

# Gas Meter Owner Audit Report

For

**Bluecurrent Metering Limited**



Prepared by

Bernie Cross: Crosshaven Consulting

Date of Audit: 11 & 12 February 2026

Date Audit Report Complete: 1 June 2026

## Executive Summary

This Performance Audit was conducted at the request of the Gas Industry Company (GIC) in accordance with Rule 88 of the Gas (Switching Arrangements) Rules 2008 (GSAR) and rule 65 of the Gas (Downstream Reconciliation) Rules (GDRR), both in effect from 14 September 2015.

The purpose of this audit is to assess the systems, processes and performance of Bluecurrent Metering (Bluecurrent) in terms of compliance with these rules.

The audit was conducted in accordance with terms of reference prepared by GIC.

### Compliance with NZS5259:2015

Bluecurrent's processes to support compliance with **NZS5259:2015** were found to be well documented and understood by Bluecurrent and its field service providers.

A small number of meters were not scheduled for testing during the acceptance test timeframes set out in **NZS 5259:2015** during this audit period and also previous audit periods due to a hard coded parameter within its legacy asset management system.

Bluecurrent have replaced its legacy asset management system so acceptance period intervals are applied correctly going forward, however the migration of data to the new asset management system has populated historic incorrect interval test timeframes that will require a process to refresh these to meet **NZS5259:2015** timeframes.

### Conversion of volume to energy for gas TOU installations (Bluecurrent as retailer agent)

Bluecurrent's process to convert measured gas TOU volumes to energy were reviewed as part of this audit where Bluecurrent operates as an agent for nine gas retailers.

Bluecurrent advised that there was an issue with how measured volumes were converted to volumes at standard conditions prior to calculating equivalent hourly and daily energy values. The overall impact was assessed as 4,300GJ under submission across all affected retailers between March 2025 and December 2025.

Bluecurrent have now provided revised TOU data to retailers to enable revised allocation submissions to correct this data. This revised data will be provided to the allocation agent as part of the revision cycles for these affected periods.

The double application of altitude correction for four ICPs was found to be outside the allowable limits and alleged breaches are recorded for the two retailers responsible for these ICPs.

### Registry information management

Bluecurrent use their GMMS (Gas Maintenance Management System) to store meter owner information.

Monthly validation between GMMS and the registry is currently in place for selected meter owner maintained fields, and I recommend this is expanded to include all meter owner maintained fields.

I found some incorrect information during the audit caused by.

- Issues with its sync tool that is creating a large number of replacement events where no attribute changes have occurred and also a small number of event attribute updates back dated to a prior event date.
- Some meter attributes with incorrect values due to the ad hoc nature of the registry verification process for a small number of attributes not currently included within the monthly registry check to GMMS

The summary of report findings in the table below shows that Bluecurrent's control environment is "effective" for three of the areas evaluated, "Acceptable" for two areas and "Needs improvement" for one area.

Three alleged breaches are recorded in relation to Bluecurrent regarding the non-compliant areas. Two alleged breaches are recorded in respect of retailers that received incorrectly converted measured gas TOU volumes to energy from Bluecurrent.

15 recommendations are also recorded to improve the effectiveness of Bluecurrent's process controls.

Bluecurrent is motivated to improve its level of compliance and have already begun to implement improvements around its registry management processes.

## Summary of Report Findings

Issue	Section	Control Rating (Refer to Appendix 4 for definitions)	Compliance Rating	Comments
General obligations	2	Effective	Compliant	<p>Bluecurrent's Registry participant register information is correct.</p> <p>Based on the information provided, Bluecurrent has met their obligations to act reasonably and use Registry software competently.</p>
Compliance with NZS 5259	3	Acceptable	Not compliant	<p>Prior to 2025, Diaphragm meters over 25 scm/hr were exchanged on a 20 year interval period between acceptance testing rather than 18 years as specified by <b>NZS5259:2015</b>.</p> <p>Incorrect conversion of volume to energy for gas TOU installations affecting 178 ICPs (<b>Appendix 1</b>) in varying degrees since March 2025. The overall impact was assessed as 4,300GJ under submission across all affected retailers between March 2025 and December 2025.</p> <p>Six recommendations made to improve process effectiveness</p> <ul style="list-style-type: none"> <li>• Investigate further these exceptions where the recorded Maximum Hourly Quantity (MHQ) exceeds the maximum flow rate (Qmax) values for the Gas Measurement System (GMS) at these ICPs.</li> <li>• Investigate implementing a monthly check of the MHQ to Qmax to ensure that where a MHQ for a GMS appears to be achieving Qmax that this is adequately investigated with the retailer to determine if a GMS capacity is required.</li> </ul>

Issue	Section	Control Rating  (Refer to Appendix 4 for definitions)	Compliance Rating	Comments
				<ul style="list-style-type: none"> <li>• Look at ways to revise the next acceptance testing due date for an installation with diaphragm meters over 25 scm/hr that will comply with <b>NZS5259:2015</b> within the new asset management system.</li> <li>• Look at ways to improve consumer engagement with the interval test programs and whether a forward looking program of upcoming meter exchanges as part of the annual pricing notification would enable retailers to begin the engagement early to identify a suitable window for this maintenance work.</li> <li>• Recommend that Bluecurrent has regular discussions with retailers regarding long term inactive ICPs over 25 scm/hr around whether to continue to perform pressure checks, meter exchanges as part of acceptance testing or arrange meter removal.</li> <li>• Consider including links within the app to Bluecurrent's policies, procedures and meter model capacity tables for field service personnel to refer to when on site.</li> </ul>

Issue	Section	Control Rating (Refer to Appendix 4 for definitions)	Compliance Rating	Comments
New connections	4	Acceptable	Not compliant	<p>12 late registry updates for new connection meter events were due to delays in the creation of an individual meter price category code (bill code) required for population of registry meter owner event.</p> <p>Four late registry updates for new connection meter events were related to incorrect asset status values in GMMS that prevented GMMS updating the registry.</p> <p>Two recommendations made to improve process effectiveness.</p> <ul style="list-style-type: none"> <li>Review the new connection process to include a check if an individual meter price category code (bill code) required as part of the quote acceptance step so these can be created and available as part of the work order creation.</li> <li>Recommend strengthening the follow up process for READY ICPs that have had Bluecurrent meters installed and recorded on the registry to enable all three allocation participants (proposed retailer, distributor, meter owner) responsible for this ICP to co-operate together so that the registry is populated in an accurate and timely manner.</li> </ul>
Registry information management	5	Needs improvement	Not compliant	<p>24 ICPs were populated with an incorrect meter location code during the audit period.</p> <p>Eight TOU ICPs with telemetry did not have the telemetry owner field populated on the registry.</p> <p>A review of meter capacity against meter price category code identified:</p>

Issue	Section	Control Rating  (Refer to Appendix 4 for definitions)	Compliance Rating	Comments
				<ul style="list-style-type: none"> <li>• 27 ICPs with a meter capacity exceeding 25 scm/hr but assigned a meter price category code for a GMS up to 10 scm/hr.</li> <li>• 16 ICPs with a meter price category code for a GMS between 10 and 25 scm/hr but where the meter capacity is either less than 10 scm/hr or more than 25 scm/hr.</li> </ul> <p>Review of the registry list as of 31 October found not all non TOU metered ICPs had standard meter type flag set to 'Y':</p> <ul style="list-style-type: none"> <li>• 17 active ICPs have all meter type flags set to 'N'</li> <li>• 107 active ICPs have the standard meter type flag set to 'N' but has the advanced meter type flag set to 'Y'.</li> </ul> <p>Six recommendations made to improve process effectiveness</p> <ul style="list-style-type: none"> <li>• Escalate the sync tool system issues so that both error scenarios are resolved and only actual meter event updates with the correct event date is provided to the registry.</li> <li>• Enhance the GMMS data population QA check process to also include meter location.</li> <li>• Bluecurrent to review how it notifies the retailer of a potential issue where the as found meter pressure does not align with the recorded meter pressure so that the size and extent of this potential issue can be determined and resolved collectively.</li> </ul>

Issue	Section	Control Rating (Refer to Appendix 4 for definitions)	Compliance Rating	Comments
				<ul style="list-style-type: none"> <li>• Develop a process with the respective distributors to regularly review and verify which gas measurement systems are operating at network pressure and update the registry accordingly.</li> <li>• As part of the annual GMS price review, check that each ICP is correctly assigned to the applicable meter price category code for the size and type of meter at the ICP.</li> <li>• Enhance the monthly reconciliation activity between the registry and GMMS to include all meter event attributes such as telemetry owner to ensure timely corrections of this registry information.</li> </ul>
Metering price codes	6	Effective	Compliant	<p>One recommendation made to improve process effectiveness.</p> <ul style="list-style-type: none"> <li>• Bluecurrent to apply appropriate end dates to those redundant meter price codes in the registry so that the meter price code table reflects only codes that are in use.</li> </ul>
Disclosure on application	7	Effective	Compliant	

# Contents

<b>Executive Summary</b>	<b>2</b>
<b>Summary of Report Findings</b>	<b>4</b>
<b>Contents</b>	<b>9</b>
<b>1.1 Scope of Audit</b>	<b>11</b>
<b>1.2 Audit Approach</b>	<b>11</b>
<b>1.3 General Compliance</b>	<b>12</b>
<b>1.4 Provision of Information to the Auditor (GSAR r91)</b>	<b>12</b>
<b>1.5 Summary of Previous Audit</b>	<b>12</b>
<b>1.6 Breach allegations</b>	<b>13</b>
<b>1.7 Draft Audit Report Comments</b>	<b>15</b>
<b>2. General obligations</b>	<b>15</b>
<b>2.1 Participant registration information (GSAR r7 and 10)</b>	<b>15</b>
<b>2.2 Obligation to act reasonably (GSAR r34)</b>	<b>16</b>
<b>2.3 Obligation to use Registry software competently (GSAR r35)</b>	<b>16</b>
<b>3. Accuracy of meter information</b>	<b>16</b>
<b>3.1 Compliance with NZS 5259 (DRR r27)</b>	<b>16</b>
<b>3.2 TOU downloads (GD RR r26.5)</b>	<b>23</b>
<b>3.3 Conversion of volume to energy for gas TOU installations (GD RR r28)</b>	<b>24</b>
<b>3.4 TOU upgrades (GD RR r29.1.1)</b>	<b>26</b>
<b>4. New connections (GSAR r56)</b>	<b>27</b>
<b>5. Registry information management (GD RR r26.5 and GSAR r58)</b>	<b>31</b>
<b>5.1 Meter Identifier</b>	<b>33</b>
<b>5.2 Meter Location Code</b>	<b>33</b>
<b>5.3 Meter Pressure</b>	<b>34</b>
<b>5.4 Register Multiplier</b>	<b>35</b>
<b>5.5 Meter Pressure Operating at Network Pressure Flag</b>	<b>35</b>
<b>5.6 Register Reading Digits</b>	<b>36</b>
<b>5.7 Standard Meter</b>	<b>36</b>
<b>5.8 Prepay meter</b>	<b>36</b>
<b>5.9 Advanced Meter &amp; Advanced Meter Owner</b>	<b>37</b>
<b>5.10 TOU Meter</b>	<b>37</b>
<b>5.11 Logger Owner</b>	<b>37</b>
<b>5.12 Corrector Owner</b>	<b>37</b>
<b>5.13 Telemetry Owner</b>	<b>37</b>

<b>5.14 Metering Price Category</b>	<b>38</b>
<b>5.15 Registry validation and correction (GSAR r61.1, 61.2 and 62)</b>	<b>38</b>
<b>6. Metering Price Codes (GSAR r49)</b>	<b>41</b>
<b>7. Disclosure on application (GSAR r50)</b>	<b>41</b>
<b>8. Recommendations</b>	<b>42</b>
<b>Appendix 1 – Conversion of volume to energy for gas TOU installations (GDDR r28)</b>	<b>43</b>
<b>Appendix 2 - GMS suitability and design</b>	<b>50</b>
<b>Appendix 3 – Registry information management</b>	<b>51</b>
<b>Appendix 4 – Control Rating Definitions</b>	<b>58</b>
<b>Appendix 5 – Impact Rating Definitions</b>	<b>59</b>
<b>Appendix 6 – Remedial Rating Definitions</b>	<b>60</b>
<b>Appendix 7 – Bluecurrent Metering Comments</b>	<b>61</b>

## 1.1 Scope of Audit

This Performance Audit was conducted at the request of the Gas Industry Company (GIC) in accordance with Rule 65 of the Gas (Downstream Reconciliation) Rules 2008 effective from 14 September 2015. Rule 65 is inserted below:

*65. Industry body to commission performance audits.*

*65.1 The industry body must arrange at regular intervals performance audits of the allocation agent and allocation participants.*

*65.2 The purpose of a performance audit under this rule is to assess in relation to the allocation agent or an allocation participant, as the case may be, -*

*65.2.1 The performance of the allocation agent or that allocation participant in terms of compliance with these rules; and*

*65.2.2 The systems and processes of the allocation agent or that allocation participant that have been put in place to enable compliance with these rules. The audit was conducted in accordance with terms of reference prepared by the GIC, and in accordance with the "Guideline note for rules 65 to 75 and 80: the commissioning and carrying out of performance audits and event audits, V3.0" which was published by GIC in June 2013.*

The purpose of this audit is to assess the systems, processes, and performance of Bluecurrent in terms of compliance with these rules.

The audit was carried out on site between 11 and 12 February 2026.

## 1.2 Audit Approach

As mentioned in **section 1.1** the purpose of this audit is to assess the performance of Bluecurrent Metering in terms of compliance with the rules, and the systems and processes that have been put in place to enable compliance with the rules.

This audit has examined the effectiveness of the controls Bluecurrent Metering has in place to achieve compliance, and where it has been considered appropriate sampling has been undertaken to determine compliance.

The following registry data files were used to assess Bluecurrent Metering's compliance with Gas (Switching Arrangements) Rules:

- Registry list (LIS) file snapshot for the date 31 October 2025
- Registry list (LIS) file history for the audit period of 1 May 2022 to 31 Oct 2025.
- Registry Event detail Report (EDA) for the audit period of 1 May 2022 to 31 Oct 2025.
- Switch breach compliance history report for the audit period of 1 May 2022 to 31 October 2025.
- Registry maintenance compliance report for the audit period of 1 May 2022 to 31 October 2025.

Where sampling has occurred, this has been conducted using the Auditing Standard 506 (AS-506) which was published by the Institute of Chartered Accountants of New Zealand. I have used my

professional judgement to determine the audit method and to select sample sizes, with an objective of ensuring that the results are statistically significant.<sup>1</sup>

Where compliance is reliant on manual processes, manual data entry for example, the sample size has been increased to a magnitude that, in my judgement, ensures the result has statistical significance.

Where errors have been found or processes found not to be compliant the materiality of the error or non-conformance has been evaluated.

### 1.3 General Compliance

The Market Administrator confirmed that no alleged breaches have been recorded for Bluecurrent between May 2022 and December 2025, when this audit was commenced.

### 1.4 Provision of Information to the Auditor (GSAR r91)

In conducting this audit, the auditor may request any information from Bluecurrent Metering, and any Registry participant or operator.

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

Information was not required from any other participant in relation to this audit. I consider that Bluecurrent Metering have complied with the requirements of this rule.

### 1.5 Summary of Previous Audit

Bluecurrent Metering provided a copy of their previous audit conducted in 2022 by Langford Consulting. Six breach allegations were made, and resolution of these matters is summarised in the table below:

Breach notice number	Breach Allegation	Rule	Section in this report	Resolution
2022-052	One request for disclosure of pricing information had not been responded to within the required timeframe	50.2	7	The Market Administrator did not raise any material issues.
2022-053	In a sample of 40 new ICPs, information for 5 ICPs had not been entered into the registry within two business days of confirmation that the metering equipment had been installed	56.2	5.1	The Market Administrator did not raise any material issues.

