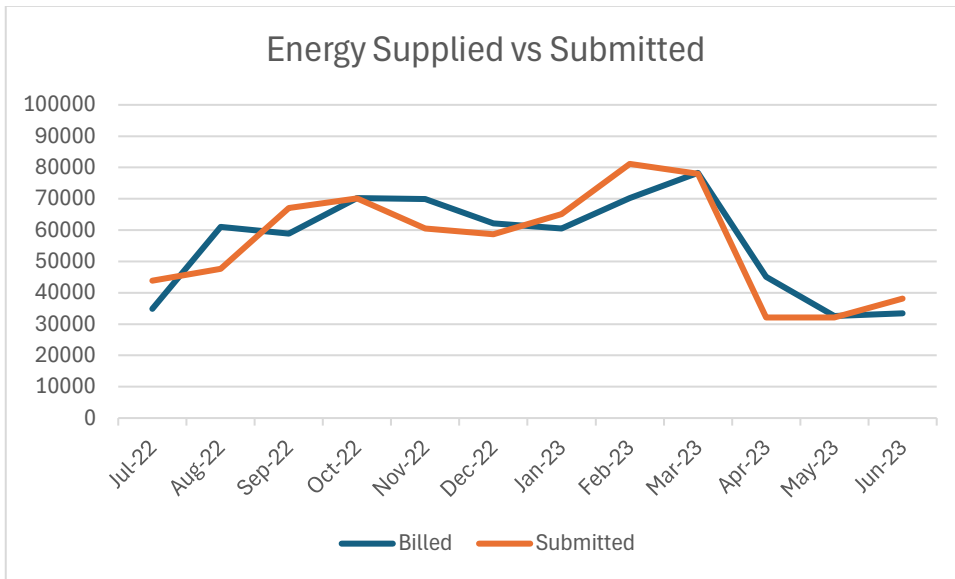
**Audit observation**

This was discussed with EDGE and JCC. BILLED files and reconciliation submission files between for the audit period were reviewed.

**Audit commentary**

The graph below identifies supplied against submissions between July 2022 and June 2023:





Previous audits have noted that the graph had an “unusual” shape possibly due to the supplied (billed) volume having tier 2 billed volume extracted from the EDGE data. There is also a slight distortion caused by large batches of backdated switch’s to MERX at times.

**Audit outcome**

Compliant

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

**Code reference**

Clause 15.8

**Code related audit information**

*A retailer or direct purchaser (excluding direct consumers) must deliver to the reconciliation manager its total monthly quantity of electricity supplied for each half hourly metered ICP for which it has provided submission information to the reconciliation manager, including:*

*15.8(a) - submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period*

*15.8(b) - revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.*

**Audit observation**

This was discussed with EDGE and JCC. Three submissions of HHRAGGR and HHRVOLS files were compared, and two ICPs HHR data checked end to end. The GR-90 ICP missing files for the audit period and the Registry were checked.

**Audit commentary**

The GR-90 ICP missing file checks there were no missing ICPs for the audit period.

Differences between the HHRAGGR and HHRVOLS volumes were negligible.

The checks on the two ICP HHR data from MEP file to HHRVOLS and aggregates file and submission summary confirmed compliance.

**Audit outcome**

Compliant

## 12. SUBMISSION COMPUTATION

### 12.1. Daylight saving adjustment (Clause 15.36)

#### Code reference

Clause 15.36

#### Code related audit information

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

#### Audit observation

This was discussed with EDGE and JCC. MEP Audit Reports were checked.

#### Audit commentary

EDGE have agreements with MEPs AMS, FCLM, and IHUB/MTRX to provide metering installations and meter readings. Raw meter data is collected by the MEPs. JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's and validates the information using RM TOOL.

The MEPs provide HHR data that is adjusted for NZDT.

A review of the MEP audit reports confirmed that daylight savings adjustment techniques meet code requirements.

#### Audit outcome

Compliant

### 12.2. Creation of submission information (Clause 15.4)

#### Code reference

Clause 15.4

#### Code related audit information

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

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

#### Audit observation

This was discussed with EDGE and JCC. Submission files HHRVOLS, HHRAGGR, NNHVOLS and ICPDAYS along with GR-100,GR-090 and GR-170 files were checked. Checks for late file breaches were made.

## Audit commentary

No late file submission breaches were discovered.

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's servers and validates the information using RM TOOL.

Allocation of volume information is completed by JCC. ICP information from the registry is refreshed in the RM TOOL prior to each reconciliation submission to ensure that aggregation factors and statuses are consistent with the registry.

A check of the monthly Submission Summary Reports confirmed ICPs, and consumption volume was allocated to the correct NSPs. HHRAGGR, HHRVOLS NHHVOLS ICP DAYS submissions compared to GR-170NHHR, GR-090, GR-100 files confirmed NSP allocations were matched.

Checks confirmed that all submission files including revisions were submitted as required by the code.

