

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

WELLINGTON ADVERTISING SIGNS
(CKHK WLGBBD)
AND PRIME ENERGY LIMITED
NZBN: 9429031626552

Prepared by: Tara Gannon

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Audit report due date: 1 March 2024

TABLE OF CONTENTS

Executive summary	3
Audit summary	4
Non-compliances	4
Recommendations	5
Issues	5
1. Administrative.....	6
1.1. Exemptions from Obligations to Comply with Code	6
1.2. Structure of Organisation.....	7
1.3. Persons involved in this audit.....	8
1.4. Hardware and Software	8
1.5. Breaches or Breach Allegations.....	8
1.6. ICP Data	8
1.7. Authorisation Received	8
1.8. Scope of Audit	9
1.9. Summary of previous audit	9
1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F).....	11
2. DUML database requirements.....	12
2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)	12
2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)	13
2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)	14
2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)	14
2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)	15
2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3).....	17
2.7. Audit trail (Clause 11(4) of Schedule 15.3).....	17
3. Accuracy of DUML database	19
3.1. Database accuracy (Clause 15.2 and 15.37B(b))	19
3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))	21
Conclusion	24
Participant response	24
4. Field audit discrepancies.....	25

EXECUTIVE SUMMARY

This audit of the **Wellington Advertising Signs CKHK WLGBBD (JCDecaux)** DUML database and processes was conducted at the request of **Prime Energy Limited (Prime)** in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied. The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

The database is an Excel spreadsheet maintained by Prime. Any new additions, deletions and changes are expected to be provided to Prime by JCDecaux. When changes occur, a new sheet is added to the database reflecting the changes with a sheet name which includes the date that the change becomes effective. The database has not been updated during the audit period. Prime is aware of the audit trail requirements and intends to ensure that a compliant audit trail is created for any future changes.

The database contains one record for each billboard. A location, ICP number, and number of lights is recorded for each billboard but there is no light description or capacity in watts. There are fields named "kW/fitting" and "kW/day" but these show kWh not kW. For the purpose of assessing database accuracy, I used the "kW/day" and "daily streetlight hours" to calculate the wattage installed at each billboard.

Based on a field audit of all database records it appears billboard lighting changes are not being consistently communicated to Prime, including where billboards change ownership, are upgraded to digital, or are removed. The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.

Prime settles the load as NHH using the RPS profile, and has a process to provide revision submissions where corrections occur.

This audit found five non-compliances and the audit risk rating is 26, indicating that the next audit is due in three months. I have considered this in conjunction with Prime's comments and the size and potential impact on the market and recommend that the next audit be in at least nine months on 1 December 2024. This will allow time for the database inaccuracies to be investigated and corrected, and revised submission data provided before the database is audited again.

The matters raised are detailed in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p>	Weak	Medium	6	Investigating
Description and capacity of load	2.4	11(1) of Schedule 15.3	The database does not include a description of each item of load, and the capacity of each item in watts.	None	Low	5	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	For billboard ID 0011101 at 85 Hutt Road no lights were recorded in the database but four 400W Metal Halide (400W lamp + 38W gear) were installed.	Weak	Low	3	Investigating
Database accuracy	3.1	15.2 and 15.37B(b)	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The database does not include a description of each item of load, and the capacity of each item in watts.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other</p>	Weak	Medium	6	Investigating

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
			ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.				
Volume information accuracy	3.2	15.2 and 15.37B(c)	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p>	Weak	Medium	6	Investigating
Future Risk Rating						26	

Future risk rating	0	1-4	5-8	9-15	16-18	19+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Clause	Recommendation
			Nil

