

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

MAINPOWER NEW ZEALAND LIMITED
NZBN: 9429038908514

Prepared by: Brett Piskulic, Provera

Date audit commenced: 12 January 2024

Date audit report completed: 11 March 2024

TABLE OF CONTENTS

Executive summary	4
Audit summary	5
Non-compliances	5
Recommendations	5
Issues	5
1. Administrative	6
1.1. Exemptions from Obligations to Comply with Code (Section 11)	6
1.2. Structure of Organisation	7
1.3. Persons involved in this audit	8
1.4. Use of contractors (Clause 11.2A)	8
1.5. Supplier list	9
1.6. Hardware and Software	9
1.7. Breaches or Breach Allegations	10
1.8. ICP and NSP Data	10
1.9. Authorisation Received	11
1.10. Scope of Audit	11
1.11. Summary of previous audit	12
2. Operational Infrastructure	14
2.1. Requirement to provide complete and accurate information (Clause 11.2(1) and 10.6(1))	14
2.2. Requirement to correct errors (Clause 11.2(2) and 10.6(2))	15
2.3. Removal or breakage of seals (Clause 48(1A) and 48(1B) of Schedule 10.7).....	15
2.4. Provision of information on dispute resolution scheme (Clause 11.30A).....	16
3. Creation of ICPs.....	17
3.1. Distributors must create ICPs (Clause 11.4)	17
3.2. Participants may request distributors to create ICPs (Clause 11.5(3))	17
3.3. Provision of ICP Information to the registry manager (Clause 11.7)	18
3.4. Timeliness of Provision of ICP Information to the registry manager (Clause 7(2) of Schedule 11.1)	18
3.5. Timeliness of Provision of Initial Electrical Connection Date (Clause 7(2A) of Schedule 11.1)	19
3.6. Connection of ICP that is not an NSP (Clause 11.17).....	19
3.7. Connection of ICP that is not an NSP (Clause 10.31).....	20
3.8. Temporary electrical connection of ICP that is not an NSP (Clause 10.31A)	20
3.9. Connection of NSP that is not point of connection to grid (Clause 10.30)	21
3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30A and 10.30B).....	21
3.11. Definition of ICP identifier (Clause 1(1) Schedule 11.1)	22
3.12. Loss category (Clause 6 Schedule 11.1).....	22
3.13. Management of “new” status (Clause 13 Schedule 11.1).....	22
3.14. Monitoring of “new” & “ready” statuses (Clause 15 Schedule 11.1).....	23
3.15. Embedded generation loss category (Clause 7(6) Schedule 11.1)	23
3.16. Electrical connection of a point of connection (Clause 10.33A)	24
3.17. Electrical disconnection of a point of connection (Clause 10.30C and 10.31C)	24
3.18. Meter bridging (Clause 10.33C).....	25

4.	Maintenance of registry information.....	26
4.1.	Changes to registry information (Clause 8 Schedule 11.1)	26
4.2.	Notice of NSP for each ICP (Clauses 7(1),(4) and (5) Schedule 11.1)	26
4.3.	Customer queries about ICP (Clause 11.31).....	27
4.4.	ICP location address (Clause 2 Schedule 11.1).....	27
4.5.	Electrically disconnecting an ICP (Clause 3 Schedule 11.1).....	28
4.6.	Distributors to Provide ICP Information to the Registry manager (Clause 7(1) of Schedule 11.1)	28
4.7.	Provision of information to registry after the trading of electricity at the ICP commences (Clause 7(3) Schedule 11.1)	30
4.8.	GPS coordinates (Clause 7(8) and (9) Schedule 11.1)	31
4.9.	Management of “ready” status (Clause 14 Schedule 11.1)	31
4.10.	Management of “distributor” status (Clause 16 Schedule 11.1)	32
4.11.	Management of “decommissioned” status (Clause 20 Schedule 11.1)	32
4.12.	Maintenance of price category codes (Clause 23 Schedule 11.1).....	33
5.	Creation and maintenance of loss factors	34
5.1.	Updating table of loss category codes (Clause 21 Schedule 11.1).....	34
5.2.	Updating loss factors (Clause 22 Schedule 11.1)	34
6.	Creation and maintenance of NSPs (including decommissioning of NSPs and transfer of ICPs).....	35
6.1.	Creation and decommissioning of NSPs (Clause 11.8 and Clause 25 Schedule 11.1)	35
6.2.	Provision of NSP information (Clause 26(1) and (2) Schedule 11.1)	36
6.3.	Notice of balancing areas (Clause 24(1) and Clause 26(3) Schedule 11.1)	36
6.4.	Notice of supporting embedded network NSP information (Clause 26(4) Schedule 11.1).....	37
6.5.	Maintenance of balancing area information (Clause 24(2) and (3) Schedule 11.1)	37
6.6.	Notice when an ICP becomes an NSP (Clause 27 Schedule 11.1)	38
6.7.	Notification of transfer of ICPs (Clause 1 to 4 Schedule 11.2)	38
6.8.	Responsibility for metering information for NSP that is not a POC to the grid (Clause 10.25(1) and 10.25(3))	38
6.9.	Responsibility for metering information when creating an NSP that is not a POC to the grid (Clause 10.25(2)).....	39
6.10.	Obligations concerning change in network owner (Clause 29 Schedule 11.1)	40
6.11.	Change of MEP for embedded network gate meter (Clause 10.22(1)(b))	40
6.12.	Confirmation of consent for transfer of ICPs (Clauses 5 and 8 Schedule 11.2)	41
6.13.	Transfer of ICPs for embedded network (Clause 6 Schedule 11.2).....	41
7.	Maintenance of shared unmetered load	42
7.1.	Notification of shared unmetered load ICP list (Clause 11.14(2) and (4))	42
7.2.	Changes to shared unmetered load (Clause 11.14(5)).....	42
8.	Calculation of loss factors	44
8.1.	Creation of loss factors (Clause 11.2).....	44
	Conclusion	45
	Participant response	46

