

## Compliance plan for Trustpower

Relevant Information		
Non-compliance	Description	
<b>Audit ref:</b> 2.1 <b>With:</b> Clause 11.2 & 15.2  <b>From/to:</b> 1/6/16-30/4/17	Some registry discrepancies. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Multiple times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are strong and most issues have been identified and resolved. The impact on settlement is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Trustpower continues to utilise exception reporting as part of our BAU processes to identify and resolve Registry discrepancies. It's pleasing to see that our focus on data integrity is reflected in the results achieved this audit. We will continue to engage with 3rd parties ie Traders, Distributors and customers to maintain and where possible, improve our performance in this area.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will continue its focus on identifying and resolving Registry discrepancies to ensure the integrity of our data.	Ongoing	

Metering Certification		
Non-compliance	Description	
<b>Audit ref:2.10</b> <b>With:</b> Clause 10.33(2)  <b>From/to:</b> Oct 16-Jan 17	2 ICPs not certified within 5 business days of energisation. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The new connection process is robust with strong controls in place. The two examples found of late meter certification are exceptions. These had already been identified through BAU reporting and were under investigation hence audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As noted by the auditors, the 2 ICP's are exceptions only and sound reporting enables Trustpower to identify and investigate where this has occurred as part of our BAU processes.	ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will continue its focus on identifying and investigating instances where a late meter certification has occurred and will monitor our own performance to measure our compliance in this area.	ongoing	

Changes to registry information		
Non-compliance	Description	
<b>Audit ref:</b> 3.3 <b>With:</b> Clause 10 of schedule 11.1  <b>From/to:</b> 1/10/16-30/4/17	Registry information not provided within 5 business days. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Seven times previously <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The updating of registry information process is robust and the overall level of compliance is high.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Trustpower continues to look for opportunities to refine our reporting and processes to improve our performance in updating registry information within 5 business days. It's pleasing to see this reflected in our results and we will continue to monitor our own performance and work with our MEP and contractors to ensure the timely and accurate return of metering paperwork. Reporting has been created to address the issue of late MEP nominations where a change of MEP has occurred. This will identify any fieldwork service order that has been logged without the relevant MEP nomination.	30/06/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will continue its focus on identifying and resolving Registry discrepancies to ensure the integrity of our data.	ongoing	

Trader responsibility for an ICP		
Non-compliance	Description	
<b>Audit ref:</b> 3.4 <b>With:</b> Clause 11.18  <b>From/to:</b> 1/10/16-30/4/17	Correct MEP nomination late for three ICPs. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Weak <b>Breach Risk Rating:</b> 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	The process for managing MEP changes does not have robust controls resulting in the MEP being nominated late hence the rating of weak. Whilst the controls are weak analysis found only three examples of late MEP hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As noted by the auditors only 3 ICP's were identified where a late MEP nomination occurred through the New Connection process. Trustpower has well defined MEP areas which ensures a high level of performance in this area, however reporting has now been created to address the issue of late MEP nominations. This reporting will identify new connection fieldwork service order that has been logged without the relevant MEP nomination.	30/06/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reporting is now in place to identify new connection fieldwork service orders that have been logged without the relevant MEP nomination and we will monitor our own performance to measure our compliance in this area.	ongoing	

Management of "Active" status		
Non-compliance	Description	
<b>Audit ref:</b> 3.8 <b>With:</b> Clause 17 of Schedule 11.1  <b>From/to:</b> 21/12/16-13/3/17	Some builders' temporary supplies energised without Trustpower's knowledge. <b>Potential impact:</b> Medium <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Weak <b>Breach Risk Rating:</b> 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	Controls are weak in relation to when an approved contractor energises a builders temporary supplies without advising Trustpower. Trustpower only become aware of the connection when the site moves to the permanent supply. Overall the level of compliance is high but the lack of controls in this area is resulting in submission occurring late for these ICPs hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As noted by the Auditors, Trustpower's level of compliance is high with only exceptions identified where BTS supplies have been energised without our knowledge. Reporting is in place to review any ICP where a new connection is still in progress after 185 days and we will continue to work with our MEP and contractors for the timely return of metering and livening paperwork. Where breaches are identified feedback is provided for improved performance. Additional reporting has been created to identify any new connection not yet energised where a BTS to Permanent application has been received. This reporting will be used as an indicator that livening has potentially occurred or is imminent and therefore requires urgent follow up.	24/07/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will continue to monitor our own performance and work with MEP's and contractors to ensure the timely and accurate return of metering and livening data to maintain our compliance levels.	ongoing	