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

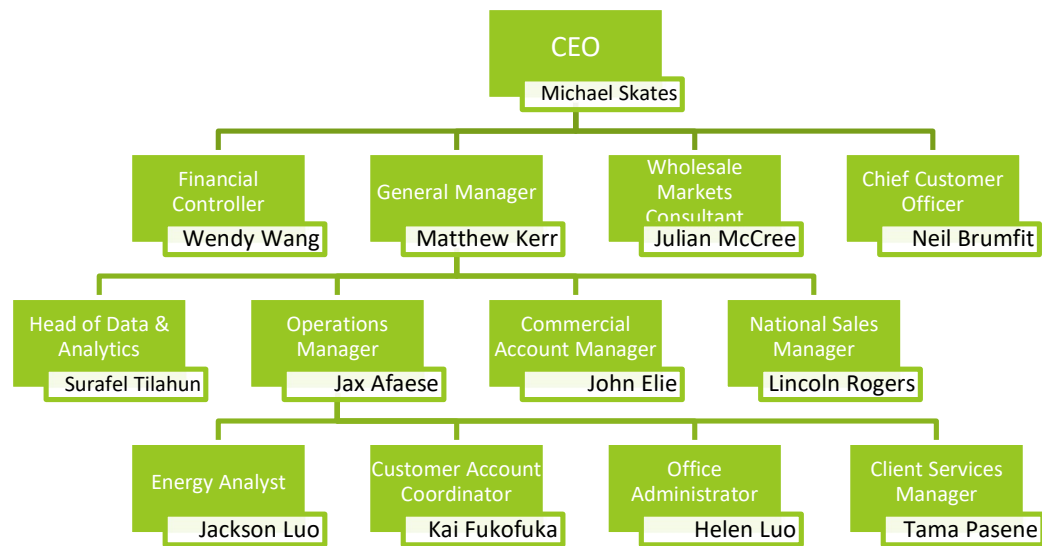
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Prime provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditor:

Name	Role	Company
Tara Gannon	Auditor	Provera

Other personnel assisting in this audit were:

Name	Title	Company
Jackson Luo	Business Analyst	Prime Energy
Jax Afaese	Operations Manager	Prime Energy

1.4. Hardware and Software

Data is contained in a spreadsheet managed by Prime. Backup is in accordance with standard industry protocols, with Amazon and in-house backups performed.

The Orion system is used to record unmetered load and produce unmetered load reconciliation submissions. Access to Orion is restricted using logins and passwords. Amazon and in-house backups are performed.

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

1.5. Breaches or Breach Allegations

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

1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	kW	kWh per day (based on 11.877 hrs)
0000156503CK186	APN CPK0331	CPK0331	RPS	35	3,960	47.032
0001259564UN4AC	APN WIL0331	WIL0331	RPS	19	2,100	24.941
Total				54	6,060	71.973

1.7. Authorisation Received

All information was provided directly by Prime.

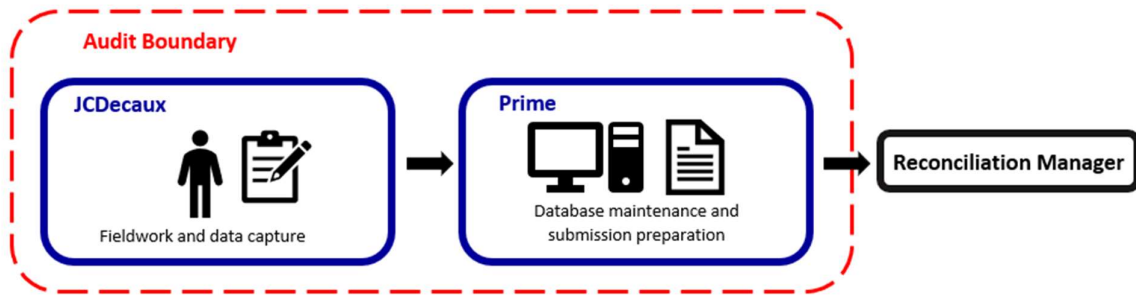
1.8. Scope of Audit

This audit of the **JCDecaux** DUML database and processes was conducted at the request of Prime Energy Limited (Prime) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied. The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

Any new additions, deletions and changes are expected to be provided to Prime by JCDecaux. When changes occur, a new sheet is added to the database reflecting the changes with a sheet name which includes the date that the change becomes effective. No changes to the database have occurred during the audit period.

Prime settles the load as NHH using the RPS profile, and has a process to provide revision submissions where corrections occur.

