GAS REGISTRY AND SWITCHING PERFORMANCE AUDIT

Vector Limited as Distributor

Audit date: 31 May to 1 June 2022

Report date: 29 June 2022

Under the Gas (Switching Arrangements) Rules 2008 the Gas Industry Company has commissioned Langford Consulting to undertake a performance audit of Vector Limited in its role of distributor. The purpose of the audit is to assess compliance with the rules and the systems and processes put in place to enable compliance.

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Executive Summary

Under the Gas (Switching Arrangements) Rules 2008 (the rules) the Gas Industry Company commissioned Langford Consulting to undertake a performance audit of Vector Ltd (Vector) as distributor.

The purpose of the audit is to:

- assess compliance with the rules
- assess the systems and processes put in place to enable compliance with the rules

The audit was conducted within the terms of reference supplied by the GIC and within the guideline note *Guideline note for rules 65 to 75: the commissioning and carrying out of performance audits and event audits, version 3.0* (http://www.gasindustry.co.nz/dmsdocument/2858).

The summary of report findings shows that the Vector control environment, for the ten areas evaluated, is "effective" for five areas and "adequate" for four areas, no areas were found to be "not adequate" and one was "not applicable". This was an improvement on the findings from the last audit.

Eleven breach allegations are made in relation to Vector regarding the non-compliant areas and are summarised in the following table. The following observations and recommendations were also made:

> **Recommendation:** Vector should include postcodes as a quality check for its gas gate assignment process.
>
> **Recommendation:** Vector revise its Google Earth app to include a designated gas gate for the Auckland airport area.
>
> **Recommendation:** The GIC reinstate showing details of which ICPs had been added or removed from the critical contingency designation list.
>
> **Recommendation:** Vector should maintain records to demonstrate that rule 50 regarding disclosure of information is being complied with.
>
> **Recommendation:** Vector establish how their loss factor was calculated and review whether the figure is still appropriate

Summary of breach allegations

Section	Summary of issue	Rules potentially breached
4.2	A new ICP was created and added to the registry with a status code of NEW, but it was a duplicate.	r43.2
4.2	An ICP had been created in the registry with a status of NEW, without a responsible retailer, even though the ICP was connected and had a retailer	r58.1
4.2	2 ICPs had been entered into the registry with an incorrect physical address region	r58.1
4.2	94 ICPs created since 1 January 2018 were found to have incorrect gas gates in the registry: • 1 ICP was found from a review of a general sample of 56 new ICPs • 93 ICPs were found out of a list of 109 ICPs with atypical postcodes for the gas gate	r58.1
4.2	138 ICPs created since 1 January 2018 were found to have incorrect load shedding categories: • 6 ICPs from a general sample of 56 new ICPs • 117 ICPs identified from analysis of load shedding code against allocation group code • 15 ICPs identified from analysis of load shedding code against network price code	r58.1
4.2	7 ICPs created since 1 January 2018 were found to have incorrect network pressure populated in the registry: • 3 ICPs from a general sample of 56 new ICPs • 4 ICPs identified from analysis of network pressure against gas gate	r58.1
4.3	A comparison of Gentrack versus the registry found there were 21 incorrect registry gas gates	r58.1
4.3	38 ICPs created prior to 2018 were found to have incorrect load shedding categories: • 34 had a load shedding category of DOM in the registry, but should have had a load shedding category of either 4 or 6. • A review of Vector's Gentrack data versus the registry identified 4 ICPs with incorrect load shedding categories.	r58.1

4.3	3 ICPs were shown in the registry with a load shedding designation of 7, but their designations had lapsed.	r58.1
4.3	Out of a sample of 33 ICPs created prior to 2018, 1 ICP was found to have a significantly incorrect altitude figure	r58.1
4.3	112 ICPs were found to have incorrect network pressure: • After reviewing Gentrack records against registry records it was established 2 ICPs had incorrect network pressure in the registry • A review of outlier ICPs found 110 ICPs with incorrect network pressures	r58.1

Summary of report findings

Issue	**Section**	**Control Rating** (refer to appendix 1 for definitions)	**Compliance Rating**	**Comments**
Participant registration information	3.1	Effective	Compliant	Vector had up to date participant details on the register
Obligation to act reasonably	3.2	Effective	Compliant	No examples of Vector acting unreasonably were found
Obligation to use registry software competently	3.3	Effective	Compliant	No examples of Vector using software incompetently were found
Assignment of ICPs	4.1	Effective	Compliant	There were no issues found with the Vector process for assigning ICP identifiers
Creation of new ICPs	4.2	Adequate	Not compliant	Incorrect load shedding and gas gates were the most common issue. Issues occurred both before and after the introduction of the new automation
Maintenance of ICPs in the registry	4.3	Adequate	Not compliant	Load shedding had improved since the last audit but remained the most common issue along with gas gate and network pressure.
Notices of gas gate creation/decommissioning	4.4	Not Applicable	Not Applicable	There had been no changes to gas gates since the last audit
Publishing of network price category codes	4.5	Effective	Compliant	Vector routinely publish network prices on their website and the current publication was up to date
Disclosure of ICP information	4.6	Adequate	Compliant	The instances found had been responded to in a timely fashion, but there was no formal process to ensure compliance
Loss factor codes	4.7	Adequate	Compliant	The loss factor code is now published It is recommended Vector review how the loss factor is calculated.

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1. Introduction

Under the Gas (Switching Arrangements) Rules 2008 (the rules) the Gas Industry Company (GIC) commissioned Langford Consulting to undertake a performance audit of Vector as a distributor. The audit was commissioned under rule 88 and was conducted within terms of reference prepared by the GIC and related to the gas registry participant code UNLG.

The engagement commenced on 17 March 2022 and involved two days with Vector staff 31 May to 1 June 2022. The audit was conducted via Microsoft Teams, out of respect for Vector's covid 19 protocols, which precluded a site visit.

The purpose of the audit is to:

- assess compliance with the rules
- assess the systems and processes put in place to enable compliance with the rules

In preparing the report, the auditor used the processes set out in the guideline note issued on 1 June 2013: *Guideline note for rules 65 to 75: the commissioning and carrying out of performance audits and event audits, version 3.0* (http://www.gasindustry.co.nz/dmsdocument/2858).

2. General Compliance

2.1 Switch Breach Report

Since the last audit the Market Administrator has received one alleged breach in relation to Vector as Distributor. This was alleged by Veritek Ltd under r26.5.1 and 26.5.4 of the Gas (Downstream Reconciliation) Rules 2008 and related to an inaccurate altitude for one ICP.

