

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTOR AUDIT REPORT



For

OYSTER NETWORKS LIMITED (OYST)
NZBN:9429041790793

Prepared by: Brett Piskulic

Date audit commenced: 28 November 2023

Date audit report completed: 28 February 2024

Audit report due date: 01-Mar-24

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

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

EXECUTIVE SUMMARY

This distributor audit was conducted at the request of **Oyster Networks Limited (OYST)** to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

The embedded network is managed by **Smart Power**, who assisted with this audit.

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

The number of ICPs connected to this network has continued to increase during the audit period. There were three non-compliances identified for the audit period. The non-compliances all relate to the timeliness of registry updates. The audit risk rating recommends that the next audit is in 24 months. I have considered this in conjunction with the impact of the non-compliances found and recommend that the next audit be in 36 months.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	Ten ICPs Initial Electrical Connection dates updated late.	Strong	Low	1	Identified
Changes to registry information	4.1	8 Schedule 11.1	One late update to decommissioned. Five late distributed generation updates.	Strong	Low	1	Identified
Updating loss factors	5.2	22 Schedule 11.1	Two late loss factor updates.	Strong	Low	1	Cleared
Future Risk Rating						3	

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

RECOMMENDATIONS

Subject	Section	Description	Recommendation
		Nil	

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

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

Audit commentary

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

1.2. Structure of Organisation

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

- Nick Oldham – GM Utility Solutions.

1.3. Persons involved in this audit.

Auditor:

Name	Company	Role
Brett Piskulic	Provera	Auditor

Personnel assisting in this audit were:

Name	Title	Company
Ewa Glowacka	Director	TEG and Associates
Nick Oldham	GM Utility Solutions	Smart Power Limited

1.4. Use of contractors (Clause 11.2A)

Code reference

Clause 11.2A

Code related audit information

A participant who uses a contractor

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

Audit observation

TEG carries out OYST's registry activities and communications in relation to the establishment of new networks.

1.5. Supplier list

TEG carries out OYST's registry activities and communications in relation to the establishment of new networks.

1.6. Hardware and Software

This is covered in TEG's audit report and no changes have been made since their audit.

1.7. Breaches or Breach Allegations

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

1.8. ICP and NSP Data

Review of the NSP table showed OYST had the following NSP.

Dist	NSP POC	Description	Parent POC	Parent Network	Balancing Area	Network type	Start date	No of active ICPs
OYST	WHA0011	Oyster Capital	HEN0331	UNET	WHA0011OYSTE	E	4 December 2015	962

Status	Number of ICPs Jan 2024	Number of ICPs Feb 2021	Number of ICPs Dec 2018	Number of ICPs Feb 2018
New (999,0)	0	0	0	0
Ready (0,0)	0	1	5	5
Active (2,0)	962	641	381	175
Distributor (888,0)	0	0	0	0
Inactive – new connection in progress (1,12)	8	1	5	7
Inactive – electrically disconnected vacant property (1,4)	2	2	0	0
Inactive – electrically disconnected remotely by AMI meter (1,7)	0	2	5	0

Inactive –at pole fuse (1,8)	0	0	0	0
Inactive – electrically disconnected due to meter disconnected (1,9)	0	0	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)	0	0	1	0
Inactive – reconciled elsewhere (1,5)	0	0	0	0
Decommissioned (3)	24	22	7	0

1.9. Authorisation Received

OYST provided a letter of authorisation to Provera, permitting the collection of data from other parties for matters directly related to the audit.

1.10. Scope of Audit

This distributor audit was performed at the request of OYST, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 11.10 of part 11. The audit was conducted in accordance with the Guideline for Distributor Audits V7.2, which was produced by the Electricity Authority.

The audit analysis was undertaken on:

- a registry list snapshot as of 6 January 2024,
- a registry list with history and event detail report for 1 March 2021 to 6 January 2024,
- audit compliance reports covering 1 March 2021 to 6 January 2024,
- a meter installation details report for 6 January 2024, and
- the NSP table, NSP mapping table, loss factor table, and price category table for 28 November 2023.

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

Functions Requiring Audit Under Clause 11.10(4) of Part 11	Contractors Involved in Performance of Tasks
The creation of ICP identifiers for ICPs.	TEG & Associates
The provision of ICP information to the registry and the maintenance of that information.	
The creation and maintenance of loss factors.	