Change of MEP		
Non-compliance	Description	
<b>Audit ref:</b> 3.11 <b>With:</b> Clause 10.22(1)(a)(i)  <b>From/to:</b> 1/10/16-30/4/17	MEP change process not being managed in all instances. <b>Potential impact:</b> Medium <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Weak <b>Breach Risk Rating:</b> 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	The bulk of the MEP changes are managed compliantly. The audit highlighted weaknesses in the management of this process in certain scenarios and the lack of controls in relation to these instances is causing non-compliance for Trustpower and the MEP delaying them in the uploading of metering to the registry hence the controls rating of weak and audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As noted by the auditor the bulk of the MEP changes are managed compliantly. Reporting has now been created to address the issue of late MEP nominations where a change of MEP has occurred. This will identify any fieldwork service order that has been logged without the relevant MEP nomination. Trustpower will monitor its own performance to ensure our level of compliance remains high.	30/06/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reporting is now in place to address the risk of late MEP nominations and we will monitor our own performance to measure our compliance in this area.	ongoing	

Losing trader must provide final information		
Non-compliance	Description	
<b>Audit ref:4.3</b> <b>With:</b> Clause 5 of schedule 11.3 & 15.2  <b>From/to:</b> 1/6/16-30/4/17	Some late CS files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Seven times <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	Trustpower has robust controls in place hence controls are rated as strong. The volume of late CS files in relation to the total process is minor hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Trustpower has further enhanced their internal Switch Breach Reporting to pick up all late CS File scenarios, some that had been previously missed. Internal process changes were also made to deal with standard switch customers ringing in to final their accounts.	01/8/2017	
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will remain focused on improving our results further.	01/8/2017	Identified

Retailers must use same reading- standard switch		
Non-compliance	Description	
<b>Audit ref:4.4</b> <b>With:</b> Clause 6 & 6A of schedule 11.3  <b>From/to:</b> 1/6/16-30/4/17	11 late RR files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Seven times <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	Trustpower has robust controls in place and the late RR files were all subsequent to the original RR which was sent within 2 months, hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Trustpower is creating additional reporting to look into the accepting and rejecting of RRs and to ensure that the team are making the right decisions.	01/10/2017	
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will remain focused on improving in this area and as noted above, the additional reporting will assist those improvements.	01/10/2017	Identified

Losing trader provides information		
Non-compliance	Description	
<b>Audit ref:</b> 4.8 <b>With:</b> Clause 10 of schedule 11.3  <b>From/to:</b> 1/6/16-30/4/17	1 incorrect AN response code sent. Some late CS files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Three times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	Trustpower has robust controls in place hence the controls rating of strong. The volume of late files reported is minor compared to the volume of switches processed, and some of these are not valid breaches hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Trustpowers current breach report is excellent however Trustpower does not believe it can reach 100% compliance while the known code conflict remains in place with regards to move in switches. In regard to the one incorrect AN response that was sent, Trustpower is working with Gentrack to ensure that the incorrect code isn't automatically sent for de-energised sites. AN and CS must be sent within 5 business days of NT receipt – <b>Note Code Conflict</b> – NT can be sent up to 10 days in advance but code requires CS within 5 days of NT receipt causing the losing trader to be non-compliant if the NT is sent more than 5 days in advance.	01/9/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will continue to manage our breach report as part of our everyday process. If there is a change to the code conflict, this would help improve our numbers even more.	01/8/2017	



Gaining trader changes to switch event meter reading		
Non-compliance	Description	
<b>Audit ref:</b> 4.11 <b>With:</b> Clause 12 of schedule 11.3  <b>From/to:</b> 1/6/16-30/4/17	21 late RR files. 1 RR sent with only one validated read gained. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Seven times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	Trustpower has robust controls in place hence the control rating of strong. The RR sent with 1 validated read was due to human error and the volume of late RR files was low in relation to the overall volume of RR files processed hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Trustpower is creating additional reporting to look into the accepting and rejecting of a RRs and to ensure that the team are making the right decisions.	01/10/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will remain focused on improving in this area and as noted above, the additional reporting will assist those improvements.	01/10/2017	