The scope of the audit encompasses the collection, security, and accuracy of the data, including the preparation of submission information based on the database reporting. The diagram below shows the audit boundary for clarity.



The field audit of all items of load was undertaken on 30 January 2024.

1.9. Summary of previous audit

I reviewed the last audit report undertaken by Bernie Cross of Veritek Limited in May 2023. The table below records the current status of those findings.

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 29,547 kWh per annum. Under submission of 72.16 kwh for March 2023 due to incorrect number of days applied in the submission calculation.	Still existing Cleared
All load recorded in database	2.5	11(2A) of Schedule 15.3	17 additional items of load identified in the field were not recorded in the database	Still existing. There have been some changes in the field since the last audit was completed and there are now four

Subject	Section	Clause	Non-compliance	Status
				additional items of load.
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify the user who made the data change.	No changes have occurred during the audit period, and Prime intends to ensure that future changes have compliant audit trails created.
Database accuracy	3.1	15.2 and 15.37B(b)	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated under submission of 29,547 kWh per annum. The site labelled Main Hutt Road, Petone incorrectly assigned to WIL0331 not GFD0331.	Still existing Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated under submission of 29,547 kWh per annum. Under submission of 72.16 kwh for March 2023 due to incorrect number of days applied in the submission calculation. The site labelled Main Hutt Road, Petone incorrectly assigned to WIL0331 not GFD0331.	Still existing Cleared Still existing

Table of Recommendations

Subject	Section	Clause	Non-compliance	Status
Review the change management process.	3.2	15.2 and 15.37B(c)	Recommend that the change management process is reviewed to ensure all changes in the field are being reported to Prime in a timely manner	Adopted. Prime have tried to work with JCDecaux to ensure that changes are promptly communicated.

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

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

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

Audit observation

Prime have requested Provera to undertake this DUML audit.

Audit commentary

The completion of this audit report confirms compliance with this clause.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

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

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

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

Audit observation

The process for calculation of consumption was examined.

Audit commentary

Prime reconciles this DUML load using the RPS profile, which is allowed under the Code.

The database calculates the submission volume based on the lamp wattage, number of lamps per billboard and 11.877 on hours per day. 11.877 hours is a reasonable average compared to streetlight on/off times in the same area.

The submission totals for December 2023 were checked and confirmed to be consistent with the daily kWh calculated in the database.

ICP	Period	Submitted kWh	Submitted daily kWh	Database daily kWh
0000156503CK186	Dec-23	1,458	47.03	47.032
0001259564UN4AC	Dec-23	773	24.94	24.941

The previous audit found that under submission occurred in March 2023 because submission volumes were calculated for 30 days instead of the 31 active days in March. I confirmed that corrected submission information was provided through the revision process.

Examination of the database found:

Issue	Estimated volume information impact (Annual kWh)
The field audit of all items of load found the database is not accurate within $\pm 5\%$.	Under submission of 35,844.79 kWh p.a.
The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.	No impact because both NSPs are in the same balancing area

The database records are date ranged which allows Prime to determine the correct load for each day. Prime has a process to provide revision submissions where corrections occur.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Jan-24 To: 30-Jan-24	The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum. The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak. Based on a field audit of all database records it appears that changes are not being consistently communicated to Prime, including where billboards change ownership, are upgraded to digital, or are removed. The impact is medium, based on the kWh differences described above. The NSP difference has no impact on submission as both NSPs are within the same balancing area.		
Actions taken to resolve the issue		Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.		TBC	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Ultimately, we as the retailer are responsible in maintaining the connection however, we are unable to fulfil our requirements when we are not notified of changes. We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.		In progress	

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The database was checked to confirm an ICP is recorded for each item of load.

Audit commentary

An ICP is recorded for each item of load in the database. The accuracy of NSP assignment is assessed in **section 3.1**.

Audit outcome

Compliant

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

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

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

Audit observation

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

Audit commentary

The spreadsheet contains a street address and a photo of each item of load so it can be located.

Audit outcome

Compliant

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

Code reference

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

Code related audit information

The DUML database must contain:

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

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage.