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

1.11. Summary of previous audit

I reviewed the previous audit conducted in February 2021 by Rebecca Elliot of Veritek Limited. The findings are detailed in the table below:

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Timeliness of Provision of Initial Electrical Connection Date	3.5	7(2A) of Schedule 11.1	12 ICPs Initial Electrical Connection dates updated late.	Still existing
Changes to registry information	4.1	8 Schedule 11.1	One backdated pricing event. Three late updates to decommissioned.	Still existing

Table of Recommendations

Subject	Section	Clause	Recommendation for Improvement	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

The management of this process is discussed in the TEG audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG agent audit report, and any data discrepancies are resolved as they are identified. Examination of the list file and audit compliance reports found all information populated as required and all practicable steps are taken to check this as part of the business-as-usual processes.

Audit outcome

Compliant

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

Code reference

Clause 11.2(2) and 10.6(2)

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent audit report, and any data discrepancies are resolved as they are identified.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

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

Audit observation

The management of this process is discussed in the TEG audit report.

Audit commentary

Compliance is recorded in the TEG audit report. OYST do not complete any work requiring a change of seal, the retailer will initiate any such work required with a contractor.

Audit outcome

Compliant

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

Code reference

Clause 11.30A

Code related audit information

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

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

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

3. CREATION OF ICPS

3.1. Distributors must create ICPs (Clause 11.4)

Code reference

Clause 11.4

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report. The registry list file and combined audit compliance reports were examined. 315 ICPs were created during the audit period. A sample of ten ICPs selected using the typical case methodology were checked to confirm the process and controls worked in practice.

Audit outcome

Compliant

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

Code reference

Clause 11.5(3)

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG audit report. The registry list and audit compliance reports were examined to determine compliance. 315 ICPs were created during the audit period. A sample of ten ICPs selected using the typical case methodology were checked to confirm the process and controls worked in practice.

Audit commentary

Compliance is recorded in the TEG contractor report and no changes have been made to their process since they were last audited. The sample checked confirmed that ICPs are being created within one business day of the request from the trader.

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 management of this process is discussed in the TEG audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report. All the information was provided as required by this clause for the 315 ICPs created during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 7(2) of Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG contractor report and no changes have been made to their process since they were last audited. Analysis of the registry reports found all ICPs were created as soon as practicable and prior to electrical connection.

Audit outcome

Compliant

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

Code reference

Clause 7(2A) of Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

The audit compliance report identified ten late initial electrical connection updates from 307 ICPs that were electrically connected during the audit period. The late updates were made 11 to 38 business days after initial electrical connection. All ten late updates were checked and found that all were caused by late notification of the initial electrical connection date.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 06-Apr-21 To: 31-Oct-23	Ten ICPs Initial Electrical Connection dates updated late. Potential impact: None Actual impact: None Audit history: Multiple Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as checks are in place to monitor changes to active status and most updates are on time. This has no direct impact on submission hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have processes in place to track IEC dates however in some cases we must rely on 3 rd parties. We note that although disappointing, the update of IECDs across all ICPs created during the audit period was around 97% compliant.		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue update details as soon as possible.		ongoing	

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

Code reference

Clause 11.17

Code related audit information

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

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

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG audit report. Review of the registry data confirmed that a trader is currently recorded for all active ICPs, and there is no known shared unmetered load on OYST's network. Review of the audit compliance reports confirmed that all ICPs were made "ready" after the trader had accepted responsibility.

Audit outcome

Compliant

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

Code reference

Clause 10.31

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG audit report. There were 307 ICPs that were connected during the audit period, and all had a trader recorded in the registry as accepting responsibility.

Audit outcome

Compliant

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

Code reference

Clause 10.31A

Code related audit information

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

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

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

- *advising all traders would impose a material cost on the distributor, and*

- in the distributor's reasonable opinion, the advice would not result in any material benefit to any of the traders.

Audit observation

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

Audit commentary

Any ICPs that are temporarily electrically connected follow the same process as those for all other new connections. No temporarily connected ICPs were identified.