<sup>1</sup> in statistics, the determination that a result or an observation from a set of data is due to intrinsic qualities and not random variance of a sample. Statistical significance does not imply the size, importance, or practicality of an outcome; it simply indicates that the outcome's difference from a baseline is not due to chance. (Encyclopaedia Britannica)

Breach notice number	Breach Allegation	Rule	Section in this report	Resolution
2022-054	In a sample of 40 new ICPs, 5 ICPs had incorrect entries in the telemetry field.	58.1	5.13	The Market Administrator did not raise any material issues.
2022-055	In a sample of 40 new ICPs, 1 ICP was found to have the incorrect billing code in the registry	58.1	5.14	The Market Administrator did not raise any material issues.
2022-056	Two new ICPs were incorrectly recorded as having smart meters	58.1	5.9	The Market Administrator did not raise any material issues.
2022-059	Vector Metering had incorrectly recorded the wrong meter pressure in the registry for 1 ICP and the wrong number of dials in the registry for 2 ICPs.	58.1	5.3	The Market Administrator did not raise any material issues.

## 1.6 Breach allegations

As noted in the Summary of Report Findings, this audit has found three areas of non-compliance, relating to testing of meters and data accuracy. The following breach allegations are made in relation to these matters.

Breach Allegation	Rules	Section in this report
Prior to 2025, Diaphragm meters over 25 scm/hr were exchanged on a 20 year interval period between acceptance testing rather than 18 years as specified by <b>NZS5259:2015</b>	GDRR 27	3.1
12 late registry updates for new connection meter events were due to delays in the creation of an individual meter price category code (bill code) required for population of registry meter owner event.  Four late registry updates for new connection meter events were related to incorrect asset status values in GMMS that prevented GMMS updating the registry.	GSAR 56	4

Breach Allegation	Rules	Section in this report
<p>24 ICPs were populated with an incorrect meter location code during the audit period.</p> <p>Eight TOU ICPs with telemetry did not have the telemetry owner field populated on the registry.</p> <p>A review of meter capacity against meter price category code identified:</p> <ul style="list-style-type: none"> <li>• 27 ICPs with a meter capacity exceeding 25 scm/hr but assigned a meter price category code for a GMS up to 10 scm/hr.</li> <li>• 16 ICPs with a meter price category code for a GMS between 10 and 25 scm/hr but where the meter capacity is either less than 10 scm/hr or more than 25 scm/hr.</li> </ul> <p>Review of the registry list as of 31 October found not all non TOU metered ICPs had standard meter type flag set to 'Y':</p> <ul style="list-style-type: none"> <li>• 17 active ICPs have all meter type flags set to 'N'</li> <li>• 107 active ICPs have the standard meter type flag set to 'N' but has the advanced meter type flag set to 'Y'</li> </ul>	GSAR 58.1	5

Bluecurrent acts as an agent for nine retailers with gas TOU ICPs for the process to convert gas TOU measured volume into volume at standard conditions and also the conversion of volume at standard conditions to energy. The obligation (GDRR 28) to ensure this conversion of volume to energy sits with the retailer. Bluecurrent advised that there was an issue with the conversion of measured volumes to volumes at standard conditions for a subset of ICPs (**section 3.3**).

The following breach allegations are made against two retailers in relation to this issue.

Breach Allegation	Participant	Rule	Section in this report
<p><b>Nova Energy</b> – Altitude correction factor applied twice between 14 August 2025 and 31 December 2025 for 0002320611QT6F6 resulting in an altitude correction of 1.98% (threshold <math>\pm 1.0\%</math>)</p> <p><b>Nova Energy</b> – Altitude correction factor applied twice between 13 August 2025 and 31 December 2025 for 1001268120NG1F2 resulting in an altitude correction of 1.91% (threshold <math>\pm 0.5\%</math>)</p> <p><b>Nova Energy</b> – Altitude correction factor applied twice between 15 October 2025 and 31 December 2025 for 0008000258NGD18 resulting in an altitude correction of 1.72% (threshold <math>\pm 0.5\%</math>)</p>	GNVG	GDRR 28	3.3
<p><b>Genesis Energy</b> – Altitude correction factor applied twice between 26 September 2025 and 31 December 2025 for 0002036991QTD26 resulting in an altitude correction of 0.83% (threshold <math>\pm 0.5\%</math>)</p>	GEND	GDRR 28	3.3

## 1.7 Draft Audit Report Comments

A draft audit report was provided to the industry body (GIC), the allocation agent, and allocation participants that I considered had an interest in the report. In accordance with rule 92 of the 2015 Amendment Version of the Gas (Switching Arrangements) Rules 2008, those parties were given an opportunity to comment on the draft audit report and indicate whether they would like their comments attached as an appendix to the final audit report. The following response was received.

Party	Response	Comments provided	Included in report
Bluecurrent Metering Limited	Comments on the draft audit report	10 June 2026 by email	Vector's comments have been added to the remedial action and audited party comment sections of the non-compliance and recommendation boxes within this report.

## 2. General obligations

Bluecurrent is the meter owner for 230,024 ICPs comprising of:

- 134,451 Diaphragm meters,
- 94,427 Ultrasonic AMI meters,
- 1,122 Rotary meters,
- 24 Turbine meters, and
- 293 correctors.

The focus of this audit is predominantly the Gas (Switching Arrangements) Rules 2008, but it extends to the Gas (Downstream Reconciliation) Rules 2008 with respect to Bluecurrent as meter owner, in particular to **rules 26.5 and 27**. These rules specifically require meter owners to support compliance with and verify accuracy in accordance with **NZS 5259:2015**.

Bluecurrent also acts as a reconciliation agent for a number of retailers for the purposes of collecting gas TOU volumes and calculating consumption quantities for submission by retailers.

### 2.1 Participant registration information (GSAR r7 and 10)

All Registry participants must supply registration information to the Registry operator. Registration information consists of:

- the name of the Registry participant, and
- the Registry participant's telephone number, physical address, facsimile number, email address, and postal address, and
- identification as to which class, or classes, of Registry participant (Retailer, Distributor or Meter Owner) that the Registry participant belongs.

Registration information must be given in the form and manner required by the Registry operator as approved by the industry body. Every person who is a Registry participant at the commencement date must supply the registration information within 20 business days of the commencement date. A person who becomes a Registry participant after the commencement date must supply the registration information within 20 business days of becoming a Registry participant.

Bluecurrent's participant registration information was confirmed to be valid. Compliance is confirmed.

## **2.2 Obligation to act reasonably (GSAR r34)**

Every Registry participant must act reasonably in relation to its dealings with the Registry and, in doing so, must use its reasonable endeavours to co-operate with other Registry participants.

Processes for managing queries and complaints about Registry information were reviewed. No examples of Bluecurrent Metering acting unreasonably were found. Compliance is confirmed.

## **2.3 Obligation to use Registry software competently (GSAR r35)**

Each Registry participant must ensure that any software for the Registry is used in a proper manner by competent employees or by persons under the supervision of those employees.

No Registry participant may request, permit, or authorise anyone other than the Registry operator to provide support services in respect of any software for the Registry.

Each Registry participant must appoint a nominated manager to be responsible for all that Registry participant's communications with the Registry.

No examples of Bluecurrent Metering using Registry software incompetently were found. Access to modify Registry information is restricted and staff are appropriately trained. Bluecurrent Metering only uses Jade for Registry support services. Compliance is confirmed.

# **3. Accuracy of meter information**

## **3.1 Compliance with NZS 5259 (DRR r27)**

Under rule 27, every meter owner must ensure that all metering equipment used to collect that volume information complies with **NZS 5259:2015**. Metering equipment which has a margin of error of less than the relevant margins of error specified in **NZS 5259:2015** is considered to be accurate, and any verification of accuracy must be in accordance with **NZS 5259:2015**.

Bluecurrent's processes for both new and existing GMS were reviewed, and a sample of meter paperwork, fault, and testing information was reviewed to confirm whether processes in the standard were being followed and documentation is retained.

### **Performance – GMS suitability and design (NZS 5259 2.1-2.6, 3.3, 3.5)**

Meters are selected as part of the application approval process based on requirements for the gas installation provided by the customer's gasfitter. The standards cover processes to select and/or build and test a suitable Gas Measurement System (GMS) and are consistent with the requirements of **NZS 5259:2015** and the rules.

Larger connections are referred to the engineering team for review to ensure that the maximum load and pressure requested can be supplied. Bluecurrent's standards are used to determine the type of meter installed and whether it is required to be individually designed by the engineering team.

I checked a sample of 26 new connections and confirmed that suitable metering was installed as required by the rules and **NZS 5259:2015**.

For TOU gas ICPs, the data services team, monitors site usage trends, tracking volume against date, and alerts the GMS technical support team when noticeable changes occur. If a load assessment identifies a metering upgrade is required, then the GMS technical support team will coordinate a meter upgrade with the retailer.

A sample of gas TOU hourly data for turbine meters were reviewed and compared to the maximum flow rate (Qmax) for each GMS to ensure that the Maximum Hourly Quantity (MHQ) recorded by the TOU logger was below the rated maximum flow rate at which a gas meter is required to operate within its maximum permissible error and within its rated operating conditions. This check is to ensure the suitability of the installed GMS still applies currently.

For six ICPs (**Appendix 2**) the measured maximum hourly quantity (scm/hr) exceeded the recorded Qmax for the meter between 3.4% and 22.6%. Bluecurrent is investigating whether the current customers load requirements now exceeds the GMS suitability and design.

Recommendation	Audited party comment
Investigate further these exceptions where the recorded MHQ exceeds the Qmax values for the GMS at these ICPs.	<p>Bluecurrent identified that incorrect Qmax (meter badge capacity, ACMH) values had been applied in Flow2E for these sites. These values were legacy/historic entries (including some provided via retailers). Measured Maximum Hourly Quantity (MHQ) data is recorded in Standard Cubic Meters per Hour (SCMH). For meter accuracy assessment, badged capacity must be converted to Standard Cubic Meters per Hour (SCMH) using the site operating conditions (e.g., pressure and temperature).</p> <p>Bluecurrent will monitor all exchanges relating to TOU to ensure the correct badge capacities are in place for the accuracy assessments. Based on these findings, the MHQ values were recalculated, and it was confirmed that the six meters referenced are operating well below their Qmax capacity (refer Appendix 2 for results).</p>
Investigate implementing a monthly check of the MHQ to Qmax to ensure that where a MHQ for a GMS appears to be achieving Qmax that this is adequately investigated with the retailer to determine if a GMS capacity is required.	<p>Bluecurrent acknowledges this as an area of improvement to capture this information in our internal training &amp; process documents and update the systems with correct badge capacities for the meters.</p> <p>Technical Team will notify the Field Services Provider to capture all the relevant operating parameters at the site like inlet Pressure, NMP, Outlet pressure.</p>

### Performance – competency (NZS 5259:2015 - 2.9)

Bluecurrent confirmed that people involved in selection, installation, maintenance and testing of a GMS and components are trained and experienced to accepted regulatory and industry standards or are adequately supervised by a person who is.

## **Performance – documentation (NZS5259:2015 - 2.8)**

*NZS 5259:2015 section 2.8 requires documentation be kept demonstrating conformance with the requirements of the standard, including suitability.*

Records are maintained to demonstrate compliance with **NZS 5259:2015**. I reviewed documentation for a sample of metering events and tests to confirm this.

## **Operation and maintenance (NZS5259:2015 - 3.4)**

Bluecurrent provided copies of their Gas Operations policies and procedures for GMS including GMS fabrication, operation, maintenance and testing. The standards are consistent with the requirements of **NZS5259:2015** and the rules.

Inspection intervals for GMS over 25 scm/hr are clearly defined in the inspection procedures and are appropriately applied.

The interval periods between acceptance testing (**NZS5259:2015 – Table 7**) for each type of meter was reviewed and found:

- Prior to 2025, Diaphragm meters over 25 scm/hr were placed on a 20 year interval period between acceptance testing rather than 18 years as specified by **NZS5259:2015**
- Some meter exchanges have not occurred during the interval period due to consumers refusing shutdowns to enable a meter exchange. Bluecurrent is working with the retailers involved to arrange suitable shut down periods for this work.

This issue around interval periods exceeding 18 years for diaphragm meters exceeding 25scm/hr was due to a previous asset management systems hard coded configuration. A 20 year acceptance test interval period has never been part of the current or previous versions of **NZS5259:2015** and it is notable that Bluecurrent and its predecessor implemented this interval period that was not consistent with **NZS5259:2015**.

This asset management system was replaced in 2025. However, the data migration from the old system into the new asset management system still applied the 20 year interval to the meter fleet.

Bluecurrent have begun a remediation program to update all interval periods to 18 years. This program will operate over the next three years to ensure that the acceptance testing interval for diaphragm meters exceeding 25scm/hr aligns with **NZS5259:2015** requirements.

Recommendation	Audited party comment
<p>Look at ways to revise the next acceptance testing due date for an installation with diaphragm meters over 25 scm/hr so they will comply with <b>NZS5259:2015</b> within the new asset management system.</p>	<p>During the migration of planned maintenance functionality from SAP to GMMS (Salesforce) the meter exchange policy for the All Diaphragms (Except AL425&lt;35 kPa) (AL425, AC630, SP400, AL1000, AL800, AL1400, AL2300, SP1000) has been changed to 15 years, so any meter exchanges happened post Go live 21/03/25 will automatically have the policy changed to 15 yrs. We acknowledge the auditor’s feedback and have implemented an action plan to bring forward meter exchange dates to 18 years in an efficient way, while maintaining a manageable impact on the planned maintenance budget. We are confident this will achieve compliance within the next three years. In the interim, these sites will be monitored through our defect review process and via reactive maintenance.</p>
<p>Look at ways to improve consumer engagement with the interval test programs and whether a forward looking program of upcoming meter exchanges as part of the annual pricing notification would enable retailers to begin the engagement early to identify a suitable window for this maintenance work.</p>	<p>Bluecurrent acknowledges this recommendation as site access and identifying appropriate windows for planned maintenance remain significant challenges across all retailers. Past engagement has shown that providing information too far in advance is not consistently effective due to frequent schedule changes; however, sharing updates one to two months prior to planned maintenance activities has been the most successful approach. Exceptions are addressed on a case-by-case basis as part of the established process between the technical and customer-facing teams at Bluecurrent during retailer interactions. Additionally, during periodic meetings with retailers, Bluecurrent raises concerns about booking planned maintenance and works collaboratively to identify opportunities for process improvement.</p>

The current process to undertake acceptance testing of meters exceeding 25 scm/hr includes those ICPs that are inactive, but the metering remains in place. A review of a registry list file from 31 October 2025 identified over 450 inactive ICPs where the meter price category code indicated these meters have a capacity exceeding 25 scm/hr. A number of these ICPs have been inactive for more than 12 months.

There is an opportunity to optimise the effort to continue to schedule and undertake acceptance testing effort where it is unlikely the ICP will have an ongoing requirement for a gas supply. It is recommended that Bluecurrent has regular discussions with retailers regarding long term inactive ICPs over 25 scm/hr around whether to continue to perform pressure checks, meter exchanges as part of acceptance testing or arrange meter removal.

Recommendation	Audited party comment
<p>Recommend that Bluecurrent has regular discussions with retailers regarding long term inactive ICPs over 25 scm/hr around whether to continue to perform pressure checks, meter exchanges as part of acceptance testing or arrange meter removal.</p>	<p>Bluecurrent acknowledges this recommendation; however, it is important to clarify that any decision regarding the removal of a GMS must be initiated and directed by the Retailer. The inactive status of an ICP is governed by retailer protocols, which respond to specific customer actions or inactions—some of which may be cyclical, depending on the nature of their business. Retailers are aware of these varying requirements and have the opportunity to review them each time Bluecurrent presents a new list of sites requiring planned maintenance. In certain cases, this maintenance necessitates a meter exchange.</p>

Operational tasks are split between:

- BAU with Omexom as the third party service provider
- AMI metering deployment with Aquaheat as the third party service provider.

Both field service providers have been trained on Bluecurrent’s policies and procedures for selecting, installing and maintaining meters.