## Audit outcome

Compliant

### 12.3. Allocation of submission information (Clause 15.5)

#### Code reference

Clause 15.5

#### Code related audit information

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

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

#### Audit observation

This was discussed with EDGE and JCC. Submission files HHRVOLS, HHRAGGR, NHHVOLS and ICPDAYS along with GR-100,GR-090 and GR-170 files were checked. The LIS and Registry were also checked.

## Audit commentary

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's servers and validates the information using RM TOOL.

Allocation of volume information is completed by JCC. ICP information from the registry is refreshed in the RM TOOL prior to each reconciliation submission to ensure that aggregation factors and statuses are consistent with the registry.

A check of the monthly Submission Summary Reports confirmed ICPs, and consumption volume was allocated to the correct NSPs. Volume submissions compared to GR-170 files

confirmed NSP allocations were matched, and NSPs with no ICPs appropriately identified zero volume.

#### **Audit outcome**

Compliant

### 12.4. Grid owner volumes information (Clause 15.9)

#### **Code reference**

Clause 15.9

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file was checked.

#### **Audit commentary**

EDGE stated it is not a grid owner.

This clause is not applicable. Compliance was not assessed

#### **Audit outcome**

Not applicable

### 12.5. Provision of NSP submission information (Clause 15.10)

#### **Code reference**

Clause 15.10

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. The LIS file was checked.

#### **Audit commentary**

EDGE stated it is not an Embedded Network owner

This clause is not applicable. Compliance was not assessed

## Audit outcome

Not applicable

## 12.6. Grid connected generation (Clause 15.11)

### Code reference

Clause 15.11

### Code related audit information

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

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

### Audit observation

This was discussed with EDGE and JCC. The LIS file was checked.

### Audit commentary

EDGE stated it is not a grid connected generator owner or operator.

This clause is not applicable. Compliance was not assessed

### Audit outcome

Not applicable

## 12.7. Accuracy of submission information (Clause 15.12)

### Code reference

Clause 15.12

### Code related audit information

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

### Audit observation

This was discussed with EDGE and JCC. Submission summaries, Submission files HHRVOLS, HHRAGGR, NNHVOLS and ICPDAYS along with GR-100,GR-090 and GR-170 files were checked. The Registry was also checked.

### Audit commentary

No late file submission breaches were discovered.

Consecutive submissions were checked, and metering updates were observed in file revisions. The effect of backdated switch's to MERX was noticeable in the revision files.

Checks confirmed volumes and revisions were submitted for all ICPs traded during the audit period as required by the code.

### Audit outcome

Compliant

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

### Code reference

Clause 4 Schedule 15.2

### Code related audit information

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

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

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

### Audit observation

This was discussed with EDGE and JCC. Submission summaries, Submission files HHRVOLS, HHRAGGR, NNHVOLS with revisions were checked. MEP Audit Reports were checked. A sample of ten x ICPs were checked.

### Audit commentary

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

JCC collects metering information from the MEP's servers and validates the information using RM TOOL.

Meter reading information collected from MEPs is actual and is labelled as such in RM TOOL. If Estimated Readings are required they are created according to code requirement and labelled appropriately as estimated in RM TOOL.

Checks of revision submission files confirmed estimated reading information were updated as with actual information as it became available.

### Audit outcome

Compliant

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

### Code reference

Clause 2 Schedule 15.3

### Code related audit information

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

- *half hour volume information for the total metered quantity of electricity for each ICP notified in accordance with clause 11.7(2) for which there is a category 3 or higher metering installation (clause 2(1)(a)) for each ICP about which information is provided under clause 11.7(2) for which there is a category 1 or category 2 metering installation (clause 2(1)(ac) to 2(1)(ae)):*
  - a) *any half hour volume information for the ICP; or*

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

### **Audit observation**

This was discussed with EDGE and JCC. Submission summaries, Submission files HHRVOLS, HHRAGGR, NNHVOLS with revisions were checked along with the LIS file.

### **Audit commentary**

Checks confirm JCC as agent for EDGE submits volume submissions to the Reconciliation Manager using the RPS, PV1 and HHR Profiles. Control Devices, operation logs or other profile determination were not used to create volumes. Loss or compensation arrangements were not required.

EDGE stated they did not trade any Shared UML or UML during this this audit period, checks confirm this.

Checks using the above information confirmed all ICP consumption volume was submitted that EDGE was responsible for during the audit period.

### **Audit outcome**

Compliant

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

### **Code reference**

*Clause 3 Schedule 15.3*

### **Code related audit information**

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

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

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

### **Audit observation**



This was discussed with EDGE and JCC. Submission summaries, Submission files NNHVOLS with revisions were checked along with the LIS file.

### Audit commentary

Checks confirmed historic estimates were included in NNHVOLS and identified correctly.

### Audit outcome

Compliant

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

### Code reference

Clause 4 and 5 Schedule 15.3

### Code related audit information

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

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

### Audit observation

This was discussed with EDGE and JCC. Submission summaries, Submission files NNHVOLS with revisions were checked along with the LIS file. Historical Estimate process and scenario examples were checked.