Audit commentary

There is one record in the database per billboard. The database does not include:

- a description of each item of load, and
- the capacity of each item in watts.

The number of lights per billboard is recorded.

There is a field called "illumination" for each billboard but this is not populated for all items of load and does not provide a description of the light make, model or type. If populated, it records whether the billboard is front lit at the top or bottom, or back lit only.

There is no field showing the wattage of the installed lights. There are fields named "kW/fitting" and "kW/day" but these show the kWh not kW. For the purpose of assessing database accuracy, I used the

“kW/day” and “daily streetlight hours” to calculate the wattage installed at each billboard. Ideally the database should contain separate fields for the lamp wattage and gear wattage.

Prior to 30 June 2019 the database did contain the number of lights, watts per light and total wattage but did not contain a lamp description.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(1) of Schedule 15.3 From: 30-Jun-19 To: 30-Jan-24	The database does not include a description of each item of load, and the capacity of each item in watts. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There are no controls because the required lamp description and wattage information is not recorded in the database. The impact is assessed to be low because the wattage can be derived from the kW per day and on hours, and an indication of the lamp type can be determined by calculating the wattage.		
Actions taken to resolve the issue		Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.		TBC	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have added in these fields to our database and will update information accordingly.		23/02/2024	

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

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

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

Audit observation

A field audit was undertaken of all items of load on 30 January 2024.

Audit commentary

A field audit was conducted for the entire database and I found a large number of discrepancies, including:

- nine billboards which changed ownership to Jolly (5), Go Media (1) or Lumo (3) and are expected to be removed from the database,
- three billboards had been removed and/or had their lighting removed and are expected to be removed from the database,
- five billboards had been upgraded to digital and are expected to have new ICP numbers created and be removed from the database, and
- ten billboards had a total wattage which differed from the database total wattage (calculated from the daily kWh and on hours).

This section requires non-compliance to be recorded where items of load present in the field are not recorded in the database. For billboard ID 0011101 at 85 Hutt Road no lights were recorded in the database but four 400W Metal Halide (400W lamp + 38W gear) were installed. Other discrepancies are recorded as non-compliance in sections **2.1**, **3.1** and **3.2**.

A full list of discrepancies is in **section 4**, and a database copy with field audit comments has been provided to Prime.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 30-Jan-24 To: 30-Jan-24	For billboard ID 0011101 at 85 Hutt Road no lights were recorded in the database but four 400W Metal Halide (400W lamp + 38W gear) were installed. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak. Based on a field audit of all database records it appears that changes are not being consistently communicated to Prime, including where billboards change ownership, are upgraded to digital, or are removed. The impact is low, as one billboard was found to have extra lights installed.		
Actions taken to resolve the issue		Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.		TBC	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.	In progress	

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

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

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

Audit observation

The ability of the database to track changes was assessed and the process for tracking of changes in the database was examined.

Audit commentary

The database is an Excel spreadsheet, and any new additions, deletions and changes are expected to be provided to Prime by JCDecaux. When changes occur, a new sheet is added to the database reflecting the changes with a sheet name which includes the date that the change becomes effective. This allows changes to be tracked at a daily level.

Audit outcome

Compliant

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

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

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

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

Audit observation

The database was checked for audit trails.

Audit commentary

The database is an Excel spreadsheet, and any new additions, deletions and changes are expected to be provided to Prime by JCDecaux. When changes occur, a new sheet is added to the database reflecting the changes with a sheet name which includes the date that the change becomes effective. The database has not been updated during the audit period.

Prime is aware of the audit trail requirements and intends to ensure that a compliant audit trail is created for any future changes, including:

- the before and after values for changes (which will continue to be visible by comparing the current sheet to the previous one),
- the date and time of the change or addition, and
- the person who made the addition or change to the database.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

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

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

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

Audit observation

A full field audit was undertaken, and the database content and change management process were reviewed.

Audit commentary

Change management process

The database is an Excel spreadsheet, which contains one row per billboard.

Any new additions, deletions and changes are expected to be provided to Prime by JCDecaux. When changes occur, a new sheet is added to the database reflecting the changes with a sheet name which includes the date that the change becomes effective.