AMI completion details are returned to Bluecurrent via an app. This app includes validation to ensure correct and complete information is returned to Bluecurrent. The information then flows through to GMMS which in turn updates the registry. The field service provider can also provide digital photos as part of this app. This app has improved both the timeliness and accuracy of information provided to Bluecurrent. This app could further improve the accuracy of the field service work by providing online links to Bluecurrent’s policies, procedures and also meter model capacity tables for field service personnel to refer to when on site.

Recommendation	Audited party comment
<p>Consider including links within the app to Bluecurrent’s policies, procedures and meter model capacity tables for field service personnel to refer to when on site.</p>	<p>Bluecurrent has carefully considered this recommendation and investigated this. After thorough evaluation, it has been determined that linking multiple detailed process documents is not feasible, as it would likely slow down the application, increase the probability of errors and poor performance, and ultimately undermine the intended use case.</p> <p>We are confident that this matter is being effectively managed and remain committed to enhancing accuracy and management by exception. All relevant Policies and Procedures are made available and comprehensively understood by our field service providers. Bluecurrent regularly communicates with both field service providers regarding any process changes through document control protocols and weekly and monthly operational meetings, where exceptions are discussed with the aim of continuous improvement.</p> <p>Both FSP’s have their own work process documents based on Bluecurrent process documents.</p>

The BAU process for completing paperwork remains a manual process where information is written down on a form by the technician before it is then transferred to an editable PDF template that is then sent to Bluecurrent. This information is then populated into GMMS.

**Compliance with NZS 5259 – operations and maintenance (NZS5259:2015 – section 3.4)**

Non-compliance	Description	
Report section: 3.1 Rule: 27  From: 1 May 2022 To: 31 October 2025	Audit history: No  Controls: Acceptable  Impact: Minor	Prior to 2025, Diaphragm meters over 25 scm/hr were exchanged on a 20 year interval period between acceptance testing rather than 18 years as specified by <b>NZS5259:2015</b> .
Remedial action rating	Remedial timeframe	Remedial comment
In progress	<p><b>Compliance timeframe</b></p> <p>Bluecurrent aims to bring all affected metering sites into compliance within three years.</p>	<p><b>Approach</b></p> <p>Bluecurrent has implemented a staged action plan for the affected ICPs.</p> <p><b>What is changing (timeline)</b></p> <p>Plans scheduled from Jan 2029 (i.e., after Dec 2028) are being brought forward in stages to align with the 18-year requirement.                      Plans scheduled before this date remain unchanged.</p> <p><b>Why the plan is staged</b></p> <ul style="list-style-type: none"> <li>• To avoid disrupting work already scheduled.</li> <li>• To manage the impact on the planned maintenance budget.</li> </ul> <p>To avoid pressure on meter stock, given long procurement lead times and associated supply constraints.</p>

Audited party comment	
The circumstances of the matters outlined in the breach notice.	Bluecurrent acknowledges an oversight in that the meter exchange intervals for diaphragm meters (AL425, AC630, SP400, AL1000, AL800, AL1400, AL2300, SP1000) were set to 20 years instead of the 18-year interval specified in NZS 5259 as a result of historic embedded ruleset in previous scheduling software.
Whether or not the participant admits or disputes that it is in breach.	Bluecurrent acknowledges the oversight of this maintenance plan.
Estimate of the impact of the breaches (where admitted).	The impact is that the scheduled exchange intervals for Bluecurrent's diaphragm meters that are on the previous plans are extended by two years beyond the compliance intervals specified in NZS 5259.
What steps or processes were in place to prevent the breaches?	The ruleset in the new maintenance system meets the compliance requirements. Any asset change automatically has the new ruleset applied to it. As stated above there is a staged action implemented to meet compliance of affected ICPs.
What steps have been taken to prevent recurrence?	Bluecurrent's Technical team continues to monitor & manage the maintenance policies of any new & existing meters in line with compliance intervals specified in NZS5259. This is reviewed periodically to ensure compliance is met.

## Faults

Faults are initiated via three mechanisms:

- Retailer initiated – customer / retailer suspects a faulty device or can physically see meter damage – the retailer raises a Service Request.
- Bluecurrent initiated - Identified by Field Service Provider and reported. Advance Gas meters - AMI team advises retailer or initiates possible faulty meter exchange. This process is reliant on the technician's assessment if remedial actions require an additional site visit
- Reactive callouts such as smell of gas or no gas complaints.

Faults are raised via the GMMS Gas Workflow management or Corrective Work Order management process and faults are generally resolved in:

- 10 to 15 business days for mass market sites
- Large C&I meters can take 3-4 weeks as they may require additional design, fabrication / order replacement parts require and coordination with the Field Service Provider.

I checked ten examples of faults during the audit period including potentially stopped or faulty meters, meters damaged by corrosion, and meters which could not be read due to condensation or damaged perspex covering the index. Bluecurrent attended and replaced the meters for all of the faults. Appropriate testing was conducted where it could be completed, and the retailer was advised of the outcome of the testing and fieldwork.

Where the fault relates to an AMI meter, all meters are sent back to the supplier for further testing and investigation to identify any trends in the fault or type of failure relating to these meters.

### **GMS testing (NZS5259:2015 3.4)**

Bluecurrent provided copies of their Gas Operations standards for GMS including GMS fabrication, operation, maintenance and testing. The standards cover acceptance testing, in service testing, as found testing and statistical sampling and are consistent with the requirements of **NZS5259:2015** and the rules.

A sample of 19 test results were reviewed and were all confirmed as compliant with **NZS5259:2015**. test results maintained in L&G spreadsheet. Bluecurrent and its meter testing provider maintain a register of all meters tested and the outcome of each test. Physical test certificates are available on request.

I checked the accuracy of sample of metering changes from throughout the audit period including 26 new connections and 42 meter changes. Testing was consistently completed as set out in Bluecurrent's Gas Operations Standard.

I checked the processes for statistical sampling of meters with capacities less than or equal to 25 scm/hr and found that it was compliant and consistent with **NZS5259:2015**. All meters with capacities less than less than or equal to 25 scm/hr are being replaced as part of the advanced metering deployment.

## **3.2 TOU downloads (GD RR r26.5)**

TOU meter downloads provided to Retailers should be complete, accurate, updated in a timely manner and support compliance with **NZS5259:2015** (if applicable).

Bluecurrent has 293 TOU metered ICPs. 196 have telemetry and Bluecurrent provides TOU data to the retailers for these ICPs.

Validation and monitoring of Bluecurrent's TOU meters is split between the asset engineering team that review the meter event logs and ensure time synchronisation is performed, and the data services team that perform the following data validations to ensure that the data is complete and accurate:

- Zero consumption for more than seven periods
- Recorded values outside site specific thresholds for volume, temperature and pressure
- No data received or gaps in data. Where data is missing for three days it is escalated to the meter owner for investigation or a site visit.

Exceptions are reported to the retailer for further investigation or clarification from the consumer of the change in consumption patterns.

Bluecurrent also performs data estimations for missing or corrupt data. A sample of four estimations were reviewed and confirmed that the method of estimation complies with Schedule 1 of the Gas Downstream Regulations.

Compliance is confirmed.

### 3.3 Conversion of volume to energy for gas TOU installations (GDDR r28)

*Every retailer must ensure the conversion of measured volume to volume at standard conditions and the conversion of volume at standard conditions to energy complies with NZS 5259 for metering equipment installed at each consumer installation for which the retailer is the responsible retailer.*

Bluecurrent acts as an agent for nine retailers with gas TOU ICPs for the process to convert gas TOU measured volume into volume at standard conditions and also the conversion of volume at standard conditions to energy. In most cases this relates to Allocation group 1 ICPs for each retailer, however for a subset of retailer's data for some Allocation group 2 ICPs also the volume converted to energy.

Bluecurrent uses its Flow2E system to perform data validations across gas volumes, measured temperature, pressure and also data completeness checks. Flow2E also performs the required conversions from measured volume to volume at standard conditions and also the conversion of volume at standard conditions to energy.

Retailers are provided with both DDR (Daily Delivery Report) and HDR (Hourly Delivery Report) format files each month. The HDR file format enables retailers to check the accuracy of the process to convert measured volume to volume at standard conditions and the conversion of volume at standard conditions to energy.

The process to convert measured volume to volume at standard conditions was reviewed. The calculations for altitude, compressibility and energy conversion were checked for five ICPs across two consumption periods and the conversions performed by Flow2E were confirmed as correct.

#### **Temperature and absolute pressure correction data**

Bluecurrent advised that there was an issue with how Flow2E was converting measured volumes to volumes at standard conditions. This was identified in another participant's audit involving this gas TOU conversion function performed by Bluecurrent for this participant. The Flow2E has a single configuration to perform the conversion of measured volumes to volumes at standard conditions. This configuration is for temperature gauge pressure correction only. Flow2E applies altitude, compressibility and energy conversion factors for all data it receives.

Where Flow2E receives TOU measured volumes from a temperature and absolute pressure corrector, it also applies an altitude correction factor to this measured volume resulting in an under submission of volume by the respective retailers of these affected ICPs.

The impact was assessed across the ICPs where Bluecurrent is the meter owner from the date on the installation of Bluecurrent's Macbat 5 model TA correctors. 178 ICPs (**Appendix 1**) were identified as being affected in varying degrees since March 2025 (date first Macbat 5 corrector installed). The overall impact was assessed as 4,300GJ under submission across all affected retailers between March 2025 and December 2025. Bluecurrent have applied a solution into Flow2E for all Macbat correctors (applies absolute pressure correction within the corrector) to ensure all data now received does not apply an additional altitude correction. As at the time of this audit, Bluecurrent have now provided revised TOU data to retailers to enable revised allocation submissions to correct this data. When this revised data is provided to the allocation agent there will be some further allocation inaccuracies within the non TOU allocations due to the incremental corrections to the gas

seasonal adjustment daily shape values (SADSV) where non TOU retailers apply these SADSV values to their historic estimate calculations and the period between reads spans corrected and uncorrected shape values.

The double application of altitude correction (once via the corrector and once via Flow2E) for four ICPs (**Appendix 1**) were found to be outside the allowable limits described in **table 3** of **NZS5259:2015**. Alleged breaches are recorded for the retailers responsible for these ICPs.

Conversion of volume to energy for gas TOU installations		
Non-compliance	Description	
<p>Report section: 3.3</p> <p>Rule: 28</p> <p>From: From: 13 August 2025</p> <p>To: 31 December 2025</p>	<p>Audit history: No</p> <p>Controls: Acceptable</p> <p>Impact: Moderate</p>	<p><b>Nova Energy</b> – Altitude correction factor applied twice between 14 August 2025 and 31 December 2025 for 0002320611QT6F6 resulting in an altitude correction of 1.98% (threshold <math>\pm 1.0\%</math>)</p> <p><b>Nova Energy</b> – Altitude correction factor applied twice between 13 August 2025 and 31 December 2025 for 1001268120NG1F2 resulting in an altitude correction of 1.91% (threshold <math>\pm 0.5\%</math>)</p> <p><b>Nova Energy</b> – Altitude correction factor applied twice between 15 October 2025 and 31 December 2025 for 0008000258NGD18 resulting in an altitude correction of 1.72% (threshold <math>\pm 0.5\%</math>)</p> <p><b>Genesis Energy</b> – Altitude correction factor applied twice between 26 September 2025 and 31 December 2025 for 0002036991QTD26 resulting in an altitude correction of 0.83% (threshold <math>\pm 0.5\%</math>)</p>
Remedial action rating	Remedial timeframe	Remedial comment
Completed	Bluecurrent confirms that the remediation of this issue has been successfully completed.	Bluecurrent confirms that the remediation of this issue has been successfully completed.

Audited party comment	
The circumstances of the matters outlined in the breach notice.	Bluecurrent's Data Conversion System is designed to perform altitude correction calculations on incoming data. With the implementation of a new corrector type (Macbat), which contains its own altitude correction capability, an update to the process became necessary. The modification to existing procedures was overlooked during the operationalisation phase for Macbat setup, resulting in the root cause of the identified issue.
Whether or not the participant admits or disputes that it is in breach.	In some instances, the allowable threshold was breached with the altitude having been applied twice. However, for the majority of affected sites, the allowable threshold of $\pm 1.5\%$ had not been breached.
Estimate of the impact of the breaches (where admitted).	Bluecurrent accepts that the impact has been accurately classified as 'Moderate' but reiterates that, for the majority of sites where this issue was applicable, they remained within the allowable threshold of $\pm 1.5\%$ .  Bluecurrent have retrospectively adjusted and delivered recalculated data for affected sites going back to March 2025.
What steps or processes were in place to prevent the breaches?	A ruleset has been provided to Data Services, aligned to the TOU asset type (TA or TG), to enable the necessary billing adjustments.
What steps have been taken to prevent recurrence?	Bluecurrent has identified the root cause and implemented a solution for the use of Macbat hardware by setting the Altitude parameter in Flow2E, our data calculation system, to 1. This recognises from an overall process perspective that the Altitude calculation will be performed on site. This adjustment corrects the process going forward.  As previously communicated, the C&I Data Services team has analysed the dataset, identified discrepancies, and resubmitted the corrected data to the impacted retailers as part of the remediation effort.

### 3.4 TOU upgrades (GDRR r29.1.1)

If a consumer installation is consuming, or is expected to consume, more than 10 TJ per annum TOU metering should be installed. Under the Gas (Downstream Reconciliation) Rules 29.1 the Retailer must ensure that a TOU meter is installed as soon as practicable, and no more than three months after becoming aware that expected or actual consumption is over 10 TJ.

There were 15 upgrades to TOU metering during the audit period, and I confirmed that the upgrade process was correctly followed. These upgrades are generally completed within one month of the quote being accepted by the retailer.

## 4. New connections (GSAR r56)

Meter Owner information must be provided on the Registry within two business days of confirmation that a meter has been installed. If no responsible Meter Owner is populated, the Meter Owner who has installed the meter may populate the Registry to become the responsible Meter Owner.

Since 15 September 2015, Meter Owners have been able to populate metering details without Retailer nomination of the responsible Meter Owner. However, if the Retailer has populated a different responsible Meter Owner, Bluecurrent will be unable to update any metering details until the responsible Meter Owner is changed to Bluecurrent.

Meters are selected as part of the application approval process based on requirements for the gas installation provided by the customer or their agent such as a gasfitter. Installation work is scheduled and completed by Bluecurrent's field service contractors. The completed meter installation information is received by the respective BAU or AMI processes and uploaded into GMMS which then updates the registry.

Bluecurrent completed 8,668 new connections between 1 May 2022 and 31 October 2025. I reviewed the metering events on the event detail report for these new connection ICPs and identified 26 (0.3% of all new connections) where the registry population was more than two business days after Bluecurrent were aware of the meter installation and found:

- 12 (46%) late updates were due to delays in the creation of an individual meter price category code (bill code) required for population of registry meter owner event.
- Eight (31%) were due to delays in the provision of paperwork from the field service provider.
- Four (15%) related to incorrect asset status values in GMS that prevented GMMS updating the registry.
- Two (8%) were replacement meter events where the initial event was provided on time.

Recommendation	Audited party comment
<p>Review the new connection process to include a check if an individual meter price category code (bill code) required as part of the quote acceptance step so these can be created and available as part of the work order creation.</p>	<p>Bluecurrent has evaluated this recommendation and can confirm that limitations within our systems currently prevent implementation. From a procedural perspective, bespoke pricing cannot be created in advance, as it is contingent upon the physical installation of the meter and subsequent updating of the metering record within our platform. For new connections, installation must be completed prior to bill code creation. This requirement reflects dependencies inherent in our system design and processes.</p> <p>To enhance the management and timely processing related to this requirement, the GMS Services Team will pilot a procedure whereby commercial and industrial new-connection paperwork—typically classified as project builds internally—is processed on the same day it is received in the team's shared inbox. This process will trigger the immediate creation of the applicable bespoke bill code, rather than deferring the case to another user for later action. This is a manual process, and the business will continually assess the feasibility of this approach and seek further improvements by collaborating with the internal Logistics team to ensure all meters required for Residential, Commercial and Industrial sized New Connections are set to Available status in GMMS once allocated to our field service. We cannot update GMMS until the meters are installed. For new connections, the installation must be created first, after which the bill code can be set up. As a workaround, we can process project new-connection paperwork on the same day it is received in the inbox by creating the bill code immediately, rather than assigning the email case for later action by another user. The GMS Services Team will also work with the internal Logistics team to ensure all meters are set to Available status in GMMS once they are allocated to Omexom.</p>

A review of ICPs at READY status for more than 12 months but with a Bluecurrent meter event applied reflecting that the ICP is connected and active was undertaken and found three ICPs<sup>1</sup> yet to be claimed by the proposed retailer. The existing process to provide metering information to proposed retailers was found to be robust for the vast majority of new connections as there is usually no change of proposed retailer in most instances. However, in the rare scenario that a distributor updates the proposed retailer for a READY ICP, there is no step in Bluecurrent's process to provide the metering information to the revised proposed retailer's new connection team. In this scenario the proposed retailer would only be notified of the metering being installed via a registry notification.