Audit outcome

Compliant

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

Code reference

Clause 10.30

Code related audit information

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

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

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

Audit observation

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

Audit observation

No new NSPs have been electrically connected during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30A and 10.30B

Code related audit information

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

- has been authorised to make the request by the reconciliation participant responsible for the NSP; and*

- the MEP has an arrangement with that reconciliation participant to provide metering services.

A distributor may only electrically connect an NSP if:

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

Audit observation

The NSP table was checked.

Audit observation

No new NSPs have been electrically connected during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1(1) Schedule 11.1

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TEG audit report.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. The new ICPs were created compliantly.

Audit outcome

Compliant

3.12. Loss category (Clause 6 Schedule 11.1)

Code reference

Clause 6 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG audit report. The registry list was examined to confirm all active ICPs have a single loss category code.

Audit commentary

Compliance is recorded in the TEG agent audit report. Each active ICP only has a single loss category, which clearly identifies the relevant loss factor.

Audit outcome

Compliant

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

Code reference

Clause 13 Schedule 11.1

Code related audit information

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

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent audit report.

ICPs are created at the “ready” status. Examination of the list file found no ICPs at the “new” status.

Audit outcome

Compliant

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

Code reference

Clause 15 Schedule 11.1

Code related audit information

If an ICP has had the status of “new” or has had the status of “ready” for 24 calendar 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

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

Audit commentary

This process is discussed in the TEG agent report and has not changed since the last audit. An examination of the audit compliance reports found no ICPs at the “ready” status for more than 24 months.

Audit outcome

Compliant

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

Code reference

Clause 7(6) Schedule 11.1

Code related audit information

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

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

Audit observation

The registry list was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 10.33A(4)

Code related audit information

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

Audit observation

The connection process was examined in relation to the electrical connection process.

Audit commentary

OYST requires all requests for new ICP's to be sent from the trader before electrically connecting ICPs, as discussed in **section 3.2**. No new unmetered load connections have been completed during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.30C and 10.31C

Code related audit information

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

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

Audit observation

The disconnection process was examined.

Audit commentary

OYST does not complete disconnections. This work is undertaken by the traders and their MEPs.

Audit outcome

Compliant

3.18. Meter bridging (Clause 10.33C)

Code reference

Clause 10.33C

Code related audit information

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

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

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

If the distributor bridges a meter, the distributor must notify the responsible trader within 1 business day and include the date of bridging in its advice.

Audit observation

Processes for meter bridging were reviewed.

Audit commentary

OYST does not bridge meters. Traders are responsible for connection and reconnection.

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

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

Audit commentary

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

The audit compliance report was analysed and found all changes were made within the required timeframe with the exception of:

Pricing events

There were 125 pricing updates made. The audit compliance reports identified eight that were backdated between four and nine days. OYST confirmed that the updates were all made within three days of the changes being agreed.

Status events

There was one ICP decommissioned during the audit period. The update was made four business days after the trader updated the ICP to “ready for decommissioning”. The late update occurred due to a delay confirming the decommissioning date with the contractor.

Distributed generation updates

There were seven updates made following the installation of distributed generation. Four of the updates were made four to 12 business days after the installation of distributed generation and in all four cases OYST relied on the provision of the metering installation date, which was not available within three business days, to update its information.

There was one ICP, 1000010395OYF19 identified where a battery system was connected with no other source of generation as part of a trial by the Vector network in August 2022. The battery system was

initially not intended to export any energy to the local network, but it was subsequently found that in some situations a small amount of energy was exported. Export metering was installed in November 2023, and the retailer updated their registry information to reflect the generation capability. No application was made to OYST for the installation of the system and no approval has been granted by OYST. OYST was advised of the situation by the retailer in May 2023 and has been in communication with them to establish the details of the generation capability in order to update the distributor generation fields on the registry. The registry will be updated once the correct distributed generation details are confirmed. I have recorded non-compliance for the pending late update, but compliance for information accuracy as the correct details have not yet been confirmed.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 11-Aug-21 To: 19-Jan-24	One late update to decommissioned. Five late distributed generation updates. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong - checks are in place to monitor registry changes. This affected six ICPs therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The commentary above covers off the relevant details; the registry was updated as soon as we had the required information.		various	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to update details as soon as possible.		ongoing	

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

Code reference

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

Code related audit information

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

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

Audit observation

The management of this process is discussed in the TEG audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG audit report in relation to this clause. Due to the nature of embedded networks, there is no uncertainty regarding the ICP and NSP relationships. A check of the list file confirmed compliance.

