

ELECTRICITY INDUSTRY PARTICIPATION CODE
METERING EQUIPMENT PROVIDER AUDIT REPORT

For



CONTACT ENERGY

Prepared by: Steve Woods – Veritek Limited

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Audit report due date: 03-Jul-19

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EXECUTIVE SUMMARY

Contact Energy Limited (Contact) is a Metering Equipment Provider (MEP) and is required to undergo an audit by 03/07/19, in accordance with clause 1(1)(b) of schedule 10.5.

The main issue from the previous audit was 5,423 ICPs with expired certification. Most of these have switched to a different MEP and are no longer Contact's responsibility. There are now 52 installations with expired certification.

Some ICPs were identified where Contact should have been recorded as the MEP but the retailer had incorrectly nominated a different MEP. The correction of these records resulted in some backdated registry updates.

Registry data has a high level of accuracy, but there are some control device records missing. Contact is liaising with distributors to resolve as many as possible before considering field visits.

One area where stronger controls are required is the investigation of defective metering, where some delays exist due to contractor resourcing in some areas.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends an audit frequency of 18 months. I agree with this recommendation.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Registry notification	3.2	2 of Schedule 11.4	Some late registry updates where Contact became the MEP	Strong	Low	1	Identified
Changes to registry records	4.10	3 of Schedule 11.4	Some records updated on the registry later than 10 business days	Moderate	Low	2	Identified
Provision of Registry Information	6.2	Clause 7 (1), (2) and (3) of Schedule 11.4	Some registry records incomplete or incorrect	Strong	Low	1	Identified
Certification of metering installations	7.1	10.38 (a), clause 1 and clause 15 of Schedule 10.7	Certification expired for 52 ICPs	Moderate	Low	2	Identified
Timekeeping Requirements	7.10	Clause 23 of Schedule 10.7	17 ICPs with time switches not checked within 12 months.	Strong	Low	1	Identified

Defective metering	9.1	10.43(4) and (5)	17 potentially defective installations not investigated within 20 business days	Moderate	Low	2	Identified
Future Risk Rating						9	
Indicative Audit Frequency						18 months	

Future risk rating	1-2	3-6	7-9	10-19	20-24	25+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Recommendation	Description

ISSUES

Subject	Section	Recommendation	Description
		Nil	

1. ADMINISTRATIVE

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

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

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

Audit observation

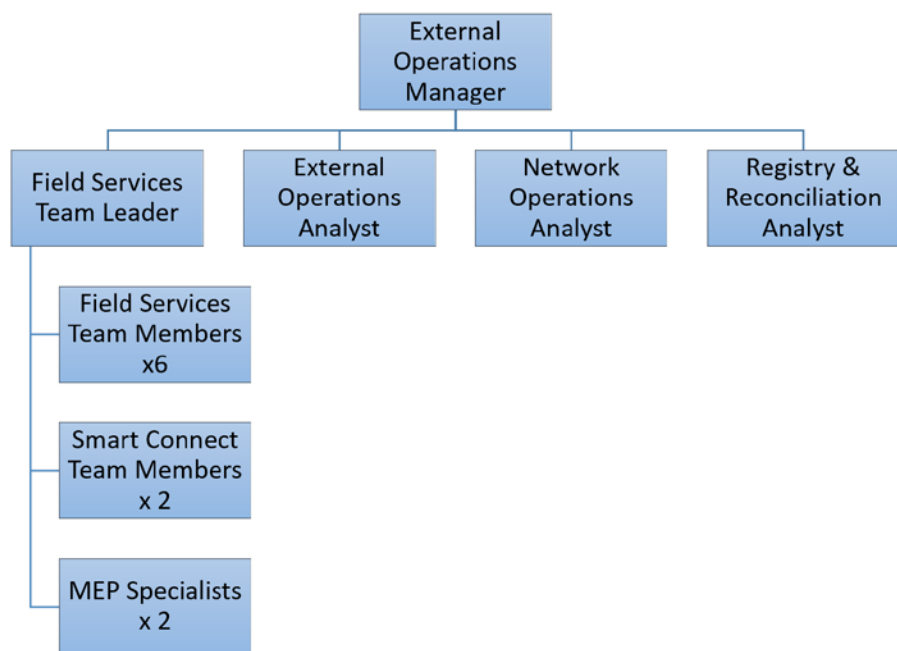
I checked the Electricity Authority website and I confirm there are no exemptions in place.

Audit commentary

I checked the Electricity Authority website and I confirm there are no exemptions in place.

1.2. Structure of Organisation

Metering Services Structure – Effective 1st September 2018



1.3. Persons involved in this audit

Auditor: Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Contact personnel assisting in this audit were.

Name	Title
Nagham Anayi	MEP Specialist

1.4. Use of Agents (Clause 10.3)

Code reference

Clause 10.3

Code related audit information

A participant who uses a contractor

- *remains responsible for the contractors 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

During the audit period, Contact engaged with the Wells, VEMS and DELTA ATHs to conduct certification activities. Contact relies on these ATHs to act as agents for the management and storage of some Category 1 certification records. I requested certification reports for 33 ICPs to confirm their compliance and availability.

Audit commentary

All certification records were provided, which achieves compliance with this clause. The reports provided were compliant.

1.5. Hardware and Software

Contact MEP data is held in SAP. SAP is “cloud hosted” so if any single datacentre failed the business can still operate.

Specific SAP back up procedures are shown below.

Backup	SAP System	Full Backup	Differential Backup	Transaction Log backup
SAP Database Backups	ECC	Weekly (Sunday)	Daily	Every 30 minutes
	CRM			
	Gateway			
	Portal			
	PO			

The default location for these backups are to local Disk, and Contact is also moving these backups to S3 bucket.

1.6. Breaches or Breach Allegations

Contact confirmed there are no breach allegations related to the scope of this audit.

1.7. ICP Data

Metering Category	Number of ICPs
1	30,528
2	307
3	0
4	0
5	0
9	14
Total	30,849

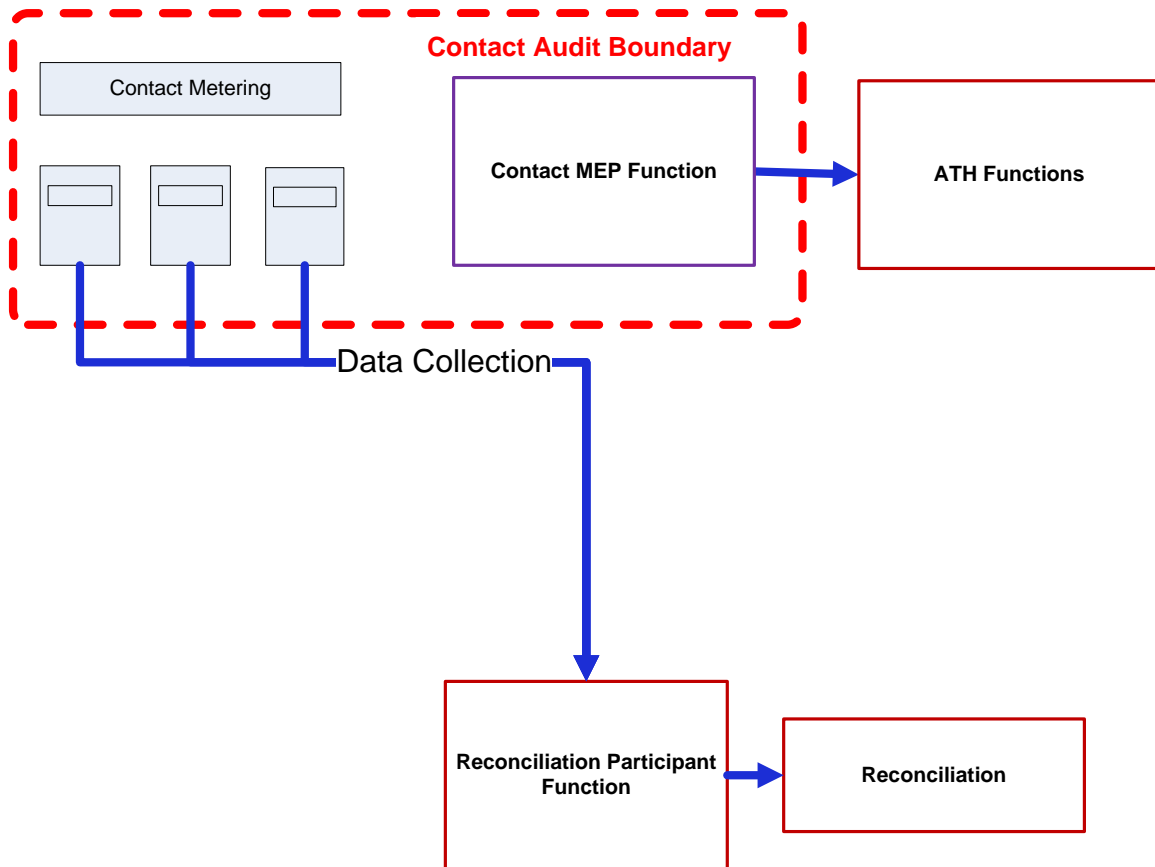
1.8. Authorisation Received

A letter of authorization was not required or requested.

1.9. Scope of Audit

This audit was conducted in accordance with the Guideline for Metering Equipment Provider Audits V2.2, which was published by the Electricity Authority.

The boundaries of this audit are shown below for greater clarity.