EXECUTIVE SUMMARY

MainPower New Zealand Limited (MainPower) intends to change to the processes used for integration between Salesforce and the registry. MainPower currently use three C# engines which will be replaced by Boomi processes. The Boomi processes will perform the following functions:

- Inbound - Receives registry NOT files once daily from an SFTP server and creates inbound records which are sent to Salesforce,
- Outbound - Retrieves outbound records created in Salesforce every five minutes and creates outbound records which are sent to the registry via an SFTP server, and
- Acknowledge - Retrieves registry acknowledgement files every five minutes from an SFTP server and updates the Salesforce outbound records.

Clause 16A.11 requires that if a distributor intends to make a “material” change to any certified facilities, processes, or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of MainPower so that it can be supplied to the Electricity Authority to satisfy the requirements of 16A.11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2.

Compliance was assessed for all areas which could be impacted by the material change by reviewing process documentation, the results of testing and walking through the testing processes. No non-compliances were identified, and no recommendations were made. The material change is not expected to have any impact on MainPower’s ability to maintain and update registry information and does not change any of the current processes from a user perspective. A comprehensive program of testing including all scenarios where information is transferred between Salesforce and the registry was carried out.

MainPower’s next audit due date is 12 December 2024, and I recommend that this audit date is retained because future compliance is not expected to be negatively impacted by the material change.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			Nil				
Future Risk Rating						0	

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

RECOMMENDATIONS

Subject	Section	Description	Action
		Nil	

ISSUES

Subject	Section	Issue	Description
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