2.2 Summary of previous audit

This is the second audit for Vector as distributor under the rules. The previous audit done in November 2017 found that the Vector control environment, for the ten areas evaluated, was "effective" for four areas and "adequate" for three areas, two areas were found to be "not adequate" and one was "not applicable".

Nine breach allegations were made in relation to Vector regarding the non-compliant areas and are summarised in the following table. The following observations and recommendations were also made:

> **OBSERVATION:** Rules 51 and 53 do not reflect the process undertaken by Vector and apply time constraints that have no relevance. If this is true of other distributors there may be a case for a review of the rules to align with the operational process.
>
> **RECOMMENDATION:** Consider a review of rules 51 and 53 once all the distributors have undergone their first audit.
>
> **RECOMMENDATION:** That Vector improve its processes for maintaining the load shedding category field. Adding a report of the load shedding category versus allocation group to the routine suite of weekly reporting could assist with this. Vector have already raised the IT request for this report to be built. GIEP1 data provided by retailers to distributors at an ICP-level to support invoicing, could be used to evaluate potential changes in category.

RECOMMENDATION: That Vector review their processes for changes to gas gates to ensure they as distributor make the required notifications. Alternatively, a change to the rule could be considered to make this a transmission system owner responsibility.

RECOMMENDATION: That Vector review, document and publish their loss factor code.

Summary of breach allegations from the last audit (2017)

Section	Summary of issue	Rules potentially breached
4.2	6 ICPs within a sample of 34 new ICPs created since 2013, were not created within 3 business days of request.	r 51.2
4.2	In 2017 5 ICPs were assigned to the wrong gas gate and from a sample of 34 new ICPs 3 additional ICPs had wrong gas gates assigned.	r 58.1
4.2	Within a sample of 34 new ICPs 2 ICPs had an incorrect network pressure entered into the registry.	r 58.1
4.3	A review of ICPs with unusual or incompatible load shedding categories/allocation groups found incorrect load shedding categories entered into the registry for 1,183 ICPs.	r 58.1
4.3	A review of altitude outliers on the registry found 1 ICP with incorrect altitudes.	r 58.1
4.3	A review of the registry for unexpected combinations of network pressures and load shedding category identified incorrect network pressures entered into the registry for 12 ICPs.	r 58.1
4.3	A review of a sample of 77 established ICPs showed 17 instances of incorrect parameters: • 4 ICPs had incorrect altitudes • 6 ICPs had incorrect gas gates • 6 ICPs had incorrect load shedding categories • 1 ICP had incorrect price category	r 58.1
4.5	Vector had not published the current schedule of its network price categories, codes and associated charges.	r 46
4.7	The loss factor was not published and there was no evidence of it being maintained.	r 47.1

2.3 Provision of Information to the Auditor

In conducting this audit, the auditor may request any information from Vector, the industry body and any registry participant.

Information was provided by Vector in a timely manner in accordance with this rule.

3. General obligations

3.1 Participant registration information

Vector's registration details recorded on the registry were reviewed and confirmed as accurate and current. They were reviewed on 30 March 2022 and they had last been updated on 7 March 2022.

3.2 Obligation to act reasonably

No examples of Vector acting unreasonably were found.

3.3 Obligation to use registry software competently

No examples of Vector using registry software incompetently were found.

4. Obligations as Distributor

Vector uses Siebel for customer management and work orders, Gentrack 'Velocity' version 4.13 for creating and maintaining ICPs and invoicing. Siebel sends updates to Gentrack, which in turn automatically updates the gas registry as required. Registry files are examined every morning to identify and resolve any registry upload issues. The version of Siebel and Gentrack were unchanged since the last audit in 2017, although Siebel is in the process up being updated so will be changing shortly. The validation of registry parameters occurs in Gentrack.

The main change in systems since the last audit were the addition of some automation to assist with the set-up of new ICPs and the updating of ICPs which are now automated.

4.1 Assignment of ICPs (rules 5.2, 43.1 and 43.2)

The need for a new ICP arises via three different processes:

1. A new connection is requested for a site which currently has no network connection
2. A customer requests a connection on a subdivision which already has reticulated gas, but nonetheless they will need a new ICP and a gas meter to be fitted
3. A reconnection is requested for an address that was previously connected but has been decommissioned. They will also need a new ICP.

The customer's request could arrive via the call centre; via the on-line portal or via a retailer and is managed in Siebel. The application process requires the supply of address, expected retailer and appliance information, which means the anticipated load can also be established.

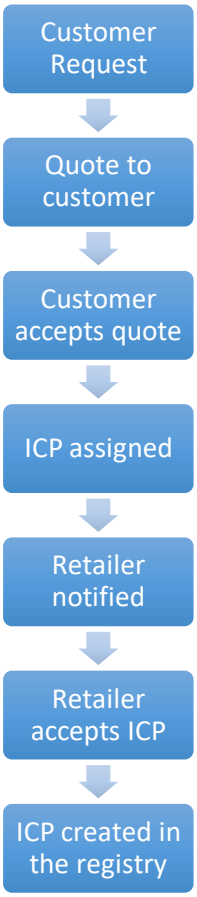
The start of the process is for the request to be determined as residential or commercial. Whether a customer is residential or commercial is determined by use, an apartment block or retirement village would be considered commercial. Residential requests are managed by

Electrix and commercial requests by the Vector customer connection team, so they can assess whether the load can be managed and to determine the quote for the job.

A quote for the job is sent to the customer, and once it is accepted the ICP is created. The acceptance of a quote in Siebel prompts a job in Gentrack to create an ICP and assign an ICP number, which then sends the ICP number back to Siebel.

The ICP is then notified to the expected retailer who accepts the ICP in Siebel. The collected data is then revalidated and populated in the registry.

There is a parallel process alongside the retailer acceptance to assess the site, obtain council consent and to create a date for the installation.



Rules 43.1 and 43.2 require that a distributor assign an ICP identifier for each consumer installation connected to its system. Each consumer installation must represent a single consumer installation that:

- may be isolated without affecting another consumer installation
- may have a single loss factor and network price category and
- has its gas volume measured directly by a single set of compliant metering equipment or indirectly by a method approved by the industry body

Vector ensure there is a single customer for each installation by waiting on the acceptance of a quote for the connection. They also do an address check and view the address on the GIS system. If there is any doubt, they will phone the customer. Occasionally these conversations have identified that two ICPs are required (for example it transpires a residential address also has a granny flat attached).