1.10. Summary of previous audit

The previous audit was conducted in August 2018 by Brett Piskulic of Veritek Limited. The table below shows the status of the issues which were raised.

Table of Non Compliance

Subject	Section	Clause	Non compliance	Status
Changes to registry records	4.10	3 of Schedule 11.4	Some records updated on the registry later than 10 business days	Still existing
Provision of Registry Information	6.2	Clause 7 (1), (2) and (3) of Schedule 11.4	Some registry records incomplete or incorrect	Still existing
Certification of metering installations	7.1	10.38 (a), clause 1 and clause 15 of Schedule 10.7	Certification expired for 5,423 ICPs	Still existing for 52 ICPs
Timekeeping Requirements	7.10	Clause 23 of Schedule 10.7	16 ICPs with time switches not checked within 12 months.	Still existing
Interim certification	7.19	18 of Schedule 10.7	5,313 ICPs with expired interim certification.	Cleared

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Status

2. OPERATIONAL INFRASTRUCTURE

2.1. MEP responsibility for services access interface (Clause 10.9(2))

Code reference

Clause 10.9(2)

Code related audit information

The MEP is responsible for providing and maintaining the services access interface.

Audit observation

I checked certification records for 33 metering installations, covering all relevant ATHs.

Audit commentary

The Code places responsibility for maintaining the services access interface on the MEP and places responsibility for determining and recording it with ATHs. I checked the certification records for all relevant ATHs and found the location of the services access interface was correctly recorded in all cases.

Audit outcome

Compliant

2.2. Dispute Resolution (Clause 10.50(1) to (3))

Code reference

Clause 10.50(1) to (3)

Code related audit information

Participants must in good faith use its best endeavours to resolve any disputes related to Part 10 of the Code.

Disputes that are unable to be resolved may be referred to the Authority for determination.

Complaints that are not resolved by the parties or the Authority may be referred to the Rulings Panel by the Authority or participant.

Audit observation

I checked whether any disputes had been dealt with during the audit period.

Audit commentary

Contact has not been required to resolve any disputes in accordance with this clause.

Audit outcome

Compliant

2.3. MEP Identifier (Clause 7(1) of Schedule 10.6)

Code reference

Clause 7(1) of Schedule 10.6

Code related audit information

The MEP must ensure it has a unique participant identifier and must use this participant identifier (if required) to correctly identify its information.

Audit observation

I checked the registry data to ensure the correct MEP identifier was used.

Audit commentary

Contact uses the CTCT identifier in all cases.

Audit outcome

Compliant

2.4. Communication Equipment Compatibility (Clause 40 Schedule 10.7)

Code reference

Clause 40 Schedule 10.7

Code related audit information

The MEP must ensure that the use of its communication equipment complies with the compatibility and connection requirements of any communication network operator the MEP has equipment connected to.

Audit observation

Contact is not the MEP for AMI metering installations where communication equipment is present.

Audit commentary

Contact is not the MEP for AMI metering installations where communication equipment is present.

Audit outcome

Compliant

2.5. Participants to Provide Accurate Information (Clause 11.2 and Clause 10.6)

Code reference

Clause 11.2 and Clause 10.6

Code related audit information

The MEP must take all practicable steps to ensure that information that the MEP is required to provide to any person under Parts 10 and 11 is complete and accurate, not misleading or deceptive and not likely to mislead or deceive.

If the MEP becomes aware that in providing information under Parts 10 and 11, the MEP has not complied with that obligation, the MEP must, as soon as practicable, provide such further information as is necessary to ensure that the MEP does comply.

Audit observation

The content of this audit report was reviewed to determine whether all practicable steps had been taken to provide accurate information.

Audit commentary

The content of this audit report indicates that Contact has taken all practicable steps to ensure that information is complete and accurate. There are some registry discrepancies where site visits are required to determine the correct data. These will take some time to resolve, therefore “as soon as practicable” may be some weeks or months.

Audit outcome

Compliant

3. PROCESS FOR A CHANGE OF MEP

3.1. Payment of Costs to Losing MEP (Clause 10.22)

Code reference

Clause 10.22

Code related audit information

The MEP for a metering installation may change only if the responsible participant enters into an arrangement with another person to become the MEP for the metering installation, and if certain notification requirements are met (in relation to the registry and the reconciliation manager).

The gaining MEP must pay the losing MEP a proportion of the costs within 20 business days of assuming responsibility.

The costs are those directly and solely attributable to the certification and calibration tests of the metering installation or its components from the date of switch until the end of the current certification period.

Audit observation

Contact has not sent or received any invoices in relation to this clause.

Audit commentary

Contact has not sent or received any invoices in relation to this clause.

Audit outcome

Compliant

3.2. Registry Notification of Metering Records (Clause 2 of Schedule 11.4)

Code reference

Clause 2 of Schedule 11.4

Code related audit information

The gaining MEP must advise the registry of the registry metering records for the metering installation within 15 days of becoming the MEP for the metering installation.

Audit observation

I checked the event detail for the period 01/08/18 to 31/03/19 for all records where Contact became the MEP to evaluate the timeliness of updates.

Audit commentary

Contact became the MEP for 26 ICPs during the audit period. The registry was updated late for 10 of the 26. In all 10 cases the updates were due to the discovery that the incorrect MEP was recorded in the registry, where Contact should have been recorded. Contact was nominated late as the MEP to correct historic errors.

For “business as usual” updates, Contact run a report “CTCT meter installed” which checks for records in SAP with no records on the registry. This report ensures that updates are completed as required.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 06-May-14 To: 31-May-19	Some late registry updates where Contact became the MEP Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls for business as usual are strong. Late nomination by the trader was the cause of all late updates. The volume of ICPs is low, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All records have been corrected in the registry.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact will mitigate and improve via the following mechanisms: 1. We are and will continue to actively work with our Field Service Providers to emphasise the importance of providing the meter installation paperwork within the required timeframes. 2. Contact will continue to target improvements in prioritising workflow internally to ensure timely updates between our service order system and the registry.		Ongoing	

3.3. Provision of Metering Records to Gaining MEP (Clause 5 of Schedule 10.6)

Code reference

Clause 5 of Schedule 10.6

Code related audit information

During an MEP switch, a gaining MEP may request access to the losing MEP's metering records.

On receipt of a request from the gaining MEP, the losing MEP has 10 business days to provide the gaining MEP with the metering records or the facilities to enable the gaining MEP to access the metering records.

The losing MEP must ensure that the metering records are only received by the gaining MEP or its contractor, the security of the metering records is maintained, and only the specific metering records required for the purposes of the gaining MEP exercising its rights and performing its obligations are provided.

Audit observation

I checked with Contact to confirm whether there had been any requests from other MEPs.

Audit commentary

There were no requests during the audit period.

Audit outcome

Compliant

3.4. Termination of MEP Responsibility (Clause 10.23)

Code reference

Clause 10.23

Code related audit information

Even if the MEP ceases to be responsible for an installation, the MEP must either comply with its continuing obligations; or before its continuing obligations terminate, enter into an arrangement with a participant to assume those obligations.

The MEP is responsible if it:

- *is identified in the registry as the primary metering contact or*
- *is the participant who owns the meter for the POC or to the grid or*
- *has accepted responsibility under clause 1(1)(a)(ii) of schedule 11.4 or*
- *has contracted with a participant responsible for providing the metering installation.*

MEPs obligations come into effect on the date recorded in the registry as being the date on which the metering installation equipment is installed or, for an NSP the effective date set out in the NSP table on the Authority's website.

An MEPs obligations terminate only when;

- *the ICP changes under clause 10.22(1)(a);*
- *the NSP changes under clause 10.22(1)(b), in which case the MEPs obligations terminate from the date on which the gaining MEP assumes responsibility;*
- *the metering installation is no longer required for the purposes of Part 15; or*
- *the load associated with an ICP is converted to be used solely for unmetered load.*

Audit observation

I confirmed that Contact has ceased to be responsible for some metering installations by checking the event detail report.

Audit commentary

Contact continues with their responsibilities, mainly in relation to the storage of records, which are kept indefinitely. I checked the records for two ICPs where the meter had been removed, the records were still kept.

Audit outcome

Compliant

4. INSTALLATION AND MODIFICATION OF METERING INSTALLATIONS

4.1. Design Reports for Metering Installations (Clause 2 of Schedule 10.7)

Code reference

Clause 2 of Schedule 10.7

Code related audit information

The MEP must obtain a design report for each proposed new metering installation or a modification to an existing metering installation, before it installs the new metering installation or before the modification commences.

Clause 2(2) and (3)—The design report must be prepared by a person with the appropriate level of skills, expertise, experience and qualifications and must include a schematic drawing, details of the configuration scheme that programmable metering components are to include, confirmation that the configuration scheme has been approved by an approved test laboratory, maximum interrogation cycle, any compensation factor arrangements, method of certification required, and name and signature of the person who prepared the report and the date it was signed.

Clause 2(4)—The MEP must provide the design report to the certifying ATH before the ATH installs or modifies the metering installation (or a metering component in the metering installation).

Audit observation

Contact has engaged ATHs for certification activities. The ATHs have provided design reports for this work which I have checked.

Audit commentary

The design reports include all relevant details required by the Code and ATHs had correctly recorded the design for all 33 metering installations checked.

Audit outcome

Compliant

4.2. Contracting with ATH (Clause 9 of Schedule 10.6)

Code reference

Clause 9 of Schedule 10.6

Code related audit information

The MEP must, when contracting with an ATH in relation to the certification of a metering installation, ensure that the ATH has the appropriate scope of approval for the required certification activities.