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

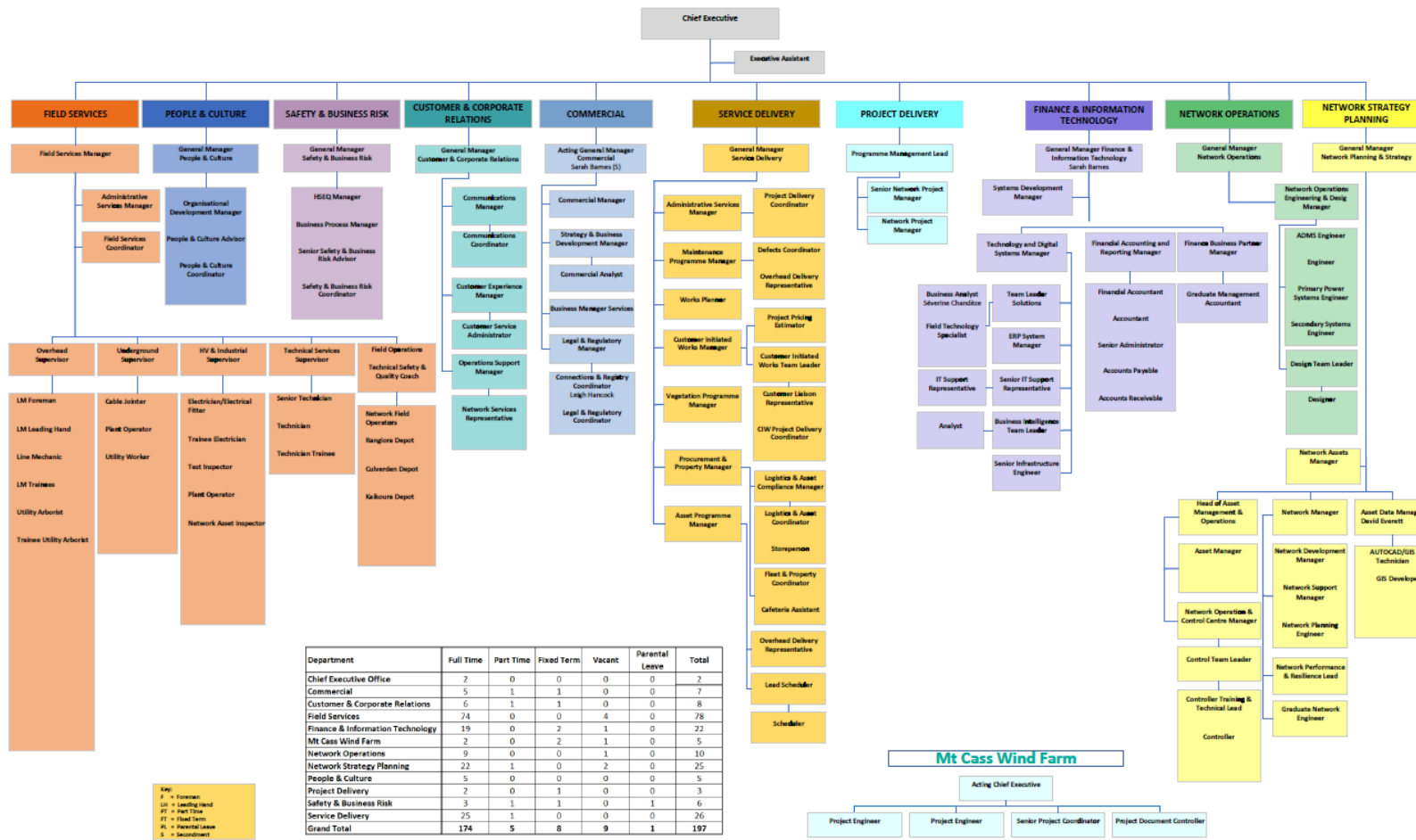
Audit commentary

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

1.2. Structure of Organisation

MainPower provided their organisational structure:

Organisation Structure



1.3. Persons involved in this audit

Auditor:

Name	Company	Role
Brett Piskulic	Provera	Auditor

MainPower Networks personnel assisting in this audit were:

Name	Title
Leigh Hancock	Connections & Registry Coordinator
Sarah Barnes	Legal & Regulatory Manager
Severine Chandeze	Business Analyst
Stu Alexandre	Datacom

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

MainPower subcontracts Vector Electrical Services, Delta, Wells and Safepower to conduct some field activities. The management and control areas covered by this audit are conducted by MainPower employees. This matter was discussed during the audit to ensure MainPower understands their responsibilities under this clause.

Audit commentary

MainPower has maintained responsibility for all of their obligations during the audit period.

1.5. Supplier list

MainPower engages Vector Electrical Services, Delta, Wells and Safepower to conduct some field activities.

1.6. Hardware and Software

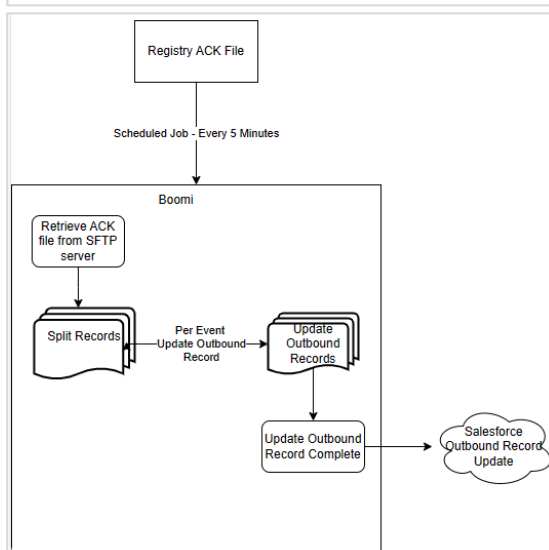
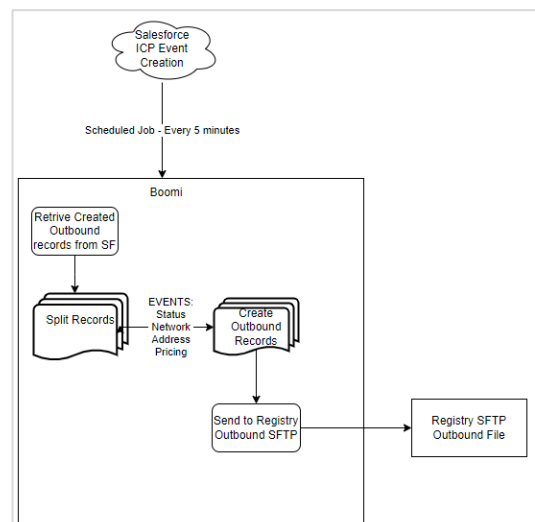
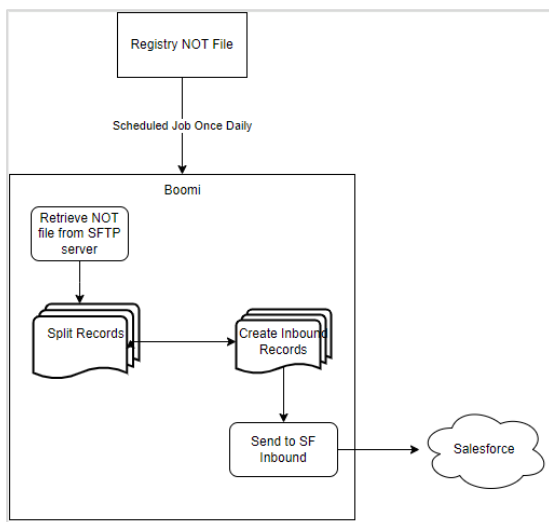
MainPower uses the Salesforce system (known as MACK internally) to manage processes and data related to the scope of this audit.