Losing trader provision of information		
Non-compliance	Description	
<b>Audit ref:</b> 4.13 <b>With:</b> Clause 15 of schedule 11.3  <b>From/to:</b> 1/3/17 -30/4/17	Incorrect AN code of MU sent for 3 HH switches. <b>Potential impact:</b> Low <b>Actual impact:</b> None <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	The AN code assignment is system set and therefore was assumed to be correct with no checks to confirm the correct code was being sent hence the control rating of moderate. This information is available for each ICP on the registry therefore this has no material impact on settlement hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
All of our AN files are sent within 3 business days of the NT being received. This happens automatically within our system.  We will investigate how to mitigate any incorrect AN codes being used for HH sites within the system automation.	01/10/2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
All of our AN files are sent within 3 business days of the NT being received. This happens automatically within our system.  We will investigate how to mitigate any incorrect AN codes being used for HH sites within the system automation.	01/10/2017	

Withdrawal of switch requests			
Non-compliance	Description		
<b>Audit ref:</b> 4.15 <b>With:</b> Clause 17&18 of schedule 11.3  <b>From/to:</b> 1/3/17 -30/4/17	6 switches withdrawn greater than 2 months of the event date. 1 late AW sent. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 4		
Audit Risk Rating	Rationale for audit risk rating		
Medium	The manual process to manage win backs can result in ICPs being delayed in getting actioned effecting billing and submission.		
Actions taken to resolve the issue		Completion date	Remedial action Status
Trustpower believes they have some good controls in place to monitor and respond to these in a timely manner. We will look at other improvements in this area too, to avoid any breaches at all.		01/10/2017	
Preventative actions taken to ensure no further issues will occur		Completion date	
As stated above we will see if there is any other improvements we can make, whether it be staff training or reports to avoid any breaches.		01/10/2017	Investigating

<b>Unmetered threshold</b>		
<b>Non-compliance</b>	<b>Description</b>	
<b>Audit ref:</b> 5.2 <b>With:</b> Clause 10.14(2)(b) of part 10  <b>From/to:</b> 01/06/16 -30/04/17	28 ICPs with annual consumption over 6,000 kWh per annum. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> six times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The unmetered load figures used for submission are accurate, and the main issue is that more ICPs are required to lower the annual kWh per fixture.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
As noted by the Auditor, Trustpower has a comprehensive set of validation reports in place to identify ICPs where the threshold has been exceeded. These are identified on a daily basis and investigations commence immediately. Trustpower continues its project with Chorus our account managed customer to review and individually meter cabinet supplies that are in breach of this regulation.	ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As noted by the Auditor, Trustpower has a comprehensive set of validation reports in place to identify ICPs where the threshold has been exceeded. These are identified on a daily basis and investigations commence immediately. Trustpower continues its project with Chorus our account managed customer to review and individually meter cabinet supplies that are in breach of this regulation.	ongoing	

<b>Unmetered threshold exceeded</b>		
<b>Non-compliance</b>	<b>Description</b>	
<b>Audit ref:</b> 5.3 <b>With:</b> Clause 10.14(2)(b) of part 10  <b>From/to:</b> 01/06/16 -30/04/17	28 ICPs with annual consumption over 6,000 kWh per annum and remedial actions are not yet complete. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> six times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The unmetered load figures used for submission are accurate, and the main issue is that more ICPs are required to lower the annual kWh per fixture.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
As noted by the Auditor, Trustpower has a comprehensive set of validation reports in place to identify ICPs where the threshold has been exceeded. These are identified on a daily basis and investigations commence immediately. Trustpower continues its project with Chorus our account managed customer to review and individually meter cabinet supplies that are in breach of this regulation.	ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As noted by the Auditor, Trustpower has a comprehensive set of validation reports in place to identify ICPs where the threshold has been exceeded. These are identified on a daily basis and investigations commence immediately. Trustpower continues its project with Chorus our account managed customer to review and individually meter cabinet supplies that are in breach of this regulation.	ongoing	

<b>Distributed unmetered load</b>		
<b>Non-compliance</b>	<b>Description</b>	
<b>Audit ref:</b> 5.4 <b>With:</b> Clauses 11(1) of schedule 15.3, 10.14 & 15.13  <b>From/to:</b> 01/06/16 -30/04/17	Some incorrect submission information for DUML ICPs. <b>Potential impact:</b> High <b>Actual impact:</b> Low <b>Audit history:</b> Multiple times <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are rated as moderate, because some databases were not checked during the audit period. The impact on settlement is minor, therefore the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
As noted by the Auditor, Trustpower has a comprehensive set of validation reports in place to identify ICPs where the threshold has been exceeded. These are identified on a daily basis and investigations commence immediately. Trustpower continues its project with Chorus our account managed customer to review and individually meter cabinet supplies that are in breach of this regulation.	ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We will continue to work with our customers and network companies to improve databases and maintenance processes, and any submission data will be revised accordingly.	Ongoing	