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

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

Audit outcome

Compliant

4.4. ICP location address (Clause 2 Schedule 11.1)

Code reference

Clause 2 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process is discussed in the TEG audit report. The audit compliance reports were examined to determine compliance.

Audit commentary

The audit compliance reports confirmed that all addresses were readily locatable.

Audit outcome

Compliant

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

Code reference

Clause 3 Schedule 11.1

Code related audit information

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

Audit observation

The management of this process was examined.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 7(1) Schedule 11.1

Code related audit information

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

- *the location address of the ICP identifier (clause 7(1)(a) of schedule 11.1),*
- *the NSP identifier of the NSP to which the ICP is usually connected (clause 7(1)(b) of schedule 11.1),*
- *the installation type code assigned to the ICP (clause 7(1)(c) of schedule 11.1),*
- *the reconciliation type code assigned to the ICP (clause 7(1)(d) of schedule 11.1),*
- *the loss category code and loss factors for each loss category code assigned to the ICP (clause 7(1)(e) of schedule 11.1),*
- *if the ICP connects the distributor's network to an embedded generating station that has a capacity of 10MW or more (clause 7(1)(f) of schedule 11.1):*
 - a) *the unique loss category code assigned to the ICP,*
 - b) *the ICP identifier of the ICP,*
 - c) *the NSP identifier of the NSP to which the ICP is connected,*
 - d) *the plant name of the embedded generating station,*
- *the price category code assigned to the ICP, which may be a placeholder price category code only if the distributor is unable to assign the actual price category code because the capacity or volume information required to assign the actual price category code cannot be determined before electricity is traded at the ICP (clause 7(1)(g) of schedule 11.1),*
- *if the price category code requires a value for the capacity of the ICP, the chargeable capacity of the ICP as follows (clause 7(1)(h) of schedule 11.1):*

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent audit report.

Distributed generation

The registry list identified seven ICPs with distributed generation recorded, all of which had been added during the audit period. All seven had a non-zero generation capacity and a fuel type recorded, and the

trader had recorded a generation compatible profile. The changes to distributed generation details during the audit period were confirmed to be accurate. The timeliness of registry updates is discussed in **section 4.1** where non-compliance is recorded for five late updates.

Unmetered load

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

Other information

No other inaccurate information was identified.

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

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 7(8) and (9) Schedule 11.1

Code related audit information

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

Audit observation

The registry list file was examined to determine compliance with this clause.

Audit commentary

OYST do not populate the GPS co-ordinates on the registry.

Audit outcome

Compliant

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

Code reference

Clause 14 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

The management of this process is discussed in the TEG audit report. The registry list and audit compliances report were examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 16 Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

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

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

Audit outcome

Compliant

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

Code reference

Clause 20 Schedule 11.1

Code related audit information

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

Decommissioning only occurs when:

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

Audit observation

The management of this process is discussed in the TEG audit report. The registry list and audit compliance reports were examined to determine compliance.

Audit commentary

Compliance is recorded in the TEG contractor report and no changes have been made to their process since they were last audited in relation to the decommission process.

Decommissioning

Nine ICPs were identified as decommissioned; one was decommissioned during the audit period.

Ready for Decommissioning

This audit found no ICPs pending decommissioning.

The timeliness of status updates is detailed in **section 4.1**.

Audit outcome

Compliant

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

Code reference

Clause 23 Schedule 11.1

Code related audit information

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

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

A price category code takes effect on the specified date.

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report.

OYST has not created any new price category codes during the audit period.

Audit outcome

Compliant

5. CREATION AND MAINTENANCE OF LOSS FACTORS

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

Code reference

Clause 21 Schedule 11.1

Code related audit information

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

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

A loss category code takes effect on the specified date.

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report.

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

Audit outcome

Compliant

5.2. Updating loss factors (Clause 22 Schedule 11.1)

Code reference

Clause 22 Schedule 11.1

Code related audit information

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

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report.

OYST updated the loss factor for its one loss code three times during the audit period.

