



Gas Registry and Switching Performance Audit Final Report

For



Nova Energy Limited

Prepared by: Tara Gannon

Date of Audit: June to July 2026

Date Audit Report Complete: 17 September 2026

Executive Summary

This Performance Audit was conducted at the request of the Gas Industry Company (GIC) in accordance with Rule 88 of the 2015 Amendment Version of the Gas (Switching Arrangements) Rules 2008.

The purpose of this audit is to assess the systems, processes and performance of Nova Energy Limited (Nova) in terms of compliance with these rules. The audit was conducted in accordance with terms of reference prepared by GIC.

During the audit period Nova supplied gas ICPs using the GNVG and MEGA participant codes. By 1 April 2026 all MEGA ICPs were switched to GNVG. Read validation, gas conversion and submission activities for MEGA ICPs use the same Orion and EnergyMarket processes as are used for GNVG ICPs. Nova is continuing to provide revision submissions and maintain historic ICP information for MEGA ICPs. In agreement with GIC, because MEGA has no connected ICPs and no future connected ICPs are expected, I focussed on ensuring that post switch registry information changes were correctly managed. I checked all backdated registry information changes affecting submission which occurred after the MEGA ICPs switched to GNVG including network, retailer, status, metering, read renegotiations and switch withdrawals and confirmed they were correctly updated in Orion and accounted for in submission information.

Across most areas covered by this audit, Nova's compliance was high.

New connections are closely monitored using service orders and most ICPs were claimed on time. I identified only small numbers of late updates which could have been prevented by Nova. The majority of retailer and status updates made by Nova checked during the audit were on time and accurate. Nova focusses on ensuring that registry information is on time and accurate.

Switching is well managed, with no breaches for late switching files and few inaccuracies found. Most of these had a low impact and corrective action has already been taken to improve processes to prevent recurrence.

Orion-registry data discrepancies for most fields are promptly identified and resolved. A relatively small number of discrepancies were found for all fields apart from the network pressure and allocation groups.

The network pressure differences have been long standing; and are difficult to resolve as each ICP requires a meter change to correct the pressure. In most cases they are not causing gas conversion errors outside the maximum permissible limits in NZS 5259.

Allocation groups for non-TOU ICPs are intended to be checked using a report which compares the allocation groups recorded in Orion and the registry, and the annualised consumption. At the time of the 2024 audit, the report was not being regularly reviewed. Following the 2024 audit responsibility for non-TOU allocation groups was assigned, but the process ceased during the audit period due to staffing changes. Nova intends to reinstate the non-TOU allocation group validation process.

Some discrepancies are being identified but not consistently resolved promptly including meter pressure differences, altitude differences, and gas gate differences where the gates do not form part of the same notional delivery point. These errors can result in conversion and/or historic estimate calculation errors which can cause unaccounted for gas and errors outside the maximum permissible errors in NZS 5259. Nova intends to investigate and resolve these issues.

The summary of report findings in the table below shows that Nova's control environment is effective for nine of the areas evaluated, acceptable for four areas, and processes for resolving discrepancies need improvement. Ten breach allegations are made in relation to the non-

compliances identified and I have made six recommendations to improve the processes to resolve discrepancies and manage read renegotiations within Orion.

Summary of Report Findings

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)	Compliance Rating	Comments
Participant registration information	2	Effective	Compliant	Registration information is accurate.
Obligation to act reasonably	3	Effective	Compliant	No examples of Nova acting unreasonably were found.
Obligation to use registry software competently	4	Effective	Compliant	No examples of Nova using registry software incompetently were found.
ICP identifier on invoice	5	Effective	Compliant	The ICP identifier is shown on Nova's invoices.
Uplift of READY ICP	6	Acceptable	Non-compliant	Nova's new connections are well managed and most ICPs were claimed on time. The registry was not populated within two business days of Nova entering into a contract to supply gas to a consumer for three of 20 new connections claimed more than three business days after the event date.
Maintenance of ICP information in registry	7	Acceptable	Non-compliant	Most updates are made very close to the event date, and a small number of late updates within Nova's direct control were identified. ICP status was not updated on the registry as soon as practicable for 22 of the 63 backdated updates checked, and retailer information was not updated as soon as practicable for nine of the 21 backdated updates checked.
Resolving discrepancies	8	Needs improvement	Non-compliant	Most data discrepancies for most fields are promptly identified and resolved. A relatively small number of discrepancies were found for all fields, apart

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)	Compliance Rating	Comments
				from the network pressure and allocation groups which had large numbers of differences. The best endeavours requirements were not consistently met for the accuracy of all data fields.
Initiation of consumer switch/switching notice	9.1	Effective	Non-compliant	Controls over GNTs are effective and only three errors were identified. One of a sample of 31 switch move GNTs was issued more than two business days after entering into an agreement, 0000621801QTB51 GNT-11535493. One GNT was issued as a standard switch although the customer was moving in. The switch type was automatically applied because the ICP was unmetered. Nova is working with the digital team to prevent recurrence of this issue, preferably so that unmetered switch gains do not occur. One NTD breach was recorded where the wrong switch type was accidentally selected, and the switch was withdrawn, and compliantly re-requested as a switch move and completed.
Response to a gas switching notice	9.2	Effective	Compliant	
Gas acceptance notice	9.3	Acceptable	Non-compliant	Orion's automated GAN process creates accurate files as long as the underlying data in Orion is correct, non-compliance has only occurred where Orion was not up to date. Nine ICPs did not have the correct GAN response code, because of mismatches between Orion and the registry. The registry was updated to reflect the disconnection or reconnection before Orion, and the older Orion status information was used to produce the GAN.

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)	Compliance Rating	Comments
Gas transfer notice	9.4	Effective	Non-compliant	The GTN process is operating effectively. One TOU GTN had an incorrect switch event read applied, but there was no impact on submission because it is a GD ICP. Another two TOU ICPs had incorrect read types recorded in their GTN files. TND breaches where the GTN was issued for the day before the gaining retailer's requested date were recorded for ICP 1000522201PG9FE 10 June 2025 and ICP 0000132511QTBFE 17 December 2024. Both were created when users manually changed the dates in the files in error, and training has been completed to prevent recurrence and no issues occurred after 1 July 2025.
Accuracy of switch readings	9.5	Effective	Non-compliant	Section 9.5 has the same read accuracy non-compliances as section 9.4 .
Gas switching withdrawal	9.6	Effective	Non-compliant	The GNW process is now operating effectively. Six of a sample of 31 rejected GNWs checked were issued in error and no withdrawal was required. Further training has been provided to prevent recurrence, and apart from one error relating to a transfer from MEGA to GNVG the inaccuracies occurred before 2026.
Switch reading negotiation	9.7	Acceptable	Non-compliant	While the processes to produce accurate and on time GNC and GAC files are acceptable, making agreed switch event readings misreads when a GNC is issued affects the accuracy of submission information. This is discussed further in the 2026 Gas Downstream Reconciliation Performance Audit. ICP 1000508622PG3E7 GNC-12313447 16 April 2026 had a reading of 716 recorded in Orion and 717 on the registry, which Nova intends to correct. The error occurred because the GAC was completed manually on the registry and the process to update the reading did not complete in Orion correctly.

Persons Involved in This Audit

Auditor:

Tara Gannon

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Nova personnel in the following roles assisted with this audit:

- Metering and Energy Connections Manager,
- Senior Metering and Energy Connections Coordinator,
- Metering and Energy Connections Coordinator,
- Team Leader Reconciliation,
- Energy Analyst,
- Billing Services Manager, and
- Billing Analyst.

Contents

Executive Summary	2
Summary of Report Findings	4
Persons Involved in This Audit	7
1. Pre-Audit and Operational Infrastructure Information	10
1.1 Scope of Audit	10
1.2 Audit Approach	10
1.3 General Compliance	11
1.3.1 Summary of Previous Audits	11
1.3.2 Breach Allegations	16
1.4 Provision of Information to the Auditor (Rule 91)	21
1.5 Draft Audit Report Comments	21
2. Participant Registration Information (rules 7 and 10)	21
3. Obligation to Act Reasonably (rule 34)	22
4. Obligation to Use Registry Software Competently (rule 35)	22
5. ICP Identifier on Invoice (rule 36)	22
6. Uplift of Ready ICP (rule 54)	22
7. Maintenance of ICP Information in the Registry (rules 58 to 61)	26
8. Resolving Discrepancies (rule 62.1)	33
9. Switching	47
9.1 Initiation of Consumer Switch/Switching Notice (rules 65 to 67)	48
9.2 Response to a Gas Switching Notice (rules 69 to 75)	52
9.3 Gas Acceptance Notice (rule 70)	52
9.4 Gas Transfer Notice (rule 72)	54
9.5 Accuracy of Switch Readings (rule 74)	58
9.6 Gas Switching Withdrawal (rules 74A, 75, 76 and 78)	58
9.7 Switch Reading Negotiation (rules 79 and 81)	61
10. Bypass of Distributor (rule 82)	65
11. Recommendations	66
Appendix 1 – Control Rating Definitions	67
Appendix 2 – Impact Rating Definitions	68
Appendix 3 – Remedial Rating Definitions	69

Appendix 4 – Network pressure differences causing temperature factor differences over maximum permissible errors	70
Appendix 5 – Meter pressure differences causing pressure factor differences under maximum permissible errors	73
Appendix 6 – Nova Comments	75

1. Pre-Audit and Operational Infrastructure Information

1.1 Scope of Audit

This Performance Audit was conducted at the request of the Gas Industry Company (GIC) in accordance with Rule 88 of the 2015 Amendment Version of the Gas (Switching Arrangements) Rules 2008.

88. Industry body to commission performance audits.

88.1 The industry body must arrange performance audits of registry participants at intervals of no greater than five years.

88.2 The purpose of a performance audit under this rule is to assess in relation to the roles performed by a registry participant -

88.2.1 The performance of the registry participant in terms of compliance with these rules; and

88.2.2 The systems and processes of that registry 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 GIC and completed remotely using Microsoft Teams between 21 and 28 July 2026.

The scope of the audit includes compliance with the “switching arrangements” rules only. There is a separate report for downstream reconciliation.

During the audit period Nova supplied gas ICPs using the GNVG and MEGA participant codes. By 1 April 2026 all MEGA ICPs were switched to GNVG. In agreement with GIC, because MEGA has no connected ICPs and no future connected ICPs are expected and the same systems and processes are used to manage GNVG and MEGA information, I focussed on ensuring that post switch registry information changes were correctly managed.

1.2 Audit Approach

As mentioned in **section 1.1** the purpose of this audit is to assess the performance of Nova 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 Nova has in place to achieve compliance, and where it has been considered appropriate sampling has been undertaken to determine compliance.

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.¹

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.

¹ In statistics, a result is called statistically significant if it is unlikely to have occurred by chance. (Wikipedia)

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

1.3 General Compliance

1.3.1 Summary of Previous Audits

January 2024 audit

The previous audit was completed in February 2024 by Bernie Cross of Crosshaven Consulting. The table below shows the issues found during the audit and whether they have been resolved.

Section in this report	Summary of issue	Participant	Rules potentially breached	Status
6	Alleged breach 2024-030: Registry not populated within two business days of MegaTEL entering into a contract to supply gas to a consumer for eight new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. MegaTEL wait for confirmation of the meter installation before they manually update the registry. All delays were due to delays in the transfer of metering paperwork from meter owner to Nova Energy to MegaTEL.	MEGA	54.1	Awaiting a determination from the market administrator.
7	Alleged breach 2024-031: ICP status was not updated on the registry as soon as practicable for 30 of the 90 late updates checked.	GNVG	61.1	Awaiting a determination from the market administrator.
7	Alleged breach 2024-032: ICP status was not updated on the registry as soon as practicable for 2 of the 21 late updates checked.	MEGA	61.1	Awaiting a determination from the market administrator.
8	Alleged breach 2024-034: Nova Energy did not consistently use best endeavours to identify and resolve discrepancies, and some discrepancies have been present for extended periods. Some of the discrepancies resulted in gas conversion or reconciliation submission errors, and some of the discrepancies caused errors outside the maximum permissible errors in NZS 5259:2015. One of the 4 ICPs with ACTV or ACTC status where the registry recorded a meter identifier of "REMOVED" were confirmed to have an incorrect status.	GNVG	62.1	Awaiting a determination from the market administrator.

Section in this report	Summary of issue	Participant	Rules potentially breached	Status
	For ICP 1001301717NG752, the correction to the incorrect profile code occurred seven months after the initial event. There was no impact to submission. Seven inactive ICPs identified with an incorrect ICP connection status. There are currently 25,959 ICPs out of a population of 33,300 ICPs (78%) where the network pressure is set to the meter pressure within Orion. 12 ICPs were identified as having temperature factor values outside the maximum permissible error ($\pm 0.9\%$) due to the network pressure in Orion being recorded as meter pressure. 620 ICPs with allocation group discrepancies have not been reviewed or updated since April 2022. Five ICPs identified with a different altitude between Orion and the registry had an incorrect altitude recorded in Orion. One ICP (0001026382PG8D5) resulted in an altitude factor which was over the maximum permissible error in NZS 5259:2015. Seven of a sample of 120 ICPs checked had an incorrect altitude recorded in Orion, but the altitude was consistent with the registry value. None of the differences was over the maximum permissible error in NZS 5259:2015. Eight ICPs had incorrect meter numbers recorded in Orion. One ICP had incorrect meter digits recorded in Orion. Eight ICPs with meter pressure differences had an incorrect meter pressure recorded in Orion. four of the differences were over the maximum permissible error in NZS 5259:2015.			
8	Alleged breach 2024-033: MegaTEL Energy did not consistently use best endeavours to identify and resolve discrepancies, and some discrepancies have been present for extended periods. Some of the discrepancies resulted in gas conversion or reconciliation submission errors, and some of the discrepancies caused errors outside the maximum permissible errors in NZS 5259:2015. There are currently 2,359 ICPs out of a population of 2,591 ICPs (91%) where the network pressure is set to the meter pressure within Orion. All ICPs were identified as having temperature factor values within the maximum permissible error ($\pm$	MEGA	62.1	Awaiting a determination from the market administrator.

Section in this report	Summary of issue	Participant	Rules potentially breached	Status
	0.9%) due to the network pressure in Orion being recorded as meter pressure. 12 ICPs with allocation group discrepancies have not been reviewed or updated since April 2022. Two ICPs identified with a different altitude between Orion and the registry had an incorrect altitude recorded in Orion. One ICP (0001000879NG56D) resulted in an altitude factor which was over the maximum permissible error in NZS 5259:2015. One of a sample of 98 ICPs checked had an incorrect altitude recorded in Orion, but the altitude was consistent with the registry value. None of the differences was over the maximum permissible error in NZS 5259:2015. 15 ICPs with meter pressure differences had an incorrect meter pressure recorded in Orion. 11 of the differences were over the maximum permissible error ($\pm 0.9\%$) in NZS 5259:2015. Five ICPs had incorrect meter digits recorded in Orion.			
9.1	Alleged breach 2024-035: Two of a sample of 44 GNTs were not issued within two business days of entering into a contract to supply gas.	GNVG	66.1	Awaiting a determination from the market administrator.
9.1	Alleged breach 2024-038: A NTD breach was recorded for ICP 0000808811QTE87 because a requested switch date prior to the GNT issue date was recorded for a standard switch	MEGA	69.1	Awaiting a determination from the market administrator.
9.2	Alleged breach 2024-037: The expected switch date provided for four GANs were earlier than the requested switch date provided in the GNT that complied with Rule 67.3. Controls are effective overall as four out of 12,055 GAN responses had incorrect expected switch dates provided. The switch for ICP 1001100241QT46E recorded a GAN, GNW and GTN breach because a response to the gaining retailer's GNT was not issued to the registry within two business days of receipt. The registry's switch breach history report is used to identify switching files that are due, however	GNVG	70.2	Awaiting a determination from the market administrator.

Section in this report	Summary of issue	Participant	Rules potentially breached	Status
	due to user error a GAN response was not provided.			
9.4	Alleged breach 2024-039: Incorrect date of last meter reading for five ICPs from a sample of 22 GTN files. The logic within Orion is considering final estimate reads as an actual read for the purposes for determining the last actual read date.	GNVG	72.1.5	Awaiting a determination from the market administrator.
9.6	Alleged breach 2024-042: The GNW for ICP 1001286563QT0ED was incorrectly issued with reason request code of CR – customer request, when the reason request code should have been WS – wrong switch type. There was no impact on submission because the GNW was rejected by the other retailer.	GNVG	75.1	Awaiting a determination from the market administrator.
9.6	Alleged breach 2024-043: The GNW for nine ICPs was incorrectly issued with reason request code of DF – date failed, when the reason request code should have been CR – customer request as the customer in all four cases wanted to amend the switch move date. There was no impact on submission because two GNWs were rejected prior to switch completion and seven were accepted by the other retailer prior to the creation of the GTN file.	MEGA	75.1	Awaiting a determination from the market administrator.
9.7	Alleged breach 2024-044: 11 GNC files had the readings identified as actuals, but they were estimates calculated from the template. There was no impact on submission because the agreed switch reading value was applied. All switch event readings are treated as validated readings or permanent estimates by the switching process and are used to calculate historic estimate volumes.	GNVG	79.4.6	Awaiting a determination from the market administrator.
9.7	Alleged breach 2024-045: Three GNC files had the readings identified as actuals, but they were estimates calculated from the template. There was no impact on submission because the agreed switch reading value was applied. All switch event readings are treated as validated readings or permanent estimates by the switching process and are used to calculate historic estimate volumes.	GNVG	79.4.6	Awaiting a determination from the market administrator.