Electricity conveyed & notified in accordance with the code		
<b>Non-compliance</b>	<b>Description</b>	
<b>Audit ref:</b> 6.1 <b>With:</b> Clause 10.13 & 15.13  <b>From/to:</b> May 16-April 17-	Some incorrect submission information for ICPs with distributed generation. <b>Potential impact:</b> Medium <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	Trustpower have put robust reporting in place to address ICPs with embedded generation indicated therefore going forward these will be managed effectively hence controls are strong. This issue has been addressed therefore the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
System was changed (during audit period) to allow PV1 and EG1 profiles to be used.	Completed	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Nothing further	Completed	

Electricity conveyed & notified in accordance with the code		
Non-compliance	Description	
<b>Audit ref:6.1</b> <b>With:</b> Clause 10.12 & 10.24(b) of part 10  <b>From/to:</b> 01/06/16 -30/04/17	Six metering installations bridged and two metering installations interfered with. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Three times <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	Controls are strong with regard to identification of bridged meters. Trustpower only initiates bridging themselves in exceptional circumstances to ensure customers have electricity supply. Submission information is estimated for the bridged period so the impact on submission accuracy is considered low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We are picking up the majority of these with current reporting in place but have found a small number of exceptions that slipped through. These are corrected as they are identified.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
An additional report will be created to pick up AMI sites that have been reconnected after hours and there is no use on the meter in the days following the reconnection. Reporting should be completed in the next month to be actioned as needed and we expect this will pick up the ones that had been missed previously.	30/09/2017	



Responsibility for metering at GIP		
Non-compliance	Description	
<b>Audit ref:</b> 6.2 <b>With:</b> Clause 10.26(7) of part 10  <b>From/to:</b> 03/09/16 to 03/06/17	RM not notified of the new expiry date for Matahina metering installation. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Controls are strong with regard to ensuring certification is conducted, but they are only moderate for ensuring the RM is notified.  There is no risk that submission information will be incorrect, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
<b>Notified Reconciliation manager</b> NOTE: Metering was certified and compliant but register not updated.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Jason (RM) provided list of NSP Meters we should submit.	Completed	

Certification of control devices		
Non-compliance	Description	
<b>Audit ref:</b> 6.3 <b>With:</b> Clause 33(1A) & (1) of schedule 10.7  <b>From/to:</b> 01/06/16 - 30/04/17	4 ICPs without certified control devices. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because these 4 ICPs were not identified.  There is no effect on submission accuracy because the control devices have not failed, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have investigated it and will amend the ICPs as soon as possible.	25/07/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Trustpower will build reporting to identify all ICPs and look at correcting any profiling issues, or following up any Certification issues, if required.	31/08/2017	

Derivation of meter readings		
Non-compliance	Description	
<b>Audit ref:</b> 6.6 <b>With:</b> Clause 3(2) &3(2) & 5 of schedule 15.2  <b>From/to:</b> 1/6/16 -30/4/17	Customer reads being treated as actuals. Checks for phase failure not conducted and recorded by Datacol. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because clarification has only recently been provided in relation to the application of customer reads and Trustpower are working with Gentrack to remedy this and Datacol have a fix in progress to mitigate the risk. Trustpower have good overall controls in relation to the management of reads hence the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Readings to be inputted as estimates as opposed to scheduled reads. To be completed by Meter Reading team. Phase failure is recorded whenever it is observed. Staff have been trained to identify this.	01/08/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Readings to be inputted as estimates as opposed to scheduled reads. To be completed by Meter Reading team. Phase failure is recorded whenever it is observed. Staff have been trained to identify this.	Ongoing	

Interrogate meters once		
<b>Non-compliance</b>	<b>Description</b>	
<b>Audit ref:</b> 6.8 <b>With:</b> Clause 7(1) & (2) of schedule 15.2  <b>From/to:</b> 1/6/16 -30/4/17	Customer reads being treated as actuals. Checks for phase failure not conducted and recorded by Datacol. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are recorded as moderate because clarification has only recently been provided in relation to the application of customer reads and Trustpower are working with Gentrack to remedy this and Datacol have a fix in progress to mitigate the risk. Trustpower have good overall controls in relation to the management of reads hence the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
Work will be completed with Datacol to rectify the situation moving forward for some sites.	31/08/2017	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Review to ensure this is successfully addressed.	30/10/2017	