Back-ups are carried out daily in accordance with industry standards.

MainPower intends to change to the processes used for integration between Salesforce and the registry. MainPower currently use three C# engines which will be replaced by Boomi processes. The Boomi processes will perform the following functions:

- Inbound - Receives registry NOT files once daily from an SFTP server and creates inbound records which are sent to Salesforce,
- Outbound - Retrieves outbound records created in Salesforce every five minutes and creates outbound records which are sent to the registry via an SFTP server, and
- Acknowledge - Retrieves registry acknowledgement files every five minutes from an SFTP server and updates the Salesforce outbound records.

The diagrams below show each of the three Boomi processes:



1.7. Breaches or Breach Allegations

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

1.8. ICP and NSP Data

MainPower owns and operates the electricity network in the North Canterbury region.

The table below lists the relevant NSPs and their associated balancing area, and the number of active ICPs connected.

Distributor	NSP POC	Description	Balancing Area	Network type	Start date	No of ICPs
MPOW	ASY0111	ASHLEY	ASYAREAMPOWG	G	1 October 2016	2,995
MPOW	CUL0331	CULVERDEN	SWCKMPOWG	G	1 August 2016	3,665
MPOW	CUL0661	CULVERDEN	SWCKMPOWG	G	1 August 2016	2,894
MPOW	KAI0111	KAIAPOI	KAI0111MPOWG	G	1 May 2008	10,089
MPOW	SBK0661	SOUTHBROOK	KAI0111MPOWG	G	1 October 2016	18,301
MPOW	WPR0331	WAIPARA	SWCKMPOWG	G	1 August 2016	3,556
MPOW	WPR0661	WAIPARA	SWCKMPOWG	G	1 January 2016	2,686

MainPower does not own any embedded networks. There is one embedded network connected to the MainPower network. The details are shown in the table below.

Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network Type	Start Date
TENC	TRG0011	Freedom Gardens Ravenswood	SBK0661	MPOW	TRG0011TENCE	E	21 June 2023

The following ICP information is from a February 2024 list file:

Status	Number of ICPs 2024	Number of ICPs 2023	Number of ICPs 2021	Number of ICPs 2020	Number of ICPs 2019
New (999,0)	26	11	27	20	-
Ready (0,0)	74	71	70	46	-
Active (2,0)	44,146	43,525	42,163	40,892	40,080
Distributor (888,0)	9	9	7	7	-
Inactive – new connection in progress (1,12)	47	69	68	30	47
Inactive – electrically disconnected vacant property (1,4)	796	741	744	726	763

Status	Number of ICPs 2024	Number of ICPs 2023	Number of ICPs 2021	Number of ICPs 2020	Number of ICPs 2019
Inactive – electrically disconnected remotely by AMI meter (1,7)	138	123	82	79	81
Inactive – electrically disconnected at pole fuse (1,8)	14	14	12	13	20
Inactive – electrically disconnected due to meter disconnected (1,9)	9	7	6	6	6
Inactive – electrically disconnected at meter box fuse (1,10)	-	-	-	1	0
Inactive – electrically disconnected at meter box switch (1,11)	-	-	-	0	0
Inactive – electrically disconnected ready for decommissioning (1,6)	-	4	1	7	8
Inactive – reconciled elsewhere (1,5)	-	-	-	0	0
Decommissioned (3)	4,467	4,371	4,218	4,078	3,942

1.9. Authorisation Received

An authorisation letter was provided.