While there have been initial follow ups between Bluecurrent and the retailers regarding these ICPs there has been no further follow up by Bluecurrent with either the current proposed retailer or distributor and these ICPs remain unclaimed and are not part of the allocation process.

Recommendation	Audited party comment
<p>Recommend strengthening the follow up process for READY ICPs that have had Bluecurrent meters installed and recorded on the registry to enable all three allocation participants (proposed retailer, distributor, meter owner) responsible for this ICP to co-operate together so that the registry is populated in an accurate and timely manner.</p>	<p>Bluecurrent has reviewed this recommendation and supports the objective of working constructively with retailers. However, we would like to clarify that the primary responsibility and actions rest with the retailer. As the MEP, Bluecurrent completes its obligations by installing a compliant GMS according to work orders generated by the respective retailer, who is accountable for claiming these ICPs in the registry. To assist in this effort, the Bluecurrent GMS Services Team will implement a monthly review process to identify all ICPs in 'Ready' status and notify the relevant retailers, requesting they complete the necessary registry claims.</p> <p>Additionally, we are prepared to develop procedures that may involve our Key Account Managers to address disputes and investigations, aiming to resolve outstanding claims within the registry efficiently.</p> <p>It should be noted that the management of ICP status is primarily a responsibility shared between the network and the retailer, with limited involvement from the meter owner. Therefore, any breaches or recommendations pertaining to the claiming of READY ICPs should be implemented by the relevant parties to ensure process integrity and completeness.</p>

<sup>1</sup> ICP 0000504561QT3F0 – meter event date 14 September 2015. ICP 1002164232QT2E0 – meter event date 28 May 2024, ICP 1002182915QT9CC – meter event date 24 November 2023

Meter owner information for new ICP		
Non-compliance	Description	
Report section: 4 Rule: 56  From: From: 1 May 2022 To: 31 October 2025	Audit history: Yes  Controls: Acceptable  Impact: Minor	12 late registry updates for new connection meter events were due to delays in the creation of an individual meter price category code (bill code) required for population of registry meter owner event.  Four late registry updates for new connection meter events were related to incorrect asset status values in GMMS that prevented GMMS updating the registry.
Remedial action rating	Remedial timeframe	Remedial comment
In progress	Bluecurrent intends to conduct a review the effectiveness of the recently implemented changes in six months and will determine the appropriate next steps at that time.	As outlined in Bluecurrent’s response to the recommendation regarding section 4 New Connections (GSAR r56), Bluecurrent is currently piloting a new process and will evaluate its effectiveness after a six-month period. Following this review, we intend to either reaffirm, adjust, or confirm the continued implementation of these improved processes based on the outcomes observed.  The GMS team will aim to improve coordination with the internal Logistics team to ensure meters are placed in Available status in GMMS as soon as they are allocated to FSP.
Audited party comment		
The circumstances of the matters outlined in the breach notice.	Bluecurrent acknowledges that updates to the registry have occurred outside the required timeframes. An evaluation has determined that system limitations and process delays were the primary causes of these instances. Procedurally, bespoke pricing can only be established after the physical installation of the meter and the corresponding update of the metering record within the platform. For new connections, installation must be finalized before bill codes are generated, reflecting necessary dependencies in our system design and processes. The new controls introduced—such as same-day processing of new connection documentation and enhanced coordination with Logistics to ensure timely meter availability—are considered effective measures to mitigate the risk of delays under current system constraints.	
Whether or not the participant admits or disputes that it is in breach.	Bluecurrent accepts that it has breached the requirement to update the registry within 2 business days of having the metering installation confirmed.	
Estimate of the impact of the breaches (where admitted).	Bluecurrent agrees with the auditor that the impact is MINOR. There is no effect on customer safety, and minimal implications for retailers and billed usage, as new connections are primarily associated with new constructions where site consumption typically takes additional	

	<p>time after the metering has been installed. This is because active gas usage only begins once the premises are operationally ready or someone has moved in and is living there.</p> <p>Bluecurrent has acknowledged ongoing efforts to refine the process, and we accept that existing controls are classified as ‘Acceptable’. Our rationale is based on the inspection of 8,668 New Connection ICPs, of which only 27 were identified as being updated outside of two business days. This represents just 0.3%, which substantiates Bluecurrent's position that current controls, some of which are detailed in our comments below, is correctly recognised as ‘Acceptable’.</p>
<p>What steps or processes were in place to prevent the breaches?</p>	<p>To ensure timely metering updates within the gas registry, the team employs a range of systems and process-based controls. These measures support the updating of metering data within two business days following confirmation of installation. The controls include:</p> <ul style="list-style-type: none"> <li>• Agreements with Field Services Providers requiring prompt reporting and system updates upon the installation of new gas connections.</li> <li>• Submission of installation documentation to the retailers linked to the New Connection job in our workflow systems.</li> <li>• Rigorous quality checks to verify that system and registry updates are accurate for metering data.</li> <li>• Automated exception reporting to identify issues or errors with metering registry updates.</li> <li>• Availability of an 0800 contact number and shared inbox for queries related to data update concerns, allowing the team to investigate further.</li> <li>• An open jobs report on new connections, monitored collaboratively by Bluecurrent and the field service provider.</li> <li>• Implementation of standard bill codes for most new connections to facilitate swift registry updates.</li> <li>• Individual project management for large commercial or industrial new connections.</li> <li>• Timely updates of asset status in GMMS when procured or refurbished by the Bluecurrent Logistics team to enable prompt data updates when meters are installed</li> </ul> <p>Collectively, these robust controls enable the Bluecurrent gas teams to effectively meet their obligations regarding metering data management</p>
<p>What steps have been taken to prevent recurrence?</p>	<p>As detailed in Bluecurrent’s response to the recommendation regarding section 4 New Connections (GSAR r56), Bluecurrent is piloting a new process to enhance the management and timely processing of registry metering updates associated with the two areas identified in this breach.</p> <ol style="list-style-type: none"> <li>1. Creation of bespoke pricing codes: The GMS Services Team will initiate a procedure whereby commercial and industrial new-connection documents—internally referred to as project builds—are processed on the same day they are received in the team’s shared inbox. This approach will enable the</li> </ol>

	<p>immediate creation of the applicable bespoke bill code, eliminating the need to defer cases for later action.</p> <p>2. Asset Status Errors: Enhanced coordination with the Bluecurrent Logistics team to ensure asset statuses are accurately reflected within the systems used by both the field service providers and the GMS Services team. This collaboration aims to facilitate rapid identification and resolution of exceptions, as well as the recognition of opportunities for further improvement.</p> <p>3. Process Review: A review will take place in six months. Following this evaluation, Bluecurrent intends to reaffirm, adjust, or confirm</p>
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## 5. Registry information management (GDRR r26.5 and GSAR r58)

The Meter Owner must use its reasonable endeavours to maintain current and accurate information in the Registry in relation to the ICPs and the ICP parameters for which it has responsibility.

New connections and installation changes are completed by Bluecurrent’s field service providers. Job completion details are transferred automatically into GMMS via the app for AMI meter installations and via a robotic process automation (RPA) for BAU meter installations on receipt of the PDF template of the updated metering information. The registry is then updated using the updated GMMS information via a regular running automated interface with GMMS. Any failed registry acknowledgments are put into salesforce queue to be reviewed and corrections applied.

While the RPA tool enables timely and accurate population of information provided by the field service providers, it is not able to interpret any additional comments provided by the field service provider. Where further follow up is required the field service provider will contact Bluecurrent directly via phone or email so that it can be addressed appropriately.

Bluecurrent is investigating potential improvements to this process where completed fieldwork details are provided in CSV format, similar to the current compliance process. This would allow Bluecurrent to review the full set of data extracted from reports based on paperwork received via the RPA process, including any comments. This will enable the fieldwork review process to be enhanced by adding dedicated fieldwork comments columns to be added the compliance review worksheet ensuring technician comments are explicitly reviewed by a user and appropriate follow up action is taken where required.

Bluecurrent operates a sync tool to identify what updates are required to be sent to the registry. Via its regular monthly reconciliations between GMMS and the registry, Bluecurrent has identified a small number of erroneous registry transactions caused by the maloperation of this sync tool:

- multiple registry updates where there has been no change in the attribute values
- small number of recent attribute changes where the event date is earlier than the actual date of the attribute change.

Erroneous registry updates create additional work for all associated participants for these affected ICPs and also increases the effort required by a participant to perform its monthly reconciliation between its systems and the registry.

Recommendation	Audited party comment
Escalate the sync tool system issues so that both error scenarios are resolved and only actual meter event updates with the correct event date is provided to the registry.	Bluecurrent supports this recommendation as the GMS Services Team proactively raises a priority ticket where issues are identified through the sync process during BAU activities or as part of the monthly reconciliation. Responsibility for the sync process rests with the Data Excellence team, which collaborates with GMS Services to investigate, triage and resolve any issues that may arise.

Bluecurrent’s monthly reconciliation process between the registry and GMMS checks the following attributes:

- meter pressure,
- meter serial number,
- meter model,
- number of dials,
- metering price category,
- advanced flag,
- status,
- meter owner, and
- multiplier.

This monthly report is a manual reconciliation activity which provides details where the values are different between these systems. The other fields are reviewed on a quarterly basis using manual process to run a registry Current Details Report file and then comparing this to GMMS data. The quarterly nature of this process has resulted in the frequency of running this report to decline. I recommend that this monthly reconciliation activity be enhanced to cover all meter event attributes.

Recommendation	Audited party comment
Enhance the monthly reconciliation activity between the registry and GMMS to include all meter event attributes such as telemetry owner to ensure timely corrections of this registry information.	<p>A monthly verification process has been established and is performed during the first week of each month to ensure that the Telemetry Owner field in the Gas Registry remains current.</p> <p>This reconciliation activity is carried out by the Technical Support Team in parallel with the other reconciliation processes undertaken by the GMS Services team.</p>

Reported discrepancies are investigated to confirm the correct values before GMMS and/or the registry is updated as required. I saw evidence of this process being performed using the automated report. However, I found that the manual reconciliation process had not been undertaken for some months resulting in some exceptions existing for an extended period. Any non-conformance for each attribute is recorded in **section 5.15**.

The accuracy of information recorded on the registry was checked:

#### **Timeliness of Registry information**

The timeliness and accuracy of metering updates for new connections is discussed in **section 4**. I evaluated the timeliness and accuracy of event updates between 1 May 2022 and 31 October 2025

not relating to new connections or status. The rules do not specify a clear timeframe for update of metering information not related to new connections.

There were 19,861 meter events not relating to new ICPs. 18,828 (95%) updates were made within five business days of the event date, 995 within 30 business days and 38 greater than 30 days. I reviewed a sample of 23 updates to determine the reasons for the backdated updates:

- nine were due to initial registry event update failures which were subsequently identified in the registry reconciliation / failed event acknowledgement files processing and updated manually,
- eight were due to user error where pressure change was applied using an incorrect date,
- four related to late or incorrect paperwork from the field service provider, and
- two updates were delayed while the retailer updated the meter owner to enable Bluecurrent to provide the meter event.

Overall, my review of the update of registry information for existing connections has identified that 94.7% of updates occur within five business days and 99.8% of updates occur within 30 business days.

Because the rules do not specify a timeframe for the update of this information, I have not alleged any breaches.

## 5.1 Meter Identifier

Meter identifier is held in GMMS. Meter identifier is recorded on the daily discrepancy report discussed in **section 5.15**.

### **Meter identifier accuracy**

I reviewed matches between Bluecurrent's GMMS data and the registry for 31 October 2025 and found no meter serial number differences or ICP-meter serial number differences.

## 5.2 Meter Location Code

Meter location is held in GMMS and meter locations are recorded on installation paperwork. Meter locations are not included in the daily discrepancy report discussed in **section 5.15**.

### **Accuracy of meter location codes**

Review of the registry list as of 3 April 2024 found 2,122 ICPs had a meter location of "0" or "UNKN" recorded. 133 ICPs had creation dates during the audit period and 541 ICPs had metering event created during the audit period indicating that a site visit had been undertaken. Bluecurrent also has 504 ICPs greater than 25 scm/hr with a meter location of "0" or "UNKN" where regular meter pressure checks are required to be performed, providing an opportunity to confirm meter location.

The following samples of ICPs were reviewed to determine if meter locations were known by Bluecurrent:

- eight ICPs with creation dates during the audit period. All eight ICPs had a location recorded in the returned fieldwork paperwork and the missed update was a result of human error when populating GMMS
- ten ICPs that had metering event created during the audit period indicating that a site visit had been undertaken. All ten ICPs had a location recorded in the returned

fieldwork paperwork and the missed update was a result of human error when populating GMMS

- ten ICPs greater than 25 scm/hr where regular meter pressure check was performed during the audit period. Six ICPs had a location recorded in the returned fieldwork paperwork and the missed update was a result of human error when populating GMMS.
- These exceptions are listed in **Appendix 3**.

The current QA checks performed by Bluecurrent as part of GMMS data population does not include checks of meter location accuracy.

Recommendation	Audited party comment
Enhance the GMMS data population QA check process to also include meter location.	<p>Bluecurrent has accepted this recommendation.</p> <p>Following a review by Bluecurrent’s GMS Team Manager, operational discussions took place with Bluecurrent’s metering field service provider. It was agreed that technicians will now be required to include meter location details on all paperwork. To ensure this, the Bluecurrent GMS Services Team will establish this requirement as a standard part of QA checks, ensuring updates to meter location information where necessary. Additionally, Bluecurrent will seek to collaborate with retailers to obtain meter location details from meter reader notes when such information is currently unavailable.</p>

### 5.3 Meter Pressure

#### Accuracy of meter pressures

I reviewed matches between Bluecurrent’s GMMS data and the Registry for 31 October 2025 all exceptions identified were confirmed as timing issues related to when the reports were respectively run.

Meter pressure corrections over 100 days were reviewed to determine that both the meter pressure and event dates were correct and to understand the reasons for these long period back dates. Six were related to either recent meter pressure downgrade requests from consumers or where a reactive field service site visit (gas leak around meter, etc) identified that the recorded meter pressure was incorrect. The GMMS to registry update incorrectly applied the meter install date as opposed to this field work event date. Three of these exceptions resulted in the pressure factor exceeding the allowable accuracy threshold stated in **NZS5259:2015**. Bluecurrent is looking into the issue with incorrect event dates being selected for registry updates.

A further review of meter changes was undertaken where a meter pressure change also occurred as part of the meter exchange. Nine examples were identified where the as found meter pressure did not match.

For all nine ICPs the retailer was provided the meter change paperwork but was not explicitly advised that there was an incorrect meter pressure recorded previously. This meant there was no effort between Bluecurrent and the retailer to attempt to determine from what date this incorrect meter pressure applied from and if any revised submissions would be required. I recommend that Bluecurrent review how it notifies the retailer of a potential issue where the as found meter

pressure does not align with the recorded meter pressure so that the size and extent of this potential issue can be determined and resolved collectively.