The table below shows the status of recommendations made for GNVG during the February 2024 audit:

Section	GNVG Recommendation	Status
2	Refresh the participant registration information to ensure there is sufficient and current contact information relating to the respective teams responsible for registry interactions.	Adopted.
8	As part of the registry data correction process ensure there is a feedback loop to the original user who made the error to ensure users are aware of the need to check that the registry attributes are correctly applied in the initial event. This will reduce the ongoing volume of required remedial registry corrections.	Adopted. I saw evidence of this during the audit.
8	Ensure meter owners are advised where discrepancies between the initial ACTC status and metering event dates are identified to ensure the Registry is updated.	Adopted. I saw evidence of this during the audit.
8	Ensure the outstanding list of potential allocation group updates are reviewed and updated.	Not adopted. Allocation group validation processes for groups 4 and 6 were ceased during the audit period following staffing changes and will be reinstated.
8	Ensure allocation group exception report is run on a regular cycle and also reviewed after each generation of the report.	
8	Review meter set up process and exception monitoring for Orion to ensure the correct network pressure is applied for all new meter set ups.	Adopted. I saw evidence of this during the audit.
8	Ensure the meter serial number report is actively monitored, and exceptions actioned in a timely manner to ensure the billing, switching and submission processes are not impacted.	Adopted. I saw evidence of this during the audit, and the number of meter number discrepancies is small.
9.1	Review the online sign-up process to improve the accuracy of the information provided by customers to enable accurate switch types to be determined.	Adopted.
9.7	Investigate expanding the current switch read amendment template to also populate the GNC file format that will ensure the correct read type is applied for all GNC files.	Each GNC is individually checked prior to being issued to ensure that the correct read types are applied.

The table below shows the status of recommendations made for MEGA during the February 2024 audit:

Section	MEGA Recommendation	Status
6	Implement a process to actively monitor the registry 'RSREADY' report and match the ICPs listed against	

Section	MEGA Recommendation	Status
	received customer supply applications to ensure all proposed new connections are accounted for.	The MEGA participant code is no longer used and no new connections will occur.
6	Review new connection process so that once a supply agreement has been entered into with a consumer, that the registry is updated to reflect this.	
9.6	Develop matrix of common reasons to withdraw a switch that is mapped to the request reason codes that ensures the correct request reason code is accurately selected by users.	Adopted.

1.3.2 Breach Allegations

Nova has 30 alleged breaches recorded by the Market Administrator since April 2024, 26 were alleged as part of the previous audit and the other four related to switching file content. A summary of the breaches is shown in the table below.

Breach notice number	Breach month	Underlying breaches	Rule allegedly breached	Details	Outcome
2025-002	Jan 2025	1	72.2	Non-compliant outgoing GTN switch event date.	No material issues raised.
2025-045	Jul 2025	1	72.2	Non-compliant outgoing GTN switch event date.	No material issues raised.
2025-073	Oct 2025	1	67.3	Non-compliant outgoing GNT requested switch event date.	No material issues raised.
2024-028	Apr 2024	1	70.2	GAN content.	No material issues raised.
2024-030	Apr-24	8	54.1	Raised following the previous switching audits, as discussed in section 1.3.1 .	Awaiting decision from market administrator.
2024-031	Apr-24	8	61.1		
2024-032	Apr-24	2	61.1		
2024-033	Apr-24	8	62.1		
2024-034	Apr-24	2394	62.1		
2024-035	Apr-24	2	66.1		
2024-036	Apr-24	1	9.1		
2024-037	Apr-24	4	70.2		
2024-038	Apr-24	1	69.1		

Breach notice number	Breach month	Underlying breaches	Rule allegedly breached	Details	Outcome
2024-039	Apr-24	5	72.1.5		
2024-040	Apr-24	3	72.1.5		
2024-041	Apr-24	2	74.2.2		
2024-042	Apr-24	1	75.1		
2024-043	Apr-24	9	75.1		
2024-044	Apr-24	11	79.4.6		
2024-045	Apr-24	3	79.4.6		
2025-053	Aug-25	1	12.3.5		No material issues raised.
2025-054	Jul-25	1	58.1		Awaiting decision from market administrator.
2025-055	Jul-25	5	58.1		
2025-056	Jul-25	20	58.1		
2025-057	Jul-25	31	58.1		
2025-058	Jul-25	11	59.11		
2025-059	Jul-25	1	62.2		
2025-060	Jul-25	16	27		
2025-061	Jul-25	6	58.1		
2025-062	Jul-25	2099	62.2		

Non-compliance was found in nine sections of this audit. Ten breach allegations are made in relation to these matters.

Breach Allegation	Rule	Section in this report
The registry was not populated within two business days of Nova entering into a contract to supply gas to a consumer for three of 20 new connections claimed more than three business days after the event date.	54.1	6
ICP status was not updated on the registry as soon as practicable for 22 of the 63 backdated updates checked, and retailer information was not updated as soon as practicable for nine of the 21 backdated updates checked.	61.1	7

Breach Allegation	Rule	Section in this report
The best endeavours requirements were not consistently met for all data fields, and non-compliance is recorded for: ICP status and connection status Three of the 92 status records checked had incorrect status event dates. ICPs 0001428684QT79E and 0001855201QT1CD cannot be corrected because the ICPs are decommissioned and ICP 1001132268QT506 which was updated to ACTC-GAS from 25 February 2022 in error because of a misread. ICPs not set up in Orion following switch in ICPs 0000852081QTC59 and 1002124819QT0FE were not created in Orion on switch in due to a GTN processing issue. The ICPs and meters were immediately added in Orion on discovery during the audit, and investigation found another two affected ICPs which were added. A new daily check has been implemented from July 2026 to identify ICPs where GNVG is the retailer, but the ICP is not in Orion to prevent recurrence. Allocation groups Validation of non-TOU allocation groups is not currently occurring. 107 ICPs have different allocation groups in Orion and the registry, and 1,168 ICPs have allocation groups which appear inconsistent with their consumption and/or metering information. The impact is likely to be low because the energy reconciliation team ensures that the registry allocation group is applied, all ICPs are scheduled to be read at least monthly regardless of their allocation group, and the ICPs in AG4 or AG6 which were reported to have consumption over 10,000 GJ per annum are likely to have actual consumption below 10,000 GJ per annum. Gas gate 14 ICPs have incorrect gas gates, and this is unlikely to result in gas conversion errors outside the maximum permissible limits in NZS 5259. It could result in consumption being incorrectly apportioned between reconciliation periods where SADS from the wrong gate are used to calculate historic estimate. Altitude For 15 ICPs Orion recorded an incorrect ICP altitude which differed from the registry altitude by more than ±10m. Altitude factor errors outside the maximum permissible errors in NZS 5259 have occurred for ICPs 1001295261NG3AD (-3.01%) and 0000027411GN5E9 (+5.55%). Three of a sample of 75 ICPs with non-zero altitudes and one of the 36 ICPs with zero altitudes differed from the Google Earth altitude by more than ±10m. None of the differences were outside the maximum permissible errors in NZS 5259. Network pressure 24,616 ICPs have a different network pressure in Orion and the registry. 110 GAS status non-TOU ICPs have network pressures in Orion which are more than ±400 kPa of the registry network pressure value, and likely to cause temperature factor differences outside the maximum permissible errors in NZS 5259. Most ICPs with material differences have been corrected and revised submission information will be washed up where final revisions have not already been completed. 54 ICPs listed in Appendix 6 are still to be corrected.	62.1	8

Breach Allegation	Rule	Section in this report
Meter serial numbers 14 ICPs had incorrect serial numbers recorded in Orion and have now been corrected. Meter digits Two ICPs had incorrect meter digits in Orion and have been corrected. Meter pressure There were 51 ICPs with inaccurate meter pressures recorded in Orion. All nine differences over ± 1.1 kPa and likely to result in errors outside the maximum permissible errors recorded in NZS 5259 and were corrected during the audit in time for revised submission information to be washed up for all affected periods. One of the 42 differences under ± 1.1 kPa has been corrected and Nova intends to resolve the other issues which are listed in Appendix 5.		
One of a sample of 31 switch move GNTs was issued more than two business days after entering into an agreement, 0000621801QTB51 GNT-11535493.	66.1	9.1
Rule 67.1.2 ICP 0001001735NGA79 GNT-11905609 was issued as a standard switch although the customer was moving in. The switch type was automatically applied because the ICP was unmetered. Nova is working with the digital team to prevent recurrence of this issue, preferably so that unmetered switch gains do not occur. Rule 67.3 One NTD breach was recorded for ICP 0001686381QT924 GNT-11977218, which had a backdated requested switch date. The wrong switch type was accidentally selected, and the switch was withdrawn, and compliantly re-requested as a switch move and completed.	67.1.2 and 67.3	9.1
Nine ICPs² did not have the correct GAN response code because of mismatches between Orion and the registry. The registry was updated to reflect the disconnection or reconnection before Orion, and the older Orion status information was used to produce the GAN. Orion's automated GAN process creates accurate files as long as the underlying data in Orion is correct, non-compliance has only occurred where Orion was not up to date. Processing of manual updates to disconnected status for vacant ICPs is de-prioritised as there is no customer impact, although recently vacant disconnected ICPs can be more likely to receive a switch move GTN. The impact on other participants is minimised because the correct status was recorded on the registry.	70.3	9.3

² 1002068671QTF68 GAN-12282170 PD should be AA. 1000502276PG8A4 GAN-12330447, 0002204921QT520 GAN-11354445, 0002215601QTE3B GAN-11686303, 0000802331QTE9C GAN-12222286, 0002104571QTD90 GAN-12239138, 0002105621QT73B GAN-12193932, 0001403702QTC72 GAN-12059957 and 0001818791QTA9A GAN-12285156 AA should be PD.

Breach Allegation	Rule	Section in this report
TND breaches where the GTN was issued for the day before the gaining retailer's requested date were recorded for ICP 1000522201PG9FE 10 June 2025 and ICP 0000132511QTBFE 17 December 2024. Both were created when users manually changed the dates in the files in error, and training has been completed to prevent recurrence. No issues occurred after 1 July 2025.	72.1.5	9.4
TOU 0008000071NG41B GTN-11882451 had an incorrect switch event read applied, because an estimated read used for switching was later replaced with an actual read. There was no impact on submission or the other retailer for this GD ICP. ICP 0001787671QT9FA GTN-11896628 and ICP 1000525876PGF03 GTN-11209913 had an estimated read type in its GTN, but an actual reading was recorded in Orion. Nova will raise a ticket to investigate.	75.1.5 and 74	9.4 and 9.5
Seven of a sample of 31 rejected GNWs checked were issued in error and no withdrawal was required. There was no impact on submission because the invalid GNWs were rejected by the other retailer. Further training has been provided to prevent recurrence, and apart from one error relating to a transfer from MEGA to GNVG the inaccuracies occurred before 2026.	75.1	9.6
ICP 1000508622PG3E7 GNC-12313447 16 April 2026 had a reading of 716 recorded in Orion and 717 on the registry, which Nova intends to correct. The error occurred because the GAC was completed manually on the registry and the process to update the reading did not complete in Orion correctly.	81	9.7

One alleged breach is recorded for a distributor in relation to the altitude for ICP 0000027411GN5E9:

ICP	Distributor	Registry Altitude	Orion Altitude	Google Earth Altitude	Altitude factor Orion	Altitude factor google earth	Difference
0000027411GN5E9	GNET	15	483	0	0.944545	1	5.55%

Breach Allegation	Rule	Section in this report
Incorrect registry altitude for GasNet ICP 0000027411GN5E9: The ICP altitude for 0000027411GN5E9 is recorded in the registry as 15m, but the Google Earth altitude for the ICP is 0m. Altitudes are required to be accurate within ± 10 m to support compliance with NZS 5259.	DR 26.5	6

1.4 Provision of Information to the Auditor (Rule 91)

In conducting this audit, the auditor may request any information from Nova, the industry body and any registry participant. Information was provided by Nova in a timely manner in accordance with this rule.

1.5 Draft Audit Report Comments

A draft audit report was provided to the industry body (GIC), the registry operator, and registry participants that I considered had an interest in the report. In accordance with rule 92.3 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 responses were received.

Party	Response	Comments provided	Attached as appendix
Nova Energy	Yes	Yes	No. Comments are added to non-compliances and recommendations in the report body.
Powerco	Yes	Yes	Yes. Section 8 has been updated to reflect that the AG1 ICPs without a telemetry owner recorded on the registry have internal modems and AG1 is correctly assigned. The recommendation to check these ICPs has been removed, but a general recommendation to validate allocation groups against the telemetry owner remains in the Gas Registry and Switching Performance Audit Report. The number of ICPs which have allocation groups which appear inconsistent with their consumption and/or metering information has been reduced in from 1,183 to 1,168 in the breach allegation.

2. Participant Registration Information (rules 7 and 10)

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

- the name of the registry participant,
- 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. Every person who becomes a registry participant after the commencement date must supply the registration information within 20 business days of becoming a registry participant.

Nova has supplied correct registration information to the gas registry.

3. Obligation to Act Reasonably (rule 34)

No examples of Nova acting unreasonably were found.

4. Obligation to Use Registry Software Competently (rule 35)

No examples of Nova using registry software incompetently were found.

5. ICP Identifier on Invoice (rule 36)

The ICP identifier is shown on Nova's invoices.

6. Uplift of Ready ICP (rule 54)

New connection process

The process for the connection and activation of new ICPs was examined. Customers or their agents apply to their local network for a new connection, nominating Nova as their retailer.

When the network advises Nova of the new connection, a service request is created in SFI (Salesforce) and the connections team arranges a customer contract. Once a contract is finalised, including the customer accepting any charges associated with the new connection, Nova manually claims the ICP on the registry at INACT-GNM status, creates the ICP in Orion, and raises a job for meter installation through the meter owner's portal. The SFI service order is updated as steps are completed, and expected due dates for the next step are added.

Work completion paperwork is received from the network and meter owner via email, and staff monitoring the inbox update the service order, and change the due date to indicate paperwork is received. Nova is considering automating the process to update the SFI service orders when paperwork is received to improve timeliness.

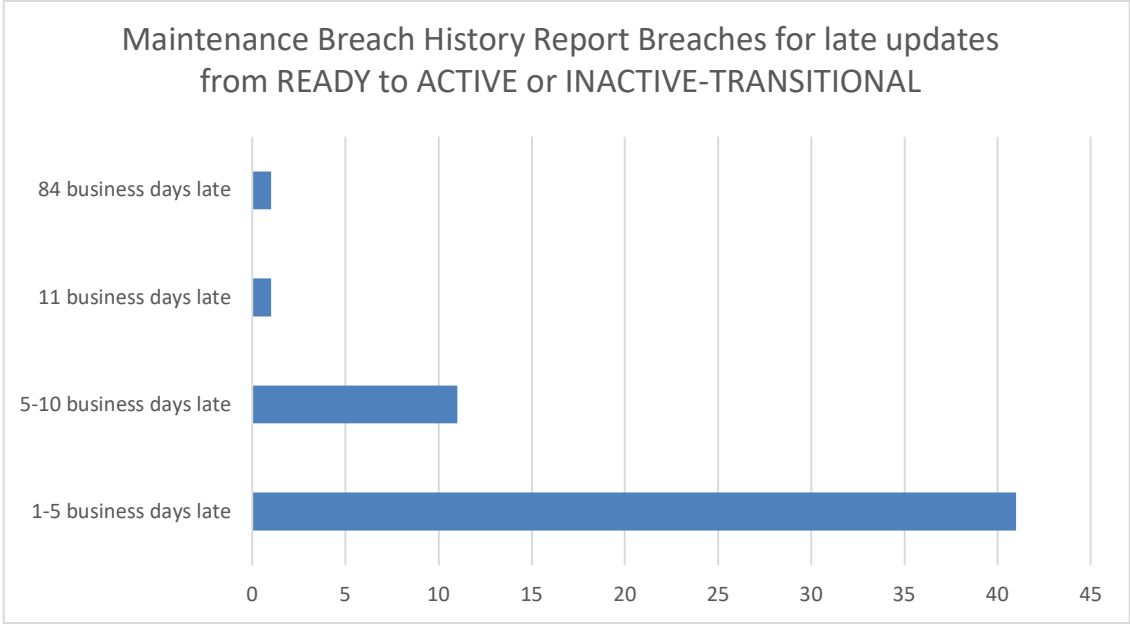
Connections and technical staff work through the service orders and returned paperwork and manually update the ICP status in Orion and the registry, and metering information in Orion.