Audit observation

I confirmed that Contact has used the Wells, VEMS and DELTA ATHs during the audit period. I checked the Authority's website for scopes of approval.

Audit commentary

I have checked the Authority's website and confirm that the ATHs have current and appropriate scopes of approval.

Audit outcome

Compliant

4.3. Metering Installation Design & Accuracy (Clause 4(1) of Schedule 10.7)

Code reference

Clause 4(1) of Schedule 10.7

Code related audit information

The MEP must ensure:

- *that the sum of the measured error and uncertainty does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of the metering installation*
- *the design of the metering installation (including data storage device and interrogation system) will ensure the sum of the measured error and the smallest possible increment of the energy value of the raw meter data does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of installation*
- *the metering installation complies with the design report and the requirements of Part 10.*

Audit observation

I checked the processes used by Contact to ensure compliance with the design and with the error thresholds stipulated in Table 1. I also checked the certification records for 33 metering installations.

Audit commentary

With regard to the design of the installation (including data storage device and interrogation system), Contact ensures the sum of the measured error and the smallest possible increment of the energy value of the raw meter data does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of installation. There are no components installed where “coarse” rounding is in place for the data, or where meters with a low pulse rate are connected to separate data storage devices.

Contact has a process to ensure the metering installation complies with the design report and the requirements of Part 10 by requiring ATH’s to confirm the installations match the design, or by requiring updates to be provided if the installation does not match the design.

I checked 33 recent certification records and found that the design report was populated correctly in all cases. Compliance is achieved with the requirement to ensure metering installations comply with the design.

Audit outcome

Compliant

4.4. Subtractive Metering (Clause 4(2)(a) of Schedule 10.7)

Code reference

Clause 4(2)(a) of Schedule 10.7

Code related audit information

For metering installations for ICPs that are not also NSPs, the MEP must ensure that the metering installation does not use subtraction to determine submission information used for the purposes of Part 15.

Audit observation

I asked Contact to confirm whether subtraction was used for any metering installations where they were the MEP.

Audit commentary

Contact does not have any metering installations where subtractive metering is used.

Audit outcome

Compliant

4.5. HHR Metering (Clause 4(2)(b) of Schedule 10.7)

Code reference

Clause 4(2)(b) of Schedule 10.7

Code related audit information

For metering installations for ICPs that are not also NSPs, the MEP must ensure that all category 3 or higher metering installations must be half-hour metering installations.

Audit observation

Contact is not the MEP for any metering installations above Category 2.

Audit commentary

Contact is not the MEP for any metering installations above Category 2.

Audit outcome

Compliant

4.6. NSP Metering (Clause 4(3) of Schedule 10.7)

Code reference

Clause 4(3) of Schedule 10.7

Code related audit information

The MEP must ensure that the metering installation for each NSP that is not connected to the grid does not use subtraction to determine submission information used for the purposes of Part 15 and is a half-hour metering installation.

Audit observation

Contact is not the MEP for any NSP metering installations.

Audit commentary

Contact is not responsible for any NSP metering.

Audit outcome

Compliant

4.7. Responsibility for Metering Installations (Clause 10.26(10))

Code reference

Clause 10.26(10)

Code related audit information

The MEP must ensure that each point of connection to the grid for which there is a metering installation that it is responsible for has a half hour metering installation.

Audit observation

Contact is not responsible for any grid metering.

Audit commentary

Contact is not responsible for any grid metering.

Audit outcome

Compliant

4.8. Suitability of Metering Installations (Clause 4(4) of Schedule 10.7)

Code reference

Clause 4(4) of Schedule 10.7

Code related audit information

The MEP must, for each metering installation for which it is responsible, ensure that it is appropriate having regard to the physical and electrical characteristics of the POC.

Audit observation

I checked the ATH audit reports to confirm compliance.

Audit commentary

The VEMS design report contains reference to workmanship; ensuring access cannot be gained to live conductors; earthing arrangements and compliance with AS/NZS 3000. I have checked the DELTA process and confirmed that the MR-002 quality manual/operating instructions ensures compliance with relevant electrical legislation. Wells has clear instructions for technicians and the certification reports confirm enclosure suitability.

Audit outcome

Compliant

4.9. Installation & Modification of Metering Installations (Clauses 10.34(2), (2A) and (3))

Code reference

Clauses 10.34(2), (2A) and (3)

Code related audit information

If a metering installation is proposed to be installed or modified at a POC, other than a POC to the grid, the MEP must consult with and use its best endeavours, to agree with the distributor and the trader for that POC, before the design is finalised, on the metering installations:

- *required functionality*
- *terms of use*
- *required interface format*
- *integration of the ripple receiver and the meter*
- *functionality for controllable load.*

Each participant involved in the consultations must use its best endeavours to reach agreement and act reasonably and in good faith.

Audit observation

I checked previous communication regarding metering designs, and I checked whether there were any new or modified designs during the audit period.

Audit commentary

Contact has written agreements in place with traders and these refer to “existing metering arrangements” and “compliance with the Code”. Contact has also consulted with distributors as required by this clause. There were no new or modified designs during the audit period.

Audit outcome

Compliant

4.10. Changes to Registry Records (Clause 3 of Schedule 11.4)

Code reference

Clause 3 of Schedule 11.4

Code related audit information

The MEP must advise the registry of the registry metering records or any change to the registry metering records for a metering installation for which it is responsible, no later than 10 business days following:

- a) *the electrical connection of an ICP that is not also an NSP*
- b) *any subsequent change in any matter covered by the metering records.*

Audit observation

I checked the event detail report for the period 01/08/18 to 31/03/19 to evaluate the timeliness of registry updates.

Audit commentary

The table below shows that there were no new connections.

There were 532 updates of which 480 were late. These were mostly corrections to historic data.

Event	Year	Total ICPs	ICPs Notified Within 10 Days	ICPs Notified Greater Than 10 Days	Average Notification Days	Percentage Compliant
New Connection	2017	2	1	1	29	50%
	2018	0	-	-	-	-
	2019	0	-	-	-	-
Updates	2017	17542	15516	2026	54	88%
	2018	830	81	749	591	10%
	2019	532	52	480	516	10%

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Aug-18 To: 31-Mar-19	Some records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as moderate because registry updates occur as soon as errors are found or as soon as the correct information is confirmed. The impact on participants, customers or settlement is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All records have been corrected in the registry		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact will improve our current process by increasing the frequency the reports to every two weeks (effective from 1 July 2019)to mitigate the potential for late updates to the registry.		Ongoing	

4.11. Metering Infrastructure (Clause 10.39(1))

Code reference

Clause 10.39(1)

Code related audit information

The MEP must ensure that for each metering installation:

- *an appropriately designed metering infrastructure is in place*
- *each metering component is compatible with, and will not interfere with any other component in the installation*
- *collectively, all metering components integrate to provide a functioning system*
- *each metering installation is correctly and accurately integrated within the associated metering infrastructure.*

Audit observation

Contact does not have any AMI metering.

Audit commentary

Contact does not have any AMI metering.

Audit outcome

Compliant

4.12. Responsibility for Metering at ICP (Clause 10.23A)

Code reference

Clause 10.23A

Code related audit information

If a metering installation at an ICP is to be decommissioned, but the ICP is not being decommissioned, the metering equipment provider that is responsible for decommissioning the metering installation must—

(a) if the metering equipment provider is responsible for interrogating the metering installation—

(i) arrange for a final interrogation to take place before the metering installation is decommissioned; and

(ii) provide the raw meter data from the interrogation to the trader that is recorded in the registry as being responsible for the ICP; or

(b) if another participant is responsible for interrogating the metering installation, advise the other participant not less than three business days before the decommissioning—

(i) of the date and time of the decommissioning; and

(ii) that the participant must carry out a final interrogation.

(2) To avoid doubt, if a metering installation at an ICP is to be decommissioned because the ICP is being decommissioned—

(a) the metering equipment provider is not responsible for arranging a final interrogation of the metering installation; and

(b) the trader that is recorded in the registry as being responsible for the ICP must arrange for a final interrogation of the metering installation under clause 11.18(3).

Audit observation

I checked whether Contact was the MEP at any decommissioned metering installations and whether notification had been provided to relevant traders.

Audit commentary

There were no examples of decommissioned metering installations where the ICP was not also decommissioned.

Audit outcome

Compliant

4.13. Measuring Transformer Burden and Compensation Requirements (Clause 31(4) and (5) of Schedule 10.7)

Code reference

Clause 31(4) and (5) of Schedule 10.7

Code related audit information

The MEP must, before approving the addition of, or change to, the burden or compensation factor of a measuring transformer in a metering installation, consult with the ATH who certified the metering installation.

If the MEP approves the addition of, or change to, the burden or compensation factor, it must ensure the metering installation is recertified by an ATH before the addition or change becomes effective.

Audit observation

I asked Contact whether they had approved any burden changes during the audit period.

Audit commentary

There have been no burden changes during the audit period. Contact's processes show that any action leading to a change in burden results in recertification.