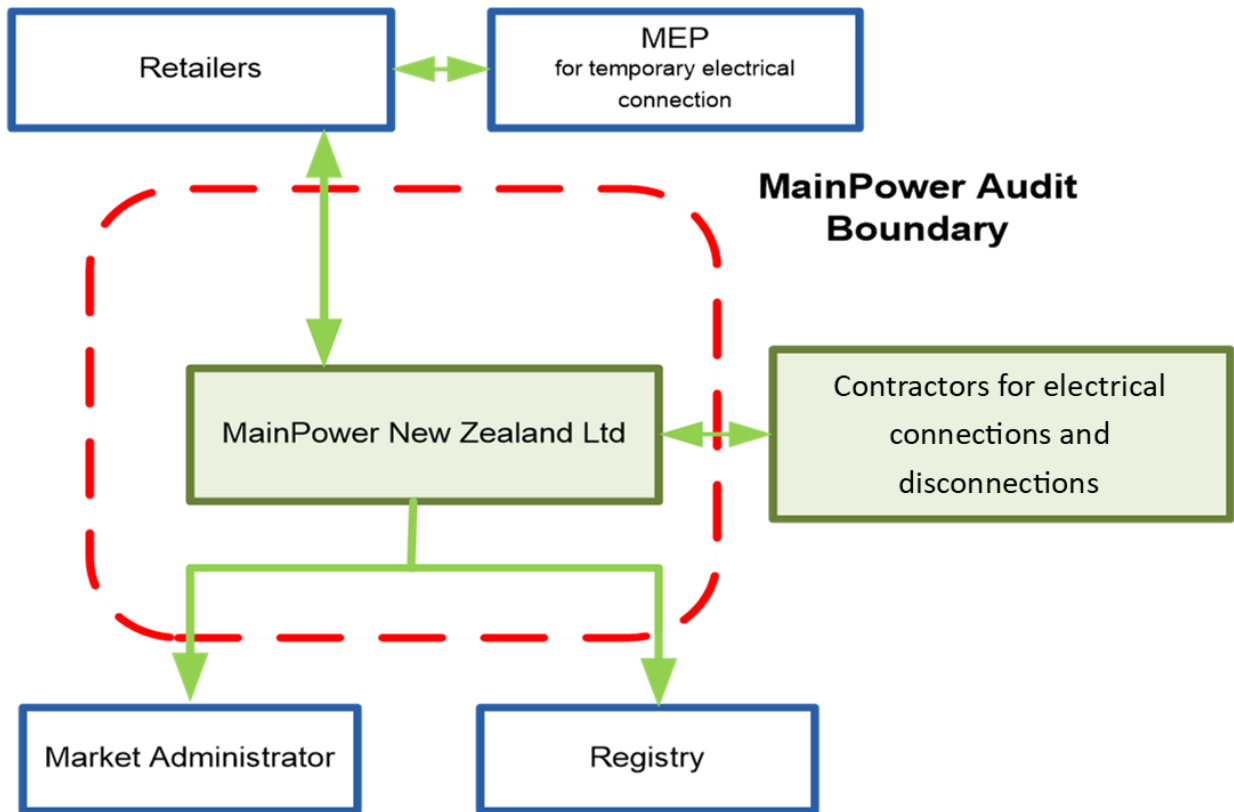
1.10. Scope of Audit

MainPower intends to change to the processes used for integration between Salesforce and the registry. MainPower currently use three C# engines which will be replaced by Boomi processes. The Boomi processes will perform the following functions:

- Inbound - Receives registry NOT files once daily from an SFTP server and creates inbound records which are sent to Salesforce,
- Outbound - Retrieves outbound records created in Salesforce every five minutes and creates outbound records which are sent to the registry via an SFTP server, and
- Acknowledge - Retrieves registry acknowledgement files every five minutes from an SFTP server and updates the Salesforce outbound records.

Clause 16A.11 requires that if a distributor intends to make a “material” change to any certified facilities, processes, or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of MainPower so that it can be supplied to the Electricity Authority to satisfy the requirements of 16A.11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2.

The scope of the audit is shown in the diagram below, with the MainPower audit boundary shown for clarity.



All activities covered by this audit are conducted at MainPower’s head office in Rangiora.

1.11. Summary of previous audit

I reviewed the previous audit, conducted in June 2024 by Brett Piskulic of Provera. The audit found eight non-compliances and made no recommendations. The current status of these matters is detailed in the table below.

Table of non-compliance

Subject	Section	Clause	Non-compliance	Status
Removal and breakage of seals	2.3	48(1A) and 48(1B) of Schedule 10.7	MainPower does not re-seal metering equipment after bridging.	The material change is not expected to have any impact on compliance.
Timeliness of Provision of ICP Information to the registry manager	3.4	Clause 7(2) of Schedule 11.1	Late update to “ready” for one ICP electrically connected during the audit period.	
Initial electrical connection date population	3.5	7(2A) of Schedule 11.1	16 initial electrical connection dates updated late to the registry.	
Connection of ICP that is not an NSP	3.6	11.17	One ICP where the trader was not recorded in the registry as having accepted responsibility prior to electrical connection.	

Subject	Section	Clause	Non-compliance	Status
Changes to registry information	4.1	8 Schedule 11.1	28 late address updates. One late NSP update. 56 late pricing updates. Two late status updates.	
Notice of NSP for each ICP	4.2	7(1) Schedule 11.1	11 ICPs mapped to the incorrect NSP.	
Distributors to Provide ICP Information to the Registry manager	4.6	7(1) Schedule 11.1	One ICP with incorrect distributor unmetered load recorded. Two LE ICPs with the NSP dedication set to No.	
Provision of information to registry after the trading of electricity at the ICP commence	4.7	7(3) Schedule 11.1	One late pricing update to provide the actual price category code.	

Recommendations

Subject	Section	Description	Status
		Nil	

2. OPERATIONAL INFRASTRUCTURE

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

Code reference

Clause 11.2(1) and 10.6(1)

Code related audit information

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

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

Audit observation

I considered whether the changes were likely to result in incomplete, incorrect, or misleading information. I viewed documentation and test results and walked through processes in the test system.

Audit commentary

Data entry and registry synchronisation

There is no change to the user processes for entry of information in Salesforce. The Boomi processes will continue to perform the registry synchronisations functions as follows:

- Inbound - Receives registry NOT files once daily from an SFTP server and creates inbound records which are sent to Salesforce,
- Outbound - Retrieves outbound records created in Salesforce every five minutes and creates outbound records which are sent to the registry via an SFTP server, and
- Acknowledge - Retrieves registry acknowledgement files every five minutes from an SFTP server and updates the Salesforce outbound records.