Overdue SFI service orders are monitored and reported on each morning. Overdue field work is followed up with the meter owner or distributor as necessary.

New connection information timeliness

Consumption information will not be provided to the allocation agent unless the ICP has a metered status and open meter recorded in Orion. Under rule 54, retailers are required to claim the ICP on the registry and move it to an active or inactive status within two business days of entering into an agreement with the customer.

The “Maintenance Breach History Report (RET breaches)” report was examined for the period from 1 April 2024 to 3 June 2026. This report contained 54 ICPs where an update from READY status to ACTIVE-CONTRACTED, ACTIVE-VACANT or INACTIVE-TRANSITIONAL status was made more than two business days after the event date, an improvement from 88 for the period from 1 August 2022 to 31 July 2023. 52 of the updates were made within ten days of the event date, and the other updates were 11 and 84 days after the event date respectively. The median late update was made three business days after the event date, and the average late update was 5.2 business days after the event date.



I checked the records for the 20 latest updates, including all made more than three business days after the event date:

- for 15 of the late updates Nova claimed the ICP at either ACTC-GAS or INACT-GNM within two days of the network creating the ICP; I have recorded compliance for these as it was not possible for Nova to claim the ICPs sooner as they cannot claim an ICP on the registry until the distributor has created the ICP at GIR status and recorded GNVG as the expected retailer.
- two of the updates were on time, and were made within two business days of the customer contract being entered into, and
- three of the 20 updates did not occur within two business days of entering into a contract to supply gas to the consumer and the ICP being at GIR status; the table below shows the ICPs and the reason for the late updates.

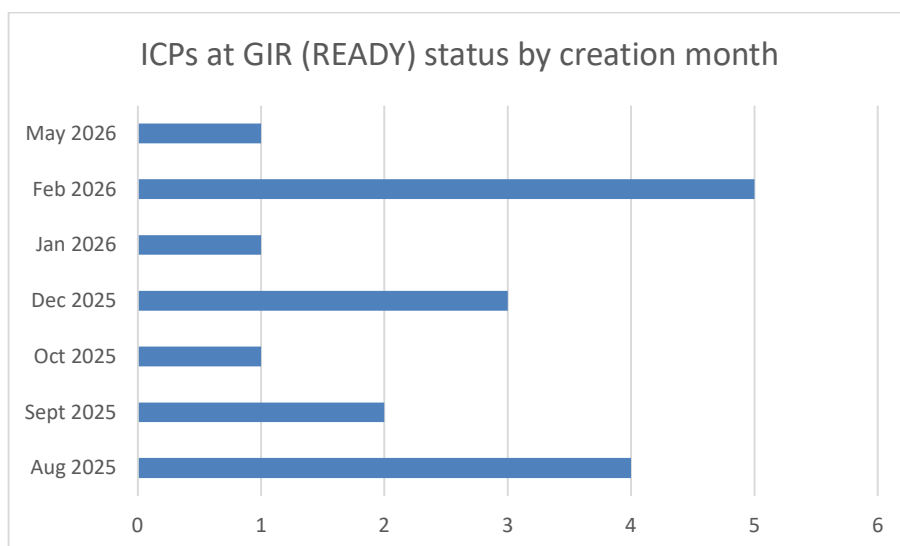
ICP	Event date	Input date	Days overdue	Reason
1000625678PG627	11 March 2026	27 March 2026	10	The contract was entered into on 12 February 2026 and the ICP was created at GIR on 19 March 2026. The claim was late because the service request was not updated in SFI.

ICP	Event date	Input date	Days overdue	Reason
1000617897PG724	26 April 2024	6 May 2025	4	The contract was entered into on 8 April 2024 and the ICP was created at GIR on 29 April 2024, but it was not claimed until 6 May 2025.
1001305632NG8CC	25 September 2024	2 October 2024	3	The contract was entered into on 25 September 2024 and the ICP was already at ready, but it was not claimed until 2 October 2024.

For most of the audit period, Nova ran a weekly report of ICPs at READY status where Nova is recorded as the expected retailer. Because ICPs at READY are normally identified through email notifications from distributor and meter owner portals prior to the report being checked, the review frequency was dropped to monthly and has not been run for the last two months. From July 2026 onwards Nova intends to complete a monthly review.

The “RSREADY” report was reviewed for 17 May 2026 and contained 27 ICPs at READY status, where Nova was the proposed retailer:

- 12 were claimed after the report was run upon the customer contract being finalised and the customer accepting charges associated with the new connection,
- ICP 1001307141NGD13 will be claimed once a contract is entered into with the customer, and is being monitored by the connections team,
- six connections have been declined by Nova as no agreement has been reached with the customer, and the network has been advised,
- four connections have been placed on hold by the network and Nova also has no agreement with the customer,
- the connection for ICP 1002213364QT00E has been cancelled by the network but the ICP remains at READY status, and ICP 1001306748NG4E4 has been decommissioned, and
- two connections had the expected retailer updated to TRUS.



Uplift of ready ICPs		
Non-compliance	Description	
Report section: 6 Rule: 54.1 From: 2 Oct 2024 To: 27 Mar 2026	Audit history: Yes Controls: Acceptable Impact: Insignificant	The registry was not populated within two business days of Nova entering into a contract to supply gas to a consumer for three of 20 new connections claimed more than three business days after the event date. The delays were very minor and the impact is insignificant. Where the ICP is not claimed on the registry or set up in Orion in time for the initial reconciliation submission, revised data will be washed up through the revision process as long as the update is made within 13 months of the event date.
Remedial action rating	Remedial timeframe	Remedial comment
Completed	Completed prior to finalisation of the audit report	Remedial actions focused on strengthening the management and visibility of new connection activities to ensure all required Registry updates are completed within prescribed timeframes. Periodic reviews of READY status ICPs have also been reinstated as an additional control to support the timely identification and progression of new connections.
Audited party comment		
The circumstances of the matters outlined in the breach notice.		The exceptions identified during the audit arose from a small number of new connection processes not progressing through the normal workflow as expected. In these cases, the required registry updates were not completed within the prescribed timeframe due to administrative oversight and delays in progressing connection requests through internal tracking processes. The three identified

	ICPs were isolated events and do not reflect the overall operation of Nova's new connection process, which successfully managed and processed the majority of new connections within the required timeframes.
Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach
Estimate of the impact of the breaches (where admitted).	Nova considers the impact of these breaches to be insignificant. The affected ICPs represented isolated exceptions within the overall new connection process, and had no impact on normal reconciliation and revision processes
What steps or processes were in place to prevent the breaches?	Nova had established processes for managing new connections, including service request tracking, monitoring of outstanding connection activities, registry management procedures, daily reporting of overdue service orders, and review of READY status ICPs where Nova was recorded as the expected retailer. Staff also relied on notifications from distributors and meter owners to progress connection requests and complete registry updates.
What steps have been taken to prevent recurrence?	Additional monitoring has been introduced to ensure new connection requests remain visible until all registry actions have been completed, and periodic reviews of READY status ICPs have been reinstated as an additional control. Nova will continue to monitor exceptions and follow up on any outstanding connection activities to ensure registry updates are completed within the required timeframes. Nova is also investigating opportunities to further automate aspects of the connection workflow to improve visibility and reduce the risk of administrative oversight.

7. Maintenance of ICP Information in the Registry (rules 58 to 61)

Registry maintenance process

Retailers must use "reasonable endeavours" to maintain current and accurate information in the registry (rule 58) and, if a responsible retailer becomes aware that information is incorrect or requires updating, they must correct or update the information "as soon as practicable" (rule 61).

Status updates

Statuses are updated separately in the registry and Orion.

Disconnection and reconnection requests are sent directly to the contractor or meter owner. The retailer field services team create a SFI service order at the same time. As paperwork is received via email to a shared inbox, the retailer field services team updates the SFI service order with the field results including whether the job was successful or unsuccessful. If a job is unsuccessful, they consider whether any issues need to be resolved before it can be completed successfully and re-raise the job if necessary.

A daily sweep of updated SFI service orders is completed, and this information is used to update the registry status and event date. Separately, the shared inbox is worked through to update the Orion status, and disconnection reading. Reconnection readings are sometimes entered.

Decommissioned ICPs are updated manually in the registry and Orion at the same time, when the paperwork is received.

A weekly exception report identifies status differences between the registry and Orion, and the metering and connections team investigates and clears as many as possible. Reporting for inactive consumption and zero consumption can also identify ICPs with incorrect statuses.

Nova is considering automating the process to update Orion and will ensure that reconnection as well as disconnection reads are consistently entered.

Retailer updates

Most retailer changes are to allocation groups or the expected meter owner, and the registry and Orion are updated separately.

Expected meter owner changes are normally at the meter owner's request and are updated manually on the registry and in Orion at the same time.

Processes to validate and update allocation groups for AG4 and AG6 have not been operating as they were designed during the audit period following staffing changes and will be reinstated. Bulk allocation group changes are expected to be made using scripts. Processes to validate and update allocation groups for AG1 and AG2 ICPs are managed by the billing team. Information inaccuracies for allocation groups are discussed further and recorded as non-compliance in **section 8**.

Network updates

Orion is manually updated when paperwork indicating changes to network attributes is received, and other network information changes are generally identified and updated through the validation processes discussed in **section 8** except network pressures, and gas gates where the two gates do not have the same notional delivery point.

Network pressure is recorded against the meter as the inlet pressure in Orion and was not used by Orion's processes until it began adjusting gas temperatures for the Joule Thomson Effect. Many long term ICPs which have not undergone meter changes have the meter outlet pressure recorded as the network inlet pressure. Because a meter change must be processed in Orion to correct the pressure, it is not practical to process corrections for all ICPs. The large number of discrepancies to the registry makes it difficult to identify new exceptions.

For gas gates, there is an automated process to correct the gate if the two gates have the same notional delivery point. During the audit, Nova found that gates with different notional delivery points were excluded from these updates. The logic will be changed so that all ICPs with gate differences are corrected.

Information inaccuracies relating to these two issues are discussed further and recorded as non-compliance in **section 8**.

Meter owner updates

Orion is manually updated when paperwork indicating changes to meter attributes is received, and other changes are expected to be identified through validation reporting. Changes initiated by Nova are managed through SFI service orders, and an internal service order is created if the change is initiated by the meter owner.

Registry status update timeliness

I reviewed the event detail report to identify all status updates made by Nova between 1 April 2024 to 3 June 2026.

Status	Total updates	Update > five business days	Update > 20 business days	Update > 120 business days	Latest update business days	Average update days
ACTC	4,731	2,083	1,324	41	639	21
ACTV	1	1	1	-	42	42
INACP	247	52	26	3	257	8
INACT	3,104	164	61	32	3,615	8

The Rules do not define a specific time period for updates but for the purpose of this audit, I checked the reasons for late updates for a sample of 63 late updates including at least the ten latest updates (or all late updates) to each connection status and ICP status code combination. I have recorded breach allegations where I consider the reason for the late update was within Nova's control and additional steps could have been taken to prevent the late update.

Status	Non-compliant	Compliant
ACTC	12 x updates were primarily delayed because there was a delay in actioning service orders which required user intervention or reviewing all items on exception reports.	7 x updates where errors were corrected as soon as practicable after discovery of incorrect information. 2 x updates where late receipt of information from other parties was the primary cause of the late update.
ACTV	1 x update was primarily delayed because there was a delay in actioning workflow items which required user intervention.	
INACT	7 x updates were primarily delayed because there was a delay in actioning workflow items which required user intervention or exception reports. 1 x update had an incorrect year entered. ICP 0001855201QT1CD should have been inactive from 12 January 2025, instead of 12 January 2024, but cannot be corrected because it is now decommissioned.	16 x updates were delayed by a combination of delayed paperwork and a Nova processing delay. Compliance is recorded because most of the delay was beyond Nova's control. 6 x updates where errors were corrected as soon as practicable after discovery of incorrect information.
INACP	1 x update had an incorrect year entered. ICP 0001428684QT79E should have been inactive from 6 January 2026, instead of 6 January 2025, but cannot be corrected because it is now decommissioned.	Ten x updates were delayed by a combination of delayed paperwork and a Nova processing delay. Compliance is recorded because most of the delay was beyond Nova's control.
Total	22	41

The updates where I consider the reason for the late update was within Nova's control and additional steps could have been taken to prevent the late update are listed by ICP status in the tables below.

Status	ICP	Event date	Input date	Bus days	Reason
ACTC	1000579957PGFE3	26 April 2024	16 April 2026 16:07	491	Missed status change during downgrade.
ACTC	1001302321NGFC4	10 June 2025	23 March 2026 16:01	196	Missed status change.
ACTC	1001275851NG322	10 May 2023	1 August 2024 10:45	307	Missed reconnection on switch in.
ACTC	0000019626GNC30	30 May 2025	24 March 2026 15:30	203	
ACTC	1001161407QT2BA	25 June 2025	25 March 2026 9:01	188	
ACTC	0000194151QT672	24 April 2025	12 January 2026 16:05	179	Delay in working through inactive consumption exceptions. ICPs with inactive consumption are not consistently investigated and resolved promptly, and many ICPs that appear on the exception reports do not have genuine consumption during inactive periods, but it appears they do because reconnection readings are not consistently entered. From July 2026 onwards Nova will prioritise the ICPs with the largest volumes over the longest periods to help to identify and resolve the real exceptions more quickly.
ACTC	0002247281QT744	20 November 2023	8 August 2024 9:40	177	
ACTC	1001134187QT6A1	24 March 2025	25 November 2025 16:16	170	
ACTC	0004003067NGAE4	11 December 2023	9 August 2024 11:32	163	
ACTC	0001397651QT5F1	26 May 2025	15 February 2026 18:12	180	
ACTC	1001264335NG797	30 October 2024	23 June 2025 11:43	157	Late correction from ACTV to ACTC.
ACTC	1000563163PGFBD	31 May 2025	24 June 2025 13:34	14	
ACTV	1001294520NG3EF	26 March 2025	28 May 2025 20:50	42	Missed reconnection on switch in.
INACP	0001428684QT79E	6 January 2025	16 January 2026 11:30	257	Incorrect year entered.

Status	ICP	Event date	Input date	Bus days	Reason
INACT	0002029047NGFA5	30 October 2025	9 December 2025 19:39	28	Delay in working paperwork or exceptions.
INACT	0001528481QT4BA	30 July 2024	6 August 2024 10:28	5	
INACT	0004205197NGEEF	8 April 2019	21 January 2025 14:13	1,445	
INACT	0001853631QTFF4	24 February 2025	25 February 2026 15:06	250	
INACT	1001132268QT506	18 September 2024	15 August 2025 10:04	225	
INACT	0001420667QTCE4	4 February 2026	16 March 2026 8:35	27	
INACT	0004220804NGA2C	14 January 2025	29 January 2025 15:24	10	
INACT	0001855201QT1CD	12 February 2024	13 February 2025 14:08	251	Incorrect year entered.

In addition to the updates for ICPs 0001428684QT79E and 0001855201QT1CD with incorrect dates, ICP 1001132268QT506 was updated to ACTC-GAS from 25 February 2022 in error because of a misread. All other updates checked were correct.

Registry retailer update timeliness

I reviewed the event detail report to identify all retailer updates made by Nova between 1 April 2024 to 3 June 2026, excluding retailer events automatically created on switch completion.

Update type	Total updates	Update > five business days	Update > 20 business days	Update > 120 business days	Latest update business days	Average update days
Retailer	577	81	17	8	1,764	14

The Rules do not define a specific time period for updates but for the purpose of this audit I checked the reasons for all 21 updates more than 15 business days after the event date. Eight of the updates were delayed by late notification that a change was required, and a further four required an investigation before the correct attributes could be confirmed. The other updates were genuinely late because of incorrect event dates or delays in working through changes or exceptions.

I have recorded breach allegations where I consider the reason for the late update was within Nova's control and additional steps could have been taken to prevent the late update. The updates where I consider the reason for the late update was within Nova's control and additional steps could have been taken to prevent the late update are listed by ICP status in the tables below.

ICP	Event date	Input date	Bus days	Reason
0000026444GN10E	1 October 2023	7 May 2025 12:01	395	Delays in processing exceptions.