Recommendation	Audited party comment
<p>Bluecurrent to review how it notifies the retailer of a potential issue where the as found meter pressure does not align with the recorded meter pressure so that the size and extent of this potential issue can be determined and resolved collectively.</p>	<p>Bluecurrent has accepted this recommendation.</p> <p>For clarity, Bluecurrent does notify retailers when a change in metering pressure is identified. To make these notifications clearer and more consistent, Bluecurrent is reviewing how this information is communicated.</p> <p>To support this, the team is considering system processes that would trigger retailer communications using agreed templates. This initiative was raised by the GMS Services Team and is now being prioritised by the systems team under ticket SER-66236.</p>

These exceptions are listed in **Appendix 3**.

## 5.4 Register Multiplier

Register multiplier is held in GMMS. Register multiplier is recorded on the daily discrepancy report discussed in **section 5.15**, and exceptions are reported.

### Accuracy of meter multipliers

I reviewed matches between Bluecurrent’s GMMS data and the Registry for 31 October 2025 and found no multiplier exceptions.

No multiplier discrepancies were identified through review of metering paperwork.

## 5.5 Meter Pressure Operating at Network Pressure Flag

Meter pressure operating at network pressure is recorded in GMMS. Non TOU meters operating at network pressure can be identified where there is no regulator asset recorded against the meter / ICP within Bluecurrent’s asset register.

### Accuracy of meter pressure operating at network pressure

A review of the registry list as of 31 October 2025 was undertaken to identify standard meter type ICPs where the network pressure matched the meter pressure but the meter pressure operating at network pressure flag is set to ‘N’. This list was then checked using the Vector open data gas distribution network GIS information to verify the operating network pressure and 45 active ICPs (**Appendix 3**) were found to have this flag incorrectly set to ‘N’.

Bluecurrent’s process around maintaining this attribute for TOU meter sites was found to be adequate. All TOU ICPs where the meter pressure is operating at network pressure flag are correctly set to yes based on their meter configuration.

Recommendation	Audited party comment
<p>Develop a process with the respective distributors to regularly review and verify which gas measurement systems are operating at network pressure and update the registry accordingly.</p>	<p>The GMS Services team has conducted an initial analysis and identified sites requiring verification. Bluecurrent's Technical teams have reviewed the relevant data and are collaborating with the appropriate Gas Network to investigate, update the registry, and make necessary adjustments to our platform.</p> <p>In the short to medium term, the GMS Services team plans to refine their reconciliation processes with the registry. This serves as a provisional measure, as the long-term solution depends on a systems enhancement that is awaiting prioritisation and implementation. The initiative will be tracked using ticket SER-60042.</p> <p>The team will address any future discrepancies by coordinating with the respective distributors to ensure effective resolution on a case by case basis.</p>

## 5.6 Register Reading Digits

Register reading digits is held in GMMS. Register reading digits is recorded on the monthly discrepancy report, and exceptions are reported.

### Accuracy of register reading digits

I checked the registry list information as of 31 October 2025 for reasonableness and also compared the digit value recorded in the GMMS to the registry list. No register digit exceptions were identified.

No further register digit discrepancies were identified through review of metering paperwork.

## 5.7 Standard Meter

A check of the standard meter type flag is not included in the monthly discrepancy report. Where an ICP is to be recorded as TOU the meter type flags and component owner details are manually updated on the registry.

### Standard meter type flag accuracy

Review of the registry list as of 31 October found not all non TOU metered ICPs had standard meter type flag set to 'Y':

- 17 active ICPs have all meter type flags set to 'N'
- 107 active ICPs have the standard meter type flag set to 'N' but has the advanced meter type flag set to 'Y'. All other gas smart meters installations (91,204) have both standard meter type and also advanced meter type flag's set to 'Y'.

These exceptions are listed in **Appendix 3**.

## 5.8 Prepay meter

Bluecurrent Metering does not supply any ICPs with prepay meters.

### Prepay meter accuracy.

Review of the registry list as of 31 October 2025 found all metered ICPs had prepay meter set to No.

## 5.9 Advanced Meter & Advanced Meter Owner

Bluecurrent has installed over 91,000 gas smart meters to date.

### Advanced meter and advanced meter owner accuracy

Review of the registry list as of 31 October 2025 found all ICPs with a gas smart meter installed had the advanced meter flag correctly populated.

## 5.10 TOU Meter

293 of Bluecurrent's ICPs are TOU metered.

### TOU meter accuracy

Review of the registry list as of 31 October 2025 found all 293 TOU metered ICPs had the TOU meter flag set to Y. All non-TOU ICPs had the TOU meter flag set to N. Compliance is confirmed.

## 5.11 Logger Owner

293 of Bluecurrent's ICPs have a corrector installed with logging capability.

### Logger owner accuracy

Review of the registry list as of 31 October 2025 found all 293 TOU metered ICPs had the logger owner code set to NGCM. All non-TOU ICPs had the logger owner set to NONE. Compliance is confirmed.

## 5.12 Corrector Owner

293 of Bluecurrent's ICPs have a corrector installed.

### Corrector owner accuracy

Review of the registry list as of 31 October 2025 found all 293 TOU metered ICPs had the Corrector owner code set to NGCM. All non-TOU ICPs had the corrector owner set to NONE. Compliance is confirmed.

## 5.13 Telemetry Owner

181 of Bluecurrent's TOU ICPs have telemetry.

### Telemetry owner accuracy

Telemetry owner field is manually populated by Bluecurrent once installed on site. Bluecurrent has a manual query to compare its records with the registry on a regular basis when resourcing allows. This comparison was last performed in August 2025.

Review of the registry list as of 31 October 2025 found eight ICPs (**Appendix 3**) which had TOU meters with telemetry however the telemetry owner incorrectly set to NONE on the registry.

## 5.14 Metering Price Category

Metering price category is set based upon the meter type installed. Price category discrepancies are not checked as part of the discrepancy reporting process discussed in **section 5.15**.

### Metering price category accuracy

A review of meter capacity against meter price category codes identified:

- 27 ICPs with a meter capacity exceeding 25 scm/hr but assigned a meter price category code for a GMS up to 10 scm/hr.
- 16 ICPs with a meter price category code for a GMS between 10 and 25 scm/hr but where the meter capacity is either less than 10 scm/hr or more than 25 scm/hr.

Recommendation	Audited party comment
<p>As part of the annual GMS price review, check that each ICP is correctly assigned to the applicable meter price category code for the size and type of meter at the ICP.</p>	<p>Bluecurrent has accepted this recommendation.</p> <p>In response to the billing code discrepancies identified during the audit, we have implemented corrective measures to address the inaccuracies. Our GMS Services team is actively collaborating with our Retailer Key Account Managers to ensure that all affected retailers are promptly informed of the necessary changes. Once notified, we will proceed to update the billing codes to reflect the correct assignments. Furthermore, we are establishing ongoing review processes to conduct regular checks of billing code assignments, thereby minimising the risk of similar issues arising in the future. We have taken action to correct the billing code inaccuracies identified and working with Key Account Managers to inform the retailers and then apply the correct bill codes. We will also perform similar checks going forward.</p>

## 5.15 Registry validation and correction (GSAR r61.1, 61.2 and 62)

If the Meter Owner becomes aware that Registry information is incorrect or requires updating, the responsible Meter Owner must update or correct the Registry as soon as practicable.

The Meter Owner Registry report should be reviewed, and any corrections required should be entered on the Registry by 4pm on the 15<sup>th</sup> business day of the month.

Bluecurrent has an automated process to compare a registry list to its GMMS data to identify and present and mismatches for a selection of meter owner fields for investigation and action.

- meter serial number,
- meter owner,
- status,
- meter pressure,
- register digits,
- meter price category code,
- advanced meter flag, and
- meter multiplier.

The most recent exception report was reviewed as part of the audit and the exceptions identified were confirmed as having corrections correctly applied to the registry data.

The remaining meter owner fields are reviewed on an irregular frequency via manual checks whenever resources are available. A recommendation is recorded in **section 5** that this automated monthly reconciliation report be enhanced to cover all meter event attributes.

Registry information management		
Non-compliance	Description	
<p>Report section: 5.13</p> <p>Rule: 58.1</p> <p>From: From: 1 May 2022</p> <p>To: 31 October 2025</p>	<p>Audit history: Yes</p> <p>Controls: Acceptable</p> <p>Impact: Insignificant</p>	<p>24 ICPs were populated with an incorrect meter location code during the audit period.</p> <p>Eight TOU ICPs with telemetry did not have the telemetry owner field populated on the registry.</p> <p>A review of meter capacity against meter price category code identified:</p> <ul style="list-style-type: none"> <li>• 27 ICPs with a meter capacity exceeding 25 scm/hr but assigned a meter price category code for a GMS up to 10 scm/hr.</li> <li>• 16 ICPs with a meter price category code for a GMS between 10 and 25 scm/hr but where the meter capacity is either less than 10scm/hr or more than 25 scm/hr.</li> </ul> <p>Review of the registry list as of 31 October found not all non TOU metered ICPs had standard meter type flag set to 'Y':</p> <ul style="list-style-type: none"> <li>• 17 active ICPs have all meter type flags set to 'N'</li> <li>• 107 active ICPs have the standard meter type flag set to 'N' but has the advanced meter type flag set to 'Y'</li> </ul>
Remedial action rating	Remedial timeframe	Remedial comment
In progress	Remedial actions have been implemented or initiated, with ongoing controls embedded into BAU and periodic review processes.	Remedial actions focused on strengthening system controls, reconciliation checks, data quality assurance, and stakeholder notification processes. Where system limitations were identified, incidents were raised and solutions progressed through data remediation and permanent code fixes to ensure long term alignment.

Audited party comment	
The circumstances of the matters outlined in the breach notice.	The matters arose due to a combination of system limitations, data misalignment between GMMS and the Gas Registry, and gaps in validation checks. These resulted in certain registry attributes and information not being consistently accurate or synchronised.
Whether or not the participant admits or disputes that it is in breach.	Bluecurrent acknowledges the issues identified and accepts the findings outlined.
Estimate of the impact of the breaches (where admitted).	Bluecurrent has reviewed this and agrees with the auditor's classification that the impact is "Insignificant" and that the controls within the business are "adequate/acceptable" The impact was assessed as limited and operational in nature. Issues identified were addressed through correction activities, with no evidence of widespread or material customer detriment.
What steps or processes were in place to prevent the breaches?	Existing controls include GMS Services team monitoring of completed work, Retailer billing processes, sync processes with defined ownership of exceptions, monthly registry reconciliation activity and annual pricing reviews. However, these controls did not fully capture all data attributes or system exceptions,
What steps have been taken to prevent recurrence?	<p>System issues identified through sync processes are escalated via priority tickets with clear ownership.</p> <p>Monthly reconciliation checks have been enhanced to include additional attributes where system capability allows.</p> <p>QA checks now include additional data fields such as meter location, supported by reinforced FSP requirements.</p> <p>Standardised retailer email notification will be introduced for meter pressure discrepancies.</p> <p>Data remediation and permanent code fixes will be progressed to address system misalignment where automation is not currently available.</p> <p>Billing code validation checks will be embedded into ongoing annual GMS price review processes.</p> <p>The reconciliation of Telemetry data with the registry is conducted through the generation of the following reports during the first week of each month:</p> <ul style="list-style-type: none"> <li>• All Installed TOU Report</li> <li>• Last Month's Service Fee Report from the Billing Folder</li> <li>• All Current Details Report from the Registry covering all ICPs</li> </ul> <p>These reports are reviewed to identify any ICPs where the Telemetry owner information has not been updated. When discrepancies are found, manual updates are performed as necessary.</p>

## 6. Metering Price Codes (GSAR r49)

*The Gas (Switching Arrangements) Rules 2008 r49.1 requires meter owners to determine, publish and maintain a schedule of its metering price codes applicable to all ICPs where it is the responsible meter owner and provide a copy of that pricing schedule to registry participants it contracts to, unless the pricing is disclosed on application under r50.*

Bluecurrent supplied a copy of their meter pricing schedule, which is sent to all retailers as part of the yearly pricing updates and is also available on request.

The latest meter pricing schedules were compared to the registry list of meter price category codes for Bluecurrent. All current codes were present in the registry list. 107 out of 532 (20%) meter price category codes no longer in use were found to be still active in the registry. It is recommended for Bluecurrent to apply appropriate end dates to these codes so that the meter price code table reflects only codes that are in use.

Recommendation	Audited party comment
Bluecurrent to apply appropriate end dates to those redundant meter price codes in the registry so that the meter price code table reflects only codes that are in use.	Bluecurrent acknowledges the merit of this recommendation and have commenced an initiative to explore opportunities for data clean-up. Initial efforts to address these issues within the Gas Registry have been met with errors. Bluecurrent will contact the gas registry team to seek further guidance on how to appropriately start the clean-up in the Gas Registry; however, we are encountering errors. We will reach out to the Gas Registry helpdesk to get further information on how to proceed.

## 7. Disclosure on application (GSAR r50)

*The Gas (Switching Arrangements) Rules 2008 r50 allows meter owners to not publish pricing and disclose pricing on application where they do not have a reasonably practicable alternative method of protecting its commercial interest in that information to the extent necessary to protect that interest. They must confirm whether they will disclose the pricing within one business day of receiving a request, and if they agree to disclose the information it must be provided within a further business day.*

Bluecurrent assigns bespoke meter price category codes for sites with a capacity or more than 40 scm/hr. This requires retailers to request pricing details where required for ICPs where the GMS capacity exceeds 40 scm/hr.

I reviewed a sample of seven requests during the audit period and confirmed that Bluecurrent provided a response including pricing within one business day of receiving the request for six request and within two business days for one request.

## 8. Recommendations

As a result of this audit, I recommend the following:

- Investigate further these exceptions where the recorded MHQ exceeds the Qmax values for the GMS at these ICPs.
- Investigate implementing a monthly check of the MHQ to Qmax to ensure that where a MHQ for a GMS appears to be achieving Qmax that this is adequately investigated with the retailer to determine if a GMS capacity is required.
- Look at ways to revise the next acceptance testing due date for an installation with diaphragm meters over 25 scm/hr so they will comply with NZS5259:2015 within the new asset management system.
- Look at ways to improve consumer engagement with the interval test programs and whether a forward looking program of upcoming meter exchanges as part of the annual pricing notification would enable retailers to begin the engagement early to identify a suitable window for this maintenance work.
- Recommend that Bluecurrent has regular discussions with retailers regarding long term inactive ICPs over 25 scm/hr around whether to continue to perform pressure checks, meter exchanges as part of acceptance testing or arrange meter removal.
- Consider including links within the app to Bluecurrent's policies, procedures and meter model capacity tables for field service personnel to refer to when on site.
- Review the new connection process to include a check if an individual meter price category code (bill code) required as part of the quote acceptance step so these can be created and available as part of the work order creation.
- Recommend strengthening the follow up process for READY ICPs that have had Bluecurrent meters installed and recorded on the registry to enable all three allocation participants (proposed retailer, distributor, meter owner) responsible for this ICP to co-operate together so that the registry is populated in an accurate and timely manner.
- Escalate the sync tool system issues so that both error scenarios are resolved and only actual meter event updates with the correct event date is provided to the registry.
- Enhance the monthly reconciliation activity between the registry and GMMS to include all meter event attributes such as telemetry owner to ensure timely corrections of this registry information.
- Enhance the GMMS data population QA check process to also include meter location.
- Bluecurrent to review how it notifies the retailer of a potential issue where the as found meter pressure does not align with the recorded meter pressure so that the size and extent of this potential issue can be determined and resolved collectively.
- Develop a process with the respective distributors to regularly review and verify which gas measurement systems are operating at network pressure and update the registry accordingly.
- As part of the annual GMS price review, check that each ICP is correctly assigned to the applicable meter price category code for the size and type of meter at the ICP.
- Bluecurrent to apply appropriate end dates to those redundant meter price codes in the registry so that the meter price code table reflects only codes that are in use.