Every new ICP is assessed to ensure there is a separate riser and shutoff valve.

Vector have only one loss factor that is used for all their ICPs.

Vector as distributor do not do any checks in respect of the metering equipment compliance.

The assignment of the ICP is therefore prompted by the customer accepting a quote – not as envisaged by the rules a request from the retailer. No issues were identified in the review of ICP assignment.

4.2 Creation of new ICPs (rule 51 and 53)

The last audit occurred at the end of 2017. Vector had created 15,500 new ICPs since 1 January 2018.

Since the last audit new ICP creation had been automated, triggered by system events in Gentrack. This was released 5 December 2019, but there was approximately a 2-month transition period after this clearing out earlier jobs, so some manual ICPs were still raised during this period.

The population of the registry is prompted by the acceptance of the ICP by the retailer, not the installation, as envisaged by the rules. The registry is therefore populated in advance of the installation date so that no breaches of the timing for updating the registry parameters occur.

Once the parameters are populated in the registry the upload is acknowledged by the registry and the status changed to READY. This occurs before the ICP is actually ready as the installation has not yet occurred.

Once the installation is complete the retailer changes the status to ACTC and enters the install date.

The Vector process was validated by checking the registry creation of the ICP date for a sample of ICPs created since 1 January 2018 against the installation date. No exceptions were found.

The process was also validated by looking for ICPs created since 1 January 2018 by Vector in the registry with a status code of NEW. Two ICPs were found, one had been added to the registry, but was actually a duplicate record. Vector changed the status of the ICP to 'decommissioned' during the audit.

> **Alleged breach:** A new ICP was created and added to the registry with a status code of NEW, but it was a duplicate. (r43.2)

The second NEW ICP was created, Vector had then tried to change the retailer, but in error removed the retailer without replacing it with another. This meant the ICP had been connected, with gas able to follow, but without any responsible retailer. The new retailer was added during the audit with the effective date backdated.

> **Alleged breach:** An ICP had been created in the registry with a status of NEW, without a responsible retailer. This ICP had gas connected so would have had the opportunity to use gas without the associated usage being collected by any retailer as a part of the reconciliation process, or the customer receiving any bill. (r58.1)

The GIS system is used to check addresses, establish the altitude, network pressure and pipe size. The relevant gas gate is established using coloured overlays on a Google Earth app.

During the audit the auditor noticed that two Vector ICPs, with addresses in Auckland, had been described in the registry with a physical address region of Bay of Plenty, which was not correct.

Alleged breach: 2 ICPs had been entered into the registry with an incorrect physical address region (r58.1)

See appendix B for alleged breach details

A sample of 56 ICPs created since the beginning of 2018 were reviewed for accuracy of registry entries, these are commented on below in the relevant subsection.

Gas Gates

The gas gate was reviewed for each of the 56 ICPs in the general sample of ICPs created since 1 January 2018. 1 new ICP from this sample was found to have an incorrect gas gate.

All the ICPs created since 1 January 2018 were analysed by gas gate and postcode to create a list of 109 outliers with postcodes that were not typical for the gas gate. These were all reviewed and 93 proved to have incorrect gas gates.

Alleged breach: 94 ICPs created since 1 January 2018 were found to have incorrect gas gates in the registry (r58.1):

- 1 ICP was found from a review of a general sample of 56 new ICPs
- 93 ICPs were found out of a list of 109 ICPs with atypical postcodes for the gas gate

See appendix B for alleged breach details

Recommendation: Vector should include postcodes as a quality check for its gas gate assignment process.

A process issue was also identified where the Google Earth app used to assign gas gates using coloured overlays had omitted to assign Auckland Airport with a gas gate. This was a hangover from the electricity side of the business where Vector didn't own the electricity distribution assets at the airport.

Recommendation: Vector revise its Google Earth app to include a designated gas gate for the Auckland airport area.

Load Shedding

Out of the general sample of 56 new ICPs, 6 ICPs were found to need the load shedding category revising.

No of ICPs	Original registry load shedding code	Revised load shedding category
2	4	3
4	6	4

A list of 176 outliers created since 1 January 2018, where the load shedding code appeared to be inconsistent with the allocation group code were reviewed, and 117 were found to need a revision of load shedding category.

No of ICPs	Original registry load shedding code	Revised load shedding category
3	4	3
1	6	3
106	6	4

6	DOM	4
1	4	6

A list of 19 outliers, all created since 1 January 2018, where the load shedding code appeared to be inconsistent with the network price code was also reviewed. 15 were found to need a change to the registry load shedding category code. No incorrect network price codes were found as a part of this review.

No of ICPs	Original registry load shedding code	Revised load shedding category
1	6	3
1	6	4
9	DOM	4
2	DOM	6
2	6	DOM

Alleged breach: 138 ICPs created since 1 January 2018 were found to have incorrect load shedding categories (r58.1):

- 6 ICPs from a general sample of 56 new ICPs
- 117 ICPs identified from analysis of load shedding code against allocation group code
- 15 ICPs identified from analysis of load shedding code against network price code

See appendix B for alleged breach details

Altitude

Altitude is automatically populated using information from the GIS system. Of the general sample of 56 new ICPs altitudes were reviewed. Many were inaccurate by a few meters, but the largest difference was 22 meters. These differences will therefore not result in a material change to energy calculations and have not been recorded as alleged breaches.

Network Pressure

The network pressure is identified by viewing the address in GIS. There is a table which the automated process uses to determine which network pressure should be entered for each type of pipeline. For example, if the pipeline at the address is described as MP4, 400 is populated in the network pressure parameter.

Out of the general review of 56 new ICPs, 3 were found to have an incorrect network pressure recorded in the registry.

Analysis also produced a list of outlier ICPs where the registry network pressure didn't align with other ICPs at the same gas gate. Of the 34 outliers reviewed 4 were found to have incorrect pressures.

Alleged Breach: 7 ICPs created since 1 January 2018 were found to have incorrect network pressure populated in the registry (r 58.1):

- 3 ICPs from a general sample of 56 new ICPs
- 4 ICPs identified from analysis of network pressure against gas gate

See appendix B for alleged breach details

Network pricing category

The price category is selected based on the customer connection type and maximum hourly quantity. The maximum hourly quantity is calculated from the customers appliance information provided on their application. See table below for current categories.