ICP	Event date	Input date	Bus days	Reason
0009000959NG4EA	1 August 2025	14 April 2026 13:58	173	
0001399823QTEE2	22 October 2025	20 November 2025 15:59	20	
0000018846GN46B	28 August 2024	20 September 2024 14:08	17	
0000190021QTCAB	1 December 2025	5 February 2026 10:52	43	
0009000740NG61D	1 December 2024	28 January 2025 15:26	36	
0000621511QT4F4	1 November 2022	30 August 2024 11:18	455	Incorrect event date for allocation group change, should have been 15 August 2024.
0002057231QT5CF	27 August 2020	13 April 2026 13:25	1,401	Incorrect event date for meter owner change, should have been 10 April 2026.
1000624391PG669	14 January 2026	19 May 2026 12:56	84	Delayed correction to meter owner.

The corrections were processed from the correct event date and with the correct attributes apart from ICP 1000624391PG669 where the incorrect meter owner was selected which was updated the following day through business-as-usual processes, and the incorrect event dates for ICPs 0000621511QT4F4 and 0002057231QT5CF.

Updates backdated by more than one year

ICP allocation group affects reconciliation submission aggregation, and ICP status affects whether an ICP's volumes are included in or excluded from reconciliation reports.

Initial submissions are provided by 12pm on the 4th working day of the month after the reconciliation period, interim submissions are provided by 8am on the 9th working day of the 4th month after the consumption period, and final submissions are provided by 8am on the 14th working day of the 13th month after the consumption period.

All ICPs are included in submissions regardless of their status, so only changes affecting metering, readings, gas conversion or ICP aggregation factors affect submission.

I checked all retailer and status updates backdated by more than 260 business days (approximately one year) and found that they did not result in submission errors, only inaccurate registry information.

Maintenance of ICP information			
Non-compliance		Description	
Report section: 7 Rule: 61.1 From: 8 April 2024 To: 2 June 2026		Audit history: Yes Controls: Acceptable Impact: Minor	ICP status was not updated on the registry as soon as practicable for 22 of the 63 backdated updates checked, and retailer information was not updated as soon as practicable for nine of the 21 backdated updates checked. Most updates are made very close to the event date, and a small number of late updates within Nova's direct control were identified. The impact of each discrepancy varies depending on the nature of the change, and how backdated each update is. Because Nova reports all metered volumes regardless of status, backdated status corrections usually have little to no impact.
Remedial action rating		Remedial timeframe	Remedial comment
In progress		Ongoing, with strengthened monitoring and process improvements already implemented and further automation opportunities under assessment.	Remedial actions have focused on improving the timeliness and accuracy of Registry updates through enhanced monitoring, prioritisation of outstanding exceptions, and strengthened exception-management processes. This includes increased oversight of workflow queues, service orders and Registry discrepancies, reinstatement of allocation group validation activities, prioritisation of inactive-consumption investigations, and the assessment of automation opportunities to reduce reliance on manual processes.
Audited party comment			
The circumstances of the matters outlined in the breach notice.		Nova acknowledges that a small number of Registry updates were not completed as soon as practicable. The late updates primarily arose from delays in resolving exceptions and workflow items requiring manual intervention, together with a small number of data-entry and processing errors. Most Registry updates were completed close to the event date, and the identified exceptions represented a small subset of overall Registry activity during the audit period.	
Whether or not the participant admits or disputes that it is in breach.		Nova admits the breach	
Estimate of the impact of the breaches (where admitted).		Nova considers the impact of the breaches to be minor. The delayed updates represented a small proportion of Registry maintenance activities undertaken during the audit period. As Nova reports all metered volumes regardless of ICP status, the principal impact was	

	temporary inaccuracy of Registry information rather than any material impact on reconciliation or allocation outcomes.
What steps or processes were in place to prevent the breaches?	Nova had established controls to identify and manage Registry updates, including daily review of service orders and fieldwork information, weekly exception reporting, inactive and zero-consumption monitoring, and investigation of discrepancies identified through operational and reconciliation processes. While these controls identified most issues, some exceptions requiring manual intervention were not resolved within expected timeframes.
What steps have been taken to prevent recurrence?	Nova has strengthened the monitoring and resolution of workflow issues, service orders and exception reports, reinstated allocation group validation activities, and improved the prioritisation of inactive-consumption investigations. Additional focus has also been placed on capturing reconnection information, reinforcing Registry update requirements, and assessing automation opportunities to improve the timeliness and accuracy of future updates.

8. Resolving Discrepancies (rule 62.1)

Nova Energy has a set of validation processes and reports to identify and resolve discrepancies between Orion and the registry, which was demonstrated during the audit. Nova is working to improve their reporting and investigate whether automation could be used to group and/or resolve some common or simple exceptions, so that staff can focus on resolving more complex cases.

Metering information validation

Metering discrepancies are managed by the metering and connections team using daily exception reports for metering and connection status, serial numbers, digits, and meter pressures. Each exception type is assigned to a user, and as many are worked through as time allows. The suite of reports also includes zero usage and inactive consumption reporting. As part of the review process SFI service requests are used to log investigations and outcomes.

Energy reconciliation pre submission ICP information validation

Key ICP information is reviewed by the energy reconciliation team as part of their pre-submission checks, including identifying discrepancies between the allocation groups, networks and gas gates recorded in submission data and the registry, ICPs included in submission data but missing from the registry, and ICPs supplied by GNVG on the registry but missing from submission data.

Due to limited time available before each submission is due, the team focusses on correcting the data for submission, but does not usually correct the data at the source in Orion.

Automated processes to update distributor information

On the 21st of each month, a system process compares Orion altitudes to registry altitudes and creates a script to update the altitudes in Orion which is emailed to energy reconciliation and metering team members. The script is only usually executed if there are more than 50 ICPs to be updated, which is typically twice each year.

For gas gates, there is an automated process to correct the gate if the two gates have the same notional delivery point. During the audit, Nova found that gates with different notional delivery

points were excluded from these updates. The logic will be changed so that all ICPs with gate differences are corrected.

I checked processes to identify and resolve discrepancies for each data field.

ICP status and connection status

Nova Energy updates ICP statuses and connection statuses manually in Orion and on the registry where field services paperwork confirms an ICP has been connected or disconnected.

Metering and status discrepancies are managed by the metering and connections team using daily exception reports including ICPs with removed meters with a connected metered status, and ICPs which are metered with an unmetered status. The previous audit recommendation to communicate potential meter owner data inaccuracies to the meter owner has been adopted.

Status accuracy

I checked the records for 92 ICPs which had undergone status changes during the audit period and found the ICP status, connection status, and event dates applied were correct apart from ICPs 0001428684QT79E and 0001855201QT1CD which had incorrect dates which cannot be corrected because the ICPs are now decommissioned, and ICP 1001132268QT506 which was updated to ACTC-GAS from 25 February 2022 in error because of a misread.

The registry list recorded seven ICPs with ACTV or ACTC status where the registry recorded a meter identifier of "REMOVED". I confirmed that all were timing differences and either new metering was added, or the status was updated soon after report was run.

The registry list recorded 23 ICPs with a status indicating that the meter is removed where the registry recorded a valid meter identifier. Nova had received paperwork confirming meter removal for 17 ICPs, but the meter owner had not yet updated the registry. The other six ICPs are confirmed to be metered, and Nova had an incorrect unmetered status recorded because of a misunderstanding about whether the meter was removed, the ICP switched in with the incorrect status or there was a delay in receiving meter installation paperwork. All of the ICPs were identified through Nova's exception reporting, and the statuses are now correct.

I checked all 15 ICPs which appeared on the registry list as ACTC or ACTV but did not appear in Nova's ICP and/or meter information extract. 13 were timing differences between the extracts. The ICPs and meters for 0000852081QTC59 which switched in on 21 March 2025 and 1002124819QT0FE which switched in on 3 February 2026, had not been set up in Orion when the incoming GTN was processed due to a data issue. The ICPs and meters were immediately added in Orion on discovery during the audit, and investigation found another two affected ICPs which were added. A new daily check has been implemented from July 2026, to identify ICPs where GNVG is the retailer, but the ICP is not in Orion, to prevent recurrence.

Allocation groups

Allocation groups for TOU ICPs are managed by the billing team, who also ensure that the ICPs are assigned to the correct meter reader. The correct group is assigned on switch in and is updated (along with the meter reader if necessary) if the telemetry flag changes.

Allocation groups for non-TOU ICPs are intended to be checked using a report which compares the allocation groups recorded in Orion and the registry, and the annualised consumption. At the time of the 2024 audit, the report was not being regularly reviewed. Following the 2024 audit responsibility for non-TOU allocation groups was assigned, but the process ceased during the audit period due to staffing changes. Nova intends to reinstate the non-TOU allocation group validation process.

Allocation group accuracy

I compared each ACTC and ACTV allocation group in Orion for 5 June 2026 to a registry list for 3 June 2026. 107 ICPs supplied by GNVG had allocation group differences:

Discrepancy	Count ICPs	Comment
AG4 in the registry AG6 in Orion	25	The energy reconciliation team ensures that the registry allocation group is applied for submission, and there is no impact on compliance with the meter read attainment requirements because all ICPs are scheduled to be read monthly.
AG6 in the registry AG4 in Orion	10	
AG6 in the registry with RPS ³ in Orion	72	

I validated the registry allocation groups for ACTC and ACTV ICPs on the registry list against the average daily consumption recorded in Orion and metering information, and found 1,183 ICPs which may be in an incorrect allocation group:

Discrepancy	Count ICPs ⁴	Comment
AG6 with consumption over 250 GJ	755	Because all ICPs are scheduled to be read monthly, incorrect allocation groups do not have a direct impact on read attainment. The ICPs with potentially incorrect allocation groups should be checked and updated.
AG4 with consumption under 250 GJ	393	
AG6 with consumption over 10,000 GJ	9	Nine ICPs which switched to GNVG from MEGA effective from 1 April 2026 are recorded with annual consumption over 10,000 GJ in information provided for this audit. It appears that the estimated consumption information is likely to be overstated; issues sometimes occur around meter rollover add factors where ICPs move between codes.
AG4 with consumption over 10,000 GJ	2	ICP 0000075541QT86F switched to GNVG from MEGA effective from 1 April 2026 and ICP 0001005778NG107 has undergone a meter change in the last year. Both are recorded with annual consumption over 10,000 GJ in information provided for this audit. It appears that the estimated consumption information is likely to be overstated for ICP 0000075541QT86F; issues sometimes occur around meter rollover add factors where ICPs move between codes. ICP 0001005778NG107 is close to the threshold at 10,410 GJ.
AG1 without TOU metering with telemetry	15	These ICPs were checked, and Powerco confirmed that they have a modem internal to the corrector and AG1 is correctly assigned.
AG2 without TOU metering which does not have telemetry	9	The ICPs should be checked to confirm whether they have telemetry and the allocation group updated as necessary.

³ RPS is an electricity reconciliation profile.

⁴ ICPs which are settled with GN ICP type.

Recommendation	Audited party comment
Review AG4 and AG6 ICPs which may have estimated consumption over 10,000 GJ per annum: ICPs 0000075541QT86F, 0001424895QTCFD, 0000542321QT906, 0002027806NG988, 0044103550PG7EB, 0001432267QTB44, 0002282851QT39C, 0003475134NG8CE, 0003008311NGBF5 and 1001245680NG502 switched from MEGA to GNVG effective 1 April 2026 and are not expected to have annual consumption over 10,000 GJ. The ICPs should be checked to determine whether the high consumption is correct and Orion adjusted as necessary. ICP 0001005778NG107 is close to the threshold at 10,410 GJ and underwent a meter change during the past year. It should be checked to determine whether it is genuinely expected to use more than 10,000 GJ per annum. If any of the ICPs are genuinely consuming or expected to consume more than 10,000 GJ per annum they must be upgraded to TOU metering within three months and have their allocation group corrected.	Nova accepts the recommendation. The identified ICPs will be reviewed to confirm the accuracy of annualised consumption. Orion and Registry information will be corrected where necessary, and any ICP genuinely expected to exceed 10,000 GJ per annum will be upgraded to TOU metering within the required timeframe. This review has been reinstated as a six-monthly process to also avoid too frequent changes between AG4 and AG6.
Review AG4 ICPs with consumption under 250 GJ per annum and AG6 ICPs with consumption over 250 GJ: if the consumption is correct, consider moving the ICPs to the correct allocation group in Orion and on the registry. Nova may elect to leave ICPs close to the threshold in their current allocation group.	Nova accepts the recommendation. The reinstated non-TOU allocation group validation process will be used to review the identified ICPs and correct Orion and Registry information where the allocation group is not appropriate.
Review AG1 ICPs without telemetry owners: check for AG1 ICPs without a telemetry owner on the registry and update the allocation group to AG2 if they are confirmed not to have telemetry.	Nova accepts the recommendation. A validation report was implemented on 19 August 2026 to compare allocation group and telemetry information recorded in Orion against the Registry. The report is reviewed regularly to identify AG1 ICPs without a telemetry owner and other allocation group discrepancies. Identified exceptions will be investigated and, where telemetry is not present, the allocation group will be updated to AG2 and the associated Registry and Orion information corrected as required
Review AG2 ICPs with telemetry owners: check for AG2 ICPs with a telemetry owner on the registry and update the allocation group to AG1 if they are confirmed to have telemetry.	Nova accepts the recommendation. A validation report was implemented on 19 August 2026 to compare allocation group and telemetry information recorded in Orion against the Registry. The report is reviewed regularly to identify AG2 ICPs with telemetry owners and other allocation group discrepancies. Identified exceptions will be investigated and, where telemetry is confirmed to

Recommendation	Audited party comment
	be present, the allocation group will be updated to AG1 and the associated Registry and Orion information corrected as required

All ICPs with the TOU flag set to Y were in AG1 or AG2. There were no discrepancies between the registry allocation group and registry profile.

Network and gas gate

Network and gas gate information recorded in Orion is populated from the registry manually. Network and gas gate is compared to the registry by the energy reconciliation team as part of their pre-submission checks, and a system process automatically updates the gas gate where the registry gas gate and Orion gas gate are part of the same notional delivery point. The logic will be changed so that all ICPs with gate differences are corrected.

Network accuracy

I compared each ICP's network and gas gate in Orion to the registry list for ACTC and ACTV ICPs, and one network discrepancy for GD ICP 0008000192NGB65 where no submission information is provided, and the difference has no impact. NGCD is recorded in Orion and VCTX on the registry.

Gas gate accuracy

I compared each ICP's network and gas gate in Orion to the registry list for ACTC and ACTV ICPs, and 14 gate discrepancies were identified for gates which have different notional delivery points. 13 ICPs underwent backdated gas gate changes, and one had an incorrect gate entered manually in Orion.

Although the energy reconciliation team has a process to identify ICPs with incorrect gas gates and correct them in submission files, the Orion gas gate determines the gas temperature and gas type for conversion, and the Seasonal Adjusted Daily Shape Values (SADSV) applied to calculate historic estimates. The impact of the incorrect Orion gas gates on gas conversion and submission accuracy was assessed:

- all of the gas gates have the same gas type, so there is no impact on gas composition inputs into the conversion process,
- temperatures used to calculate the temperature factor vary between gas gates, and differences over 2 degrees C are likely to result in maximum permissible temperature factor errors over $\pm 0.7\%$ for in service meters, which is the maximum allowed under NZS 5259; I determined the maximum monthly temperature differences for the affected gas gates were all within ± 0.8 degrees C and unlikely to cause temperature errors outside maximum permissible errors,
- different Seasonal Adjusted Daily Shape Values (SADSV) are published for each gas gate, as they are calculated independently by the Allocation Agent; the impact of the differences on historic estimate calculations is difficult to quantify and will vary from read-to-read period.

ICP	Registry gas gate	Gas type for registry gas gate	Orion gas gate	Gas type for Orion gas gate	Maximum monthly temperature difference (Orion-registry)	Allocation Group Code
0003027815NG95C	MTG17301	R	HTV11301	R	+0.8 degrees C	6

ICP	Registry gas gate	Gas type for registry gas gate	Orion gas gate	Gas type for Orion gas gate	Maximum monthly temperature difference (Orion-registry)	Allocation Group Code
0003033279NG1D9	MTG17301	R	HTV11301	R	+0.8 degrees C	6
0003066938NG863	MTG17301	R	HTV11301	R	+0.8 degrees C	6
0009000666NG3C3	MTG17301	R	HTV11301	R	+0.8 degrees C	4
1002187314QT8A3	HEN74101	X	WTK33901	X	+0.6 degrees C	6
1002189827QT855	HEN74101	X	WTK33901	X	+0.6 degrees C	6
1002195293QT286	HEN74101	X	WTK33901	X	+0.6 degrees C	6
1002195639QT409	HEN74101	X	WTK33901	X	+0.6 degrees C	6
1002195955QT7E8	HEN74101	X	WTK33901	X	+0.6 degrees C	6
1002196059QTF1F	HEN74101	X	WTK33901	X	+0.6 degrees C	6
1002188466QTB19	HEN74101	X	WTK33901	X	+0.6 degrees C	6
0000773641QTBA7	WKM17701	X	WTK33901	X	+0.5 degrees C	6
1002210498QTEE5	WTK33901	X	HEN74101	X	-0.4 degrees C	6
1002188856QT0ED	WTK33901	X	WST03610	X	+0.3 degrees C	6

ICP altitude

When a new ICP is connected, or a switch in occurs, the current ICP altitude on the registry is entered into Orion. On the 21st of each month, a system process compares Orion altitudes to registry altitudes and creates a script to update the altitudes in Orion which is emailed to energy reconciliation and metering team members. The script is only usually executed if there are more than 50 ICPs to be updated, which is typically twice each year. There are no reasonableness checks for ICP altitude.