Audit outcome

Compliant

4.14. Changes to Software ROM or Firmware (Clause 39(1) and 39(2) of Schedule 10.7)

Code reference

Clause 39(1) and 39(2) of Schedule 10.7

Code related audit information

The MEP must, if it proposes to change the software, ROM or firmware of a data storage device installed in a metering installation, ensure that, before the change is carried out, an approved test laboratory:

- *tests and confirms that the integrity of the measurement and logging of the data storage device would be unaffected*
- *documents the methodology and conditions necessary to implement the change*
- *advises the ATH that certified the metering installation of any change that might affect the accuracy of the data storage device.*

The MEP must, when implementing a change to the software, ROM or firmware of a data storage device installed in a metering installation:

- *carry out the change in accordance with the methodology and conditions identified by the approved test laboratory under clause 39(1)(b)*
- *keep a list of the data storage devices that were changed*
- *update the metering records for each installation affected with the details of the change and the methodology used.*

Audit observation

Contact is not the MEP for any installations where changes to ROM, software or firmware have occurred.

Audit commentary

Contact is not the MEP for any installations where changes to ROM, software or firmware have occurred.

Audit outcome

Compliant

4.15. Temporary Energization (Clause 10.28(6))

Code reference

Clause 10.28(6)

Code related audit information

An MEP must not request the temporary energisation of a new POC unless authorised to do so by the reconciliation participant responsible for that POC and has an arrangement with that reconciliation participant to provide metering services.

Audit observation

I checked for examples of insufficient load certification to determine whether there were any examples of temporary energisation for the purposes of testing. None were identified.

Audit commentary

I checked for examples of insufficient load certification to determine whether there were any examples of temporary energisation for the purposes of testing. None were identified.

Audit outcome

Compliant

5. METERING RECORDS

5.1. Accurate and Complete Records (Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4)

Code reference

Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4

Code related audit information

The MEP must, for each metering installation for which it is responsible, keep accurate and complete records of the attributes set out in Table 1 of Schedule 11.4. These include:

- a) the certification expiry date of each metering component in the metering installation*
- b) all equipment used in relation to the metering installation, including serial numbers and details of the equipment's manufacturer*
- c) the manufacturer's or (if different) most recent test certificate for each metering component in the metering installation*
- d) the metering installation category and any metering installations certified at a lower category*
- e) all certification reports and calibration reports showing dates tested, tests carried out, and test results for all metering components in the metering installation*
- f) the contractor who installed each metering component in the metering installation*
- g) the certification sticker, or equivalent details, for each metering component that is certified under Schedule 10.8 in the metering installation:*
- h) any variations or use of the 'alternate certification' process*
- i) seal identification information*
- j) any applicable compensation factors*
- k) the owner of each metering component within the metering installation*
- l) any applications installed within each metering component*
- m) the signed inspection report confirming that the metering installation complies with the requirements of Part 10.*

Audit observation

I checked certification records for 33 metering installations and I also checked all available inspection records to evaluate compliance with this clause.

Audit commentary

Contact engages with the Wells, VEMS and DELTA ATHs to conduct certification activities. All 33 certification records were provided, I checked the records and confirmed that they met all the above requirements.

The inspection reports I checked were signed and contained the required information. The inspection results are contained in Section 6.2 and confirm there were no examples of incorrect records.

Audit outcome

Compliant

5.2. Inspection Reports (Clause 4(2) of Schedule 10.6)

Code reference

Clause 4(2) of Schedule 10.6

Code related audit information

The MEP must, within 10 business days of receiving a request from a participant for a signed inspection report prepared under clause 44 of Schedule 10.7, make a copy of the report available to the participant.

Audit observation

I asked Contact whether any requests had been made for copies of inspection reports.

Audit commentary

Contact has not been requested to supply any inspection reports, but these are available and can be supplied on request.

Audit outcome

Compliant

5.3. Retention of Metering Records (Clause 4(3) of Schedule 10.6)

Code reference

Clause 4(3) of Schedule 10.6

Code related audit information

The MEP must keep metering installation records for 48 months after any metering component is removed, or any metering installation is decommissioned.

Audit observation

I checked a directory of metering records from 2015 to confirm compliance.

Audit commentary

Contact keeps records indefinitely and the availability of the 2015 records confirms compliance.

Audit outcome

Compliant

5.4. Provision of Records to ATH (Clause 6 Schedule 10.6)

Code reference

Clause 6 Schedule 10.6

Code related audit information

If the MEP contracts with an ATH to recertify a metering installation and the ATH did not previously certify the metering installation, the MEP must provide the ATH with a copy of all relevant metering records not later than 10 business days after the contract comes into effect.

Audit observation

Contact has provided information to ATH's in the past and this may occur in future. There are no current examples to examine.

Audit commentary

Contact has provided information to ATH's in the past and this may occur in future. There are no current examples to examine

Audit outcome

Compliant

6. MAINTENANCE OF REGISTRY INFORMATION

6.1. MEP Response to Switch Notification (Clause 1(1) of Schedule 11.4)

Code reference

Clause 1(1) of Schedule 11.4

Code related audit information

Within 10 business days of being advised by the registry that it is the gaining MEP for the metering installation for the ICP, the MEP must enter into an arrangement with the trader and advise the registry it accepts responsibility for the ICP and of the proposed date on which it will assume responsibility.

Audit observation

I checked the event detail report for the period 01/08/18 to 31/03/19 to confirm whether all responses were within 10 business days.

Audit commentary

All MN files were sent within 10 business days.

Audit outcome

Compliant

6.2. Provision of Registry Information (Clause 7 (1), (2) and (3) of Schedule 11.4)

Code reference

Clause 7 (1), (2) and (3) of Schedule 11.4

Code related audit information

The MEP must provide the information indicated as being 'required' in Table 1 of clause 7 of Schedule 11.4 to the registry, in the prescribed form for each metering installation for which the MEP is responsible.

From 1 April 2015, a MEP is required to ensure that all the registry metering records of its category 1 metering installations are complete, accurate, not misleading or deceptive, and not likely to mislead or deceive.

The information the MEP provides to the registry must derive from the metering equipment provider's records or the metering records contained within the current traders system.

Audit observation

I checked the list file for 100% of records and I checked the Category 1 inspection records to identify discrepancies.

Audit commentary

I examined the records for 432 metering installations where Contact had conducted inspections during 2018. The table below shows all the issues found. There were no examples of incorrect registry information or records.

Count of ICP's	Description of Non-compliance
1	Burnt Relay - Damaged/Missing Perspex Window
1	Damaged/Missing Perspex Window - Missing Seals
1	Main Earth Load disconnected from stake
1	Meter box isn't in good condition - Missing site cert sticker
1	Meter box isn't in good condition - Damaged/Missing Perspex Window
1	Meter box isn't in good condition - Damaged/Missing Perspex Window - Missing Seals
1	Meter box/Wiring isn't in good condition - Missing Seals
1	Uncertified meter
1	Unmetered supply
2	Incorrect ICP on cert sticker - Missing Seals
2	Meter box isn't free of foreign elements
2	Short terminal cover
3	Meter box/Wiring isn't in good condition
4	Meter box can't be opened
5	Damaged/Stopped Meter
5	Exposed wiring
9	Missing Meter/Relay/Main Switch Seals
9	Uncertified Relay
10	Missing site cert sticker
11	Bypassed/Damaged Relay
12	Damaged/Missing Perspex Window
12	Meter box isn't in good condition
30	Faded site cert sticker
125	Grand Total

I checked all of Contact's registry records to identify discrepancies with their data. The table below shows the results.

Quantity of ICPs April 2019	Quantity of ICPs September 2018	Quantity of ICPs September 2017	Quantity of ICPs September 2016	Issue
0	0	0	0	Blank records on the registry.
0	0	0	0	Interim certified installations over Category 1.
0	0	0	6	Fully certified installations with compensation factors of 3.
0	0	0	0	Category 1 Installations with compensation factors greater than 3.
18,701	8,957	10,824	40,464	Control device details not populated in the registry. Contact response: Contact is now developing the required reports to capture the control device details to enable updates to the registry information. Contact will start using these reports from 1 August 2019.
0	0	1	2	Incorrect certification date or certification expiry date for Cat 2.
3	0	0	2	Incorrect certification duration on Category 1 installations. Contact response: This is now resolved and Contact's system now includes a decimal point.
4	5,220	0	7,470	Interim certified installations recorded as fully certified with certification and expiry dates both 01/04/15 Contact response: Contact has a Reconciliation Participant exemption to submit unmetered DUML as HHR – however to correctly reflect the HHR settlement indicator on the registry there must be a MEP record for this unmetered supply. We create an MEP record (ie a pseudo/dummy MEP record) to enable the correct HHR settlement indicator to be populated to flag the submission type as a HHR. Contact continues to work with providers of street light logger data to identify a method that would allow the loggers installed, to determine the hours of operation, to be certified consistent with the Code.
27	83	27	665	Interim certified ICPs without 01/04/15 as the certification expiry date. Expiry dates of 31/12/99 for unmetered streetlight ICPs Contact response: Contact has a Reconciliation Participant exemption to submit unmetered DUML as HHR – however to correctly reflect the HHR settlement indicator on the registry there must be a MEP record for this unmetered supply. We create an MEP record (ie a pseudo/dummy MEP record) to enable the correct HHR settlement indicator to be populated to flag the

				submission type as a HHR. Contact continues to work with providers of street light logger data to identify a method that would allow the loggers installed, to determine the hours of operation, to be certified consistent with the Code.
0	0	0	0	New connection ICPs with no certification date populated and showing as interim certified.
0	0	0	0	Installations with AMI but 365 days for interrogation cycle.
1	0	3	2	Category 2 plus installations without CT information on the registry. Contact response: This is now resolved and Contact's system now includes CT information that flows through to the registry.
0	0	0	0	CN only (residential)
0	0	0	2	Day and night do not = 24.
4	7	6	6	ICPs with generation but with no injection register. 3 now have a different MEP. 1 definitely has DG but the trader has not nominated a new MEP. Contact does not install import/export metering Contact response: A control is now in place to send a reminder to the trader to arrange and install import/export metering.
0	0	0	2	Day with no night.
0	0	0	5	Night with no day.
0	0	13		Max interrogation cycle of zero days. Unmetered.
58	6	12		Expired certification Contact Response: A number of the expired certification ICPs have since been resolved and Contact has a plan in place to remedy the remaining cases 31 October 2019.
1	1	1	1	Quantity of metering installations with compensation factor of 101 CTCT Reply: This AMP is metered with one amplifier on a multiplier of 1 (x1), currently the number of amplifiers spread over the Kapiti coast which is according to Telstra one hundred and one hence the multiplier of 101
69	-	-	-	UN only with a control device. It's likely many of these should be INEM