Description	Price category	Load size (MHQ)
Residential	GA0R	n/a
Business	GA01	≤ 10
Commercial	GA02	> 10 and ≤ 40
Commercial	GA03	> 40 and ≤ 200
Industrial	GA04	> 200
Industrial	GA05	> 200

The table is published on the Vector website in the distribution pricing section.

No issues were found with network price codes during the review of new ICPs.

Since the last audit new ICP creation had been automated, triggered by system events in Gentrack. This was released 5 December 2019, but there was approximately a 2-month transition period after this clearing out earlier jobs, so some manual ICPs were still raised during this period. The alleged breaches for new ICPs were reviewed to see whether they occurred on ICPs created since 1 March 2020, it was found there were examples of load shedding, gas gate and network pressure had arisen since the automation process was introduced.

4.3 Maintenance of ICPs in the registry

There are a number of routes that could result in registry changes occurring:

1. Alterations might be requested by the retailer via the logging of a job in Siebel. These might include reconnections, relocations, upgrades, decommissioning or meter changes.
2. Retailers might send an email request, mostly these relate to address changes. These are entered into Siebel which feeds through to Gentrack and then into the registry.
3. Ad hoc changes might arise from projects, such as a quality project focusing on a specific parameter such as altitude, system upgrades resulting in pressure changes, or a new designation spreadsheet supplied by the GIC.

Vector don't do any routine maintenance activities, such as annual reviews of load to update network pricing or load shedding, most changes are in response to retailer requests.

Since 1 January 2018 Vector have actioned:

- 65,939 address events
- 103,199 network events
- 16,621 pricing events
- 8,642 status events

Alterations requested by the retailer requires the repopulation of appliance information. Vector then confirm if the request can be accommodated and send a quote. If the retailer accepts the quote the work is done and there is an update of Siebel, which automatically updates Gentrack and the registry.

Vector has a suite of reporting to assist in maintaining their registry information. These reports validate data between Siebel, Gentrack and the Gas Registry. The suite covers all the fields that Vector are responsible for as a gas distributor. The reports are run weekly, and discrepancies identified by the reports are reviewed and corrected if appropriate.

Since the last audit Vector had released their automated process for updating the registry, triggered by system events in Gentrack. It was released 6 August 2020, although there was a couple of months transition while old jobs were still being processed.

Vector also has a process to decommission ICPs. Usually this is initiated by a request from a retailer which is lodged via Siebel. It can also arise from the reviewing of routine reports which identify status discrepancies, suggesting disconnection could be appropriate, which are then discussed with the retailer. Vector had decommissioned 2,000 ICPs since the start of 2018.

The audit took a number of approaches to establish the effectiveness of Vector's ICP maintenance processes.

- A review of a general sample of active ICPs created before 2018
- A comparison of a list extracted from Vector's Gentrack system, compared against a data extracted from the registry
- Some analysis of established ICPs, which produced lists of outliers that were further reviewed

Vector supplied a list of their ICPs from their Gentrack system. The list was compared with the registry list for all ACTC/ACTV ICPs. Generally, the alignment was excellent, the differences found are discussed under the relevant subheading below.

Gas Gates

The comparison of Vector system to registry for ACTC/ACTV ICPs found 23 mismatches in the gas gate field. These were further reviewed and 21 were found to be incorrect in the registry.

> **Alleged Breach:** A comparison of Gentrack versus the registry found there were 21 incorrect registry gas gates (r58.1)

No other issues were found with gas gate accuracy during the review of ICPs created prior to 2018.

See appendix B for alleged breach details

Load Shedding

The load shedding category of DOM ICPs, for ACTC or ACTV ICPs created before 2018, was compared with the network pricing category. Out of 111,174 active DOM ICPs, 34 were found to have a network pricing code other than the expected GA0R for residential customers. Vector were asked to review these ICPs. All 34 were found to have the wrong load shedding code, no incorrect network pricing codes were found.

No of ICPs	Load shedding code in registry	Correct load shedding code
5	DOM	4
29	DOM	6

The comparison of Gentrack v the registry resulted in a list of 11 differences to review. Some required an update to the registry record, some were timing issues between when the reports were pulled, there were only 4 ICPs which identified registry changes.

No of ICPs	Original registry load shedding code	Revised load shedding category
1	DOM	6
2	3	4
1	4	6

> **Alleged breach:** 38 ICPs created prior to 2018 were found to have incorrect load shedding categories (r58.1):
>
> - 34 had a load shedding category of DOM in the registry but should have had a load shedding category of either 4 or 6.
> - A review of Vector's Gentrack data versus the registry identified 4 ICPs with incorrect load shedding categories.

See appendix B for alleged breach details

The ICPs with load shedding 5 and 7 designations were compared to the latest list of designations sent out by the GIC. 3 ICPs were found to be noted in the registry as load shedding group 7 but were not on the latest designation spreadsheet.

> **Alleged breach:** 3 ICPs were shown in the registry with a load shedding designation of 7, but their designations had lapsed. (r58.1)

The critical contingency spreadsheet of current designations used to include details of which ICPs were new and which designations had been removed but more recently this detail had been removed. This made it more difficult for recipients of the list to identify the changes they needed to make in the registry.

> **Recommendation:** That the GIC reinstate showing details of which ICPs had been added or removed from the critical contingency designation list.

See appendix B for alleged breach details

Altitude

A comparison of altitude fields between Gentrack and the registry highlighted 672 discrepancies, but they were only minor differences. There were only 6 ACTC/ACTV ICPs with altitude differences greater than 10 meters. These were further reviewed. In 4 instances the registry was correct and Gentrack needed to be updated. In 2 instances both the registry and Gentrack were incorrect, so both were revised, but neither resulted in the registry figure moving by a significant amount. No alleged breaches have been raised as there were no material differences resulting in an update to the registry.

A review of a general sample of 30 ICPs created prior to 2018 established a large number of small corrections to altitude in the registry, however only 1 ICP was found to have a difference sufficient that it might have a material effect on a retailer's energy calculation.

> **Alleged breach:** Out of a sample of 33 ICPs created prior to 2018, 1 ICP was found to have a significantly incorrect altitude figure (r58.1)

See appendix B for alleged breach detail.

Network pressure

A general sample of 30 established ICPs were reviewed but no network pressure issues were identified.

The comparison of Vector system data against registry data identified only 2 discrepancies requiring registry update.

Established ICPs created before 2018 were reviewed for network pressure outliers by gas gate. Of the X outlier ICPs reviewed, 110 ICPs were found to have incorrect network pressures. Vector commented that a large number of these related to a pressure upgrade that was only completed in April 2022 and the registry had not been updated in a timely manner.