Altitude accuracy

I compared each ICP's altitude in Orion to the registry list and found 85 ICPs had altitude differences between the Orion and registry altitude.

Distributor	Count of ACTC and ACTV ICPs	ICPs with altitude differences	ICPs with altitude differences over $\pm 10m$	ICPs with altitude differences over $\pm 20m$	Maximum difference
GNET	690	1	1	1	-468
NGCD	7,292	4	4	4	254
NOVA	194	-			-

Distributor	Count of ACTC and ACTV ICPs	ICPs with altitude differences	ICPs with altitude differences over $\pm 10\text{m}$	ICPs with altitude differences over $\pm 20\text{m}$	Maximum difference
POCO	16,056	63	6	5	62
UNLG	8,561	16	3	1	71
VCTX	8	1	1	1	297
Total	32,801	85	15	12	-468, +297

I checked all 15 differences over $\pm 10\text{m}$ against the Google Earth altitude, and I found the Orion altitude was not within $\pm 10\text{m}$ of the Google Earth altitude. For ICP 0000027411GN5E9 the network altitude was also not within $\pm 10\text{m}$ of the Google Earth altitude, and a network breach is alleged in **section 1.3.2**.

The maximum permissible error allowed by NZS 5259 for altitude factors is $\pm 1.0\%$ where meter pressure is less than 100 kPa, and $\pm 0.5\%$ where meter pressure is greater than or equal to 100 kPa. The impact of the incorrect altitudes on the altitude factor was checked. ICPs 1001295261NG3AD and 0000027411GN5E9 have significant altitude differences which will result in altitude factors outside the maximum permissible errors in NZS 5259. ICP 0001014051NG440 is excluded from the analysis below as it is a GD ICP and no submission information is provided.

ICP	Distributor	Registry Altitude	Orion Altitude	Google Earth Altitude	Altitude factor Orion	Altitude factor google earth	Difference
1001295261NG3AD	NGCD	282	28	282	0.996793	0.9677	-3.01%
0001425988QT1AF	UNLG	78	7	79	0.9992	0.990973	-0.83%
0002045681QT0DD	POCO	80	18	80	0.997933	0.990815	-0.72%
1000564298PG61D	POCO	165	122	158	0.985993	0.981859	-0.42%
0001002932NG358	NGCD	25	0	34	1	0.996096	-0.39%
0001271871PG8C0	POCO	60	40	62	0.995429	0.992916	-0.25%
1001293165QT2A2	UNLG	37	21	38	0.997595	0.995648	-0.20%
1001302495NG37E	NGCD	23	9	27	0.998969	0.996907	-0.21%
1001295581QT0D3	UNLG	16	2	17	0.999771	0.998053	-0.17%
0001726101QT4ED	POCO	23	10	24	0.998846	0.997231	-0.16%
0002249531QT234	POCO	72	94	73	0.989207	0.991619	0.24%
1000622317PG76C	POCO	26	56	26	0.99357	0.997015	0.35%
0000027411GN5E9	GNET	15	483	0	0.944545	1	5.55%

ICP	Distributor	Registry Altitude	Orion Altitude	Google Earth Altitude	Altitude factor Orion	Altitude factor google earth	Difference
0008000051NG94E	NGCD	23	0	23	TOU	TOU	TGS ICPs and within maximum permissible errors

I checked ICP altitudes for a random sample of 75 ACTC and ACTV ICPs for each network with non-zero altitudes on the registry list against Google Earth and found three altitudes were not within $\pm 10\text{m}$. The altitude factor differences were within the maximum permissible errors set out in NZS 5259.

Distributor	Total ACTC and ACTV non-TOU ICPs	ICPs checked	Quantity outside 10m
GNET	684	2	-
NGCD	7,251	16	1
NOVA	169	1	-
POCO	16,031	36	1
UNLG	8,496	20	1
Total	32,631	75	3

ICP	Distributor	Registry Altitude	Orion Altitude	Google Earth Altitude	Altitude factor difference
0007000596NGA98	NGCD	11	11	0	0.13%
0004215344NGD8B	POCO	208	208	222	-0.17%
0001437097QT674	UNLG	2	2	31	-0.33%

I also checked all 36 ICPs with zero altitudes on the registry list against Google Earth, and I found one difference over $\pm 10\text{m}$. The altitude factor difference was within the maximum permissible errors set out in NZS 5259.

Distributor	Total ACTC and ACTV non-TOU ICPs	ICPs with altitude of zero	ICPs checked	Quantity outside 10m
GNET	684	-	-	-
NGCD	7,251	35	35	1

Distributor	Total ACTC and ACTV non-TOU ICPs	ICPs with altitude of zero	ICPs checked	Quantity outside 10m
NOVA	169	-	-	-
POCO	16,031	1	1	-
UNLG	8,496	-	-	-
Total	32,631	36	36	1

ICP	Distributor	Registry Altitude	Orion Altitude	Google Earth Altitude	Altitude factor difference
1001298057NG5FD	NGCD	0	0	11	-0.13%

Network pressure

Network (inlet) pressure is stored against the meter tab in Orion and applies for the same date range that the meter is open for. When a new ICP is connected, a switch in occurs or a meter is replaced, the current ICP network pressure is entered into the meter tab in Orion. Apart from this, network pressure is not validated or updated.

Before Orion began adjusting temperatures for the Joule Thomson Effect, the network pressure was not used by Orion, and the network (inlet) pressure field was populated with the meter pressure. Some ICPs supplied for extended periods which have not undergone recent meter changes still have the meter pressure populated as the network (inlet) pressure. To correct this, each affected ICP would need to have its meter removed and replaced in Orion, and the new meter updated with the correct network pressure which is not practical.

Network pressure accuracy

I compared each ACTC and ACTV ICP's network pressure in Orion to the registry list and found 24,616 ICPs had different network pressures recorded in Orion and the registry.

Distributor	Count of ACTC and ACTV ICPs	ICPs network pressure differences between Orion and the Registry	ICPs where Orion network pressure = meter pressure	TOU ICPs with differences	Differences where Orion network pressure ≠ Orion meter pressure
GNET	690	477	465	-	12
NGCD	7,292	5,005	4,634	5	366
NOVA	194	53	1	-	52
POCO	16,056	12,733	11,736	3	994
UNLG	8,561	6,347	5,980	3	364

Distributor	Count of ACTC and ACTV ICPs	ICPs network pressure differences between Orion and the Registry	ICPs where Orion network pressure = meter pressure	TOU ICPs with differences	Differences where Orion network pressure ≠ Orion meter pressure
VCTX	8	1		1	
Total	32,801	24,616	22,816	12	1,788

The differences were reviewed to determine the causes and impact on gas conversion and reconciliation. The Joule Thomson Effect reduces the gas temperature by 0.5 degrees for every 100 kPa in pressure drop and drops of over 400 kPa or 2 degrees are likely to result in maximum permissible temperature factor errors over $\pm 0.7\%$ for in service meters, which is the maximum allowed under NZS 5259.

Discrepancy type	Impact
TOU ICPs	All TOU ICPs supplied have temperature adjusted by their corrector. The TOU ICPs with network pressure differences over ± 400 kPa only use temperature information as an input into the compressibility calculation. The impact of the Joule Thomson Effect on this calculation is small and unlikely to result in differences outside the maximum permissible errors.
Non-TOU network pressure differences where Orion network pressure = meter pressure	These differences are likely to be for ICPs supplied by Nova with the same meter since before the Joule Thomson Effect was applied. 45 of the ICPs have network pressure differences over ± 400 kPa, which had not been updated as paperwork confirming the network pressure change was not received. Most ICPs were corrected during the audit and revised submission information will be washed up where final revisions have not already been completed. The nine ICPs still to be corrected are listed in Appendix 4 .
Network pressure differences where Orion network pressure ≠ meter pressure	65 of the ICPs have network pressure differences over ± 400 kPa, which had not been updated as paperwork confirming the network pressure change was not received. Some were corrected during the audit and revised submission information will be washed up where final revisions have not already been completed. The 45 ICPs still to be corrected are listed in Appendix 4 .

I rechecked the ICPs where non-compliance was recorded for incorrect network pressures in the previous audit and found five were resolved, and three were switched out before they were resolved. The previous audit exception for 0001787571QTAF9 is unresolved and included in the tables in **Appendix 4**. The other exception remains unresolved and is unlikely to have a material impact on the pressure factor:

ICP	Network pressure	Orion network pressure	Network pressure difference	Orion meter pressure
11000589557PG673	315	2.5	312.5	2.5

Meter serial numbers

Meter serial number discrepancies are identified using the metering and connections team's daily discrepancy reporting, which compares Orion meter serial numbers to the registry. When taking manual meter readings, the meter reader compares the expected meter number to the meter number on site and records a no read against the existing meter, and a new meter record with the reading and new meter number for investigation by Nova.

Meter serial number accuracy

I compared each ACTC and ACTV ICP's meter number in Orion to the registry list and found 32 differences:

- 13 were timing differences, where meter replacement paperwork was received late and Orion was updated once the paperwork was received,
- 13 were errors in the Orion meter serial number, either because the regulator number was incorrectly entered as the serial number, a data entry error was made when entering the meter number, or the meter number was accidentally overtyped or replaced,
- for four ICPs Orion matched the meter replacement paperwork, but the registry value was different; Nova advised the meter owners who updated their records for ICPs 0009000194NGC53 and 0000072155NAD53 but ICPs 1001277922QT63D and 1001283787QT67A are still under investigation to confirm the correct value,
- the meter replacement SFI service order for ICP 0002381955QTD1E meter 600893980 on 30 March 2026 was accidentally closed without the meter being updated in Orion, so the change was not processed, and
- ICP 0042114312PG0D5 is under investigation; the meter owner made a backdated change to the meter number from 2009 in May 2025. Nova will update their records once the correct meter details are confirmed.

The confirmed incorrect meter serial numbers have been updated.

Meter digits

Meter digit discrepancies are identified using the metering and connections team's daily discrepancy reporting, which compares Orion meter digits to the registry. When taking manual meter readings, the meter reader compares the expected number of meter digits to the digits for the meter on site and records a no read against the existing meter, and a new meter record with the reading and correct digits for investigation by Nova.

Meter digit accuracy

I compared the meter digits in Orion to the registry list for the 32,537 ACTC and ACTV non-TOU ICPs where the meter number had matched. There were two genuine differences; both were typos when setting up the meters and have been corrected.

Meter pressure

Meter (outlet) pressure is stored against the meter tab in Orion and applies for the same date range that the meter is open for. When a new ICP is connected, a switch in occurs or a meter is replaced, the current meter pressure is entered into the meter tab in Orion.

If a meter pressure change or correction occurs which does not coincide with a meter change, Nova completes faux meter change by replacing the existing meter in Orion with a new meter with the same meter number and the correct pressure. The closed meter has an X added as a suffix. These changes are typically made from the day after the last billed read, so backdated changes or corrections are not always applied from the correct date.

Meter pressure discrepancies are identified using the metering and connections team's daily discrepancy reporting, but they are not consistently actioned and resolved.

Meter pressure accuracy

I compared the meter pressure in Orion to the registry list for each of the 32,537 ACTC and ACTV non-TOU ICPs where the meter number had matched. Two ICPs had timing differences relating to changes, and for one ICP Orion recorded the correct pressure, and the meter owner later updated the registry.

There were 55 genuine pressure discrepancies, all of which appeared on the metering and connection team's discrepancy reporting. For four ICPs the correct pressure was recorded in Orion, and the meter owner either updated their meter pressure after the report was run or confirmed that a step down regulator was being used. I checked the other differences:

- Nine meter pressure differences over ± 1.1 kPa are likely to result in errors outside the maximum permissible errors recorded in NZS 5259 and were corrected during the audit in time for revised submission information to be washed up for all affected periods, and
- 42 meter pressure differences under ± 1.1 kPa are unlikely to result in errors outside the maximum permissible errors recorded in NZS 5259; ICP 0047125351PGA6E had undergone a meter pressure correction and the other 41 ICPs are listed in **Appendix 4**.

Nova intends to investigate and resolve each of the 41 remaining discrepancies.

I rechecked all the previous audit meter pressure differences and found the ICPs had switched out, and did not appear on the GTN mismatch report, indicating that the Orion meter pressure had been corrected to match the registry before the switch out was completed or the Orion and registry pressure was consistent.

Network pressure vs meter pressure

As discussed above, network pressure is recorded against the meter as the meter inlet pressure and many ICPs have the meter outlet pressure recorded in this field. Because some network pressures are known to be incorrect, there is no validation of the network pressure or of differences between network and meter pressure.

Network pressure vs meter pressure accuracy

I compared the network and meter pressure on the registry list for the 32,537 ACTC and ACTV non-TOU ICPs where the meter number had matched. There are nine ICPs where the network pressure and the meter pressure are the same and one of these has the "operating at network pressure" flag set to yes, which is a meter owner-maintained field. There are two ICPs with network pressure lower than meter pressure, which are being checked with the meter owner to confirm whether they are correct.

ICP	Meter Pressure	Network pressure
0002287041QTE1C	5	4
0000292441QT0AE	7	3

Meter multiplier

There are no comparisons between Orion and the registry to identify meter multiplier differences; all ICPs have a meter multiplier of 1.

Meter multiplier accuracy

I compared the meter multiplier in Orion to the registry list for each of the 32,537 ACTC and ACTV non-TOU ICPs where the meter number had matched. All ICPs had the meter multiplier set to 1 and there were no differences between Orion and the registry.

Conclusion

This rule requires the responsible retailer to use “best endeavours” to resolve discrepancies between their data and registry data. Orion-registry data discrepancies for most fields are promptly identified and resolved. A relatively small number of discrepancies were found for all fields apart from the network pressure and allocation groups. Non-compliance is recorded where the best endeavours requirements were not consistently met.

Resolving discrepancies		
Non-compliance	Description	
Report section: 8 Rule: 62.1 From: 8 April 2024 To: 28 July 2026	Audit history: Yes Controls: Needs improvement Impact: Moderate	The best endeavours requirements were not consistently met for all data fields, and non-compliance is recorded for: ICP status and connection status Three of the 92 status records checked had incorrect status event dates. ICPs 0001428684QT79E and 0001855201QT1CD cannot be corrected because the ICPs are decommissioned and ICP 1001132268QT506 which was updated to ACTC-GAS from 25 February 2022 in error because of a misread. ICPs not set up in Orion following switch in ICPs 0000852081QTC59 and 1002124819QT0FE were not created in Orion on switch in due to a GTN processing issue. The ICPs and meters were immediately added in Orion on discovery during the audit, and investigation found another two affected ICPs which were added. A new daily check has been implemented from July 2026 to identify ICPs where GNVG is the retailer, but the ICP is not in Orion, to prevent recurrence. Allocation groups Validation of non-TOU allocation groups is not currently occurring. 107 ICPs have different allocation groups in Orion and the registry, and 1,168 ICPs have allocation groups which appear inconsistent with their consumption and/or metering information. The impact is likely to be low because the energy reconciliation team ensures that the registry allocation group is applied, all ICPs are scheduled to be read at least monthly regardless of their allocation group, and the ICPs in AG4 or AG6 which were reported to have consumption over 10,000 GJ per annum are likely to have actual consumption below 10,000 GJ per annum. Gas gate 14 ICPs have incorrect gas gates, and this is unlikely to result in gas conversion errors outside the maximum permissible limits in NZS 5259. It could result in