				Contact Response: Contact will update the tariff in the registry to INEM by the 31 July 2019.
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Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Aug-18 To: 31-Mar-19	Some registry records incomplete or incorrect. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area. Sound validations are in place to ensure data is accurate. Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Comments have been included against specific items in the Table above]		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Comments have been included against specific items in the Table above]		See comments in the Table above	

6.3. Correction of Errors in Registry (Clause 6 of Schedule 11.4)

Code reference

Clause 6 of Schedule 11.4

Code related audit information

By 0900 hours on the 13th business day of each reconciliation period, the MEP must obtain from the registry:

- *a list of ICPs for the metering installations the MEP is responsible for*
- *the registry metering records for each ICP on that list.*

No later than five business days following collection of data from the registry, the MEP must compare the information obtained from the registry with the MEP's own records.

Within five business days of becoming aware of any discrepancy between the MEP's records and the information obtained from the registry, the MEP must correct the records that are in error and advise the registry of any necessary changes to the registry metering records.

Audit observation

I conducted a walkthrough of the validation processes to confirm compliance. I checked all records in the event detail report to confirm whether the timeliness requirements were being met.

Audit commentary

Contact conducts a complete validation at least once every week. This ensures that the requirement to obtain a list by 0900 hours on the 13th business day of each reconciliation period is met. I checked the records of emails confirming the files were obtained from the registry. I checked the records of the results of the comparisons and subsequent corrections and confirmed that they were made within the required five business days.

Audit outcome

Compliant

6.4. Cancellation of Certification (Clause 20 of Schedule 10.7)

Code reference

Clause 20 of Schedule 10.7

Code related audit information

The certification of a metering installation is automatically cancelled on the date on which one of the following events takes place:

- a) *the metering installation is modified otherwise than under sub clause 19(3) or 19(6)*
- b) *the metering installation is classed as outside the applicable accuracy tolerances set out in Table 1 of Schedule 10.1, defective or not fit for purpose under this Part or any audit*
- c) *an ATH advises the metering equipment provider responsible for the metering installation of a reference standard or working standard used to certify the metering installation not being compliant with this Part at the time it was used to certify the metering installation, or the failure of a group of meters in the statistical sampling recertification process for the metering installation, or the failure of a certification test for the metering installation*
- d) *the manufacturer of a metering component in the metering installation determines that the metering component does not comply with the standards to which the metering component was tested*

- e) *an inspection of the metering installation, that is required under this Part, is not carried out in accordance with the relevant clauses of this Part*
- f) *if the metering installation has been determined to be a lower category under clause 6 and the maximum current conveyed through the metering installation at any time exceeds the current rating of its metering installation category as set out in Table 1 of Schedule 10.1*
- g) *the metering installation is certified under clause 14 and sufficient load is available for full certification testing and has not been retested under clause 14(4)*
- h) *a control device in the metering installation certification is, and remains for a period of at least 10 business days, bridged out under clause 35(1)*
- i) *the metering equipment provider responsible for the metering installation is advised by an ATH under clause 48(6)(b) that a seal has been removed or broken and the accuracy and continued integrity of the metering installation has been affected.*

A metering equipment provider must, within 10 business days of becoming aware that one of the events above has occurred in relation to a metering installation for which it is responsible, update the metering installation's certification expiry date in the registry.

Audit observation

I checked for examples of all of the points listed above, and checked whether certification had been cancelled, and whether the registry had been updated within 10 business days.

Audit commentary

I checked for examples of bridged control devices and there were no examples where the control devices were used for the purposes of part 15.

There were also no examples of any of the other points listed above.

Audit outcome

Compliant

6.5. Registry Metering Records (Clause 11.8A)

Code reference

Clause 11.8A

Code related audit information

The MEP must provide the registry with the required metering information for each metering installation the MEP is responsible for, and update the registry metering records in accordance with Schedule 11.4.

Audit observation

This clause refers to schedule 11.4 which is discussed in Section 6.2, apart from the requirement to provide information in the "prescribed form". I checked for examples of Contact not using the prescribed form.

Audit commentary

This clause refers to schedule 11.4 which is discussed in Section 6.2, apart from the requirement to provide information in the "prescribed form". I checked for examples of Contact not using the prescribed form and did not find any exceptions.

Audit outcome

Compliant

7. CERTIFICATION OF METERING INSTALLATIONS

7.1. Certification and Maintenance (Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7)

Code reference

Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7

Code related audit information

The MEP must obtain and maintain certification for all installations and metering components for which it is responsible. The MEP must ensure it:

- *performs regular maintenance, battery replacement, repair/replacement of components of the metering installations*
- *updates the metering records at the time of the maintenance*
- *has a recertification programme that will ensure that all installations are recertified prior to expiry.*

Audit observation

I conducted the following checks to identify metering installations with expired, cancelled or late certification:

- the registry PR255 report was checked to identify ICPs with expired certification.
- the new connections process was checked by using the event detail report, PR255 and the list file to identify ICPs where the certification was not conducted within five business days of energisation.
- I checked ICPs where certification was cancelled to ensure the registry was updated accordingly.

Audit commentary

The registry shows 58 ICPs have expired full certification. Three of the 58 had incorrect certification dates, which are now corrected and show current certification. A further three have switched MEP. One ICP is Category 2, single phase and high voltage (66kV). This has been expired since December 2017.

The previous audit report recorded over 5,000 ICPs with expired certification. These have all had another MEP nominated and are no longer Contact's responsibility.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 07-Dec-17 To: 26-Jun-19	Certification expired for 52 ICPs Potential impact: High Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	<p>I have recorded the controls as moderate in this area because certification has been expired for a number of years for some ICPs and because all of the expired installations were fully certified at one point.</p> <p>The impact on settlement is recorded as low. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification, but the numbers are low, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact response: A number of the expired certification ICPs have since been resolved and Contact has a plan in place to remedy the remaining cases by the completion of October 2019.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact has controls in place to monitor and maintain the certification of its assets and has the relevant programs in place to maintain the certification going forward.		Ongoing	

7.2. Certification Tests (Clause 10.38(b) and clause 9 of Schedule 10.6)

Code reference

Clause 10.38(b) and clause 9 of Schedule 10.6

Code related audit information

For each metering component and metering installation an MEP is responsible for, the MEP must ensure that:

- *an ATH performs the appropriate certification and recertification tests*
- *the ATH has the appropriate scope of approval to certify and recertify the metering installation.*

Audit observation

I checked the certification records for 33 metering installations to confirm compliance. ATHs have shown that their processes include all tests and reports confirm tests are completed

Audit commentary

My checks of the certification reports confirmed that the appropriate tests are conducted, and the results are recorded.

Audit outcome

Compliant

7.3. Active and Reactive Capability (Clause 10.37(1) and 10.37(2)(a))

Code reference

Clause 10.37(1) and 10.37(2)(a)

Code related audit information

For any category 2 or higher half-hour metering installation that is certified after 29 August 2013, the MEP must ensure that the installation has active and reactive measuring and recording capability.

Consumption only installations that is a category 3 metering installation or above must measure and separately record:

- a) import active energy*
- b) import reactive energy*
- c) export reactive energy.*

Consumption only installations that are a category 2 metering installation must measure and separately record import active energy.

All other installations must measure and separately record:

- a) import active energy*
- b) export active energy*
- c) import reactive energy*
- d) export reactive energy.*

All grid connected POCs with metering installations which are certified after 29 August 2013 should measure and separately record:

- a) import active energy*
- b) export active energy*
- c) import reactive energy*
- d) export reactive energy*

Audit observation

Contact does not have any HHR installations.

Audit commentary

Contact does not have any HHR installations.

Audit outcome

Compliant

7.4. Local Service Metering (Clause 10.37(2)(b))

Code reference

Clause 10.37(2)(b)

Code related audit information

The accuracy of each local service metering installation in grid substations must be within the tolerances set out in Table 1 of Schedule 10.1.

Audit observation

This clause relates to Transpower as an MEP.

Audit commentary

This clause relates to Transpower as an MEP.

Audit outcome

Compliant

7.5. Measuring Transformer Burden (Clause 30(1) and 31(2) of Schedule 10.7)

Code reference

Clause 30(1) and 31(2) of Schedule 10.7

Code related audit information

The MEP must not permit a measuring transformer to be connected to equipment used for a purpose other than metering, unless it is not practical for the equipment to have a separate measuring transformer.

