The performance audit identified the following non-compliances.

Proposed action, responsibility and due dates for completion are provided for the non-compliance and some of the opportunities for improvement in the tables below.

Reference No/Year	Requirements	Audit Priority	Compliance Rating	Auditor Recommendation	Proposed Action
A1/2019	Electricity Industry Metering Code clause 3.1 A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act. (Obligation 319) Electricity Industry Metering Code clause 3.2(1) An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means. (Obligation 320) Electricity Industry Metering Code clause 3.3(1) An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure. (Obligation 321)	2	A	NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures. However, under Clauses 1.3 and 6.2 of the Metering Code, a metrology procedure must be submitted to and approved by the ERA. As NiW has not completed the actions required by the Code, and it does not have an approved procedure, it is not compliant with any of the obligations listed above that refer to a metrology procedure. It is recognised that from a practical point of view, there is no real benefit for NiW to develop and submit a metrology procedure to the ERA for approval other than being able to comply with the requirements of the Metering Code.	NIW acknowledges the recommendation and will consider this when PPA's are renewed or created whether to include it in the PPA's or create a separate metrology document. Based on the current customer base NIW confirms that this is all addressed in the current PPA's. Responsible: Principal Energy & Utilities Target Date: Ongoing

Reference No/Year	Requirements	Audit Priority	Compliance Rating	Auditor Recommendation	Proposed Action
A1/2019	Electricity Industry Metering Code clause 3.10 A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act. (Obligation 336) Electricity Industry Metering Code clause 3.12(2) A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure. (Obligation 343) Electricity Industry Metering Code, clause 5.21(4) A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement. (Obligation 415)	2	A	NiW may wish to consider submitting a metrology procedure to the ERA for approval but it is accepted that the information included in the PPAs adequately covers the metering of NiW's customers' usage. As a result, there is no mandatory recommendation for this obligation although NiW will continue to be non-compliant against the requirements. As noted, there is no mandatory recommendation for this obligation although NiW will continue to be technically non-compliant against the requirements of these obligations NiW may wish to consider submitting a metrology procedure to the ERA for approval but it is accepted that in practice the information included in the PPAs adequately covers the metering of NiW's customers' usage.	

Reference No/Year	Requirements	Audit Priority	Compliance Rating	Auditor Recommendation	Proposed Action
A1/2019	Electricity Industry Metering Code clause 5.25 A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure. (Obligation 434) Electricity Industry Metering Code, clause 6.2 A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to	2	A		
	it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d). (Obligation 448A)				