Where a billboard changes ownership, it is expected that the new owner will enter into an agreement to be supplied by a retailer and the billboard should be removed from the database.

Where a billboard is updated to digital, an application for a metered new connection is expected to be completed and then the old billboard should be removed from the database.

A field audit was conducted for the entire database and I found a large number of discrepancies, confirming that changes are not being communicated to Prime, including:

- nine billboards which changed ownership to Jolly (5), Go Media (1) or Lumo (3) and are expected to be removed from the database,
- three billboards had been removed and/or had their lighting removed and are expected to be removed from the database,
- five billboards had been upgraded to digital and are expected to have new ICP numbers created and be removed from the database, and
- ten billboards had a total wattage which differed from the database total wattage (calculated from the daily kWh and on hours).

A full list of discrepancies is in **section 4**, and a database copy with field audit comments has been provided to Prime.

Database accuracy

Based on the field audit, the database is not accurate within $\pm 5\%$ leading to potential under submission of 35,844.79 kWh per annum:

Wattage	0000156503CK186	0001259564UN4AC	Total
Wattage recorded in database	3,960	2,100	6,060
Wattage found in the field	5,496	3,582 ¹	9,078
Difference (field – database)	1,536	1,482	3,018
Difference kWh based on 11.877 hours per day	18,243.072	17,601.71	35,844.79
Field wattage as a percentage of database wattage	138.79%	170.6%	149.8%

Lamp description and capacity accuracy

The database does not include:

- a description of each item of load, and
- the capacity of each item in watts.

There is a field called “illumination” for each billboard but this is not populated for all items of load and does not provide a description of the light make, model or type. If populated, it records whether the billboard is front lit at the top or bottom, or back lit only.

There is no field showing the wattage of the installed lights. There are fields named “kW/fitting” and “kW/day” but these show the kWh not kW. For the purpose of assessing database accuracy, I used the kW/day which is really kWh/day and daily streetlight hours to calculate the wattage installed at each billboard.

ICP accuracy

The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission. Prime has approached Wellington Electricity about this issue, and they have indicated that investigation needs to be completed before a new ICP can be created.

Audit outcome

Non-compliant

Non-compliance	Description
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 30-Jun-19</p>	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The database does not include a description of each item of load, and the capacity of each item in watts.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p>

¹ Excluding the wattage for 162 Thorndon Quay, where it could not be determined

To: 30-Jan-24	Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak. Based on a field audit of all database records it appears that billboard light changes are not being consistently communicated to Prime.</p> <p>The impact is medium, based on the kWh differences described above. The NSP difference has no impact on submission as both NSPs are within the same balancing area, and the missing wattage and description information can largely be determined by calculating the wattage from the information which is available.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.		TBC	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Ultimately, we as the retailer are responsible in maintaining the connection however, we are unable to fulfil our requirements when we are not notified of changes. We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.		In progress	

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

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

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

Audit observation

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

- checking the registry to confirm that all ICPs have the correct profile and submission flag,
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Prime reconciles this DUML load using the RPS profile, which is allowed under the Code. The correct profile and submission type are recorded on the registry.

The database calculates the submission volume based on the lamp wattage, number of lamps per billboard and 11.877 on hours per day. 11.877 hours is a reasonable average compared to streetlight on/off times in the same area.

The submission totals were checked for December 2023 were checked, and confirmed to be consistent with the daily kWh calculated in the database.

ICP	Period	Submitted kWh	Submitted daily kWh	Database daily kWh
0000156503CK186	Dec-23	1,458	47.03	47.032
0001259564UN4AC	Dec-23	773	24.94	24.941

The previous audit found that under submission occurred in March 2023 because submission volumes were calculated for 30 days instead of the 31 active days in March. I confirmed that corrected submission information was provided through the revision process.

Examination of the database found:

Issue	Estimated volume information impact (Annual kWh)
The field audit of all items of load found the database is not accurate within $\pm 5\%$.	Under submission of 35,844.79 kWh p.a.
The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.	No impact because both NSPs are in the same balancing area

The database records are date ranged which allows Prime to determine the correct load for each day. Prime has a process to provide revision submissions where corrections occur.