If any of these processes fail Boomi generates an automated notification email to IT support for follow up and resolution.

User training

As the Boomi processes are a direct replacement of the existing processes and do not require any changes to current user processes there is no requirement to conduct any user training.

Implementation plan

At the time of the audit MainPower advised that they are ready for the changes to go live and plan to do so at least five business days after this report is finalised. The changeover process was discussed and involves shutting down the C# engines and starting the Boomi processes. Testing confirmed that there is not expected to be any disruption of the flow of information to and from the registry.

Audit outcome

Compliant

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

I considered whether the changes were likely to result in incomplete, incorrect, or misleading information. I viewed documentation and test results and walked through processes in the test system.

Audit commentary

Future compliance is not expected to be affected by the material change.

MainPower have robust processes and procedures in place to ensure they provide correct and accurate information. Weekly registry reconciliation reports are used to identify discrepancies between MainPower's records and the registry. Any discrepancies found are investigated and updated as required. The changes will not affect these processes.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The process to create ICPs after the change was examined. I viewed documentation and test results and walked through the process in the test system.

Audit commentary

There is no change to the process for creating ICPs. Testing confirmed that all information related to newly created ICPs was successfully sent to the registry. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

The process to create ICPs after the change was examined. I viewed documentation and test results and walked through the process in the test system.

Audit commentary

There is no change to the process for creating ICPs. Testing confirmed that all information related to newly created ICPs was successfully sent to the registry. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 11.7

Code related audit information

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

Audit observation

The process to create ICPs after the change was examined. I viewed documentation and test results and walked through the process in the test system.

Audit commentary

There is no change to the process for creating ICPs. Testing confirmed that all information related to newly created ICPs was successfully sent to the registry. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

I considered whether the change was likely to result in late provision of registry information. I viewed documentation and test results and walked through processes in the test system.

Audit commentary

The distributor must provide to the registry the information listed in clause 7(2) of schedule 11.1 as soon as practicable, and before electricity is traded at the ICP. New ICP information is populated in Salesforce and the Boomi process retrieves and sends any new events to the registry every five minutes. The results of testing conducted confirmed that there was no change to the flow of information from Salesforce to the registry. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

I considered whether the material change was likely to result in late provision of initial electrical connection dates. I viewed process documentation and test results.

Audit commentary

The process to determine initial electrical connection dates will not change as part of this material change. MainPower requires field contractors to return paperwork within three business days of completion. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

MainPower's processes are robust in relation to this clause as an ICP will not be electrically connected without the agreement from the trader, who in turn has agreement with an MEP for the ICP.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

3.10. Temporary electrical connection of NSP that is not point of connection to grid (Clause 10.30A and 10.30B)

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

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

A distributor may only electrically connect an NSP if:

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

yyyyyyyyyyxxccc where:

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change as there is no change to how ICP identifiers are created by MainPower.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Each “active” ICP has a single loss category, which clearly identifies the relevant loss factor.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

I considered whether the material change was likely to affect the management of ICPs at the “new” status. I viewed process documentation and test results.

Audit commentary

MainPower creates ICPs at the “new” status and changes the status to “ready” once the relevant retailer has agreed to accept responsibility for the ICP. Testing confirmed that the addition of a proposed retailer and pricing details to an ICP in the “new” status resulted in a change to the “ready” status on the registry. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

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

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

Audit observation

I considered whether the material change was likely to affect the monitoring of ICPs at the “new” and “ready” statuses. I viewed process documentation and test results.

Audit commentary

MainPower monitors these using the registry audit compliance report. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The list file was examined to identify relevant ICPs.

Audit commentary

There are no ICPs with a generation capacity greater than 10MW. There is one ICP with an individual loss category, but it is rated at 2MW.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

Processes were examined for the connection of ICPs and NSPs.

Audit commentary

The new connection application process will not change as part of this material change. New connection data will be entered into Salesforce and transferred to the registry.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

Processes were examined for the disconnection of ICPs and NSPs.

Audit commentary

MainPower understand their responsibilities in relation to this clause. They only conduct electrical disconnection for safety, and where ICPs are to be decommissioned.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

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

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

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

Audit observation

The MainPower process for bridging control devices was examined.

Audit commentary

MainPower may receive a call from a customer after hours, to investigate ‘no power’. MainPower will attend the site and may bridge the meter if required. MainPower advise the MEP and retailer to arrange a job to complete the un-bridging and resealing work the following day.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

4. MAINTENANCE OF REGISTRY INFORMATION

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

Code reference

Clause 8 Schedule 11.1

Code related audit information

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

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

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

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

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

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

Audit observation

I considered whether the material change was likely to affect the processes for updating registry information. I viewed documentation and test results and walked through processes in the test system.