## Appendix 1 – Conversion of volume to energy for gas TOU installations (GDDR r28)

### Temperature and absolute pressure correction issue

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
0002320611QT6F6	GNVG	Macbat 5	14/08/2025	TA	180	7	0.98019	1.981%	64.78
1001268120NG1F2	GNVG	Macbat 5	13/08/2025	TA	340	110	0.98082	1.918%	337.85
0008000258NGD18	GNVG	Macbat 5	15/10/2025	TA	290	100	0.98283	1.717%	62.64
1001264228NGB65	GNVG	Macbat 5	25/09/2025	TA	101	35	0.99117	0.883%	131.92
0000136921QT68A	GEND	Macbat 5	24/07/2025	TA	79	7	0.99131	0.869%	0.01
0002036991QTD26	GEND	Macbat 5	26/09/2025	TA	226	225	0.99174	0.826%	65.14
0001453858QTA90	GNVG	Macbat 5	20/11/2025	TA	77	10	0.99175	0.825%	17.37
0009000150NGAB6	GNVG	Macbat 5	14/05/2025	TA	106	60	0.99217	0.783%	28.10
1001298461NGF8B	GEND	Macbat 5	17/07/2025	TA	69	35	0.99397	0.603%	17.74
1001144688QTCC4	CTCT	Macbat 5	7/05/2025	TA	80	70	0.99443	0.557%	59.17
0001844001QT28B	GREY	Macbat 5	17/04/2025	TA	62	35	0.99458	0.542%	59.83
1001251934QT112	GREY	Macbat 5	31/03/2025	TA	56	35	0.99510	0.490%	3.37
0001833601QTA54	GNVG	Macbat 5	19/05/2025	TA	50	21	0.99513	0.487%	17.10
1002135742QT06C	GEND	Macbat 5	1/08/2025	TA	70	70	0.99513	0.487%	7.65
0003063196NG4CA	GNVG	Macbat 5	19/08/2025	TA	54	35	0.99528	0.472%	26.72
0009000969NG312	GNVG	Macbat 5	14/08/2025	TA	53	35	0.99537	0.463%	54.33
0009000813NGDDA	GMTH	Macbat 5	5/09/2025	TA	53	35	0.99537	0.463%	8.28
1001299226NG742	GNVG	Macbat 5	10/07/2025	TA	40	7	0.99560	0.440%	20.29
0009000967NG089	GEND	Macbat 5	22/07/2025	TA	50	35	0.99563	0.437%	34.05
0001393588QT361	GREY	Macbat 5	18/09/2025	TA	39	7	0.99571	0.429%	6.77
0000037371QT144	GNVG	Macbat 5	6/05/2025	TA	47	35	0.99589	0.411%	15.57
1001240380QT1E1	GNVG	Macbat 5	6/05/2025	TA	46	35	0.99598	0.402%	114.46
0002382315QT751	GNVG	Macbat 5	28/11/2025	TA	45	35	0.99607	0.393%	6.37
0008000011NGBEB	CTCT	Macbat 5	31/07/2025	TA	45	35	0.99607	0.393%	7.24
0008000150NGC0F	GREY	Macbat 5	8/05/2025	TA	65	100	0.99615	0.385%	28.26
0001426078QTA51	CTCT	Macbat 5	29/09/2025	TA	36	15	0.99631	0.369%	17.76

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
1001243404NGE85	GEND	Macbat 5	4/09/2025	TA	40	35	0.99650	0.350%	29.56
0000135641QT495	GEND	Macbat 5	18/11/2025	TA	107	275	0.99661	0.339%	6.53
1001275331QT91A	CTCT	Macbat 5	29/04/2025	TA	30	7	0.99670	0.330%	36.37
0001023427NG9DF	GNVG	Macbat 5	12/08/2025	TA	36	35	0.99685	0.315%	16.47
0001002388NG971	GNVG	Macbat 5	5/08/2025	TA	163	535	0.99695	0.305%	169.98
1001294166NGCC4	GREY	Macbat 5	21/08/2025	TA	50	100	0.99704	0.296%	72.71
1001298216NG11A	GEND	Macbat 5	21/08/2025	TA	49	100	0.99710	0.290%	69.20
0001017812NG8C8	GNVG	Macbat 5	20/08/2025	TA	33	35	0.99711	0.289%	22.42
0009001239NG9B4	GEND	Macbat 5	25/08/2025	TA	32	35	0.99720	0.280%	13.35
1001126911QT365	GNVG	Macbat 5	19/11/2025	TA	32	35	0.99720	0.280%	4.32
0009000693NGE9B	GEND	Macbat 5	20/08/2025	TA	31	35	0.99729	0.271%	24.55
1001306532NG92F	GNVG	Macbat 5	12/11/2025	TA	31	35	0.99729	0.271%	0.06
0008000024NG15C	CTCT	Macbat 5	22/07/2025	TA	60	175	0.99741	0.259%	23.07
1001287122QT3AC	GREY	Macbat 5	16/10/2025	TA	35	70	0.99756	0.244%	0.76
0009000756NGD3F	GNVG	Macbat 5	30/07/2025	TA	40	100	0.99763	0.237%	5.12
1001262556NG761	GEND	Macbat 5	29/08/2025	TA	45	140	0.99778	0.222%	117.35
0009000184NG6FE	GNVG	Macbat 5	19/08/2025	TA	20	7	0.99780	0.220%	10.21
0008000018NG5BA	GNVG	Macbat 5	8/07/2025	TA	37	100	0.99781	0.219%	26.40
1001299078QT010	CTCT	Macbat 5	7/05/2025	TA	37	100	0.99781	0.219%	12.15
0000225771QTE3C	GEND	Macbat 5	13/05/2025	TA	67	275	0.99788	0.212%	25.00
0001833681QTF1E	GREY	Macbat 5	14/04/2025	TA	24	35	0.99790	0.210%	14.05
1001303079NG77B	GNVG	Macbat 5	21/08/2025	TA	35	100	0.99793	0.207%	7.61
1001263001QT0C0	GEND	Macbat 5	31/07/2025	TA	41	140	0.99797	0.203%	23.44
0001787671QT9FA	PANP	Macbat 5	28/08/2025	TA	40	140	0.99802	0.198%	24.17
0001005241NGDAB	GNVG	Macbat 5	3/06/2025	TA	33	100	0.99805	0.195%	164.18
1001160740QTF76	GEND	Macbat 5	16/10/2025	TA	33	100	0.99805	0.195%	13.16
1001154573QT9E5	GEND	Macbat 5	29/07/2025	TA	22	35	0.99808	0.192%	10.94
1002178019QT807	GNVG	Macbat 5	19/11/2025	TA	16	7	0.99824	0.176%	2.01
0000278431QT6CE	GNVG	Macbat 5	3/04/2025	TA	20	35	0.99825	0.175%	24.53

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
0000165671QT019	GNVG	Macbat 5	18/11/2025	TA	55	275	0.99826	0.174%	7.93
0001444840QTEA8	CTCT	Macbat 5	20/11/2025	TA	72	400	0.99829	0.171%	11.29
1001156847QT95F	GEND	Macbat 5	20/11/2025	TA	71	400	0.99831	0.169%	6.09
0000845251QT79D	CTCT	Macbat 5	20/11/2025	TA	70	400	0.99834	0.166%	33.70
1002076607QTB9B	GNVG	Macbat 5	15/10/2025	TA	19	35	0.99834	0.166%	6.53
1001290576QTA2E	GNVG	Macbat 5	12/08/2025	TA	19	35	0.99834	0.166%	6.41
0008000245NG8EE	GNVG	Macbat 5	20/08/2025	TA	28	110	0.99842	0.158%	2.42
0000012521QT1A7	GNVG	Macbat 5	18/11/2025	TA	18	35	0.99843	0.157%	2.82
0009000803NG777	GEND	Macbat 5	21/08/2025	TA	26	100	0.99846	0.154%	12.35
0008000086NG9C6	CTCT	Macbat 5	20/08/2025	TA	25	100	0.99852	0.148%	11.41
1002123925QT97C	GREY	Macbat 5	16/10/2025	TA	21	70	0.99854	0.146%	4.69
1001155520QTC8D	GEND	Macbat 5	17/10/2025	TA	16	35	0.99860	0.140%	3.10
0001028461NG515	GEND	Macbat 5	19/08/2025	TA	20	70	0.99861	0.139%	1.87
1000501243PG0F3	GNVG	Macbat 5	3/04/2025	TA	20	70	0.99861	0.139%	3.42
0008000085NG506	CTCT	Macbat 5	20/08/2025	TA	34	190	0.99861	0.139%	5.98
1002198108QTA96	GNVG	Macbat 5	3/11/2025	TA	23	100	0.99864	0.136%	4.67
0009001234NG6EF	GNVG	Macbat 5	6/05/2025	TA	83	700	0.99877	0.123%	48.41
0001002120NG97D	GNVG	Macbat 5	3/06/2025	TA	20	100	0.99882	0.118%	6.58
0008000080NG849	CTCT	Macbat 5	28/08/2025	TA	17	70	0.99882	0.118%	18.31
0008000184NG047	CTCT	Macbat 5	11/08/2025	TA	40	310	0.99884	0.116%	17.01
1002144532QT42F	GNVG	Macbat 5	29/07/2025	TA	23	140	0.99886	0.114%	0.95
1001241559NG392	CTCT	Macbat 5	5/09/2025	TA	45	400	0.99893	0.107%	25.68
0008000027NGD9C	GNVG	Macbat 5	29/04/2025	TA	60	570	0.99893	0.107%	351.07
0002028094NGF87	GNVG	Macbat 5	14/10/2025	TA	12	35	0.99895	0.105%	5.04
0009001143NGD7B	GNVG	Macbat 5	20/08/2025	TA	44	400	0.99895	0.105%	6.89
0001427157QT07E	GEND	Macbat 5	17/10/2025	TA	15	70	0.99896	0.104%	3.35
0009001699NGDAA	GNVG	Macbat 5	8/04/2025	TA	70	700	0.99896	0.104%	68.69
0001001766NGEB1	TRNS	Macbat 5	7/08/2025	TA	43	400	0.99898	0.102%	107.26
0000299311QT844	GNVG	Macbat 5	13/05/2025	TA	32	275	0.99899	0.101%	10.38

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
0001788282QT04C	GEND	Macbat 5	28/08/2025	TA	17	100	0.99899	0.101%	28.66
1001304077NG080	GREY	Macbat 5	20/08/2025	TA	42	400	0.99900	0.100%	9.84
0008000068NG0E7	CTCT	Macbat 5	14/10/2025	TA	21	150	0.99900	0.100%	6.49
1002066714QTC13	GEND	Macbat 5	1/08/2025	TA	9	7	0.99901	0.099%	0.29
1001295720NG848	GREY	Macbat 5	10/07/2025	TA	25	200	0.99901	0.099%	123.75
0000316011QT96E	GNVG	Macbat 5	20/11/2025	TA	25	200	0.99901	0.099%	2.60
0008000021NGC13	CTCT	Macbat 5	9/07/2025	TA	40	400	0.99905	0.095%	7.95
1001267123QT294	GNVG	Macbat 5	2/05/2025	TA	32	300	0.99905	0.095%	107.67
0000045271QT1B9	GREY	Macbat 5	15/10/2025	TA	30	275	0.99905	0.095%	0.28
0000009961QT80F	GNVG	Macbat 5	10/11/2025	TA	19	140	0.99906	0.094%	7.23
0000122131QT24B	GMTH	Macbat 5	7/04/2025	TA	60	700	0.99911	0.089%	30.75
1002208529QTCF7	GNVG	Macbat 5	29/07/2025	TA	8	7	0.99912	0.088%	0.19
0000012821QT4AF	GREY	Macbat 5	4/12/2025	TA	35	400	0.99917	0.083%	0.54
0000322831QT39A	GREY	Macbat 5	29/07/2025	TA	25	275	0.99921	0.079%	16.83
0001452435QT797	GMTH	Macbat 5	25/07/2025	TA	9	35	0.99921	0.079%	1.77
0001809022QT2AB	GREY	Macbat 5	10/10/2025	TA	69	950	0.99922	0.078%	3.97
1001303155NG034	GNVG	Macbat 5	12/08/2025	TA	19	200	0.99925	0.075%	141.42
1002171197QTB72	GNVG	Macbat 5	17/10/2025	TA	15	140	0.99926	0.074%	0.40
0008000017NGA64	GREY	Macbat 5	4/09/2025	TA	27	350	0.99929	0.071%	12.32
1002057962QTE46	GNVG	Macbat 5	6/08/2025	TA	24	300	0.99929	0.071%	66.57
0002037951QTB69	CTCT	Macbat 5	8/04/2025	TA	15	150	0.99929	0.071%	20.08
0001799801QTA8D	GNVG	Macbat 5	25/09/2025	TA	8	35	0.99930	0.070%	5.05
0000531691QT6E8	GREY	Macbat 5	17/10/2025	TA	22	275	0.99930	0.070%	2.67
0000162151QT62E	GEND	Macbat 5	10/11/2025	TA	29	400	0.99931	0.069%	16.06
0001022593NG2C3	GNVG	Macbat 5	9/07/2025	TA	26	350	0.99931	0.069%	7.36
0008000231NGCB9	GNVG	Macbat 5	31/07/2025	TA	28	400	0.99933	0.067%	3.54
1002054790QTA3F	GNVG	Macbat 5	31/07/2025	TA	6	7	0.99934	0.066%	4.75
0003065623NG1F5	CTCT	Macbat 5	13/08/2025	TA	27	400	0.99936	0.064%	0.00
0000710031QT844	GREY	Macbat 5	1/04/2025	TA	20	275	0.99937	0.063%	20.93

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
0002285851QT7FC	CTCT	Macbat 5	23/08/2025	TA	16	200	0.99937	0.063%	3.33
0001448245QT26D	GNVG	Macbat 5	14/11/2025	TA	9	70	0.99937	0.063%	4.66
1002110722QT171	GNVG	Macbat 5	19/11/2025	TA	9	70	0.99937	0.063%	1.61
0008000032NGA7E	GMTH	Macbat 5	8/05/2025	TA	57	1000	0.99938	0.062%	42.45
0000298611QTCE1	GEND	Macbat 5	14/11/2025	TA	16	210	0.99939	0.061%	0.32
1001265617QT824	GNVG	Macbat 5	25/07/2025	TA	7	35	0.99939	0.061%	3.71
0002293851QTADD	CTCT	Macbat 5	14/08/2025	TA	5	7	0.99945	0.055%	6.06
0000187231QT080	GEND	Macbat 5	16/10/2025	TA	17	275	0.99946	0.054%	1.65
0000311061QT853	GNVG	Macbat 5	2/04/2025	TA	6	35	0.99948	0.052%	16.55
0009001252NG890	GREY	Macbat 5	28/08/2025	TA	6	35	0.99948	0.052%	2.81
1001150001QTFB8	GREY	Macbat 5	14/11/2025	TA	22	400	0.99948	0.052%	8.70
0008000038NG8EF	GNVG	Macbat 5	31/03/2025	TA	20	380	0.99950	0.050%	144.30
0002037741QT7CF	GEND	Macbat 5	1/07/2025	TA	9	118	0.99951	0.049%	29.16
0002037401QT669	GREY	Macbat 5	7/10/2025	TA	9	118	0.99951	0.049%	1.96
0000340911QT6D3	GNVG	Macbat 5	17/10/2025	TA	7	70	0.99951	0.049%	1.73
0000045031QT91B	GNVG	Macbat 5	15/04/2025	TA	20	400	0.99952	0.048%	42.61
0000326561QT81A	GNVG	Macbat 5	3/11/2025	TA	20	400	0.99952	0.048%	2.22
1001240530NG393	GNVG	Macbat 5	19/08/2025	TA	20	400	0.99952	0.048%	0.79
0000304461QTB93	GEND	Macbat 5	31/07/2025	TA	20	400	0.99952	0.048%	0.79
0001005730NG1B6	GREY	Macbat 5	4/12/2025	TA	20	400	0.99952	0.048%	0.03
0008000050NG50B	CTCT	Macbat 5	11/08/2025	TA	8	100	0.99953	0.047%	3.66
0009000960NGD43	GNVG	Macbat 5	19/08/2025	TA	31	700	0.99954	0.046%	8.09
0000353551QT27B	GNVG	Macbat 5	25/07/2025	TA	19	400	0.99955	0.045%	11.09
0002382270QTCEA	GNVG	Macbat 5	29/07/2025	TA	19	400	0.99955	0.045%	10.25
0001410327QTA68	GEND	Macbat 5	14/04/2025	TA	19	400	0.99955	0.045%	6.50
0001838542QT8D2	GREY	Macbat 5	10/10/2025	TA	20	450	0.99957	0.043%	5.21
1000501242PGCB6	GNVG	Macbat 5	10/10/2025	TA	20	450	0.99957	0.043%	2.14
0001013572NG4B0	GEND	Macbat 5	15/10/2025	TA	7	100	0.99959	0.041%	2.85
1002066713QT1D9	GEND	Macbat 5	1/08/2025	TA	9	160	0.99959	0.041%	2.02