The MEP must ensure that a change to, or addition of, a measuring transformer burden or a compensation factor related to a measuring transformer is carried out only by:

- a) the ATH who most recently certified the metering installation*
- b) for a POC to the grid, by a suitably qualified person approved by both the MEP and the ATH who most recently certified the metering installation.*

Audit observation

I asked Contact if there were any examples of burden changes or the addition of non-metering equipment being connected to metering CTs.

Audit commentary

There are no examples of burden changes having occurred.

Audit outcome

Compliant

7.6. Certification as a Lower Category (Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7)

Code reference

Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7

Code related audit information

A category 2 or higher metering installation may be certified by an ATH at a lower category than would be indicated solely on the primary rating of the current if the MEP, based on historical metering data, reasonably believes that:

- the maximum current will at all times during the intended certification period be lower than the current setting of the protection device for the category for which the metering installation is certified, or is required to be certified by the Code; or*
- the metering installation will use less than 0.5 GWh in any 12 month period.*

If a metering installation is categorised under clause 6(1)(b), the ATH may, if it considers appropriate, and, at the MEP's request, determine the metering installation's category according to the metering installation's expected maximum current.

If a meter is certified in this manner:

- the MEP must, each month, obtain a report from the participant interrogating the metering installation, which details the maximum current from raw meter data from the metering*

installation by either calculation from the kVA by trading period, if available, or from a maximum current indicator if fitted in the metering installation conveyed through the point of connection for the prior month; and

- *if the MEP does not receive a report, or the report demonstrates that the maximum current conveyed through the POC was higher than permitted for the metering installation category it is certified for, then the certification for the metering installation is automatically cancelled.*

Audit observation

I checked all ICPs for examples where the CT ratio was above the threshold to confirm that protection was appropriate or that monitoring was in place.

Audit commentary

There are no examples of certification at a lower category.

Audit outcome

Compliant

7.7. Insufficient Load for Certification Tests (Clauses 14(3) and (4) of Schedule 10.7)

Code reference

Clauses 14(3) and (4) of Schedule 10.7

Code related audit information

If there is insufficient electricity conveyed through a POC to allow the ATH to complete a prevailing load test for a metering installation that is being certified as a half hour meter and the ATH certifies the metering installation the MEP must:

- *obtain and monitor raw meter data from the metering installation at least once each calendar month to determine if load during the month is sufficient for a prevailing load test to be completed:*
- *if there is sufficient load, arrange for an ATH to complete the tests (within 20 business days).*

Audit observation

I checked if there were any examples of Insufficient load certifications.

Audit commentary

There are no examples of insufficient load certifications.

Audit outcome

Compliant

7.8. Insufficient Load for Certification – Cancellation of Certification (Clause 14(6) of Schedule 10.7)

Code reference

Clause 14(6) of Schedule 10.7

Code related audit information

If the tests conducted under clause 14(4) of Schedule 10.7 demonstrate that the metering installation is not within the relevant maximum permitted error:

- *the metering installation certification is automatically revoked:*
- *the certifying ATH must advise the MEP of the cancellation within 1 business day:*
- *the MEP must follow the procedure for handling faulty metering installations (clause 10.43 - 10.48).*

Audit observation

There are no examples of insufficient load certifications.

Audit commentary

There are no examples of insufficient load certifications.

Audit outcome

Compliant

7.9. Alternative Certification Requirements (Clauses 32(2), (3) and (4) of Schedule 10.7)

Code reference

Clauses 32(2), (3) and (4) of Schedule 10.7

Code related audit information

If an ATH cannot comply with the requirements to certify a metering installation due to measuring transformer access issues, and therefore certifies the metering installation in accordance with clause 32(1) of Schedule 10.7, the MEP must:

- *advise the market administrator, by no later than 10 business days after the date of certification of the metering installation, of the details in clause 32(2)(a) of Schedule 10.7*
- *respond, within 5 business days, to any requests from the market administrator for additional information*
- *ensure that all of the details are recorded in the metering installation certification report*
- *take all steps to ensure that the metering installation is certified before the certification expiry date.*

If the market administrator determines the ATH could have obtained access the metering installation is deemed to be defective and the MEP must follow the process of handling faults metering installations in clauses 10.43 to 10.48.

Audit observation

I checked the registry records to confirm whether alternative certification had been applied.

Audit commentary

Alternative certification has not been applied to any metering installations.

Audit outcome

Compliant

7.10. Timekeeping Requirements (Clause 23 of Schedule 10.7)

Code reference

Clause 23 of Schedule 10.7

Code related audit information

If a time keeping device that is not remotely monitored and corrected controls the switching of a meter register in a metering installation, the MEP must ensure that the time keeping device:

- a) has a time keeping error of not greater than an average of 2 seconds per day over a period of 12 months*
- b) is monitored and corrected at least once every 12 months.*

Audit observation

I asked Contact whether there were any metering installations with time switches.

Audit commentary

Contact confirmed there are 187 metering installations with time switches, triple saver. I checked the process for checking the time. Contact intends to conduct the checks by August 2019, but there are still 16 ICPs where one trader will not provide access to perform the checks. These ones were not checked last year either. I identified ICP 0000047420TRA9F, which has a two register, time switch controlled tariff. This needs to be added to the list.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 07-Aug-18 To: 31-Aug-18	17 ICPs with time switches not checked within 12 months. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area because Contact has processes to ensure time switches are checked every 12 months. The impact is low as the trader is not using the timed registers for submission, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact has emailed the traders involved a new list of 13 ICP's requesting the customer's contact details to conduct a time clock inspection program for them to meet our compliance obligation of 2019. Contact will continue to monitor these cases and escalate to enable progress, if required.		Completed	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT will discuss the issue further with the trader to gain access to these installations	Ongoing	

7.11. Control Device Bridged Out (Clause 35 of Schedule 10.7)

Code reference

Clause 35 of Schedule 10.7

Code related audit information

The participant must, within 10 business days of bridging out a control device or becoming aware of a control device being bridged out, notify the following parties:

- *the relevant reconciliation participant*
- *the relevant metering equipment provider.*

If the control device is used for reconciliation, the metering installation is considered defective in accordance with 10.43.

Audit observation

I checked the process for the management of bridged control devices, and I checked whether any notifications were required to other parties.

Audit commentary

Contact has a process for dealing with control devices which have been bridged out. If any are bridged out for more than 10 business days, they notify as required by this clause. I checked 13 examples, and in all cases the relevant trader was notified immediately. None of the control devices were used for reconciliation.

Audit outcome

Compliant

7.12. Control Device Reliability Requirements (Clause 34(5) of Schedule 10.7)

Code reference

Clause 34(5) of Schedule 10.7

Code related audit information

If the MEP is advised by an ATH that the likelihood of a control device not receiving signals would affect the accuracy or completeness of the information for the purposes of Part 15, the MEP must, within three business days inform the following parties of the ATH's determination (including all relevant details):

- a) *the reconciliation participant for the POC for the metering installation*
- b) *the control signal provider.*

Audit observation

I checked the steps Contact had taken to identify regions with signal propagation issues.

Audit commentary

Contact has not been advised of any areas by the ATHs

Audit outcome

Compliant

7.13. Statistical Sampling (Clauses 16(1) and (5) of Schedule 10.7)

Code reference

Clauses 16(1) and (5) of Schedule 10.7

Code related audit information

The MEP may arrange for an ATH to recertify a group of category 1 metering installations for which the MEP is responsible using a statistical sampling process.

The MEP must update the registry in accordance with Part 11 on the advice of an ATH as to whether the group meets the recertification requirements.

Audit observation

I checked whether statistical sampling had occurred during the audit period.

Audit commentary

Contact engaged Delta to conduct statistical sampling recertification of a population of 11,474 metering installations. The Code allows all meters to be in the same population, regardless of meter make and model and whether they are three phase or single phase. The attributes method was used, and 315 samples were required. 325 actual tests were conducted, and all 325 results were considered when certification was applied for seven years. The results are shown below. There were nine three phase meters and they correctly had the additional test point required by the standard. I checked whether the sample represented the population. There is a total of 86 meter types and 31 meter types were included in the sample. The 31 meter types represent 18,192 of 19,308 meters (94.2%). The proportion of meters in the sample closely matches the proportion in the population for the 31 meter types. The 65 meter types not tested make up 1,116 meters. 42 of the 65 meter types have 5 or less meters and 23 meter types only have one meter. There were no unknown meter types. Whilst there's a strong argument that the 1,116 meters should not be certified, because their accuracy is unknown, the sampling process achieves compliance with the Code.

The table below shows the results.

Single & Three Phase Meters based on a group of 10001-35000 (315 samples)																	Meters tested to date:			325
7.1 Metrological Performance	Pass/Fail numbers Results Group Result	Criteria 1 (±2%)						Criteria 2 (±2.5%)						Criteria 3 (±3%)						
		FL		FL 0.5		LL Measured		FL		FL 0.5		LL Measured		FL		FL 0.5		LL Measured		
		Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	
		21	22	21	22	21	22	21	22	21	22	21	22	21	22	21	22	21	22	
		314	11	9	0	307	18	321	4	9	0	314	11	322	3	9	0	317	8	
		PASS		PASS		PASS		PASS		PASS		PASS		PASS		PASS		PASS		

Audit outcome

Compliant

7.14. Compensation Factors (Clause 24(3) of Schedule 10.7)

Code reference

Clause 24(3) of Schedule 10.7

Code related audit information

If a compensation factor must be applied to a metering installation that is an NSP, the MEP must advise the reconciliation participant responsible for the metering installation of the compensation factor within 10 days of certification of the installation.