Audit commentary

The material change will not result in any change to the way registry information is updated in Salesforce by MainPower. Changes to ICP information are populated in Salesforce and the Boomi process retrieves and sends any new events to the registry every five minutes. The results of testing conducted confirmed that there was no change to the flow of information from Salesforce to the registry. The testing included changes to network, pricing, address and status fields.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

I considered whether the material change was likely to affect the processes for identifying the NSP to which an ICP is connected. I viewed documentation and test results.

Audit commentary

The material change will not result in any change to the allocation of NSPs. Testing confirmed that when NSP changes are made in Salesforce the changes flow through to the registry.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

4.3. Customer queries about ICP (Clause 11.31)

Code reference

Clause 11.31

Code related audit information

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

Audit observation

The management of customer queries was examined.

Audit commentary

MainPower seldom receives direct requests for ICP identifiers. ICP identifiers can be provided immediately on request once the address has been confirmed. This process will not be affected by the material change.

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

I considered whether the material change was likely to affect the processes for determining and allocating addresses. I viewed documentation and test results.

Audit commentary

The material change will not result in any change to the address processes. Testing confirmed that when address changes are made in Salesforce the changes flow through to the registry.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Section 2.3.6 of the Network Connection Standard contains the following statement:

“Connection for entry to and exit from the Network shall incorporate a means of disconnection of the User Network by MainPower.”

MainPower confirmed there has been no change to the policy. In addition, the new connection notification forms have fields for “tail connection type” and capacity, which would alert to any shared service mains without individual isolation.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (clause 7(1)(a) of schedule 11.1),*
- *the NSP identifier of the NSP to which the ICP is usually connected (clause 7(1)(b) of schedule 11.1),*
- *the installation type code assigned to the ICP (clause 7(1)(c) of schedule 11.1),*
- *the reconciliation type code assigned to the ICP (clause 7(1)(d) of schedule 11.1),*
- *the loss category code and loss factors for each loss category code assigned to the ICP (clause 7(1)(e) of schedule 11.1),*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (clause 7(1)(f) of schedule 11.1):*
 - a) *the unique loss category code assigned to the ICP,*
 - b) *the ICP identifier of the ICP,*

- c) *the NSP identifier of the NSP to which the ICP is connected,*
- d) *the plant name of the embedded generating station,*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (clause 7(1)(g) of schedule 11.1),*
- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (clause 7(1)(h) of schedule 11.1):*
 - a) *a placeholder chargeable capacity if the distributor is unable to determine the actual chargeable capacity,*
 - b) *a blank chargeable capacity if the capacity value can be determined for a billing period from metering information collected for that billing period,*
 - c) *if there is more than one capacity value at the ICP, and at least one, but not all, of those capacity values can be determined for a billing period from the metering information collected for that billing period-*
 - (i) no capacity value recorded in the registry field for the chargeable capacity; and*
 - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded,*
 - d) *if there is more than one capacity value at the ICP, and none of those capacity values can be determined for a billing period from the metering information collected for that billing period-*
 - (i) the annual capacity value recorded in the registry field for the chargeable capacity; and*
 - (ii) either the term "POA" or all other capacity values, recorded in the registry field in which the distributor installation details are also recorded,*
 - e) *the actual chargeable capacity of the ICP in any other case,*
- *the distributor installation details for the ICP determined by the price category code assigned to the ICP (if any), which may be placeholder distributor installation details only if the distributor is unable to assign the actual distributor installation details because the capacity or volume information required to assign the actual distributor installation details cannot be determined before electricity is traded at the ICP (clause 7(1)(i) of schedule 11.1),*
- *the participant identifier of the first trader who has entered into an arrangement to sell or purchase electricity at the ICP (only if the information is provided by the first trader) (clause 7(1)(j) of schedule 11.1),*
- *the status of the ICP (clause 7(1)(k) of schedule 11.1),*
- *designation of the ICP as "dedicated" if the ICP is located in a balancing area that has more than 1 NSP located within it, and the ICP will be supplied only from the NSP advised under clause 7(1)(b) of schedule 11.1, or the ICP is a point of connection between a network and an embedded network (clause 7(1)(l) of schedule 11.1),*
- *if unmetered load, other than distributed unmetered load, is associated with the ICP, the type and capacity in kW of unmetered load (clause 7(1)(m) of schedule 11.1),*
- *if shared unmetered load is associated with the ICP, a list of the ICP identifiers of the ICPs that are associated with the unmetered load (clause 7(1)(n) of schedule 11.1),*
- *if the ICP is capable of generating into the distributors network (clause 7(1)(o) of schedule 11.1):*
 - a) *the nameplate capacity of the generator; and*
 - b) *the fuel type,*
- *the initial electrical connection date of the ICP (clause 7(1)(p) of schedule 11.1).*

Audit observation

I considered whether the material change was likely to affect the processes for the management of registry information. I viewed documentation and test results and walked through processes in the test system.