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
0002379542QTEE9	CTCT	Macbat 5	29/09/2025	TA	36	950	0.9959	0.041%	10.01
0000033281QTED7	GREY	Macbat 5	12/08/2025	TA	17	400	0.99960	0.040%	11.59
0000072491QT849	GREY	Macbat 5	30/07/2025	TA	16	400	0.99962	0.038%	39.13
1001260308QTF72	CTCT	Macbat 5	22/05/2025	TA	16	400	0.99962	0.038%	2.48
0000013271QT70D	GNVG	Macbat 5	28/08/2025	TA	16	400	0.99962	0.038%	0.45
0000033271QTEC0	GREY	Macbat 5	12/08/2025	TA	15	400	0.99964	0.036%	15.05
0009000605NG0F3	GNVG	Macbat 5	26/08/2025	TA	6	100	0.99964	0.036%	0.68
0000020051QT393	GMTH	Macbat 5	14/04/2025	TA	14	400	0.99967	0.033%	10.72
1001279491QT587	GREY	Macbat 5	9/10/2025	TA	10	300	0.99970	0.030%	20.64
0002038251QT107	GREY	Macbat 5	7/10/2025	TA	3	21	0.99971	0.029%	0.74
0000309161QT4B6	GMTH	Macbat 5	25/11/2025	TA	12	400	0.99971	0.029%	2.46
0000038381QT833	GNVG	Macbat 5	2/04/2025	TA	10	400	0.99976	0.024%	25.33
0002376788QT8F0	TRNS	Macbat 5	16/10/2025	TA	10	400	0.99976	0.024%	3.06
0002376787QT72E	TRNS	Macbat 5	11/04/2025	TA	10	400	0.99976	0.024%	6.25
0008000047NG26C	GNVG	Macbat 5	15/04/2025	TA	7	250	0.99976	0.024%	23.52
0000190021QTCAB	GEND	Macbat 5	17/10/2025	TA	15	700	0.99978	0.022%	0.82
0008000194NGAEA	GNVG	Macbat 5	25/06/2025	TA	8	350	0.99979	0.021%	0.08
0000013451QTC5E	GREY	Macbat 5	14/11/2025	TA	17	1000	0.99982	0.018%	0.87
0000012601QTF1	VISY	Macbat 5	7/10/2025	TA	28	1900	0.99983	0.017%	61.34
0000071821QT417	GEND	Macbat 5	25/07/2025	TA	6	400	0.99986	0.014%	1.42
0008000077NG594	GEND	Macbat 5	26/08/2025	TA	5	350	0.99987	0.013%	2.59
0000071591QT3AD	PANP	Macbat 5	15/08/2025	TA	8	700	0.99988	0.012%	1.48
0000071861QT6B2	GNVG	Macbat 5	19/11/2025	TA	5	400	0.99988	0.012%	0.52
0002037801QTA65	GREY	Macbat 5	6/10/2025	TA	10	950	0.99989	0.011%	10.20
0002037711QTFC7	GREY	Macbat 5	7/10/2025	TA	8	950	0.99991	0.009%	4.03
0002011621QTD36	PANP	Macbat 5	7/10/2025	TA	8	950	0.99991	0.009%	1.79
0002005950NG386	GNVG	Macbat 5	14/10/2025	TA	1	35	0.99991	0.009%	0.58
0009000220NGCE8	GREY	Macbat 5	14/10/2025	TA	1	35	0.99991	0.009%	0.49
0008000059NGB5A	GNVG	Macbat 5	14/08/2025	TA	1	35	0.99991	0.009%	0.47

ICP	Current retailer	Model	Date of Install	TA, TG or TGS	Altitude	Meter pressure	Altitude factor	Fa % error	Volume impact GJ to 31 December 2025
0008000300NGE00	GNVG	Macbat 5	11/08/2025	TA	7	950	0.99992	0.008%	18.48
0002037541QTDC8	GREY	Macbat 5	6/10/2025	TA	1	105	0.99994	0.006%	2.30
0008000249NGBF0	GNVG	Macbat 5	11/11/2025	TA	7	1900	0.99996	0.004%	3.89
0000281891QTBE1	GREY	Macbat 5	14/05/2025	TA	7	1900	0.99996	0.004%	11.47
0008000053NG9CB	GMTH	Macbat 5	12/08/2025	TA	1	350	0.99997	0.003%	2.40
0008000211NG1EC	GMTH	Macbat 5	15/04/2025	TA	1	400	0.99998	0.002%	2.19
0009000218NG904	GNVG	Macbat 5	16/10/2025	TA	1	400	0.99998	0.002%	0.10

## Appendix 2 - GMS suitability and design

ICPs where MHQ exceeds Qmax

ICP Identifier	Meter Identifier	Gas Gate	Measured max MHQ last 12 months (scm)	Qmax	% MHQ exceeds Qmax
0001005241NGDAB	5585106	DRU15101	1471	1200	22.58%
0002011621QTD36	8119942	HST05210	3255	2900	12.24%
0002382270QTCEA	T000009213	HUN15301	576	470	22.55%
0008000027NGD9C	55600	CAM17201	2293	2150	6.65%
1001267123QT294	T000042484	TUK06502	1530	1450	5.52%
1001279491QT587	T000078286	WST03610	2585	2500	3.40%

## Appendix 3 – Registry information management

### Incorrect meter location code registry population

ICP Identifier	Install / event date	Meter Identifier	Meter Location Code	Registry Meter location	Meter Location on Paperwork
1001306408NG542	6/06/2025	600796474	UNKN	UNKN	Back Right
1002156414QTA50	4/10/2023	600754803	UNKN	UNKN	Boundary
1001302591NGB70	23/05/2023	600696988	UNKN	UNKN	Left
1002155180QT358	9/03/2023	600695321	UNKN	UNKN	Front Left
1002154224QT8EE	9/11/2022	600665889	UNKN	UNKN	Right
1002158034QT3C4	9/07/2022	20EG1282	UNKN	UNKN	Boundary
1002158090QTAD1	26/04/2022	21EG3688	UNKN	UNKN	Left
1002155944QT5B0	5/04/2022	21EG3760	UNKN	UNKN	Boundary
0000594871QTB91	29/05/2025	600839514	UNKN	UNKN	Right
0000540841QT6B8	27/05/2025	600847548	UNKN	UNKN	Left
0000003931QTE47	22/05/2025	600838446	UNKN	UNKN	Right Front
0000418461QTD9F	21/05/2025	600843438	UNKN	UNKN	Left
0000578641QTC9F	21/05/2025	600843450	UNKN	UNKN	Front Right
0000598691QTCA0	20/05/2025	600844317	UNKN	UNKN	Right
0000533331QT8B2	14/05/2025	600843128	UNKN	UNKN	Boundary
0000571591QTE7E	29/04/2025	600839201	UNKN	UNKN	Left
0000526091QTC6F	15/04/2025	600841152	UNKN	UNKN	Front Left
0000097441QTF56	11/04/2025	24X874909	UNKN	UNKN	Boundary
0000013481QT11C	14/07/2017	20514903	UNKN	UNKN	Meter Room Front
0000015001QTD97	1/12/2006	05F016818	UNKN	UNKN	Front RHS
0000045181QT2AD	13/05/2020	19M222626	UNKN	UNKN	Boundary
0000064501QT38B	6/12/2019	083456	UNKN	UNKN	Boundary
0000079421QT51B	9/04/2009	07J690903	UNKN	UNKN	LHS
0000131701QT9B4	31/05/2019	026426	UNKN	UNKN	Right

### Meter pressure corrections over 100 days

ICP Identifier	ICP Status Code	ICP Connection Status Code	Responsible Meter Owner Code	Meter Identifier	Initial meter pressure	Revised meter pressure	Meter pressure difference	Fp difference	event date	entry date	Network days	multiple retailers affected?
0000237283QT00A	INACT	GVC	NGCM	600675181	2.5	2.75	0.25	-0.24%	23/01/2023	12/11/2025	703	no
0000261141QT2D7	ACTC	GAS	NGCM	250108	1.5	2.75	1.25	-1.20%	24/03/2017	1/12/2025	2180	yes - 5
0001539971QT8E4	ACTC	GAS	NGCM	278689	2	2.5	0.5	-0.48%	7/09/2015	9/12/2025	2574	yes - 3
0001813401QT99E	ACTC	GAS	NGCM	834109431	2	2.5	0.5	-0.48%	7/09/2015	14/11/2025	2557	yes - 5
0002000773NG338	ACTC	GAS	NGCM	18EG1576	35	2.75	-32.25	30.99%	23/05/2018	27/11/2025	1888	yes - 2
0002001254NG702	ACTC	GAS	NGCM	18EG1501	35	2.75	-32.25	30.99%	30/05/2018	27/11/2025	1883	no

### As found vs recorded meter pressure exceptions

ICP Identifier	ICP Status Code	ICP Connection Status Code	Responsible Meter Owner Code	Meter Identifier	Initial meter pressure	Revised meter pressure	Fp difference	event date	entry date	Network days	comment
0001822851QTD16	ACTC	GAS	NGCM	1060210	2	2.5	-0.48%	9/09/2025	12/11/2025	46	As Found Pressure 2.50@2.50
0000120191QT914	ACTC	GAS	NGCM	600581081	1.5	2.5	-0.96%	31/08/2022	3/09/2022	3	As Found pressure@2.50
0000146871QTD3F	ACTC	GAS	NGCM	600747996	2.5	1.5	0.97%	12/02/2024	19/02/2024	6	As Found Pressure@1.50
0000191621QTB0D	ACTC	GAS	NGCM	600841710	1.5	3	-1.44%	22/01/2025	3/02/2025	9	As Found Pressure @3.00
0000339191QT58D	ACTC	GAS	NGCM	287629	2.75	2.5	0.24%	14/08/2024	17/09/2024	25	As Found Pressure
0000358151QT19A	ACTC	GAS	NGCM	600836848	1.5	2	-0.48%	3/12/2024	11/12/2024	7	As Found Pressure 2.0kpa
0000406081QTB63	ACTC	GAS	NGCM	600841535	1.5	2.5	-0.96%	12/05/2025	19/05/2025	6	As Found pressure 2.5@2.50
0000512731QTCDE	ACTC	GAS	NGCM	600760575	3	2.5	0.48%	10/04/2024	15/04/2024	4	As Found NMP@2.50
0000612481QT1DB	ACTC	GAS	NGCM	600842165	3	2.5	0.48%	16/12/2024	7/01/2025	13	As Found Pressure@2.50

## Meter Pressure Operating at Network Pressure Flag exceptions.

ICP Number	Network pressure	Meter number	Address	Meter Pressure	Meter Pressure Operating at Network Pressure Flag	Network pressure - meter pressure
0000368021QTCEF	3	94V411650	11 BOARDMAN LANE, AUCKLAND CENTRAL	3	N	0
0000227831QT0D6	3	600794962	11 NICHOLAS STREET, AUCKLAND CENTRAL	2.75	N	0.25
0000380881QT480	3	834102589	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380891QTE2D	3	834102696	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380911QT263	3	834102829	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380921QT59B	3	834102685	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380931QTF36	3	834102698	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380951QT0C6	3	834102479	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380971QTD93	3	834102681	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000380991QT729	3	834102699	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381001QT067	3	834102492	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381021QTD32	3	834102878	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381031QT79F	3	834102690	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381041QT2C2	3	834102416	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381061QTF97	3	834102695	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381071QT53A	3	834102682	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381081QT52D	3	600798177	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381091QTF80	3	834102693	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381101QT963	3	834102590	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381111QT3CE	3	834102786	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381131QTE9B	3	834102092	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000381141QTBC6	3	834102694	11 NICHOLAS STREET, AUCKLAND CENTRAL	3	N	0
0000114301QTB58	3	90S6428287	164 GREAT SOUTH ROAD, GREENLANE	3	N	0
0000363721QTC0D	3	1063813	20 WOLFE STREET, AUCKLAND CENTRAL	3	N	0
0000363731QT6A0	3	600747422	20 WOLFE STREET, AUCKLAND CENTRAL	3	N	0
0000748301QT2CB	3	278655	26 SWANSON STREET, AUCKLAND CENTRAL	3	N	0
0000366101QT07E	3	600746954	41 ALBERT STREET, AUCKLAND CENTRAL	2.75	N	0.25
0000366111QTAD3	3	834102956	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366131QT786	3	834102945	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366141QT2DB	3	600746927	41 ALBERT STREET, AUCKLAND CENTRAL	2.75	N	0.25
0000366151QT876	3	834102953	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366171QT523	3	834102955	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366191QTF99	3	834102980	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366211QT9D0	3	834102985	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366221QTE28	3	834102419	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366241QT1D8	3	834102951	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366261QTC8D	3	834102892	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366271QT620	3	834102950	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366281QT637	3	834102947	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366291QTC9A	3	834102411	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366301QTA79	3	834102957	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
0000366321QT72C	3	95W810803	41 ALBERT STREET, AUCKLAND CENTRAL	3	N	0
1000385125QTF3	3	05EG2750	41 ALBERT STREET, AUCKLAND CENTRAL	2.75	N	0.25
0000542321QT906	3	600759201	55 BIRKENHEAD AVENUE, BIRKENHEAD	3	N	0

ICP Number	Network pressure	Meter number	Address	Meter Pressure	Meter Pressure Operating at Network Pressure Flag	Network pressure - meter pressure
0002343521QT2B5	3	600686023	601 BEACH ROAD, ROTHESAY BAY	3	N	0

**Standard meter type flag exceptions**

ICP Identifier	Meter Identifier	Standard Meter Y/N	Prepay Meter Y/N	TOU Meter Y/N	Advanced Metering Y/N	Logger Owner Code	Corrector Owner Code	Telemetry Owner Code	Advanced Meter Owner Code
0001019620NG17E	06EG2397	N	N	N	N	NONE	NONE	NONE	NONE
0001031928NG8A8	09EG8125	N	N	N	N	NONE	NONE	NONE	NONE
0001032010NG6AD	09EG8407	N	N	N	N	NONE	NONE	NONE	NONE
0001032904NG403	09EG9082	N	N	N	N	NONE	NONE	NONE	NONE
0001033062NG2D5	10EG0909	N	N	N	N	NONE	NONE	NONE	NONE
0001035469NG5C0	10EG1393	N	N	N	N	NONE	NONE	NONE	NONE
0001035639NG7CF	10EG1968	N	N	N	N	NONE	NONE	NONE	NONE
1001146817QT9B6	08EG6307	N	N	N	N	NONE	NONE	NONE	NONE
1001149206QTC34	09EG7032	N	N	N	N	NONE	NONE	NONE	NONE
1001154708QT86B	09EG9257	N	N	N	N	NONE	NONE	NONE	NONE
1001158617QTF9C	10EG0590	N	N	N	N	NONE	NONE	NONE	NONE
1001160149QT721	277248	N	N	N	N	NONE	NONE	NONE	NONE
1001162519QT068	10EG1933	N	N	N	N	NONE	NONE	NONE	NONE
1001242858NG83F	11EG2293	N	N	N	N	NONE	NONE	NONE	NONE
1001253184QT0ED	286916	N	N	N	N	NONE	NONE	NONE	NONE
1001267395QTBAE	21202208	N	N	N	N	NONE	NONE	NONE	NONE
1002059707QT232	R000037468	N	N	N	N	NONE	NONE	NONE	NONE
0000092801QT6DF	600558193	N	N	N	Y	NONE	NONE	NONE	NGCM
0000134831QT663	600558072	N	N	N	Y	NONE	NONE	NONE	NGCM
0000167051QT80A	600558071	N	N	N	Y	NONE	NONE	NONE	NGCM
0000283171QTB12	600558064	N	N	N	Y	NONE	NONE	NONE	NGCM
0000527751QT522	600558070	N	N	N	Y	NONE	NONE	NONE	NGCM
0000587581QT48F	600558179	N	N	N	Y	NONE	NONE	NONE	NGCM
0000653151QT3A9	600558174	N	N	N	Y	NONE	NONE	NONE	NGCM
0000656491QT663	600558177	N	N	N	Y	NONE	NONE	NONE	NGCM
0000700821QTA05	600558187	N	N	N	Y	NONE	NONE	NONE	NGCM
0000706411QT431	600558163	N	N	N	Y	NONE	NONE	NONE	NGCM
0000726591QT1B2	600558192	N	N	N	Y	NONE	NONE	NONE	NGCM
0000854951QTDD2	600558069	N	N	N	Y	NONE	NONE	NONE	NGCM
0001003736NG5F9	600558092	N	N	N	Y	NONE	NONE	NONE	NGCM
0001003769NG22F	600558095	N	N	N	Y	NONE	NONE	NONE	NGCM
0001004410NGE40	600558097	N	N	N	Y	NONE	NONE	NONE	NGCM
0001005769NG7EF	600558166	N	N	N	Y	NONE	NONE	NONE	NGCM
0001007224NGC54	600559618	N	N	N	Y	NONE	NONE	NONE	NGCM
0001009987NG345	600560109	N	N	N	Y	NONE	NONE	NONE	NGCM
0001010009NG8DC	600558356	N	N	N	Y	NONE	NONE	NONE	NGCM
0001010912NG5AC	600558100	N	N	N	Y	NONE	NONE	NONE	NGCM
0001013597NG345	600558109	N	N	N	Y	NONE	NONE	NONE	NGCM
0001016315NG7AC	600558086	N	N	N	Y	NONE	NONE	NONE	NGCM