		consumption being incorrectly apportioned between reconciliation periods where SADS from the wrong gates are used to calculate historic estimate. Altitude For 15 ICPs Orion recorded an incorrect ICP altitude which differed from the registry altitude by more than $\pm 10\text{m}$. Altitude factor errors outside the maximum permissible errors in NZS 5259 have occurred for ICPs 1001295261NG3AD (-3.01%) and 0000027411GN5E9 (+5.55%). Three of a sample of 75 ICPs with non-zero altitudes and one of the 36 ICPs with zero altitudes differed from the Google Earth altitude by more than $\pm 10\text{m}$. None of the differences were outside the maximum permissible errors in NZS 5259. Network pressure 24,616 ICPs have a different network pressure in Orion and the registry. 110 GAS status non-TOU ICPs have network pressures in Orion which are more than $\pm 400\text{ kPa}$ of the registry network pressure value, and likely to cause temperature factor differences outside the maximum permissible errors in NZS 5259. Most ICPs with material differences have been corrected and revised submission information will be washed up where final revisions have not already been completed. 54 ICPs listed in Appendix 6 are still to be corrected. Meter serial numbers 14 ICPs had incorrect serial numbers recorded in Orion and have been corrected. Meter digits Two ICPs had incorrect meter digits in Orion and have been corrected. Meter pressure There were 51 ICPs with inaccurate meter pressures recorded in Orion. All nine differences over $\pm 1.1\text{ kPa}$ and likely to result in errors outside the maximum permissible errors recorded in NZS 5259 and were corrected during the audit in time for revised submission information to be washed up for all affected periods. One of the 42 differences under $\pm 1.1\text{ kPa}$ has been corrected and Nova intends to resolve the other issues which are listed in Appendix 5.
Remedial action rating	Remedial timeframe	Remedial comment
In progress	Ongoing, with higher-impact discrepancies prioritised and remaining exceptions being addressed through strengthened	Remedial actions have focused on strengthening the prioritisation, monitoring and resolution of discrepancies between Orion and the Registry. Higher-impact exceptions have been prioritised, allocation

	validation and exception-management processes.	group validation has been reinstated, and a daily check has been introduced to identify ICPs recorded to GNVG in the Registry but missing or inactive in Orion. Nova is also improving gas gate correction logic and assessing opportunities to automate common data corrections
Audited party comment		
The circumstances of the matters outlined in the breach notice.	Nova had validation and exception-reporting controls in place, but some discrepancies were not reviewed or resolved promptly. The exceptions resulted from manual processing, legacy data, incomplete follow-through of identified issues and the interruption of non-TOU allocation group validation following staffing changes.	
Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach	
Estimate of the impact of the breaches (where admitted).	Nova acknowledges the auditor's moderate impact assessment. The impact varied by data field. Some exceptions primarily affected data accuracy, while incorrect altitude, pressure and gas gate information had the potential to affect gas conversion or historic estimates. Higher-impact pressure exceptions were prioritised for correction and have been completed and revised submission information will be provided through the normal revision process where applicable	
What steps or processes were in place to prevent the breaches?	Nova's controls included daily metering and status exception reports, zero-usage and inactive-consumption reporting, SFI service requests, pre-submission comparisons with Registry information, and automated altitude and gas gate validation processes. These controls identified many of the discrepancies, but some exceptions were not consistently prioritised or resolved at source in Orion.	
What steps have been taken to prevent recurrence?	Nova has strengthened exception monitoring and follow-up, reinstated allocation group validation and introduced risk-based prioritisation of outstanding discrepancies. A daily check now identifies ICPs recorded to GNVG in the Registry but missing or inactive in Orion. Confirmed meter serial number and digit errors have been corrected, higher-impact pressure discrepancies were prioritised, and changes to gas gate correction logic and further automation are being progressed.	

9. Switching

Switching files are generated from Orion and sent to and received from the registry using batch interfaces run several times daily.

Customer interactions and workflow management is completed using SFI, which raises service requests for action related to switching including where registry acknowledgement errors are received.

9.1 Initiation of Consumer Switch/Switching Notice (rules 65 to 67)

GNT process

Nova Energy has Use of System Agreements with each network.

Customers may apply to become a Nova customer through a third party like Movinghub which completes an online application on the customer's behalf, or directly by completing an online application, or phoning and completing an application with an agent.

The application collects information on whether the customer is transferring between retailers or moving into the address, and their move in date. The previous audit recommended that Nova review its online application wording to enable customers to correctly identify whether they are moving in or transferring between retailers, as customers may select incorrect values due to confusion. Nova has refined the application wording and scripts for agents to clarify when the customer took responsibility for the property.

The customer account and ICP are loaded in SFI and Orion at the same time, and the application is placed on hold in Orion until Nova's credit check is complete. Creation of the SFI account generates a service request for the credit team, who focus on processing credit checks for switches which are backdated or require reconnection first. If the customer does not pass the credit check, they are advised and the application is cancelled. If the customer passes the credit check, the ICP moves off hold in Orion so that the GNT can be automatically sent once the future move in date is reached, or immediately if no future move in date is set.

GNTs are sent from Orion to the registry as a batch each morning, and SFI's RPA (Robotic Process Automation) identifies GNT acknowledgement errors returned from the registry and automatically creates a service request for the switching team to investigate.

Daily reports are used to manage GNTs:

- the **switch held** report identifies new ICPs on hold in Orion, which have not had a GNT issued; this normally only occurs where a credit check is in progress or there is a future move in date:
 - any ICPs without future move in dates are checked, and the date the credit check is expected is entered and the credit check is followed up if necessary.
 - any ICPs appearing on the report for other reasons are investigated.
- the **preswitch error** report identifies GNT files held, usually because a switch withdrawal is in progress or a there is a future move in date; all ICPs on the report are checked, and corrective action is taken as necessary.

The weekly **switch tab issues** report shows ICPs where switching tab information is incomplete or inconsistent which prevents the GNT from being generated. ICPs on this report normally appear on one of the other two reports, and this is checked to ensure that nothing is missed.

Incoming GAN and GTN files are imported into Orion each morning via the batch interface process, and Nova monitors the switch breach reports for late losing trader files. A new exception report has been created to identify any ICPs where GNVG is the trader on the registry, but the ICP is not active in Orion, after two missed incoming GTNs were discovered during this audit⁵ and a further two were identified on investigation.

⁵ The ICPs and meters for 0000852081QTC59 which switched in on 21 March 2025 and 1002124819QT0FE which switched in on 3 February 2026, had not been set up in Orion when the incoming GTN was processed due to a data issue. The ICPs and meters were immediately added in Orion on discovery during the audit, and investigation found another two affected ICPs which were added.

GNT timeliness

GNTs are required to be sent within two business days of entering into a contract to supply gas to the consumer.

I checked a sample of all files issued more than 200 business days after the event date by Nova, and ten files issued between 20 and 200 business days after the event date to confirm whether they were sent within two business days of entering into a contract to supply gas to the consumer.

20 were on time and issued within two business days of entering into an agreement with the customer, or immediately after a wrong property withdrawal was completed where the wrong ICP was initially requested. Ten were part of the mass migration of ICPs from MEGA to GNVG and are considered to be on time as this was an internal transfer only. Nova's policy for the MEGA switches was to transfer vacant sites as switch moves effective from the day that they became vacant and all other sites as standard switches. Where ICPs had issues and the initial switch did not complete successfully they were re-requested as switch moves.

The GNT for 0000621801QTB51 GNT-11535493 issued 19 December 2024 was genuinely late. The customer had electricity and gas at their address, and the status was not correctly updated in Orion for the gas ICP, preventing the GNT from being issued. The missed GNT was identified by Genesis the losing trader, because the electricity switched but not the gas. The GNT was issued after the customer agreed to the backdated move in date on 27 November 2024.

Backdated switch gains

Nova identifies any incoming switches backdated by more than four months as part of its GNT approval process and avoids backdating switches where possible. Backdated switches most commonly occur where the wrong premises has been switched in due to an addressing error, or there is a mixed metering issue. Similarly, withdrawals and read renegotiations backdated more than four months are discussed with the energy reconciliation team before acceptance or issue.

GNT content

All the GNT files contained the mandatory information required. I reviewed the application of requested switch event dates for standard switches and switch moves.

Standard switches

Nova did not request switch event dates for 6,055 of the 6,069 standard switches issued. No standard switch GNTs had requested switch event dates more than ten business days after the GNT was issued. One NTD breach was recorded for ICP 0001686381QT924 GNT-11977218, which had a backdated requested switch date. The wrong switch type was accidentally selected, and the switch was withdrawn, and compliantly re-requested as a switch move and completed.

I checked a sample of five standard switches, and found they were transfers between MEGA and GNVG or the customer had indicated on their application that they were transferring between retailers. ICP 0001001735NGA79 GNT-11905609 was issued on 15 July 2025, while no meter was installed. Although the customer was moving in, Orion automatically requests any unmetered ICP as a standard switch. Nova is working with the digital team to prevent recurrence of this issue, preferably so that unmetered switch gains do not occur.

Switch moves

Nova requested a switch date in the GNT for all 8,532 switch moves. No switch move GNTs had requested switch event dates more than ten business days after the GNT was issued.

I checked a sample of 26 switch moves and found in all cases the customer was moving in, or the ICP was migrating from MEGA to GNVG and switch move was applied to ensure that the correct switch event date was recorded.

Late GNT files			
Non-compliance	Description		
Report section: 9.1 Rule: 66.1 From: 27 November 2024 To: 19 December 2024	Audit history: Yes Controls: Effective Impact: Insignificant	One of a sample of 31 switch move GNTs was issued more than two business days after entering into an agreement, 0000621801QTB51 GNT-11535493. The GNT for issued 19 December 2024 was genuinely late. The customer had electricity and gas at their address, and the status was not correctly updated in Orion for the gas ICP preventing the switch from being issued. The missed GNT was identified by Genesis the losing trader, because the electricity switched but not the gas. The GNT was issued after the customer agreed to the backdated move in date on 27 November 2024.	
Remedial action rating		Remedial timeframe	Remedial comment
Completed		Completed prior to finalisation of the audit report.	The existing daily monitoring process has been reinforced to ensure released switches are checked through to GNT registry receipt
Audited party comment			
The circumstances of the matters outlined in the breach notice.		The future-dated switch was released from hold, however an incorrect manual update in Orion prevented the switch request from being initiated and the GNT file from being generated. The issue was later identified following an enquiry from the losing retailer.	
Whether or not the participant admits or disputes that it is in breach.		Nova admits the breach	
Estimate of the impact of the breaches (where admitted).		Nova considers the impact to be insignificant. Gas supply was not interrupted, although the customer subsequently received backdated charges.	
What steps or processes were in place to prevent the breaches?		Nova operated a daily switch-held report to monitor future-dated switches awaiting release	
What steps have been taken to prevent recurrence?		The requirement to confirm that a released switch has progressed to GNT initiation has been reinforced as part of the daily monitoring process.	

Incorrect GNT file content		
Non-compliance	Description	
Report section: 9.1 Rule: 67.1.2 and 67.3 From: 10 July 2025 To: 15 July 2025	Audit history: Yes Controls: Effective Impact: Insignificant	Rule 67.1.2 ICP 0001001735NGA79 GNT-11905609 was issued as a standard switch although the customer was moving in. The switch type was automatically applied because the ICP was unmetered. Nova is working with the digital team to prevent recurrence of this issue, preferably so that unmetered switch gains do not occur. Rule 67.3 One NTD breach was recorded for ICP 0001686381QT924 GNT-11977218, which had a backdated requested switch date. The wrong switch type was accidentally selected, and the switch was withdrawn, and compliantly re-requested as a switch move and completed.
Remedial action rating	Remedial timeframe	Remedial comment
In progress	Ongoing investigation into enhancing controls for unmetered sites. Staff refresher training is completed	Nova has reinforced staff guidance and review controls for the entry and verification of switch type and requested switch dates. Opportunities to strengthen system controls on the sign up of unmetered ICPs are being investigated.
Audited party comment		
The circumstances of the matters outlined in the breach notice.	Two GNTs contained incorrect switch information. In one instance, the absence of a supply commencement date resulted in Orion generating a standard switch for an unmetered ICP. In the other, the move-in date was not entered during manual processing, resulting in a standard switch with a backdated requested date	
Whether or not the participant admits or disputes that it is in breach.	Nova admits the breaches	
Estimate of the impact of the breaches (where admitted).	Nova considers the impact to be insignificant. The affected switches were withdrawn and re-requested with the correct switch type and date.	
What steps or processes were in place to prevent the breaches?	Switch instructions and relevant dates were recorded in the service request, with internal reporting providing an additional review control.	
What steps have been taken to prevent recurrence?	Staff guidance and training have been reinforced, including the need to accurately record and verify move-in dates and switch types before a GNT is initiated. The daily reporting provides an additional opportunity to review the information recorded in Orion	

9.2 Response to a Gas Switching Notice (rules 69 to 75)

Within two business days of receiving a gas switching notice (GNT), the responsible retailer must provide to the registry a gas acceptance notice (GAN), or a gas transfer notice (GTN), or a gas switching withdrawal notice (GNW).

Orion imports incoming GNT files each morning via its batch interface process. Following validation of the requested switch dates against Orion, an exception is generated for review, or a GAN or GNW is automatically issued from Orion. GAN files are followed by GTNs once the event reading is available.

GAN, GTN and GNW files are issued in batches from Orion. GAN and GNW files sent each morning and at 2pm, and GTNs are sent at 4.06pm after gas readings have been imported and validated in Orion at 3pm.

The switch breach history report for 1 April 2024 to 3 June 2026 was reviewed to determine whether any breaches were recorded for responses to incoming GNTs. One GTA breach was also recorded, but it was not genuine; there was no GTN because the switch was withdrawn before completion and the GAN and GNW were both issued on time.

9.3 Gas Acceptance Notice (rule 70)

GAN Process

Orion imports incoming GNT files each morning. The “retention” process is triggered within Orion which compares the GNT requested switch date against the processes business rules; and creates exceptions where the requested date is non-compliant or inconsistent with Orion information. Orion generates the GAN response code according to a system hierarchy.

Switch type	Requested date	Retention process action
Standard switch	Compliant future date	Requested date applied in GAN, and then the GTN is issued.
	Non-compliant future date	Withdrawal is automatically issued.
	No date	Compliant date applied in GAN, and then the GTN is issued.
	Past date	Withdrawal is automatically issued.
Switch move	Inconsistent with Orion, e.g., customer moved out after requested date, or customer account is still open	A #77 exception is generated for investigation so that the correct date can be confirmed and the GAN and GTN, or GNW issued.
	Consistent with Orion and compliant	Requested date applied in GAN, and then the GTN is issued.

GAN files are issued in batches from Orion each morning and at 2pm. The SFI RPA process creates a service request for review if a GAN cannot be generated or an acknowledgement error is received from the registry.

GAN timeliness

Nova monitors the switch breach history three times per day, and actions service requests created by the SFI RPA process to detect any files that have failed to generate properly or where a successful acknowledgement is not received from the registry.

The switch breach history report for 1 April 2024 to 3 June 2026 did not contain any breaches for AN files where Nova was the defaulting participant.

GAN content

All 12,816 GAN files contained the mandatory information required, including a valid response code. I checked the accuracy of AN response codes by comparing them to the most recent registry list record and incoming GNT where it was available:

- 2,741 ANs where supporting information was available were confirmed to have a reasonable code,
- I checked a sample of the 9,058 GANs with the OC or CO codes applied which could not be confirmed from registry information and found they were correct, and
- I checked a sample of 25 of the 749 ICPs where the GAN code did not appear consistent with the latest registry records; nine ICPs did not have the correct GAN response code, because of mismatches between Orion and the registry. The registry was updated to reflect the disconnection or reconnection before Orion, and the older Orion status information was used to produce the GAN.

The accuracy of GAN expected switch dates was checked using the switch breach history report, which did not contain any breaches for GAN files where Nova was the defaulting participant.

Incorrect GAN file content		
Non-compliance	Description	
Report section: 9.3 Rule: 70.3 From: 7 August 2024 To: 28 April 2026	Audit history: No Controls: Acceptable Impact: Insignificant	Nine ICPs⁶ did not have the correct GAN response code, because of mismatches between Orion and the registry. The registry was updated to reflect the disconnection or reconnection before Orion, and the older Orion status information was used to produce the GAN. Orion's automated GAN process creates accurate files as long as the underlying data in Orion is correct, non-compliance has only occurred where Orion was not up to date. Processing of manual updates to disconnected status for vacant ICPs is de-prioritised as there is no customer impact, although recently vacant disconnected ICPs can be more likely to receive a switch move GTN. The impact on other participants is minimised because the correct status was recorded on the registry.

⁶ 1002068671QTF68 GAN-12282170 PD should be AA. 1000502276PG8A4 GAN-12330447, 0002204921QT520 GAN-11354445, 0002215601QTE3B GAN-11686303, 0000802331QTE9C GAN-12222286, 0002104571QTD90 GAN-12239138, 0002105621QT73B GAN-12193932, 0001403702QTC72 GAN-12059957 and 0001818791QTA9A GAN-12285156 AA should be PD.

Remedial action rating	Remedial timeframe	Remedial comment
In progress	Ongoing. Investigation into automation is expected to be completed by Q2 2027	Nova is investigating opportunities to further strengthen controls through automation of status updates into internal systems
Audited party comment		
The circumstances of the matters outlined in the breach notice.	In a small number of instances, the Registry had been updated to reflect a status change prior to the corresponding update being completed in Orion. As a result, a switch request was received while Orion still reflected an earlier status, which led to an incorrect GAN response code being generated.	
Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach	
Estimate of the impact of the breaches (where admitted).	Nova considers the impact to be insignificant. The correct ICP status was recorded on the Registry, which minimised any impact on other participants.	
What steps or processes were in place to prevent the breaches?	Nova had exception reporting in place to identify differences between status information recorded in Orion and the Registry.	
What steps have been taken to prevent recurrence?	Nova is investigating options to automate status updates between the Registry and internal systems to improve alignment.	