> **Alleged breach:** 112 ICPs were found to have incorrect pressure (r58.1):
>
> - After reviewing Gentrack records against registry records it was established 2 ICPs had incorrect network pressure in the registry
> - A review of outlier ICPs found 110 ICPs with incorrect network pressures

See appendix B for alleged breach detail.

Network pricing category

No incorrect pricing categories were found.

4.4 Notices of gas gate creation/decommissioning

Vector had not created or decommissioned any gas gates since the last audit in 2017.

4.5 Publishing of network price category codes

The auditor went to the Vector website and confirmed that the current price category codes were available publically. This was an improvement on the last audit where the most recent year's codes had not been published, giving rise to an alleged breach.

4.6 Disclosure of ICP information

Vector uses network pricing code IG60 for non-standard contracts. Participants that wish to know the network pricing for ICPs with this code need to request the information from Vector. There is no special process for this, requests are just made and responded to via e-mail. There is no complete record/register of such requests other than to search e-mails. Vector was asked to search e-mails for the last 12 months for pricing disclosure requests, two were found and both were responded to with pricing information within 1 business day, demonstrating that rule 50 had been complied with. However, it was not possible for the auditor to be certain that the e-mail search had found all such requests.

> **Recommendation:** Vector should maintain records to demonstrate that rule 50 regarding disclosure of information is being complied with.

No instances of information being withheld under rule 50 had occurred.

4.7 Loss factor codes

At the time of the last audit, it could be seen from Vector's internal systems that the loss factor used across the whole of its system had last been changed in 2012 using average UFG information provided by the GIC. However, it was not possible to find the loss factor published

anywhere or to establish how it was being maintained, although it was still being used. An alleged breach under rule 47.1 was therefore raised.

As a part of this audit, it was established that Vector still uses the same loss factor of VEAG1, which is still set to 1.0127, across the whole of its network. Vector do now publish both the loss factor and the loss factor code in their pricing schedule available on the Vector website. The code aligns with the loss factor code entered on the registry for Vector.

However, during the audit Vector were unable to explain how this figure had been calculated, and it had still not been reviewed since 2012.

> **Recommendation:** That Vector establish how their loss factor was calculated and review whether the figure is still appropriate

5. Breach Allegations

Section	Summary of issue	Rules potentially breached
4.2	A new ICP was created and added to the registry with a status code of NEW, but it was a duplicate.	r43.2
4.2	An ICP had been created in the registry with a status of NEW, without a responsible retailer, even though the ICP was connected and had a retailer	r58.1
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4.3	112 ICPs were found to have incorrect network pressure: • After reviewing Gentrack records against registry records it was established 2 ICPs had incorrect network pressure in the registry • A review of outlier ICPs found 110 ICPs with incorrect network pressures	r58.1

6. Conclusion

The summary of report findings shows that the Vector control environment, for the ten areas evaluated, is "effective" for five areas and "adequate" for four areas, no areas were found to be "not adequate" and one was "not applicable". This was an improvement on the findings from the last audit.

Eleven breach allegations are made in relation to Vector regarding the non-compliant areas and are summarised in the following table. The following observations and recommendations were also made:

Recommendation: Vector should include postcodes as a quality check for its gas gate assignment process.

Recommendation: Vector revise its Google Earth app to include a designated gas gate for the Auckland airport area.

Recommendation: The GIC reinstate showing details of which ICPs had been added or removed from the critical contingency designation list.

Recommendation: Vector should maintain records to demonstrate that rule 50 regarding disclosure of information is being complied with.

Recommendation: Vector establish how their loss factor was calculated and review whether the figure is still appropriate

Appendix A – Control Rating Definitions

Control Rating	Definition
Control environment is not adequate	Operating controls designed to mitigate key risks are not applied, or are ineffective, or do not exist. Controls designed to ensure compliance are not applied, or are ineffective, or do not exist. Efficiency/effectiveness of many key processes requires improvement.
Control environment is adequate	Operating controls designed to mitigate key risks are not consistently applied, or are not fully effective. Controls designed to ensure compliance are not consistently applied, or are not fully effective. Efficiency/effectiveness of some key processes requires improvement.
Control environment is effective	Isolated exceptions identified when testing the effectiveness of operating controls to mitigate key risks. Isolated exceptions identified when testing the effectiveness of controls to ensure compliance. Isolated exceptions where efficiency/effectiveness of key processes could be enhanced.

Appendix B – Alleged Breach Details

New ICPs

New ICP created and added to the registry with a status code of NEW, but it was a duplicate.

1002094750QT960

New ICP created without a responsible retailer, but with gas enabled.

1002140440QTE73

2 ICPs in Auckland entered into the registry with a region of Bay of Plenty

1002055316QT35B
1002068471QT56F

Out of the general review of new ICPs, one had an incorrect gas gate

ICP Identifier	ICP Creation Date	Gas Gate Code	Gas Gate Code
1002142334QT666	3/06/2021	PAP06610	WKM17701

ICPs created since the start of 2018 - Gas gate corrections

ICP Identifier	ICP Creation Date	Original Gas Gate Code	Correct Gas Gate Code	Physical Address Post Code
1002112276QTE36	23/11/2020	WST03610	WKM17701	600
1002112994QT707	2/12/2020	WST03610	WKM17701	600
1002135575QT059	3/02/2021	HEN74101	WKM17701	600
1002135607QT682	3/02/2021	HEN74101	WKM17701	600
1002136868QT247	24/02/2021	HEN74101	WKM17701	600
1002140387QTB54	29/04/2021	WST03610	WKM17701	600
1002144623QT1C4	12/07/2021	WST03610	WKM17701	600
1002144624QTC0E	12/07/2021	WST03610	WKM17701	600
1002144625QT04B	12/07/2021	WST03610	WKM17701	600
1002144626QTC8B	12/07/2021	WST03610	WKM17701	600
1002124227QTE97	13/01/2021	HEN74101	WKM17701	604
1002139460QT53F	13/04/2021	HEN74101	WKM17701	604
1002142334QT666	3/06/2021	PAP06610	WKM17701	604
1002067096QT77E	4/07/2019	WST03610	BMC17901	610
1002112828QTFAF	30/11/2020	WKM17701	BMC17901	610
1002112833QTBD6	30/11/2020	WKM17701	BMC17901	610
1002123925QT97C	22/12/2020	WKM17701	BMC17901	610
1002077855QT4BD	20/02/2020	HEN74101	BMC17901	612