In all other cases the MEP must advise the registry of the compensation factor.

Audit observation

There were no certifications completed for category 2 and above metering installations during the audit period. I checked a sample of ten registry records for category 2 installations to check if any compensation were correctly recorded.

Audit commentary

There were no certifications completed for category 2 and above metering installations during the audit period. I checked a sample of ten registry records for category 2 installations during the previous audit and confirmed that the compensation factors were correctly recorded in all ten cases.

Audit outcome

Compliant

7.15. Metering Installations Incorporating a Meter (Clause 26(1) of Schedule 10.7)

Code reference

Clause 26(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each meter in a metering installation it is responsible for is certified.

Audit observation

I checked the certification records for 33 metering installations to confirm compliance.

Audit commentary

Meters were certified for all 33 installations.

Audit outcome

Compliant

7.16. Metering Installations Incorporating a Measuring Transformer (Clause 28(1) of Schedule 10.7)

Code reference

Clause 28(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each measuring transformer in a metering installation it is responsible for is certified.

Audit observation

There were no certifications completed for category 2 and above metering installations during the audit period. No measuring transformers were certified.

Audit commentary

There were no certifications completed for category 2 and above metering installations during the audit period. No measuring transformers were certified.

Audit outcome

Compliant

7.17. Metering Installations Incorporating a Data Storage Device (Clause 36(1) of Schedule 10.7)

Code reference

Clause 36(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each data storage device in a metering installation it is responsible for is certified.

Audit observation

I checked the certification records for 33 metering installations to confirm compliance.

Audit commentary

None of the installations checked contain data storage devices, Contact is not the MEP for any installations containing data storage devices.

Audit outcome

Compliant

7.18. Notification of ATH Approval (Clause 7 (3) Schedule 10.3)

Code reference

Clause 7 (3) Schedule 10.3

Code related audit information

If the MEP is notified by the Authority that an ATH's approval has expired, been cancelled or been revised, the MEP must treat all metering installations certified by the ATH during the period where the ATH was not approved to perform the activities as being defective and follow the procedures set out in 10.43 to 10.48.

Audit observation

I checked the ATH register to confirm compliance.

Audit commentary

All relevant ATHs have appropriate approval.

Audit outcome

Compliant

7.19. Interim Certification (Clause 18 of Schedule 10.7)

Code reference

Clause 18 of Schedule 10.7

Code related audit information

The MEP must ensure that each interim certified metering installation on 28 August 2013 is certified by no later than 1 April 2015.

Audit observation

I checked the registry records (PR255) to identify any ICPs with interim certification recorded.

Audit commentary

There are no previously interim certified installations with expired certification.

Audit outcome

Compliant

8. INSPECTION OF METERING INSTALLATIONS

8.1. Category 1 Inspections (Clause 45 of Schedule 10.7)

Code reference

Clause 45 of Schedule 10.7

Code related audit information

The MEP must ensure that category 1 metering installations (other than interim certified metering installations):

- *have been inspected by an ATH within 120 months from the date of the metering installation's most recent certification or*
- *for each 12 month period, commencing 1 January and ending 31 December, a sample of the category 1 metering installations selected under clause 45(2) of Schedule 10.7 has been inspected by an ATH.*

Before a sample inspection process can be carried out, the MEP must submit a documented process for selecting the sample to the Electricity Authority, at least two months prior to first date on which the inspections are to be carried out, for approval (and promptly provide any other information the Authority may request).

The MEP must not inspect a sample unless the Authority has approved the documented process.

The MEP must, for each inspection conducted under clause 45(1)(b), keep records detailing:

- *any defects identified that have affected the accuracy or integrity of the raw meter data recorded by the metering installation*
- *any discrepancies identified under clause 44(5)(b)*
- *relevant characteristics, sufficient to enable reporting of correlations or relationships between inaccuracy and characteristics*
- *the procedure used, and the lists generated, to select the sample under clause 45(2).*

The MEP must, if it believes a metering installation that has been inspected is or could be inaccurate, defective or not fit for purpose:

- *comply with clause 10.43*
- *arrange for an ATH to recertify the metering installation if the metering is found to be inaccurate under Table 1 of Schedule 10.1, or defective or not fit for purpose.*

The MEP must by 1 April in each year, provide the Authority with a report that states whether the MEP has, for the previous 1 January to 31 December period, arranged for an ATH to inspect each category 1 metering installation for which it is responsible under clause 45(1)(a) or 45(1)(b).

This report must include the matters specified in clauses 45(8)(a) and (b).

If the MEP is advised by the Authority that the tests do not meet the requirements under clause 45(9) of Schedule 10.7, the MEP must select the additional sample under that clause, carry out the required inspections, and report to the Authority, within 40 business days of being advised by the Authority.

Audit observation

I checked the process, and the results for the Category 1 inspection regime to confirm compliance.

Audit commentary

Contact has conducted category 1 inspections by statistical sample in accordance with this clause. The process for selection of the sample was approved by the Authority; the field process was compliant. The records were checked, and appropriate reporting was provided to the Authority.

Audit outcome

Compliant

8.2. Category 2 to 5 Inspections (Clause 46(1) of Schedule 10.7)

Code reference

Clause 46(1) of Schedule 10.7

Code related audit information

The MEP must ensure that each category 2 or higher metering installation is inspected by an ATH at least once within the applicable period. The applicable period begins from the date of the metering installation's most recent certification and extends to:

- *120 months for Category 2*
- *60 months for Category 3*
- *30 months for Category 4*
- *18 months for Category 5.*

Audit observation

I checked the registry information to confirm which ICPs were due for inspection. There were no category 2 metering installations with certification dates prior to 2009; therefore, none are due for inspection.

Audit commentary

I checked the registry information to confirm which ICPs were due for inspection. There were no category 2 metering installations with certification dates prior to 2009; therefore, none are due for inspection.

Audit outcome

Compliant

8.3. Inspection Reports (Clause 44(5) of Schedule 10.7)

Code reference

Clause 44(5) of Schedule 10.7

Code related audit information

The MEP must, within 20 business days of receiving an inspection report from an ATH:

- *undertake a comparison of the information received with its own records*
- *investigate and correct any discrepancies*
- *update the metering records in the registry.*

Audit observation

I checked the process and results from inspection regimes to ensure any incorrect records were updated.

Audit commentary

Contact checked the relevant details during inspections, and I observed evidence that updates had occurred where discrepancies were found.

Audit outcome

Compliant

8.4. Broken or removed seals (Clause 48(4) and (5) of Schedule 10.7)

Code reference

Clause 48(4) and (5) of Schedule 10.7

Code related audit information

If the MEP is advised of a broken or removed seal it must use reasonable endeavours to determine

- a) who removed or broke the seal*
- b) the reason for the removal or breakage*

and arrange for an ATH to carry out an inspection of the removal or breakage and determine any work required to remedy the removal or breakage.

The MEP must make the above arrangements within

- a) three business days, if the metering installation is category 3 or higher*
- b) 10 business days if the metering installation is category 2*
- c) 20 business days if the metering installation is category 1.*

Audit observation

I checked all examples of notification of missing seals, which were all as a result of inspection processes or notification by field technicians.

Audit commentary

I checked 12 examples of seals found missing during cat 1 inspections. In all 12 cases the seals were replaced by the ATH at the time of inspection.

Audit outcome

Compliant

9. PROCESS FOR HANDLING FAULTY METERING INSTALLATIONS

9.1. Investigation of Faulty Metering Installations (Clause 10.43(4) and (5))

Code reference

Clause 10.43(4) and (5)

Code related audit information

If the MEP is advised or becomes aware that a metering installation may be inaccurate, defective, or not fit for purpose, it must investigate and report on the situation to all affected participants as soon as reasonably practicable after becoming aware of the information, but no later than;

- a) 20 business days for Category 1,*
- b) 10 business days for Category 2 and*
- c) 5 business days for Category 3 or higher.*

Audit observation

I checked 113 examples where Contact had become aware of suspected faulty metering installations identified by the retailer's "zero consumption" reporting.

Audit commentary

All examples were Category 1. In 17 cases, the investigation was not conducted within 20 business days. I checked the root cause for five late responses and in all cases, it was due to late notification by the

contractor. Meters were confirmed as faulty for two of the 17 examples. Contact's expectation is five business days.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 01-Aug-18 To: 27-Jun-19	17 potentially defective installations not investigated within 20 business days. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
CTCT is actively working with the Field Service Providers to produce the meter installation paperwork within our required timeframes		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
CTCT is actively working with the Field Service Providers to produce the meter installation paperwork within our required timeframes		Ongoing	

9.2. Testing of Faulty Metering Installations (Clause 10.44)

Code reference

Clause 10.44

Code related audit information

If a report prepared under clause 10.43(4)(c) demonstrates that a metering installation is inaccurate, defective, or not fit for purpose, the MEP must arrange for an ATH to test the metering installation and provide a 'statement of situation'.

If the MEP is advised by a participant under clause 10.44(2)(a) that the participant disagrees with the report that demonstrates that the metering installation is accurate, not defective and fit for purpose, the MEP must arrange for an ATH to:

- a) test the metering installation*
- b) provide the MEP with a statement of situation within five business days of:*

- c) *becoming aware that the metering installation may be inaccurate, defective or not fit for purpose; or*
- d) *reaching an agreement with the participant.*

The MEP is responsible for ensuring the ATH carries out testing as soon as practicable and provides a statement of situation.