Audit commentary

The material change will not result in any change to the way registry information is validated and updated in Salesforce by MainPower. Changes to ICP information are populated in Salesforce and the Boomi process retrieves and sends any new events to the registry every five minutes. The results of testing conducted confirmed that there was no change to the flow of information from Salesforce to the registry. The testing included changes to network, pricing, address and status fields.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 7(3) Schedule 11.1

Code related audit information

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

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

Audit observation

I considered whether the material change was likely to affect the processes for the provision of pricing information. I viewed documentation and test results and walked through processes in the test system.

Audit commentary

The material change will not result in any change to the way registry information is validated and updated in Salesforce by MainPower. The price code is populated when the ICP is made “ready” with what is expected to be the correct price category code and chargeable capacity if applicable.

The results of testing conducted confirmed that there was no change to the flow of information from Salesforce to the registry. The testing included the addition of pricing information at the time of a status change from “new” to “ready”.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

I considered whether the material change was likely to affect the processes for populating GPS coordinates. I viewed documentation and test results.

Audit commentary

The material change will not result in any change to the population of GPS coordinates. Testing confirmed that when GPS coordinate changes are made in Salesforce the changes flow through to the registry.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

I considered whether the material change was likely to affect the management of ICPs at the “ready” status. I viewed process documentation and test results.

Audit commentary

MainPower creates ICPs at the “new” status and changes the status to “ready” once the relevant retailer has agreed to accept responsibility for the ICP. Testing confirmed that the addition of a proposed retailer and pricing details to an ICP in the “new” status resulted in a change to the “ready” status on the registry. Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

I considered whether the material change was likely to affect the management of ICPs at the “distributor” status. I viewed process documentation and test results.

Audit commentary

The material change will not result in any change to the management of distributor ICPs. Testing confirmed that changes made to distributor ICPs in Salesforce flowed through to the registry as expected. The test scenarios included changing of shared unmetered load details and changing of status from “distributor” to “decommissioned”.

The list file contained two embedded network (LE) ICPs and seven shared unmetered load (SI) ICPs. The details are recorded correctly on the registry.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

I considered whether the material change was likely to affect the management of “decommissioned” status. I viewed process documentation and test results.

Audit commentary

The material change will not result in any change to the management of “decommissioned” status. Testing confirmed that changes made to move ICPs to “decommissioned” status in Salesforce flowed through to the registry as expected. The test scenarios included changing ICPs at “distributor”, “inactive - ready for decommissioning” and “new” statuses to “decommissioned” status.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 Schedule 11.1

Code related audit information

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

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

A loss category code takes effect on the specified date.

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

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

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

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

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

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

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

Audit observation

The NSP table was reviewed.

Audit commentary

MainPower has not created or decommissioned any NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Not applicable

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

At least one month notification is required before the acquisition (clause 29(2) of schedule 11.1).

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit observation

I considered whether the material change was likely to affect the management of shared unmetered load. I viewed process documentation and test results.

Audit commentary

The material change will not result in any change to the management of shared unmetered load. Testing confirmed that changes made to shared unmetered load ICPs in Salesforce flowed through to the registry as expected. The test scenarios included changing of shared unmetered load ICP lists and unmetered load details.

There are 71 ICPs with shared unmetered load, related to seven parent ICPs.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

I considered whether the material change was likely to affect the management of shared unmetered load. I viewed process documentation and test results.

Audit commentary

The material change will not result in any change to the management of shared unmetered load. Testing confirmed that changes made to shared unmetered load ICPs in Salesforce flowed through to the registry as expected. The test scenarios included changing of shared unmetered load ICP lists and unmetered load details.

There are 71 ICPs with shared unmetered load, related to seven parent ICPs.

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

This process is not affected by the material change.

Audit commentary

Future compliance is not expected to be affected by the material change.

Audit outcome

Compliant

CONCLUSION

MainPower New Zealand Limited (MainPower) intends to change to the processes used for integration between Salesforce and the registry. MainPower currently use three C# engines which will be replaced by Boomi processes. The Boomi processes will perform the following functions:

- Inbound - Receives registry NOT files once daily from an SFTP server and creates inbound records which are sent to Salesforce,
- Outbound - Retrieves outbound records created in Salesforce every five minutes and creates outbound records which are sent to the registry via an SFTP server, and
- Acknowledge - Retrieves registry acknowledgement files every five minutes from an SFTP server and updates the Salesforce outbound records.

Clause 16A.11 requires that if a distributor intends to make a “material” change to any certified facilities, processes, or procedures then the changes must be subject to an audit prior to the change taking place. This audit was therefore performed at the request of MainPower so that it can be supplied to the Electricity Authority to satisfy the requirements of 16A.11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2.

Compliance was assessed for all areas which could be impacted by the material change by reviewing process documentation, the results of testing and walking through the testing processes. No non-compliances were identified, and no recommendations were made. The material change is not expected to have any impact on MainPower’s ability to maintain and update registry information and does not change any of the current processes from a user perspective. A comprehensive program of testing including all scenarios where information is transferred between Salesforce and the registry was carried out.

MainPower’s next audit due date is 12 December 2024, and I recommend that this audit date is retained because future compliance is not expected to be negatively impacted by the material change.

PARTICIPANT RESPONSE

MainPower has reviewed this report.