9.4 Gas Transfer Notice (rule 72)

GTN process

Orion automatically issues GTN files using information in Orion, once the expected switch date is reached. After reads are imported into Orion and validated at 3pm, estimated closing reads are generated based on average consumption for the meter where actual readings are not available, then SFI RPA creates exceptions for missing meter owners, meter number mismatch, and ICPs with read dates after the expected final reading date. Any readings after the closing reading are made misreads so that they will be ignored by the GTN process.

The process for TOU and non-TOU switches is the same. At 4.06pm Orion creates the GTNs through its batch interface process using:

- the validated closing estimated or actual meter reading as the switch event read,
- the last actual read recorded in Orion as the last actual read date (the exception management process ensures that reads after the switch date are made misreads),
- the average annual consumption from the meters tab, which is an estimate of the seasonally adjusted annual consumption over the past year, and
- the agreed switch event date, and metering values recorded on Orion's metering tab.

GTN timeliness

GTNs are sent at 4.06pm after gas readings have been imported and validated in Orion at 3pm. Nova monitors the switch breach history three times per day, and actions service requests created by the SFI RPA process to detect any files that have failed to generate properly or where a successful acknowledgement is not received from the registry. There were no late GTN files where Nova was the defaulting participant.

GTN content

TOU GTN accuracy

I checked a sample of ten TOU GTNs throughout the audit period for accuracy.

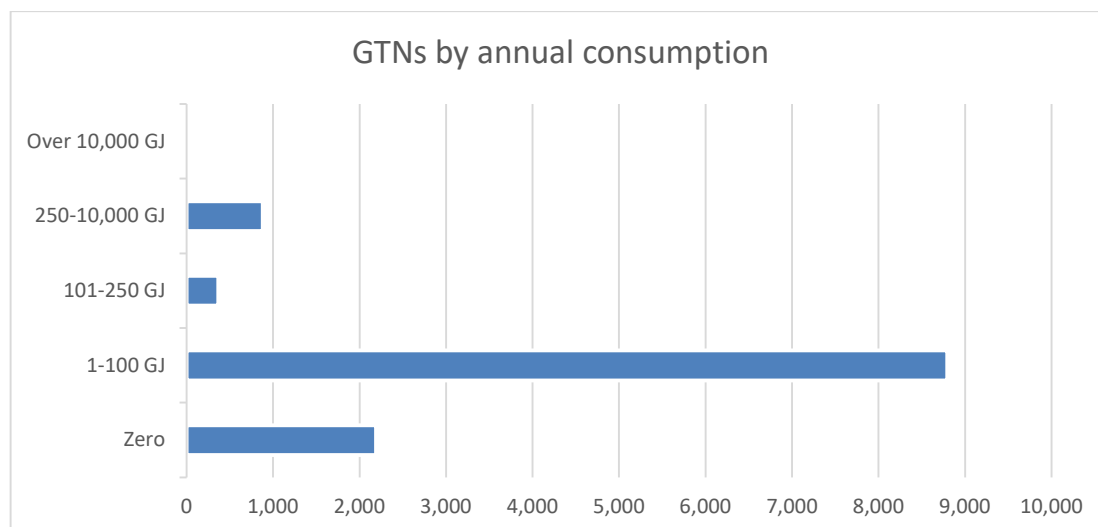
An incorrect switch event reading was accidentally applied in error for ICP 0008000071NG41B GTN-11882451 because an estimated reading at the time of the switch was replaced after the GTN was issued. A read renegotiation was successfully completed on discovery of the error during the audit. The ICP has a GD connection, and no submission data is provided to the allocation agent, and there was no impact on the other participant or the market.

ICP 0001787671QT9FA GTN-11896628 and ICP 1000525876PGF03 GTN-11209913 had an estimated read type in their GTN, but an actual reading was recorded in Orion. Nova will raise a ticket to investigate.

Non-TOU GTN accuracy

I checked a sample of 20 non-TOU GTNs throughout the audit period, and I confirmed all file content was accurate and consistent with Orion.

I checked the estimated annualised consumption for GTNs issued during the audit period where at least one meter register was recorded, and a diverse sample of 30 GTNs to determine whether the annual consumption appeared reasonable. Apart from 0004205114NG765 GTN-12328511 7,649 GJ which had a high value calculated because a reading lower than previous reading was treated as a meter rollover in error, all annual consumption estimates were within $\pm 6\%$ of the value calculated from Orion's consumption for the past year and appeared reasonable. Rule 72.1.3 requires GTN notices to contain "an annualised consumption (in gigajoules) estimate for the ICP", but it does not stipulate that the estimate must be accurate. For consistency with the previous audit, I have not alleged a breach and note that Nova has raised a ticket to investigate how to resolve this issue.



The accuracy of GTN switch dates was checked using the switch breach history report for 1 April 2024 to 3 June 2026. TND breaches where the GTN was issued for the day before the gaining

retailer's requested date were recorded for ICP 1000522201PG9FE 10 June 2025 and ICP 0000132511QTBFE 17 December 2024. Both were created when users manually changed the dates in the files in error, and training has been completed to prevent recurrence.

I checked for accuracy of meter and register information provided in GTN files by reviewing the PR-240 GTN meter and register data mismatch reports for April 2024 to May 2026. The report identifies GTNs which have failed validation due to discrepancies between the meter and register information provided in the GTN and the values held on the registry on the switch event date.

Breach description	Count	Earliest breach	Latest breach
MI – Meter Identifier	26	11 March 2024	17 April 2026
MP – Meter Pressure	19	29 April 2024	23 April 2026
RD – Register Reading Digits	2	3 September 2024	8 April 2025
Total	47		

I checked a sample of 20 of the differences and found they were timing differences where metering changes had occurred around the time of the switch, or typos or errors made when entering metering information into Orion manually or attempting to copy metering information from Orion fields (such as accidentally pasting a value over the meter number instead of copying it). Nova intends to investigate restricting access to some metering fields to reduce the risk of accidental errors. In each case the information was checked and updated, and the file reissued.

TND breaches		
Non-compliance	Description	
Report section: 9.4 Rule: 72.1.5 From: 1 May 2024 To: 1 July 2025	Audit history: No Controls: Effective Impact: Insignificant	TND breaches where the GTN was issued for the day before the gaining retailer's requested date were recorded for ICP 1000522201PG9FE 10 June 2025 and ICP 0000132511QTBFE 17 December 2024. Both were created when users manually changed the dates in the files in error, and training has been completed to prevent recurrence and no issues occurred after 1 July 2025.
Remedial action rating	Remedial timeframe	Remedial comment
Completed	Completed prior to finalisation of the audit report	Additional guidance and training have been provided regarding manual updates to GTN switch dates. No further instances have been identified following implementation of this action
Audited party comment		
The circumstances of the matters outlined in the breach notice.	In two instances, a manual update resulted in the GTN switch date being incorrectly set to the day prior to the gaining retailer's requested switch date.	

Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach
Estimate of the impact of the breaches (where admitted).	Nova considers the impact to be insignificant. The issue was limited to the switch date recorded in the GTN and did not prevent completion of the switching process.
What steps or processes were in place to prevent the breaches?	Nova had established GTN creation and review processes in place, however these instances arose from manual data entry errors during processing
What steps have been taken to prevent recurrence?	Targeted training and guidance have been provided to staff responsible for GTN processing, with additional emphasis on validating manually entered switch dates before file creation. No further instances have been identified following this action.

Incorrect GTN file content		
Non-compliance	Description	
Report section: 9.4 Rule: 75.1.5 and 74 From: 1 May 2024 To: 1 July 2025	Audit history: Yes Controls: Effective Impact: Insignificant	TOU 0008000071NG41B GTN-11882451 had an incorrect switch event read applied, because an estimated read used for switching was later replaced with an actual read. There was no impact on submission or the other retailer for this GD ICP. ICP 0001787671QT9FA GTN-11896628 and ICP 1000525876PGF03 GTN-11209913 had an estimated read type in their GTN, but an actual reading was recorded in Orion. Nova will raise a ticket to investigate.
Remedial action rating	Remedial timeframe	Remedial comment
Completed	Completed prior to audit response	Nova completed an investigation into the cause of the discrepancies and identified it was due to manual intervention on the GTN file creation. Refresher training has been completed
Audited party comment		
The circumstances of the matters outlined in the breach notice.	One GTN contained an incorrect switch event reading because an estimated reading used to complete the switch was subsequently replaced by an actual reading after the GTN had been issued. This has since been corrected via GNC but did not impact submission as TOU reads were used by both Nova and the gaining retailer. In two further instances, the GTN recorded an estimated read type where an actual reading was recorded in Orion.	

Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach
Estimate of the impact of the breaches (where admitted).	Nova considers the impact to be insignificant. The incorrect switch event reading related to a TOU ICP and had no impact on submission or the other retailer. The remaining instances were limited to the read type recorded in the GTN
What steps or processes were in place to prevent the breaches?	Nova had established GTN generation and validation processes in place, including the use of validated meter reading information held in Orion.
What steps have been taken to prevent recurrence?	Nova has completed refresher training of staff who work on GTN files for TOU switching to ensure accurate information is captured in both Orion and files with no subsequent changes completed outside of the GNC process.

9.5 Accuracy of Switch Readings (rule 74)

GTN files are generated by Orion and switch event readings are determined from the readings held within Orion at the time the switch is completed. If no actual reading is available to complete the switch, Orion will automatically create an estimate based on the meter's average annual consumption.

I checked a sample of 30 GTNs throughout the audit period and found that all file content including readings were correct and consistent with Orion, apart from:

- an incorrect switch event reading was accidentally applied in error for TOU ICP 0008000071NG41B GTN-11882451 because an estimated reading at the time of the switch was replaced after the GTN was issued; a read renegotiation was successfully completed on discovery of the error during the audit, but as the ICP has a GD connection and no submission data is provided to the allocation agent, there was no impact on the other participant or the market, and
- TOU ICPs 0001787671QT9FA GTN-11896628 and 1000525876PGF03 GTN-11209913 had an estimated read type in their GTN, but an actual reading was recorded in Orion; Nova will raise a ticket to investigate.

This is recorded as non-compliance in **section 9.4**, which affects the same three GTN files.

9.6 Gas Switching Withdrawal (rules 74A, 75, 76 and 78)

GNW

GNWs are automatically triggered by SFI RPA for backdated standard switch GNTs, or non-compliant future dated GNTs.

All other GNWs are issued manually after identification that a withdrawal is required by the switching, metering or customer teams who raise a service request for the switching team. The user selects the best advisory code based on a table of responses. The GNWs are created from Orion and sent via the batch interface each morning and at 2pm.

Incoming GAW responses are imported at 2pm, if accepted the interface will automatically update the ICP records in Orion. If rejected, or the ICP is invoiced past the switch date, the ICP will appear on the Orion switching interface for manual review and action and will be removed from the list once ticked.

GNW timeliness

Service requests are created by the SFI RPA process to detect any files that have failed to generate properly, or where a successful acknowledgement is not received from the registry.

GNWs are allowed to be issued at any point from the date that the ICP switches to Nova, until the date Nova receives a GNT for the ICP from another retailer. I did not identify any GNWs issued for dates outside Nova's period of supply.

The switch breach history report did not record any switch breaches for withdrawals where GNVG was the defaulting participant between 1 April 2024 to 3 June 2026.

GNW content

An analysis was undertaken of GNWs (switching withdrawal notices) to identify the number within each reason category. This was done as both the recipient of the GNW and as the initiator of the GNW. The results are shown in the table below.

GNW Files Sent	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
N (new retailer)	448	3	-	9	2	143	47	652	4.47%
O (old retailer)	244	3	-	14	65	33	287	646	5.03%
GNW Files Received⁷	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
N (new retailer)	272	20	-	8	4	78	2	384	2.99%
O (old retailer)	80	19	-	11	9	166	245	530	3.63%

The numbers above appear to be reasonable and have decreased since the previous audit where concerns were raised about large numbers of wrong switch withdrawals mainly due to inconsistent information being provided by customers through the online application process. The number of wrong switch withdrawals appear reasonable.

I matched the GNW files issued by Nova to the GAW responses received from other retailers and found that 118 (9.1%) of the 1,297 responses were rejections. This is approximately 2.5% higher than proportion of rejections recorded in the previous audit. I checked a diverse sample of 31 rejected files including at least three with each request reason and found that the GNW code applied was correct based on the information available at the time the file was issued apart from:

ICP	Reference	Event date	Issue
0000014787GNB4E	GNW-11782639	10 April 2025	CR (customer request): sent in error, vacant ICP.

⁷ Based on the requesting trader. This means that for incoming NWs where the requesting trader is new, Nova is the old trader.

ICP	Reference	Event date	Issue
0001310590PGCA3	GNW-11726015	28 February 2025	MI (metering issue): sent in error, meter issue should have been corrected before switching.
0002069611QTD77	GNW-11497732	30 September 2024	
0000026132GN0D9	GNW-11988512	19 September 2025	WS (wrong switch type): issued in error due to confusion when new staff were in training.
0001666321QTC46	GNW-11496398	18 November 2024	
1001243756NG50B	GNW-11988514	19 September 2025	
0002313121QTDC0	GNW-12288605	1 April 2026	WS (wrong switch type): sent in error for a Megatel ICP.

I checked examples of accepted GNWs where Nova was the new retailer and where Nova was the old retailer, including where Nova was the old and new trader for each request reason code. All 18 had correct content.

GAW

Incoming GNWs are imported via Orion's batch interface, which are worked through alongside correspondence from the other trader to accept or reject the withdrawal request. Creation of the response triggers a service request in SFI, and Orion is updated to reflect the outcome of the withdrawal process at the time it is accepted or rejected.

GAWs are issued via Orion's batch interface process each morning and at 2pm.

GAW timeliness

Nova Energy monitors the switch breach history three times per day, and actions service requests created by the SFI RPA process to detect any files that have failed to generate properly or where a successful acknowledgement is not received from the registry.

The switch breach history report did not record any GAW switch breaches where GNVG was the defaulting participant between 1 April 2024 to 3 June 2026.

GAW content

I matched the GNW files received by Nova to their GAW responses and found that 98 (10.7%) of the 914 responses were rejections, which is a similar proportion to the previous audit.

16 of the rejected files were reissued. Of those, one was accepted on reissue with a different code, 11 were accepted on reissue with the same code and four were rejected again on reissue with the same code. I also checked a diverse sample of 26 rejected files where Nova was the new and old trader for each reason code, and found they were all rejected for valid reasons.

Incorrect GNW file content		
Non-compliance	Description	
Report section: 9.6 Rule: 75.1 From: 30 September 2024 To: 1 April 2026	Audit history: Yes Controls: Effective Impact: Minor	Seven of a sample of 31 rejected GNWs checked were issued in error and no withdrawal was required. There was no impact on submission because the invalid GNWs were rejected by the other retailer. Further training has been provided to prevent recurrence, and apart from one error relating to a transfer from MEGA to GNVG the inaccuracies occurred before 2026.
Remedial action rating	Remedial timeframe	Remedial comment
Completed	Completed prior to finalisation of the audit report	Additional guidance and training have been provided regarding the circumstances in which a GNW should be issued. No similar issues have been identified in recent processing
Audited party comment		
The circumstances of the matters outlined in the breach notice.	In a small number of instances, GNWs were issued when a withdrawal was not required. The errors primarily arose from processing decisions made during manual review of switching transactions, including some instances involving staff training and one transfer between MEGA and GNVG.	
Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach	
Estimate of the impact of the breaches (where admitted).	Nova considers the impact to be minor. The invalid GNWs were rejected by the other retailer and did not impact switching outcomes or submission processes.	
What steps or processes were in place to prevent the breaches?	Nova had established switching processes, system workflows and guidance for the selection and creation of switching withdrawals.	
What steps have been taken to prevent recurrence?	Additional training and guidance have been provided to reinforce the circumstances in which a withdrawal is required and to improve consistency of switching assessments.	

9.7 Switch Reading Negotiation (rules 79 and 81)

GNC

Where a switch event read appears inaccurate, either through the read validation process or a customer enquiry, a second reading is requested to confirm which reading is correct. If this confirms the switch event reading is incorrect, a service request is raised for a read renegotiation.

A GNC is created from Orion by:

- calculating the proposed reading using a template,
- entering the proposed reading into Orion as a “GNCESTREQ” or “GNCACTREQ” reading, which is ignored by the process to calculate historic estimate, and
- making the existing switch event reading a misread, in an effort to prevent the wrong read being selected by Orion’s GNC generation process.

GNCs are issued via Orion’s batch interface process each morning and at 2pm, and the file content is manually checked to make sure the correct requested read and read type is in the GNC files. Service requests created by the SFI RPA process to detect any files that have failed to generate properly or where a successful acknowledgement is not received from the registry.