1002092231QTA10	2/06/2020	HEN74101	BMC17901	612
1002071754QT237	10/10/2019	WST03610	BMC17901	614
1002072391QT676	23/10/2019	WST03610	BMC17901	614
1002113258QT158	7/12/2020	HEN74101	BMC17901	614
1002124029QT70B	11/01/2021	HEN74101	BMC17901	614
1002135582QTD84	3/02/2021	HEN74101	BMC17901	614
1002152525QTE69	13/12/2021	WST03610	BMC17901	614
1002152910QT8D2	20/12/2021	HEN74101	BMC17901	614
1002152484QT337	10/12/2021	WEL18301	HEN74101	616
1002070430QTE6E	18/09/2019	WST03610	HEN74101	618
1002076017QT730	13/01/2020	WKM17701	HEN74101	618
1002076057QT595	14/01/2020	PUK04201	HEN74101	618
1002076749QT3A1	30/01/2020	BMC17901	HEN74101	618
1002076750QT75D	30/01/2020	BMC17901	HEN74101	618
1002076945QT6B4	3/02/2020	BMC17901	HEN74101	618
1002076946QTA74	3/02/2020	BMC17901	HEN74101	618
1002076947QT631	3/02/2020	BMC17901	HEN74101	618
1002076948QT9EF	3/02/2020	BMC17901	HEN74101	618
1002076949QT5AA	3/02/2020	BMC17901	HEN74101	618
1002076950QT156	3/02/2020	BMC17901	HEN74101	618
1002147070QT1EA	26/08/2021	WKM17701	BMC17901	618
1002147071QTDAF	26/08/2021	WKM17701	BMC17901	618
1002147072QT16F	26/08/2021	WKM17701	BMC17901	618
1002147084QT0F7	26/08/2021	WKM17701	BMC17901	618
1002147085QTCB2	26/08/2021	WKM17701	BMC17901	618
1002147086QT072	26/08/2021	WKM17701	BMC17901	618
1002147087QTC37	26/08/2021	WKM17701	BMC17901	618
1002078435QTE21	28/02/2020	PAP06610	HEN74101	620
1002073560QTD82	12/11/2019	WST03610	HEN74101	622
1002073561QT1C7	12/11/2019	WST03610	HEN74101	622
1002142316QTBB6	3/06/2021	WST03610	HEN74101	622
1002149126QT9A9	20/10/2021	PAP06610	HEN74101	622
1002077375QTAE6	13/02/2020	WST03610	HEN74101	624
1002078387QT314	27/02/2020	WKM17701	HEN74101	624
1002108308QT755	18/09/2020	WKM17701	HEN74101	626
1002072889QTDC1	31/10/2019	WST03610	HEN74101	629
1002079022QT4E7	6/03/2020	WST03610	HEN74101	630
1002113670QT218	28/09/2020	WTK33901	HEN74101	630
1002137587QT38B	9/03/2021	WST03610	HEN74101	630
1002147786QTF70	21/09/2021	HUN15301	HEN74101	630
1002152010QT1DB	3/12/2021	BMC17901	HEN74101	630
1002152011QTD9E	3/12/2021	BMC17901	HEN74101	630
1002152012QT15E	3/12/2021	BMC17901	HEN74101	630
1002152013QTD1B	3/12/2021	BMC17901	HEN74101	630
1002072898QTB29	31/10/2019	WST03610	HEN74101	632
1002153674QT887	19/01/2022	WTK33901	HEN74101	632
1002076004QT15D	13/01/2020	PAP06610	HEN74101	810
1002112830QT716	30/11/2020	PAP06610	HEN74101	810
1002140766QT1AA	6/05/2021	HEN74101	WST03610	2010

1002145240QTF55	22/07/2021	HEN74101	WST03610	2010
1002079081QT038	6/03/2020	PAP06610	WST03610	2012
1002079082QTCF8	6/03/2020	PAP06610	WST03610	2012
1002154800QTEBB	15/02/2022	HEN74101	WST03610	2012
1002108425QTA59	22/09/2020	WKM17701	WST03610	2014
1002135527QT8D4	2/02/2021	WKM17701	WST03610	2014
1002135602QTBCD	3/02/2021	WKM17701	WST03610	2014
1002140611QT039	4/05/2021	HUN15301	PAP06610	2016
1002141284QTF30	17/05/2021	HUN15301	PAP06610	2016
1002136964QT85D	25/02/2021	WST03610	PAP06610	2019
1002145211QTB18	21/07/2021	BMC17901	PAP06610	2019
1002154186QT377	3/02/2022	PUK04201	PAP06610	2019
1002155094QT1FB	21/02/2022	WST03610	PAP06610	2019
1002077350QTAFC	13/02/2020	PAP06610	WST03610	2024
1002080094QTEE6	25/03/2020	PAP06610	WST03610	2024
1002112257QTF26	23/11/2020	PAP06610	WST03610	2024
1002077055QT4B0	5/02/2020	PUK04201	PAP06610	2025
1002054397QTBF4	28/09/2018	WST03610	PAP06610	2104
1002068442QTE57	6/08/2019	HEN74101	PAP06610	2110
1002094747QTE07	16/07/2020	HEN74101	PAP06610	2110
1002080873QT99B	1/05/2020	HEN74101	PAP06610	2113
1002109128QT1A7	5/10/2020	WST03610	PAP06610	2113
1002109129QTDE2	5/10/2020	WST03610	PAP06610	2113
1002109130QT91E	5/10/2020	WST03610	PAP06610	2113
1002091650QT744	20/05/2020	PUK04201	PAP06610	2580
1002066799QT602	27/06/2019	HEN74101	PAP06610	2582

General sample of ICPs created since the beginning of 2018, with incorrect load shedding code.