Audit outcome

Non-compliant

Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-May-21</p> <p>To: 31-Mar-23</p>	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>

Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak. Based on a field audit of all database records it appears that changes are not being consistently communicated to Prime, including where billboards change ownership, are upgraded to digital, or are removed.</p> <p>The impact is medium, based on the kWh differences described above. The NSP difference has no impact on submission as both NSPs are within the same balancing area.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.		TBC	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Ultimately, we as the retailer are responsible in maintaining the connection however, we are unable to fulfil our requirements when we are not notified of changes. We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.		In progress	

CONCLUSION

The database is an Excel spreadsheet maintained by Prime using information provided by JCDecaux. The database does not contain the lamp description and wattage information required by the Code.

Based on a field audit of all database records it appears billboard lighting changes are not being consistently communicated to Prime. The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.

This audit found five non-compliances and the audit risk rating is 26, indicating that the next audit is due in three months. I have considered this in conjunction with Prime's comments and the size and potential impact on the market and recommend that the next audit be in at least nine months on 1 December 2024. This will allow time for the database inaccuracies to be investigated and corrected, and revised submission data provided before the database is audited again.

PARTICIPANT RESPONSE

Prime have reviewed this report and their comments are made within its body.

4. FIELD AUDIT DISCREPANCIES

The discrepancies between the field audit and database are listed below by type:

Discrepancy type (number of billboards)	ID	Database wattage ²	Database lights	Field finding
Ownership change to Jolly (5)	0050602	240 W	2	No lights
	0042201	120 W	1	No lights
	0050101	240 W	2	No lights
	0078301	120 W	1	Digital
	0078201	110 W	1	No lights
Ownership change to Go Media (1)	0041401	110 W	1	Digital
Ownership change to Lumo (3)	0009601	120 W	1	Digital
	0032301	220 W	2	Digital
	Murphy St no number	110 W	1	Digital
Billboard removed (4)	0050201	120 W	1	Removed
	0077901	220 W	2	Removed
	0032601	110 W	1	Removed
	0032602	110 W	1	Removed
Upgraded to digital (5)	0051201	330 W	3	Digital
	0050602	220 W	2	Digital
	0076201	110 W	1	Digital
	The Terrace Off-Ramp no number	110 W	1	Digital

² Wattage is not recorded in the database. I used the “kW/day” and “daily streetlight hours” to calculate the wattage installed at each billboard.

Discrepancy type (number of billboards)	ID	Database wattage ²	Database lights	Field finding
	Waterloo Quay no number	110 W	1	Digital
Wattage differences (10)	0079901 and 0079902	240 W	2	1 x 400 W MH (438 W)
	0080601 and 0080602	240 W	2	1 x 400 W MH (438 W)
	0052001 and 0052002	440 W	4	2 x 120 W Tango (240 W)
	0041602	550 W	5	5 x 400 W MH (2,190 W)
	0041801	330 W	3	3 x 400 W MH (1,314 W)
	0009202	220 W	2	2 x 400 W MH (876 W)
	0012401	220 W	2	2 x 400 W MH (876 W)
	0011801-0011808	880 W	8	3 x 400 W MH (1,314 W)
	0011101	None	None	4 x 400 W MH (1,392 W)
	162 Thorndon Quay no number	110 W	1	Lit around edge of billboard but lighting was not visible so could not confirm wattage

Based on the field audit, the database is not accurate within $\pm 5\%$:

Wattage	0000156503CK186	0001259564UN4AC	Total
Wattage recorded in database	3,960	2,100	6,060
Wattage found in the field	5,496	3,582 ³	9,078
Difference (field – database)	1,536	1,482	3,018
Difference kWh based on 11.877 hours per day	18,243.072	17,601.71	35,844.79

³ Excluding the wattage for 162 Thorndon Quay, where it could not be determined

Wattage	0000156503CK186	0001259564UN4AC	Total
Field wattage as a percentage of database wattage	138.79%	170.6%	149.8%