Audit observation

I checked 113 examples where Contact had become aware of suspected faulty metering installations identified by the retailer's "zero consumption" reporting.

Audit commentary

The results showed that in all cases where faulty metering was identified, the meter was replaced immediately once the technician was on-site. The subsequent reporting provided sufficient detail to determine the cause and extent of the impact on consumption information.

Audit outcome

Compliant

9.3. Statement of Situation (Clause10.46(2))

Code reference

Clause10.46(2)

Code related audit information

Within three business days of receiving the statement from the ATH, the MEP must provide copies of the statement to:

- *the relevant affected participants*
- *the market administrator (for all category 3 and above metering installations and any category 1 and category 2 metering installations) on request.*

Audit observation

I checked 113 examples where Contact had become aware of suspected faulty metering installations identified by the retailer's "zero consumption" reporting.

Audit commentary

In all cases Contact Energy was also the retailer, therefore all results were provided to the retailer in a compliant manner.

Audit outcome

Compliant

10. ACCESS TO AND PROVISION OF RAW METER DATA AND METERING INSTALLATIONS

10.1. Access to Raw Meter Data (Clause 1 of Schedule 10.6)

Code reference

Clause 1 of Schedule 10.6

Code related audit information

The MEP must give authorised parties access to raw meter data within 10 business days of receiving the authorised party making a request.

The MEP must only give access to raw meter data to a trader or person, if that trader or person has entered into a contract to collect, obtain, and use the raw meter data with the end customer.

The MEP must provide the following when giving a party access to information:

- a) the raw meter data; or*
- b) the means (codes, keys etc.) to enable the party to access the raw meter data.*

The MEP must, when providing raw meter data or access to an authorised person use appropriate procedures to ensure that:

- the raw meter data is received only by that authorised person or a contractor to the person*
- the security of the raw meter data and the metering installation is maintained*
- access to the raw meter data is limited to only the specific raw meter data under clause 1(7)(c) of Schedule 10.6.*

Audit observation

I checked whether any parties had requested access to raw meter data.

Audit commentary

No requests have been received but Contact advised access could be granted in accordance with this clause if necessary.

Audit outcome

Compliant

10.2. Restrictions on Use of Raw Meter Data (Clause 2 of Schedule 10.6)

Code reference

Clause 2 of Schedule 10.6

Code related audit information

The MEP must not give an authorised person access to raw meter data if to do so would breach clause 2(1) of Schedule 10.6.

Audit observation

I checked whether any parties had requested access to raw meter data.

Audit commentary

No requests have been received but Contact advised access could be granted in accordance with this clause if necessary.

Audit outcome

Compliant

10.3. Access to Metering Installations (Clause 3(1), (3) and (4) of Schedule 10.6)

Code reference

Clause 3(1), (3) and (4) of Schedule 10.6

Code related audit information

The MEP must within 10 business days of receiving a request from one of the following parties, arrange physical access to each component in a metering installation:

- *a relevant reconciliation participant with whom it has an arrangement (other than a trader)*
- *the Authority*
- *an ATH*
- *an auditor*
- *a gaining MEP.*

This access must include all necessary means to enable the party to access the metering components

When providing access the MEP must ensure that the security of the metering installation is maintained and physical access is limited to only the access required for the purposes of the Code, regulations in connection with the party's administration, audit and testing functions.

Audit observation

I checked whether any parties had requested access to metering installations.

Audit commentary

No requests have been received but Contact advised access could be granted in accordance with this clause if necessary.

Audit outcome

Compliant

10.4. Urgent Access to Metering Installations (Clause 3(5) of Schedule 10.6)

Code reference

Clause 3(5) of Schedule 10.6

Code related audit information

If the party requires urgent physical access to a metering installation, the MEP must use its best endeavours to arrange physical access.

Audit observation

I checked whether any parties had requested access to metering installations.

Audit commentary

No requests have been received, but Contact advised access could be granted in accordance with this clause if necessary.

Audit outcome

Compliant

10.5. Electronic Interrogation of Metering Installations (Clause 8 of Schedule 10.6)

Code reference

Clause 8 of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from an MEP's back office, the MEP must

- *ensure that the interrogation cycle does not exceed the maximum interrogation cycle shown in the registry*
- *interrogate the metering installation at least once within each maximum interrogation cycle.*

When raw meter data can only be obtained from an MEP's back office, the MEP must ensure that the internal clock is accurate, to within ± 5 seconds of:

- *New Zealand standard time; or*
- *New Zealand daylight time.*

When raw meter data can only be obtained from an MEP's back office, the MEP must record in the interrogation and processing system logs, the time, the date, and the extent of any change in the internal clock setting in the metering installation.

When raw meter data can only be obtained from an MEP's back office, the MEP must ensure that a data storage device in a metering installation does not exceed the maximum time error set out in Table 1 of clause 8(5) of Schedule 10.6.

The MEP must compare the time on the internal clock of the data storage device with the time on the interrogation and processing system clock, calculate and correct (if required by this provision) any time error, and advise the affected reconciliation participant.

When raw meter data can only be obtained from an MEP's back office, the MEP must, when interrogating a metering installation, download the event log, check the event log for evidence of malfunctioning or tampering, and if this is detected, carry out the appropriate requirements of Part 10.

The MEP must ensure that all raw meter data that can only be obtained from the MEPs back office, that is downloaded as part of an interrogation, and that is used for submitting information for the purpose of Part 15 is archived:

- *for no less than 48 months after the interrogation date*
- *in a form that cannot be modified without creating an audit trail*
- *in a form that is secure and prevents access by any unauthorised person*

in a form that is accessible to authorised personnel.

Audit observation

Contact is not the MEP for AMI metering installations and does not conduct data collection as an MEP.

Audit commentary

Contact is not the MEP for AMI metering installations and does not conduct data collection as an MEP.

Audit outcome

Not applicable

10.6. Security of Metering Data (Clause 10.15(2))

Code reference

Clause 10.15(2)

Code related audit information

The MEP must take reasonable security measures to prevent loss or unauthorised access, use, modification or disclosure of the metering data.

Audit observation

I checked the security and storage of data by looking at examples of data more than 48 months old.

Audit commentary

All data is secure and any transmission is via FTP.

Audit outcome

Compliant

10.7. Time Errors for Metering Installations (Clause 8(4) of Schedule 10.6)

Code reference

Clause 8(4) of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from the MEPs back office, the MEP must ensure that the data storage device it interrogates does not exceed the maximum time error set out in Table 1 of clause 8(5) of Schedule 10.6.

Audit observation

Contact is not the MEP for AMI metering installations.

Audit commentary

Contact is not the MEP for AMI metering installations.

Audit outcome

Not applicable

10.8. Event Logs (Clause 8(7) of Schedule 10.6)

Code reference

Clause 8(7) of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from the MEP's back office, the MEP must, when interrogating a metering installation:

- a) *ensure an interrogation log is generated*
- b) *review the event log and:*
 - i. *take appropriate action*
 - ii. *pass the relevant entries to the reconciliation participant.*
- c) *ensure the log forms part of an audit trail which includes:*
 - i. *the date and*

- ii. *time of the interrogation*
- iii. *operator (where available)*
- iv. *unique ID of the data storage device*
- v. *any clock errors outside specified limits*
- vi. *method of interrogation*
- vii. *identifier of the reading device used (if applicable).*

Audit observation

Contact is not the MEP for AMI metering installations.

Audit commentary

Contact is not the MEP for AMI metering installations.

Audit outcome

Not applicable

10.9. Comparison of HHR Data with Register Data (Clause 8(9) of Schedule 10.6)

Code reference

Clause 8(9) of Schedule 10.6

Code related audit information

When raw meter data can only be obtained from the MEP's back office, the MEP must ensure that each electronic interrogation that retrieves half-hour metering information compares the information against the increment of the metering installations accumulating meter registers.

Audit observation

Contact is not the MEP for AMI HHR metering installations.

Audit commentary

Contact is not the MEP for AMI HHR metering installations.

Audit outcome

Not applicable

10.10. Correction of Raw Meter Data (Clause 10.48(2),(3))

Code reference

Clause 10.48(2),(3)

Code related audit information

If the MEP is notified of a question or request for clarification in accordance with clause 10.48(1), the MEP must, within 10 business days:

- *respond in detail to the questions or requests for clarification*
- *advise the reconciliation participant responsible for providing submission information for the POC of the correction factors to apply and period the factors should apply to.*

Audit observation

Contact has not received any requests in relation to this clause.

Audit commentary

Contact has not received any requests in relation to this clause.

Audit outcome

Not applicable

CONCLUSION

The main issue from the previous audit was 5,423 ICPs with expired certification. Most of these have switched to a different MEP and are no longer Contact's responsibility. There are now 52 installations with expired certification.

Some ICPs were identified where Contact should have been recorded as the MEP but the retailer had incorrectly nominated a different MEP. The correction of these records resulted in some backdated registry updates.

Registry data has a high level of accuracy, but there are some control device records missing. Contact is liaising with distributors to resolve as many as possible before considering field visits.

One area where stronger controls are required is the investigation of defective metering, where some delays exist due to contractor resourcing in some areas.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends an audit frequency of 18 months. I agree with this recommendation.

PARTICIPANT RESPONSE

Contact accepts the findings of the auditor and will focus on areas of non-compliance to continue to improve in these areas.