ICP Identifier	Registry Load Shedding Category Code	Correct Load Shedding
1002044030QT5C3	6	4
1002057962QTE46	4	3
1002063304QTD9F	6	4
1002072301QT991	6	4
1002076607QTB9B	4	3
1002113313QT42D	6	4

List of outliers where load shedding code was paired with an unlikely allocation group code, where the load shedding required updating

ICP Identifier	Original Load Shedding Category Code	Correct Load shedding
1002057962QTE46	4	3
1002062497QT01A	4	6
1002062793QT213	4	3
1002076607QTB9B	4	3
1002054790QTA3F	6	3
1002044030QT5C3	6	4
1002044183QT2B5	6	4
1002047339QTA71	6	4
1002048519QT842	6	4
1002049133QTA27	6	4
1002049337QT12A	6	4
1002044693QT71A	6	4
1002045131QT122	6	4
1002045348QT029	6	4
1002045998QT761	6	4
1002046090QTE9C	6	4
1002046095QT3D3	6	4
1002047337QT9EA	6	4
1002047338QT634	6	4
1002047560QTA2E	6	4
1002047562QTAAB	6	4
1002048252QTB31	6	4
1002048262QTCC9	6	4
1002048965QT20D	6	4
1002049131QTAA2	6	4
1002049136QT768	6	4
1002049138QT4F3	6	4
1002049800QT816	6	4
1002049820QT543	6	4
1002049822QT5C6	6	4
1002049826QT4CC	6	4
1002050280QT317	6	4
1002050298QTBAE	6	4
1002050299QT7EB	6	4
1002050302QTFDC	6	4
1002051002QTD7F	6	4
1002051004QTCF0	6	4
1002051005QT0B5	6	4
1002051572QTD27	6	4
1002052292QTA7F	6	4
1002052295QT7B5	6	4

1002052396QT271	6	4
1002052693QTA3B	6	4
1002052883QT69D	6	4
1002053183QTE34	6	4
1002053190QT859	6	4
1002053446QT191	6	4
1002053548QTB0E	6	4
1002053746QT292	6	4
1002053753QT570	6	4
1002054036QTCAD	6	4
1002054396QT7B1	6	4
1002054397QTBF4	6	4
1002054402QT65E	6	4
1002054551QTB92	6	4
1002054654QT5DE	6	4
1002054826QT60D	6	4
1002055059QTD23	6	4
1002055301QT43C	6	4
1002055361QTBCC	6	4
1002055372QTDA1	6	4
1002056068QT47E	6	4
1002056144QT331	6	4
1002056305QT7D6	6	4
1002056730QT160	6	4
1002057474QT06C	6	4
1002057795QT590	6	4
1002057876QTCE5	6	4
1002058106QT9D1	6	4
1002058579QTF53	6	4
1002059512QTFD7	6	4
1002059529QT6FB	6	4
1002060320QT320	6	4
1002060321QTF65	6	4
1002061006QTD59	6	4
1002061326QT30F	6	4
1002062891QTD99	6	4
1002063245QTA7B	6	4
1002063306QTD1A	6	4
1002063308QTE81	6	4
1002063405QTED8	6	4
1002063500QTA93	6	4
1002063501QT6D6	6	4
1002064149QTE06	6	4
1002067043QT773	6	4
1002067503QT0D3	6	4
1002067517QTB74	6	4
1002067526QT0C9	6	4
1002067920QTD4A	6	4
1002068725QTF6E	6	4

1002069028QTE97	6	4
1002069161QTB67	6	4
1002069547QTBBC	6	4
1002069826QTD01	6	4
1002070553QT45A	6	4
1002070750QT29D	6	4
1002072106QTE5C	6	4
1002072301QT991	6	4
1002072590QTC35	6	4
1002072698QTD22	6	4
1002073327QT4EB	6	4
1002073815QT098	6	4
1002074035QT9A0	6	4
1002076251QTE1D	6	4
1002076938QTCB2	6	4
1002079422QT8E6	6	4
1002106287QTC05	6	4
1002113289QT05F	6	4
1002113313QT42D	6	4
1002138134QT898	6	4
1002053142QT59E	6	4
1002055293QT25A	DOM	4
1002062218QTC88	DOM	4
1002069598QT920	DOM	4
1002070554QT990	DOM	4
1002072058QTCCB	DOM	4
1002073220QT025	DOM	4

15 ICPs that needed load shedding category changing after comparison with the network price category code

ICP Identifier	Original Load Shedding Category Code	Correct Load Shedding	Network Price Category Code
1002055306QT9F6	6	DOM	GA0R
1002063246QT6BB	6	DOM	GA0R
1002048056QT03C	DOM	6	GA01
1002069598QT920	DOM	4	GA01
1002046518QTCC7	DOM	4 - estimated as no consumption yet	GA02
1002062218QTC88	DOM	4	GA02
1002072058QTCCB	DOM	4	GA02
1002073005QTA38	DOM	4 - estimated as no consumption yet	GA02
1002151311QTC7D	DOM	4 - estimated as no consumption yet	GA02
1002055293QT25A	DOM	4	GA03
1002070554QT990	DOM	4	GA03

1002073220QT025	DOM		4	GA03
1002073257QT8B2	DOM		6	GA03
1002054790QTA3F		6	3	GA04
1002057795QT590		6	4	GA04

Out of the general review of new ICPs, three had incorrect network pressure

ICP Identifier	ICP Creation Date	Original Registry Network Pressure	Correct pressure
1002053171QTEA6	28/08/2018	700	1000
1002062841QT0DB	11/04/2019	110	400
1002066930QT647	1/07/2019	400	7

New ICPs created since 2018 – Incorrect network pressures identified by gas gate

ICP Identifier	ICP Creation Date	Gas Gate Code		Original Network Pressure	Correct Network Pressure
1002079015QTED5	6/03/2020	HEN74101	GN	35	400
1002141276QTFA2	17/05/2021	WKM17701	GN	700	400
1002058926QT489	23/01/2019	WST03610	GN	200	400
1002137382QT8C2	5/03/2021	WST03610	GN	700	400

Maintenance of ICPs

Comparison of Gentrack to the Registry – 21 incorrect gas gates

	Gentrack Gas Gate	Registry Gas Gate Code	Correct Gas Gate
0000367911QTB7E	WST03610	PAP06610	WST03610
0000368021QTCEF	WST03610	PAP06610	WST03610
0000206101QT64A	WST03610	PAP06610	WST03610
0000206121QTB1F	WST03610	PAP06610	WST03610
0000773641QTBA7	WKM17701	WTK33901	WKM17701
0000740581QTC87	WST03610	PAP06610	WST03610
0000349031QTE2F	WKM17701	WTK33901	WKM17701
1002113670QT218	HEN74101	WTK33901	HEN74101
0000468401QT8B0	WST03610	PAP06610	WST03610
1002108313QT32C	WTK33901	HEN74101	WTK33901
1002108312QTF69	WTK33901	HEN74101	WTK33901
1002076132QTE2E	WTK33901	PAP06610	WTK33901
1002112273QT379	WTK33901	HEN74101	WTK33901
1002112272QTF3C	WTK33901	HEN74101	WTK33901
1002106551QTFCA	WTK33901	WST03610	WTK33901

0001434469QTB19	WST03610	PAP06610	WST03610
0000582511QTC48	PAP06610	WST03610	PAP06610
0000630551QTF10	PAP06610	WST03610	PAP06610
1002136480QT6E5	WTK33901	WRK18901	WTK33901
1002144091QT5F5	WKU16901	HEN74101	WTK33901
1002135615QTCAA	WTK33901	HEN74101	WTK33901

Comparison of Gentrack v registry, registry load shedding required revision

	Gentrack Load Shed Code	Registry Load Shedding Category Code
0000952941QT6D3	6	DOM
0000020641QTF38	4	3
0000361461QTEEB	4	3
0000072821QT6F7	6	4

34 ICPs with a load shedding code of DOM but which didn't have a residential network price code were found not to be domestic ICPs.