Loss code	Changed effective	Updated
OYL01	1 May 2021	11 March 2021
OYL01	1 May 2022	2 March 2022

Loss code	Changed effective	Updated
OYL01	1 May 2023	26 February 2023

Two of the three updates were notified less than two months prior to the effective dates. Non-compliance is recorded for the late notifications. There was only one loss factor per category code per month. The accuracy of the loss factor is discussed in **section 8.1**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.2 With: 22 Schedule 11.1 From: 01-Mar-21 To: 02-Mar-22	Two late loss factor updates. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. There is a process to ensure that loss factors are updated at least two months before coming into effect, but some updates early in the audit period were entered late. The audit risk rating is low, because both updates were made at least seven weeks before the loss factors came into effect. The 2023 loss factor updates were on time.		
Actions taken to resolve the issue		Completion date	Remedial action status
Both of the late updates were oversights on our part, in one case caused by a late revision to Vectors charges delaying our price change and loss factor update. Updates were made as soon as the oversights were identified.		various	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
we are aware of the timing requirements and have complied in 2023 and 2024		ongoing	

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

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

Code reference

Clause 11.8 and Clause 25 Schedule 11.1

Code related audit information

If the distributor is creating or decommissioning an NSP that is an interconnection point between 2 local networks, the distributor must give written notice to the reconciliation manager of the creation or decommissioning.

If the embedded network owner is creating or decommissioning an NSP that is an interconnection point between 2 embedded networks, the embedded network owner must give written notice to the reconciliation manager of the creation or decommissioning.

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

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

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

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

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 26(1) and (2) Schedule 11.1

Code related audit information

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

The request must be made at least ten 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.

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

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

Code related audit information

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

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 26(4) Schedule 11.1

Code related audit information

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

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 24(2) and (3) Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 27 Schedule 11.1

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report. No existing ICPs became NSPs during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 1 to 4 Schedule 11.2

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report. No ICPs were transferred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(1) and 10.25(3)

Code related audit information

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

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

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

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report. TEG monitors meter certification expiry dates for all of the networks they act as the registry agent for, and compliance is recorded in their agent report. The NSP supply point table was reviewed:

Distributor	NSP POC	Description	MEP	Certification Expiry
OYST	WHA0011	Oyster Capital	AMCI	4 December 2025

The NSP metering has not been recertified during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 10.25(2)

Code related audit information

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

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 29 Schedule 11.1

Code related audit information

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

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

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

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 10.22(1)(b)

Code related audit information

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

Audit observation

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

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clauses 5 and 8 Schedule 11.2

Code related audit information

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

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

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report. No ICPs have been transferred during the audit period.

Audit outcome

Compliant

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

Code reference

Clause 6 Schedule 11.2

Code related audit information

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

Audit observation

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

Audit commentary

Compliance is recorded in the TEG agent report. No ICP transfers were initiated by OYST during the audit period.

Audit outcome

Compliant

7. MAINTENANCE OF SHARED UNMETERED LOAD

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

Code reference

Clause 11.14(2) and (4)

Code related audit information

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

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

Audit observation

The registry list file was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

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

Code reference

Clause 11.14(5)

Code related audit information

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

Audit observation

The registry list was examined to determine compliance.

Audit commentary

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

Audit outcome

Compliant

8. CALCULATION OF LOSS FACTORS

8.1. Creation of loss factors (Clause 11.2)

Code reference

Clause 11.2

Code related audit information

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

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

Audit observation

The calculation of loss factors was reviewed.

Audit commentary

OYST derives loss factors for loss category codes from the published parent network loss factors for similar installations. It is expected that ICPs on embedded networks will have the same loss factor as a similar type of connection on the parent network. Vector updated their loss factors three times during the audit period and Oyster adjusted theirs accordingly. The calculations were checked and confirmed to be correct. The timeliness of the loss factor updates is discussed in **section 5.2**.

Audit outcome

Compliant

CONCLUSION

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

The number of ICPs connected to this network has continued to increase during the audit period. There were three non-compliances identified for the audit period. The non-compliances all relate to the timeliness of registry updates. The audit risk rating recommends that the next audit is in 24 months. I have considered this in conjunction with the impact of the non-compliances found and recommend that the next audit be in 36 months.

PARTICIPANT RESPONSE

OYST have reviewed this audit report and no further comments were provided.