ICP Identifier	Meter Identifier	Standard Meter Y/N	Prepay Meter Y/N	TOU Meter Y/N	Advanced Metering Y/N	Logger Owner Code	Corrector Owner Code	Telemetry Owner Code	Advanced Meter Owner Code
0001017239NG143	600558099	N	N	N	Y	NONE	NONE	NONE	NGCM
0001020306NG52D	600558101	N	N	N	Y	NONE	NONE	NONE	NGCM
0001027086NG704	600558076	N	N	N	Y	NONE	NONE	NONE	NGCM
0001027572NG31C	600558102	N	N	N	Y	NONE	NONE	NONE	NGCM
0001030956NGFCE	600560074	N	N	N	Y	NONE	NONE	NONE	NGCM
0001033017NGAC7	600649948	N	N	N	Y	NONE	NONE	NONE	NGCM
0001033247NG8C8	600558175	N	N	N	Y	NONE	NONE	NONE	NGCM
0001033777NGA35	600558066	N	N	N	Y	NONE	NONE	NONE	NGCM
0001035659NG83F	600558084	N	N	N	Y	NONE	NONE	NONE	NGCM
0001436483QT072	600558184	N	N	N	Y	NONE	NONE	NONE	NGCM
0001436694QTD12	600558183	N	N	N	Y	NONE	NONE	NONE	NGCM
0001446715QT7A0	600589710	N	N	N	Y	NONE	NONE	NONE	NGCM
0001447571QT2FD	600589719	N	N	N	Y	NONE	NONE	NONE	NGCM
0002329731QTE07	600558186	N	N	N	Y	NONE	NONE	NONE	NGCM
0002342201QT142	600558172	N	N	N	Y	NONE	NONE	NONE	NGCM
0003001113NGDD7	600558087	N	N	N	Y	NONE	NONE	NONE	NGCM
0003012641NG059	600558091	N	N	N	Y	NONE	NONE	NONE	NGCM
0003013771NGF05	600558107	N	N	N	Y	NONE	NONE	NONE	NGCM
0003014114NGFDC	600558110	N	N	N	Y	NONE	NONE	NONE	NGCM
0003031473NG60E	600558103	N	N	N	Y	NONE	NONE	NONE	NGCM
0003034080NG1F8	600558079	N	N	N	Y	NONE	NONE	NONE	NGCM
0003034629NG1B0	600558067	N	N	N	Y	NONE	NONE	NONE	NGCM
0003035031NGEAF	600558104	N	N	N	Y	NONE	NONE	NONE	NGCM
0003037853NG297	600558111	N	N	N	Y	NONE	NONE	NONE	NGCM
0003040281NGB83	600558094	N	N	N	Y	NONE	NONE	NONE	NGCM
0003064405NG688	600558073	N	N	N	Y	NONE	NONE	NONE	NGCM
0003066940NGF2A	600560066	N	N	N	Y	NONE	NONE	NONE	NGCM
1000755382QT5CF	600558189	N	N	N	Y	NONE	NONE	NONE	NGCM
1000755552QTE8B	600559514	N	N	N	Y	NONE	NONE	NONE	NGCM
1000755860QTCFE	600558185	N	N	N	Y	NONE	NONE	NONE	NGCM
1001101983QT1AA	600558182	N	N	N	Y	NONE	NONE	NONE	NGCM
1001108361QTD3F	600559521	N	N	N	Y	NONE	NONE	NONE	NGCM
1001119618QTA77	600559561	N	N	N	Y	NONE	NONE	NONE	NGCM
1001127753QT6EE	600559840	N	N	N	Y	NONE	NONE	NONE	NGCM
1001131739QT6AE	600558080	N	N	N	Y	NONE	NONE	NONE	NGCM
1001137559QT699	600558170	N	N	N	Y	NONE	NONE	NONE	NGCM
1001148834QT0E3	600559537	N	N	N	Y	NONE	NONE	NONE	NGCM
1001152031QTB00	600558188	N	N	N	Y	NONE	NONE	NONE	NGCM
1001153650QTF13	600558176	N	N	N	Y	NONE	NONE	NONE	NGCM
1001154654QTA79	600559556	N	N	N	Y	NONE	NONE	NONE	NGCM
1001160692QTB5	600558165	N	N	N	Y	NONE	NONE	NONE	NGCM
1001164033QTF69	600558108	N	N	N	Y	NONE	NONE	NONE	NGCM
1001239360QTD42	600559519	N	N	N	Y	NONE	NONE	NONE	NGCM
1001239537NG840	600558239	N	N	N	Y	NONE	NONE	NONE	NGCM
1001243800QT545	600559531	N	N	N	Y	NONE	NONE	NONE	NGCM
1001246425NG8B5	600558222	N	N	N	Y	NONE	NONE	NONE	NGCM

ICP Identifier	Meter Identifier	Standard Meter Y/N	Prepay Meter Y/N	TOU Meter Y/N	Advanced Metering Y/N	Logger Owner Code	Corrector Owner Code	Telemetry Owner Code	Advanced Meter Owner Code
1001249211NG121	600560110	N	N	N	Y	NONE	NONE	NONE	NGCM
1001250732NG1F0	600558362	N	N	N	Y	NONE	NONE	NONE	NGCM
1001250978NG7CF	600674499	N	N	N	Y	NONE	NONE	NONE	NGCM
1001253134QT25F	600558302	N	N	N	Y	NONE	NONE	NONE	NGCM
1001259788NGD73	600649968	N	N	N	Y	NONE	NONE	NONE	NGCM
1001260866NG6D1	600559652	N	N	N	Y	NONE	NONE	NONE	NGCM
1001262963NG1DA	600558315	N	N	N	Y	NONE	NONE	NONE	NGCM
1001265552NG20B	600560111	N	N	N	Y	NONE	NONE	NONE	NGCM
1001268153NG86F	600558090	N	N	N	Y	NONE	NONE	NONE	NGCM
1001268328NG9E1	600559622	N	N	N	Y	NONE	NONE	NONE	NGCM
1001271797NGCCD	600560085	N	N	N	Y	NONE	NONE	NONE	NGCM
1001273284QTA23	600559533	N	N	N	Y	NONE	NONE	NONE	NGCM
1001274565QT7BE	600558075	N	N	N	Y	NONE	NONE	NONE	NGCM
1001276621QT452	600559524	N	N	N	Y	NONE	NONE	NONE	NGCM
1001276622QT892	600559535	N	N	N	Y	NONE	NONE	NONE	NGCM
1001277817NG348	600558065	N	N	N	Y	NONE	NONE	NONE	NGCM
1001278177NGCD1	600560065	N	N	N	Y	NONE	NONE	NONE	NGCM
1001278934NG2B9	600650110	N	N	N	Y	NONE	NONE	NONE	NGCM
1001279411NG60B	600558088	N	N	N	Y	NONE	NONE	NONE	NGCM
1001282282NG956	600560088	N	N	N	Y	NONE	NONE	NONE	NGCM
1001283313QT496	600559552	N	N	N	Y	NONE	NONE	NONE	NGCM
1001283315QT519	600558180	N	N	N	Y	NONE	NONE	NONE	NGCM
1001285936NGD80	600558077	N	N	N	Y	NONE	NONE	NONE	NGCM
1001292370QTEE7	600558229	N	N	N	Y	NONE	NONE	NONE	NGCM
1001293798NGD2E	600560091	N	N	N	Y	NONE	NONE	NONE	NGCM
1001294679NG6B5	600560102	N	N	N	Y	NONE	NONE	NONE	NGCM
1001294878NGCFB	600558106	N	N	N	Y	NONE	NONE	NONE	NGCM
1001294901NGEF3	600558083	N	N	N	Y	NONE	NONE	NONE	NGCM
1001296593NGEDD	600558074	N	N	N	Y	NONE	NONE	NONE	NGCM
1001297227NG3C7	600558105	N	N	N	Y	NONE	NONE	NONE	NGCM
1001297329NG958	600558093	N	N	N	Y	NONE	NONE	NONE	NGCM
1001297626QT545	600650380	N	N	N	Y	NONE	NONE	NONE	NGCM
1001298695NG491	600558085	N	N	N	Y	NONE	NONE	NONE	NGCM
1001298740NGD98	600558096	N	N	N	Y	NONE	NONE	NONE	NGCM
1001304192QT8B7	600559551	N	N	N	Y	NONE	NONE	NONE	NGCM
1002054371QT0C1	600559557	N	N	N	Y	NONE	NONE	NONE	NGCM
1002056814QT230	600559518	N	N	N	Y	NONE	NONE	NONE	NGCM
1002071305QTA7B	600559536	N	N	N	Y	NONE	NONE	NONE	NGCM
1002073413QTD1B	600559850	N	N	N	Y	NONE	NONE	NONE	NGCM

### Telemetry owner exceptions

ICP Identifier	Allocation Group Code	Corrector ID	corrector model	Year of Manufacture	Corrector inspection date	Corrector date of install	Responsible Meter Owner Code	Meter Identifier	Logger Owner Code	Corrector Owner Code	Telemetry Owner Code	TOU Meter Y/N
0000187231QT080	1	1008750092	Macbat 5	2002	16/10/2025	16/10/2025	NGCM	605907	NONE	NGCM	NONE	Y
0000340911QT6D3	1	1008750063	Macbat 5	2007	17/10/2025	17/10/2025	NGCM	20514688	NONE	NGCM	NONE	Y
0000531691QT6E8	1	1008750091	Macbat 5	1992	17/10/2025	17/10/2025	NGCM	923173	NONE	NGCM	NONE	Y
0002038251QT107	1	1008750039	Macbat 5	2007	19/11/2025	7/10/2025	NGCM	20511124	NONE	NGCM	NONE	Y
0008000019NG9FF	1	100366	Mini AT PT	2016	2/07/2025	28/01/2022	NGCM	R000018100	NONE	NGCM	NONE	Y
1002123925QT97C	1	1008750061	Macbat 5	9999	16/10/2025	16/10/2025	NGCM	R000060224	NONE	NGCM	NONE	Y
1002171197QTB72	1	1008750084	Macbat 5	2005	17/10/2025	17/10/2025	NGCM	20501988	NONE	NGCM	NONE	Y
1002198108QTA96	1	1008750075	Macbat 5	2008	3/11/2025	3/11/2025	NGCM	20514900	NONE	NGCM	NONE	Y

## Appendix 4 – Control Rating Definitions

Rating	Definition
<b>Ineffective</b>	<p>The design of controls <u>overall is ineffective</u> in addressing key causes and/or consequences.</p> <p>Documentation and/or communication of the controls <u>does not exist</u> (e.g. policies, procedures, etc.).</p> <p>The controls are <u>not in operation</u> or have not yet been implemented.</p>
<b>Needs improvement</b>	<p>The design of controls <u>only partially</u> addresses key causes and/or consequences.</p> <p>Documentation and/or communication of the controls (e.g. policies, procedures, etc.) are <u>incomplete, unclear, or inconsistent</u>.</p> <p>The controls are <u>not operating consistently</u> and/or effectively and have not been implemented in full.</p>
<b>Acceptable</b>	<p>The design of controls is <u>largely adequate and effective</u> in addressing key causes and/or consequences.</p> <p>The controls (e.g. policies, procedures, etc.) <u>have been formally documented but not proactively communicated</u> to relevant stakeholders.</p> <p>The controls are <u>largely operating in a satisfactory manner</u> and are providing some level of assurance.</p>
<b>Effective</b>	<p>The design of controls is <u>adequate and effective</u> in addressing the key causes and/or consequences.</p> <p>The controls (e.g. policies, procedures, etc.) have been <u>formally documented and proactively communicated</u> to relevant stakeholders.</p> <p>The controls overall, are <u>operating effectively</u> so as to manage the risk.</p>

## Appendix 5 – Impact Rating Definitions<sup>1</sup>

Rating	Definition
<b>Insignificant</b>	<ul style="list-style-type: none"> <li>• A <u>small number of issues</u> with registry file timeliness and/or accuracy. <u>Negligible impact</u> on other participants or consumers. <u>Did not prevent</u> the process completing.</li> <li>• A <u>small number of issues</u> with the accuracy and/or timeliness of files to the Allocation Agent. Corrections <u>were</u> made by the interim allocation. A <u>small number of issues</u> not related to registry or allocation information.</li> </ul>
<b>Minor</b>	<ul style="list-style-type: none"> <li>• <u>Some issues</u> with registry file timeliness and/or accuracy. <u>Minor impact</u> on other participants or consumers. <u>Did not prevent</u> the process completing.</li> <li>• <u>Some issues</u> with the accuracy and/or timeliness of files to the Allocation Agent. Corrections <u>were</u> made by the interim allocation. A <u>small number of issues</u> not related to registry or allocation information.</li> </ul>
<b>Moderate</b>	<ul style="list-style-type: none"> <li>• A <u>moderate number of issues</u> with registry file timeliness and/or accuracy. <u>Moderate impact</u> on other participants or consumers. <u>Did prevent</u> some processes completing.</li> <li>• A <u>moderate number of issues</u> with the accuracy and/or timeliness of files to the Allocation Agent. Corrections <u>were not</u> made by the interim allocation. A <u>moderate number of issues</u> not related to registry or allocation information.</li> </ul>
<b>Major</b>	<ul style="list-style-type: none"> <li>• A <u>significant number of issues</u> with registry file timeliness and/or accuracy. <u>Major impact</u> on other participants or consumers. <u>Did prevent</u> some processes completing.</li> <li>• A <u>significant number of issues</u> with the accuracy and/or timeliness of files to the Allocation Agent. Corrections <u>were not</u> made by the interim allocation. A <u>significant number</u> of issues not related to registry or allocation information.</li> </ul>

<sup>1</sup> These ratings are indicative and will be used as a guide only, to aid the Market Administrator's assessment of alleged breaches.

## Appendix 6 – Remedial Rating Definitions

Rating	Definition
Completed	The alleged breach and impact have been resolved. Systems and processes are now compliant.
In progress	Steps are being taken to resolve the alleged breach and impact and ensure systems and processes are compliant.
No action	Participant undertakes no action to resolve or address auditor controls or impact assessments for commercial reasons.

# Appendix 7 – Bluecurrent Metering Comments