ICP Identifier	Original Load Shedding Category Code	Correct Load shedding code
0000015941QT63B	DOM	6
0000077041QTE2A	DOM	6
0000086391QT457	DOM	6
0000087641QTDB0	DOM	6
0000120901QT6FE	DOM	6
0000137121QT727	DOM	4
0000149141QTAAE	DOM	6
0000171801QTD2E	DOM	6
0000183491QT819	DOM	6
0000194901QTE77	DOM	6
0000233481QT009	DOM	6
0000233751QTE48	DOM	6
0000236023QT3B2	DOM	6
0000281571QT453	DOM	6
0000288331QTC50	DOM	6
0000294451QTFC3	DOM	6
0000317341QT3C5	DOM	6
0000476161QT264	DOM	6
0000594341QTF67	DOM	6
0000817751QT2AC	DOM	6
0000876871QT30E	DOM	6
0000952941QT6D3	DOM	4
0001419096QTB3C	DOM	6
0001419096QTB3C	DOM	6

0001438378QT973	DOM	6
0001452508QT630	DOM	6
0002379467QT7F7	DOM	4
0002382344QT31C	DOM	6
1000384892QT822	DOM	6
1001154943QT211	DOM	6
1001291493QT57F	DOM	6
1002036775QTCD2	DOM	6
1002037879QT163	DOM	4
1002040066QTAC4	DOM	4

Three active ICPs, shown on the registry as being load shedding group 7, could not be found on the Gas Industry Company's list of current designations.

0000498971QTD79

1001246847QTD0A

1001275061QT211

General review of a sample of ICPs created before 2018 – incorrect altitude

ICP Identifier	ICP Altitude	Correct ICP Altitude
1001277365QT358	64	106

Comparison of Gentrack to the registry – 2 incorrect network pressures

	Gentrack Network Pressure	Registry Network Pressure
0001427942QT791	400	110
0000292441QT0AE	3	7

Established ICPs – outliers – incorrect network pressures

ICP Identifier	Original Network Pressure	Correct Network Pressure
0001412297QT29E	200	400
1001283889QTAEE	700	1000
0000249621QT6E8	3	400
0000249631QTC45	3	400
0000249641QT918	3	400

0000251421QT90E	3	400
0000258301QT7F9	3	400
0000261791QT993	3	400
0000263281QT57B	3	400
0000267251QTEB9	3	400
0000274701QT9B5	3	400
0000274711QT318	3	400
0000276201QTFF0	3	400
0000304781QT22A	3	400
0000369541QT7BA	3	400
0000597711QT98E	3	400
0002379116QTBEA	35	400
1001277291QTB41	35	400
1001277405QT3AA	35	400
1001278311QTE6F	35	400
1001278331QT33A	35	400
1001278941QTC6D	35	400
1001280118QT2A5	35	400
1001283704QTFF0	35	400
1001284095QT730	35	400
1001285889QTF2E	35	400
1001285891QT797	35	400
1001285902QTDB4	35	400
1001286002QT65D	35	400
1001286037QTCEA	35	400
1001286038QT334	35	400
1001286040QT47D	35	400
1001286041QT838	35	400
1001286043QT8BD	35	400
1001286044QT577	35	400
1001286045QT932	35	400
1001286047QT9B7	35	400
1001286048QT669	35	400
1001286049QTA2C	35	400
1001286050QTED0	35	400
1001286054QTFDA	35	400
1001286055QT39F	35	400
1001286056QTF5F	35	400
1001286058QTCC4	35	400
1001286059QT081	35	400
1001286060QT928	35	400
1001286061QT56D	35	400
1001286062QT9AD	35	400
1001286064QT822	35	400
1001286066QT8A7	35	400
1001286067QT4E2	35	400
1001286312QTFF3	35	400
1001286371QTCC3	35	400
1001286797QTBF7	35	400

1001286848QT664	35	400
1001287405QT636	35	400
1001289829QTCB1	35	400
1001289830QT84D	35	400
1001289831QT408	35	400
1001289832QT8C8	35	400
1001289833QT48D	35	400
1001289834QT947	35	400
1001289836QT9C2	35	400
1001289838QTA59	35	400
1001289839QT61C	35	400
1001289840QTD10	35	400
1001289841QT155	35	400
1001290422QTA28	35	400
1001290938QT71C	35	400
1001290939QTB59	35	400
1001293464QTBE2	35	400
1001293793QT53C	35	400
1001293813QTF79	35	400
1001296083QT7B3	35	400
1001296103QTBFD	35	400
1001296410QT895	35	400
1001297963QT5A0	35	400
1001299265QTFE1	35	400
1001299721QT94B	35	400
1001304162QT8A0	35	400
1002036486QT306	35	400
1002036487QTF43	35	400
1002040732QTCC4	35	400
1002040734QTD4B	35	400
1002041133QT727	35	400
1002041494QT7F7	35	400
1002043227QTCC3	35	400
1002043488QTD04	35	400
1002041198QT1EC	110	400
1002043680QT517	210	400
0000310121QT252	1000	400
0000379301QTBF8	1000	400
0000149701QTE0D	3	400
0000181261QTD48	3	400
0000368211QT110	3	400
0000436831QT8F0	3	400
0000467111QTE78	3	400
0000485711QT643	3	400
0000562941QT531	3	400
0000841921QT74E	3	400
0002340081QTD4F	3	400
1001127830QTAD1	200	400
1001139695QT9AB	3	400

0000013251QTA58	100	400
1001131309QTD57	100	400
0001427942QT791	110	400
1002041291QTCBE	210	400
0000313861QTB1E	875	400
1002040071QTDA3	700	400