### Audit commentary

Most meters used by EDGE are read remotely, there are two non-AMI read meters read by Wells. Where newly switched ICPs require estimated volume information JCC uses the average daily consumption obtained from the registry to calculate an estimate. Any data estimated by JCC for reconciliation purposes is flagged as an estimate.

Checks of the JCC historical estimate process for the following scenarios met code requirements:

- Gained ICP not full month
- Lost ICP not full month
- Start and end reads mid-month

### Audit outcome

Compliant

## 12.12. Forward estimate process (Clause 6 Schedule 15.3)

### Code reference

Clause 6 Schedule 15.3

### Code related audit information



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

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

#### **Audit observation**

This was discussed with EDGE and JCC. Submission summaries, Submission files NNHVOLS with revisions were checked along with the LIS file. The Forward estimate process and examples was checked.

#### **Audit commentary**

Most meters used by EDGE are read remotely, there are two non-AMI read meters read by Wells.

JCC calculates forward estimates if required. Forward estimates are based on historic consumption, or the average daily consumption provided by the losing trader in the CS file in the case of a newly switched ICP.

Checks of submission summaries and submission files confirmed code requirements were met.

#### **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 7 Schedule 15.3*

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. Submission summaries the EDA and LIS files along with the Registry were checked for the audit period. Five meter changes were checked.

#### **Audit commentary**

When a meter is changed the final meter readings were used to end the old profile and the start readings were used to start the new profile.

Checks of the submission summaries confirmed code requirements were met

#### **Audit outcome**

Compliant

## 13. SUBMISSION FORMAT AND TIMING

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

#### Code reference

*Clause 8 Schedule 15.3*

#### Code related audit information

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

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

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

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

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

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

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

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

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

#### Audit observation

This was discussed with EDGE and JCC. Submission summaries, Submission files HHRVOLS, HHRAGGR, NNHVOLS were checked for the audit period.

#### Audit commentary

NHHVOLS submission files were checked, and it was verified that the format of submission files was compliant.

Submission information was provided to the reconciliation manager in the appropriate format and aggregated correctly by:

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

HHRVOLS submission files were checked, and it was verified that the format of submission files was compliant.

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

EDGE stated they did not trade any Shared UML or UML during this this audit period, checks confirm this.

Checks using the above information confirmed all ICP consumption volume was submitted that EDGE was responsible for during the audit period.

### **Audit outcome**

Compliant

## 13.2. Reporting resolution (Clause 9 Schedule 15.3)

### **Code reference**

*Clause 9 Schedule 15.3*

### **Code related audit information**

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

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

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

### **Audit observation**

This was discussed with EDGE and JCC. The EDA, Submission summaries, Submission files HHRVOLS, HHRAGGR, NNHVOLS were checked for the audit period.

### **Audit commentary**

Checks of the submission information was appropriately rounded to no more than two decimal places.

## **Audit outcome**

Compliant

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

#### **Code reference**

*Clause 10 Schedule 15.3*

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

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

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

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

#### **Audit observation**

This was discussed with EDGE and JCC. Submission summaries, Submission NNHVOLS and GR-170 were checked for the audit period.

#### **Audit commentary**

JCC is EDGE's agent for calculation of submission data and the transmission of data to the reconciliation manager.

Checks confirm revision submissions met code requirement.

#### **Audit outcome**

Compliant

## CONCLUSION

See Executive Summary

## PARTICIPANT RESPONSE

Thank you for this thorough audit.

| Subject  | Section | Clause                                   | Non Compliance  | Action to be taken   |
|--|---------|--|---|--|
| Relevant information                                       | 2.1     | 10.6,<br>11.2,<br>15.2                   | A small quantity of Registry information updates was late   | We will minimise backdating going forward<br>MERX agreed to use TR whenever possible   |
| Changes to the registry information                        | 3.3     | 10<br>Schedule<br>11.1                   | 9 x Trader Information updates to the Registry were later than five business days                         | Late updates are all related to reading issues<br>We will use the actual validated meter readings contained in the monthly submission summaries provided by JCC to calculate the average daily consumption values to fast forward the process  |
| Provision of information to the registry                   | 3.6     | Clause 9<br>(1(k) of<br>Schedule<br>11.1 | 1 x ICP had its ANZSIC code incorrectly recorded in the Registry.   | Hope it doesn't happen again   |
| Losing trader must provide final information - switch move | 4.10    | 11 of<br>Schedule<br>11.3                | 7 x ICP switch moves CS files (70% of sample) had inaccurate average daily consumption values identified. | We will avoid switching on the date that the meter was replaced<br>We will reject MI where TR can be used<br>We will use the actual validated meter readings contained in the monthly submission summaries provided by JCC to calculate the average daily consumption values to fast forward the process |

Roy Netzer  
Director