Returned GAC files are imported via the batch interface process each morning, which creates an SFI service order. If accepted, the switching team will manually update the “GNCESTREQ” or “GNCACTREQ” reading to be the opening estimate or actual reading. If rejected, they will reinstate the original switch event reading by changing it from a misread back to an opening actual or estimate reading. Breaches for other parties are monitored three times daily to identify late incoming GAC files for follow up.

Making the agreed switch event reading a misread while the read renegotiation is in progress means that the opening reading is unavailable for use in the submission process, leading to temporarily inaccurate forward and/or historic estimate.

Recommendation	Audited party comment
GNC generation process: Investigate why the GNC generation process does not always add the correct “GNCESTREQ” or “GNCACTREQ” read to the file. Staff are only making the event reads misreads to work around this issue, and in some cases, Orion is still not identifying the correct GNC reading.	Nova accepts the recommendation. The identified exceptions will be reviewed to determine why the GNC generation process does not consistently select the intended read. Any required process or system improvements will be implemented following completion of the review.
GNC recording of agreed switch reads process: Do not make opening switch event readings misreads unless they genuinely should not be used for reconciliation because 1) they have been replaced through the read renegotiation process or 2) they are no longer required because the switch is withdrawn. The <u>current agreed switch reading</u> should always be recorded in Orion for every switch gain and loss. The GTN reading remains the current agreed switch event reading until a GAC accepting a GNC is provided.	Nova accepts the recommendation. The current process will be reviewed to ensure agreed switch event readings remain recorded in Orion unless they have been formally replaced through the renegotiation process or are no longer required due to a switch withdrawal.

GNC content

I matched the GNC files issued by Nova to the GAC responses received from other retailers and found that 85 (19.1%) of the 443 responses were rejections, which is 13% higher than the previous audit. I reviewed all the rejected files and found:

- 16 GNCs were rejected once or twice, and not reissued after that, and
- 69 GNCs were accepted on reissue after up to two rejections; 11 were eventually accepted on the same read as the initial GNC and 58 were accepted on different readings.

I checked Orion for all the GNC files which were not accepted on reissue and eight ICPs where the GNCs were accepted on reissue and found all had the correct agreed switch read recorded in Orion,

but three switch events had an incorrect read type entered⁸. As all switch event readings are treated as permanent by Orion this has no impact on submission.

I checked a sample of nine accepted GNCs and confirmed that the correct event reads and read types were recorded in Orion. There were no issues with the accuracy of GNC content.

GNC timeliness

The switch breach history report did not record any switch breaches where GNVG was the defaulting participant between 1 April 2024 to 3 June 2026.

GAC

Incoming GNCs are imported via Orion's batch interface each morning, which are worked through alongside correspondence from the other trader to accept or reject the renegotiation request. GACs are issued via Orion's batch interface process each morning and at 2pm.

Staff create their own service orders, and work through the ICPs in the interface to accept or reject the incoming GNC file, and Orion is updated to reflect the outcome of the process at the time it is accepted or rejected. The switching team checks each ICP to make sure that the interface has imported the correct reading.

GAC content

I matched the GNC files received by Nova to their GAC responses, and found that 54 (17.59%) of the 307 responses were rejections:

- 38 incoming GNCs were accepted on reissue after up to two rejections; nine were eventually accepted on the same read as the initial GNC and 29 were accepted on different readings,
- 12 were rejected and not reissued, and
- four files for two ICPs were rejected twice.

I checked a diverse sample of 33 rejections and found that the correct agreed switch readings were recorded in Orion for all ICPs except 1000508622PG3E7 GNC-12313447 16 April 2026 which had 716 recorded in Orion and 717 on the registry, which Nova intends to correct. The error occurred because the GAC was completed manually on the registry and the process to update the reading did not complete in Orion correctly.

I checked a sample of ten GAC acceptances and found the correct readings were recorded in Orion.

Similarly to GNCs, seven⁹ of the 43 ICPs checked did not have the correct switch event read type recorded in Orion. This does not cause non-compliance with the Rules.

GAC timeliness

Nova Energy monitors the switch breach history three times per day, and actions service requests created by the SFI RPA process to detect any files that have failed to generate properly or where a successful acknowledgement is not received from the registry.

The switch breach history report did not record any GAW switch breaches where GNVG was the defaulting participant between 1 April 2024 to 3 June 2026.

⁸ 0002006153NGDAB GNC-12067096 4 September 2025, 0000028284GN827 GNC-12067095 3 October 2025, 0001014583NGC82 GNC-11288902 17 May 2024 A should be E.

⁹ 0001023060NGAB1 GNC-12231957 16 January 2026, 0001009177NG35F GNC-12332161 3 June 2026, 1001301245NGADA GNC-11976417 21 July 2025, 0048109199PGB29 GNC-12061349 1 August 2025, 0009001034NGCE8 GNC-12118431 3 November 2025, 0002290371QT666 GNC-12126839 2 December 2025, 0001012724NG690 GNC-12308903 10 April 2026 A should be E.

Incorrect switch event reading in Orion		
Non-compliance	Description	
Report section: 9.7 Rule: 81 From: 16 April 2026 To: 16 April 2026	Audit history: Yes Controls: Acceptable Impact: Insignificant	ICP 1000508622PG3E7 GNC-12313447 16 April 2026 had a reading of 716 recorded in Orion and 717 on the registry, which Nova intends to correct. The error occurred because the GAC was completed manually on the registry and the process to update the reading did not complete in Orion correctly.
Remedial action rating	Remedial timeframe	Remedial comment
Completed	Completed prior to finalisation of the audit report	The identified switch event reading discrepancy has been corrected and staff guidance has been reinforced regarding manual processing of accepted switch reading negotiations. The broader GNC/GAC process review will be progressed through the recommendations identified by the auditor.
Audited party comment		
The circumstances of the matters outlined in the breach notice.	Following acceptance of a switch reading negotiation, a manual update completed through the Registry did not correctly update the agreed switch event reading in Orion. As a result, the switch event reading recorded in Orion differed from the agreed reading recorded in the Registry.	
Whether or not the participant admits or disputes that it is in breach.	Nova admits the breach	
Estimate of the impact of the breaches (where admitted).	Nova considers the impact to be insignificant. The issue was limited to a single switch event reading discrepancy and did not prevent the switching process from being completed. The agreed reading was recorded in the Registry.	
What steps or processes were in place to prevent the breaches?	Nova had established read renegotiation processes in place, including review of incoming GNC and GAC transactions and manual verification of accepted switch readings prior to update in Orion.	
What steps have been taken to prevent recurrence?	The discrepancy has been corrected, and staff guidance has been reinforced regarding the updating of agreed switch event readings following acceptance of a read negotiation. Nova will also review the broader GNC/GAC process in response to the auditor's recommendations.	

10. Bypass of Distributor (rule 82)

Nova has not been involved in any new bypass events during the audit period, which was confirmed by reviewing the registry list, which showed no ICPs have been added to the Nova bypass network during the audit period.

11. Recommendations

As a result of this audit, I have made six recommendations:

Report section	Recommendation
8	Review AG4 and AG6 ICPs which may have estimated consumption over 10,000 GJ per annum: ICPs 0000075541QT86F, 0001424895QTCFD, 0000542321QT906, 0002027806NG988, 0044103550PG7EB, 0001432267QTB44, 0002282851QT39C, 0003475134NG8CE, 0003008311NGBF5 and 1001245680NG502 switched from MEGA to GNVG effective 1 April 2026 and are not expected to have annual consumption over 10,000 GJ. The ICPs should be checked to determine whether the high consumption is correct and Orion adjusted as necessary. ICP 0001005778NG107 is close to the threshold at 10,410 GJ and underwent a meter change during the past year. It should be checked to determine whether it is genuinely expected to use more than 10,000 GJ per annum. If any of the ICPs are genuinely consuming or expected to consume more than 10,000 GJ per annum they must be upgraded to TOU metering within three months and have their allocation group corrected.
8	Review AG4 ICPs with consumption under 250 GJ per annum and AG6 ICPs with consumption over 250 GJ: If the consumption is correct, consider moving the ICPs to the correct allocation group in Orion and on the registry. Nova may elect to leave ICPs close to the threshold in their current allocation group.
8	Review AG1 ICPs without telemetry owners: Check for AG1 ICPs without a telemetry owner on the registry and update the allocation group to AG2 if they are confirmed not to have telemetry.
8	Review AG2 ICPs with telemetry owners: Check for AG2 ICPs with a telemetry owner on the registry and update the allocation group to AG1 if they are confirmed to have telemetry.
9.7	GNC generation process: Investigate why the GNC generation process does not always add the correct “GNCESTREQ” or “GNCACTREQ” read to the file. Staff are only making the event reads misreads to work around this issue, and in some cases, Orion is still not identifying the correct GNC reading.
9.7	GNC recording of agreed switch reads process: Do not make opening switch event readings misreads unless they genuinely should not be used for reconciliation because 1) they have been replaced through the read renegotiation process or 2) they are no longer required because the switch is withdrawn. The <u>current agreed switch reading</u> should always be recorded in Orion for every switch gain and loss. The GTN reading remains the current agreed switch event reading until a GAC accepting a GNC is provided.

Appendix 1 – Control Rating Definitions

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

Appendix 2 – Impact Rating Definitions

Rating	Definition
Insignificant	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. 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.
Minor	<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. <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.
Moderate	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. 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.
Major	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. 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.

Appendix 3 – 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 4 – Network pressure differences causing temperature factor differences over maximum permissible errors

The following ICPs have an Orion network pressure consistent with the Orion meter pressure, which does not match the network pressure recorded by the distributor and are likely to result in temperature factor errors outside the maximum permissible limits in NZS 5259.

ICP	Network pressure	Orion network pressure	Network pressure difference	Orion meter pressure
0000341351QTFDC	700	200	500	200
0000547291QT590	1000	3	997	3
0000905551QT766	700	200	500	200
0001539691QTD51	560	3	557	3
0001787571QTAF9	560	7	553	7
0001793051QTCC8	560	1.5	558.5	1.5
0001793161QT234	560	3	557	3
0004219384NG1E4	950	1.5	948.5	1.5
1000510797PGOFF	950	3	947	3

The following ICPs have an Orion network pressure inconsistent with the Orion meter pressure, which also does not match the network pressure recorded by the distributor and are likely to result in temperature factor errors outside the maximum permissible limits in NZS 5259.

ICP	Network pressure	Orion network pressure	Network pressure difference	Orion meter pressure
0000922271QT89C	1000	10000	-9000	2.5
0000236577QTFB5	16	440	-424	2.5
0000237172QTF5B	16	440	-424	2.5
0001412669QTD13	16	440	-424	2.5
0002075751QT5B7	16	440	-424	1.5
0002076081QT517	16	440	-424	2.5
0002076851QT858	16	440	-424	2.5
0002077011QTB50	16	440	-424	2.5
0002078811QT23D	16	440	-424	2

ICP	Network pressure	Orion network pressure	Network pressure difference	Orion meter pressure
0002095571QTF98	16	440	-424	3
0002096061QT2D0	16	440	-424	2.5
0002096221QTA72	16	440	-424	2.5
0002104911QTE6C	16	440	-424	2.5
0002128731QT77F	16	440	-424	2.5
0002133521QTD04	16	440	-424	2.5
0002134181QT0AA	16	440	-424	2.5
0002140041QT278	16	440	-424	2.5
0002144211QT6F7	16	440	-424	2.5
0002146541QT2BD	16	440	-424	2.5
0002150651QT632	16	440	-424	2.5
0002155941QT4B0	16	440	-424	2.5
0002166631QTD2E	16	440	-424	2.5
0002170061QTE01	16	440	-424	2.5
0002175351QTDDA	16	440	-424	2.5
0002178381QTAB8	16	440	-424	2.5
0002245491QT8AF	16	440	-424	2.5
0002282001QTB99	16	440	-424	2.5
0002309761QTFC2	16	440	-424	2.5
0002317371QT94F	16	440	-424	2.5
0002318101QTF75	16	440	-424	2.5
0002318551QTB7C	16	440	-424	2.5
0002325631QTC83	16	440	-424	2.5
1000495290PG459	16	440	-424	2.5
1000499840PG891	16	440	-424	2.5
1000517568PG151	16	440	-424	2.5

ICP	Network pressure	Orion network pressure	Network pressure difference	Orion meter pressure
1000521643PG53F	16	440	-424	2.5
1000523119PG3E4	16	440	-424	2.5
1000524480PG337	16	440	-424	2.5
0000079631QT5B1	3	420	-417	1.5
0001406307QTA1C	3	420	-417	2.5
0002112841QT241	16	420	-404	2.5
0001208361NAB3E	650	180	470	125
0001209568NA2C9	650	180	470	70
0001210623NA9FA	650	180	470	2.5
0001213454NA98A	650	180	470	2.5
0001218671NAC77	650	180	470	2.5
0001218724NA034	650	180	470	2.5
0001229726NA03D	650	180	470	1.5
0002320851QT258	950	315	635	3
1000510797PG0FF	950	3	947	1020
0004219384NG1E4	950	1.5	948.5	2.5
1002039473QT73E	1000	35	965	2.5
0001410620QT2A7	1000	7	993	3
1002053183QTE34	1000	7	993	860
0000547291QT590	1000	3	997	1.5

I rechecked the ICPs where non-compliance was recorded for incorrect network pressures in the previous audit and found five were resolved, and three were switched out before they were resolved. The previous audit exception for 0001787571QTAF9 is unresolved and included in the tables above. The other exception remains unresolved and is unlikely to have a material impact on the pressure factor:

ICP	Network pressure	Orion network pressure	Network pressure difference	Orion meter pressure
11000589557PG673	315	2.5	312.5	2.5

Appendix 5 – Meter pressure differences causing pressure factor differences under maximum permissible errors

The following ICPs have an Orion meter outlet pressure which does not match the meter pressure recorded by the meter owner and are unlikely to result in pressure factor errors outside the maximum permissible limits in NZS 5259.

ICP	Meter Identifier	Meter Pressure	Orion meter pressure	Meter pressure match
0007000951NGCB1	20EG1641	1.5	2.5	-1
0000236808QT03E	600881526	2.5	3	-0.5
1000502699PG1C1	08K572458	2.5	3	-0.5
0000278971QT163	03D468290	2.5	3	-0.5
0000587751QT3CA	600845764	2.5	3	-0.5
0000666411QT205	600871431	2.5	3	-0.5
0001410740QT453	600849865	2.5	3	-0.5
0003033701NG395	600831932	1.2	1.5	-0.3
0001009672NG112	600846006	2.5	2.75	-0.25
0007003046NG03F	600700944	2.5	2.75	-0.25
0001015067NG397	600794700	2.5	2.75	-0.25
0004002542NGE5B	600830979	2.5	2.75	-0.25
0002011838NG907	600750145	2.5	2.75	-0.25
0000227831QT0D6	600794962	2.75	3	-0.25
0000480041QT669	600794958	2.75	3	-0.25
0001443215QT585	600871449	2.5	2.75	-0.25
0002380951QTDB4	600870727	2.5	2.75	-0.25
1001138987QTD2C	600756266	2.75	3	-0.25
0001009826NGE1B	600849129	2.5	2.75	-0.25
0001397701QT4FD	600759071	2.5	2.75	-0.25
0007003171NG309	600794662	2.75	2.5	0.25
1001294699NGC0F	600841175	2.75	2.5	0.25

ICP	Meter Identifier	Meter Pressure	Orion meter pressure	Meter pressure match
0000653781QT8ED	600847049	3	2.75	0.25
0000877561QTD0B	600841418	3	2.75	0.25
1001105561QT119	04E100355	2.75	2.5	0.25
0001223060PGE11	600828386	1.5	1.2	0.3
0001493080PGBC5	600828423	1.5	1.2	0.3
0001511596PGDEB	600679554	1.5	1.2	0.3
0001962930PG2E0	14P3615	1.5	1.2	0.3
0046110422PGC44	15P0393	1.5	1.2	0.3
0087426260PG19F	23P1205	1.5	1.2	0.3
0001813401QT99E	834109431	2.5	2	0.5
0001838271QTCE8	280686	2.5	2	0.5
0001854681QT926	22EG0304	2.5	2	0.5
0001857431QT373	17EG8545	2.5	2	0.5
0000042771QT0DC	600590753	1.5	1	0.5
0001446758QTA5E	24X874896	3	2.5	0.5
0002246401QT5A8	19M519925	2.75	2	0.75
0001710781QT34D	20EG0170	2.5	1.5	1
0001142600PG8AB	13P0347	2.5	1.5	1
0002125811QTF05	22EG0392	2.5	1.5	1
0000416291QT328	600894745	2.5	1.5	1

Appendix 6 – Nova Comments

Nova have reviewed this report and their comments are contained within its body.