NHH meters interrogated annually		
Non-compliance	Description	
<b>Audit ref:6.9</b> <b>With:</b> 8(1) & (2) of schedule 15.2  <b>From/to:</b> 1/6/16 -30/4/17	ICPs unread at 12 months under reporting. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Once previously <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because the report was still excluding unread ICPs where the estimate has been replaced with a permanent estimate at 14 months were being excluded.  Trustpower have indicated that this will be easy to correct and once done the reporting will be accurate therefore the risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
EA Report to be updated to include Permanent Estimates.	31/08/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Thorough testing of reporting changes. Cross checking meter reading BAU reports with EA monthly compliance report.	30/10/2017	

Electronic meter readings and estimated readings		
Non-compliance	Description	
<b>Audit ref: 9.6</b> <b>With:</b> Clause 17(4)(f) of schedule 15.2  <b>From/to:</b> 01/06/16 - 30/04/17	Event information not evaluated in accordance with the Code. <b>Potential impact:</b> Medium <b>Actual impact:</b> Low <b>Audit history:</b> Once <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	Event information is managed for two of four MEPS, and there are other validations in place to identify issues where consumption information may be effected, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Will work with AMI Data providers to be provided the information and place this within Trustpower systems.	31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A data manager is to be appointed and will take this as an area of responsibility.	31/12/2017	

Calculation of ICP days		
Non-compliance	Description	
<b>Audit ref:</b> 11.2 <b>With:</b> Clause 15.6 of part 15  <b>From/to:</b> June 2016	NHH ICP days discrepancies due to incorrect meter change dates in GTV. HHR ICP days incorrect for ICP 0003443370BU50D.  <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Incorrect ICP days affects scaling if the difference is above a certain threshold. These issues are below the threshold so the audit risk rating is considered low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have updated our checking process to also compare ICPCOMP and ICPMISS prior to any revision submissions which will identify these prior to submission.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Action completed	Completed	

HH		
Non-compliance	Description	
<b>Audit ref:</b> 11.4 <b>With:</b> Clause 15.8  <b>From/to:</b> 01/06/16 - 30/04/17	HHR aggregates missing from the February 2017 file for 3 ICPs. HHR aggregates file does not contain electricity supplied information. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating:</b> 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Consumption information was supplied for the next revision for the ICPs where records were missing from the HHR aggregates file; therefore, I conclude the risk rating is low. The HHR aggregates file cannot contain electricity supplied information, or other reports relying on the aggregates file will not be accurate, therefore I consider this matter does not have a risk rating.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The code is not consistent with the functional specification of what is required. It would not be possible to be compliant with the current wording. Will raise this issue at the next Retailers forum in August.	31/08/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Nothing further at this stage	31/08/2017	

Permanence of meter readings		
Non-compliance	Description	
<b>Audit ref:</b> 12.8 <b>With:</b> Clause 4 of schedule 15.2  <b>From/to:</b> September and October 2015	Some estimated data still existing at 14 months. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The total consumption affected was very small. Controls had already identified this issue and it is now resolved.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Unsure why this is noted as we had already identified the issue and resolved by the time of the audit. (4 ICP's)	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Nothing further	Completed	

Forward estimate process		
Non-compliance	Description	
<b>Audit ref:</b> 12.12 <b>With:</b> Clause 6 of schedule 15.2  <b>From/to:</b> Sept 15 to Nov 16	FE accuracy threshold not met for some balancing areas. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Six times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The total consumption affected is small as a total percentage, therefore I consider the risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have implemented our own Provisional Profile shapes which are proving to be very accurate.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Nothing further	Completed	

Compulsory meter reading after profile change		
Non-compliance	Description	
<b>Audit ref:</b> 12.13 <b>With:</b> Clause 7 of schedule 15.2  <b>From/to:</b> April 2017	Profile changes made on estimates. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are strong but the changes were made on estimates based on advice from the RM rather than in accordance with the Code. There is no effect on submission accuracy, in fact the submission information will be more accurate once the first meter reading after the profile change is obtained.	
Actions taken to resolve the issue	Completion date	Remedial action Status
This was discussed with the RM before we made these changes.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Nothing further.	Completed	

Historical estimate reporting		
<b>Non-compliance</b>	<b>Description</b>	
<b>Audit ref:</b> 13.4 <b>With:</b> Clause 10 of schedule 15.3  <b>From/to:</b> Sept 15 to Nov 16	HE targets not met for a small number of NSPs. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> Six times <b>Controls:</b> Strong <b>Breach Risk Rating:</b> 1	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are strong to ensure meter readings are obtained which in turn leads to a high percentage of HE. There is only a very small impact on consumption information therefore I consider the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
We have implemented our own Provisional Profile shapes which are proving to be very accurate.	Completed	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Nothing further	Completed	