

Compliance plan for Electra

Non-compliance	Description		
Audit Ref: 1.2 With: 16A.11 From: 01-Jul-17 To: 31-Aug-17	NIMS was replaced by Wind Mil, which does not have an interface to the registry. This has a significant impact on processes covered by this audit Potential impact: Low Actual impact: Low Audit history: Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as none. No material change audit was conducted. No impact on settlement outcomes therefore audit risk rating recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
None, system replacement implemented in July 2017.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Unaware of change to code regarding material change audit, now aware of it for future changes.			

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 16-Sep-16 To: 15-Aug-17	Some information in the registry still must be corrected or populated Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as moderate. The new connection process is good. Audit risk rating is assessed as low because Electra pursue data correction. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continue to pursue historic data correction using site visits		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes in place for new data entry		ongoing	

Non-compliance	Description		
Audit Ref: 2.2 With: 11.2(2) From: 16-Sep-16 To: 15-Aug-17	Incorrect data is corrected but in some cases, it is identified late and results in backdating transactions in the registry. There is no structured process yet. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as moderate, Audit risk rating is assessed as low because Electra proactively pursue data correction. It is just a matter of time and resources. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted in auditor comments Electra pursues data correction. Historical corrections have been completed			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

New IECD process implemented.	ongoing	
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Non-compliance	Description		
<p>Audit Ref: 3.4</p> <p>With: 7(2) of Schedule 11.1</p> <p>From: 16-Sep-16</p> <p>To: 15-Aug-17</p>	<p>2 ICPs were not uploaded to the registry prior to electricity being traded at the ICP</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history:</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded the controls as strong. We identified two ICPs which did not meet compliance obligations but overall the process is good. No impact on settlement outcomes therefore audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
Action complete.		17/2 & 23/2 2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Adhere to current ICP process controls.		ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 16-Sep-16</p> <p>To: 15-Aug-17</p>	<p>The Initial Electrical Connection Date was not recorded in the registry for any new connections before 10 business days as required</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as weak. Electra fully relies on traders' updates. There is no validation of the accuracy of data. No impact on settlement outcomes therefore audit risk rating recorded as low		

Actions taken to resolve the issue	Completion date	Remedial action status
No action - Electra has no other source of information other than updates provided by the respective trader.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process in place to check weekly for updates to active status	ongoing	

Non-compliance	Description		
Audit Ref: 3.6 With: 11.17 From: 16-Sep-16 To: 15-Aug-17	5 ICPs were connected without traders being recorded accepting responsibility in the registry Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	We recoded controls as strong. The process for new connections is managed well but as always there is room for improvement. No impact on settlement outcome. Audit risk rating is recorded as low		
Actions taken to resolve the issue	Completion date	Remedial action status	
Traders added to ICPs.	August and July 2017	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
Process improved to insist on trader being populated before file uploaded to registry	ongoing		

Non-compliance	Description
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<p>Audit Ref: 3.15</p> <p>With: 7(6) of Schedule 11.1</p> <p>From: 16-Sep-16</p> <p>To: 01-Sep-17</p>	<p>Incorrect Loss Factor Code for Mangahao Power Station recorded in the registry caused King Country Energy to purchase an additional 7,400 (approx.) units of electricity per year</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	We recorded controls as weak because there is not much of a process to check if correct loss factor code was assigned to ICPs. It is easily understood because all ICPs except Mangahao have the same loss factor applied; settlement outcome was effected; volume will be corrected through wash-up process; This error directly impacted levy calculation therefore some traders were charged more than they should have been. Audit risk rating recorded as medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Loss factor corrected immediately on identification.		1/9/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Check for correct value when changes made to this ICP.		ongoing	

Non-compliance	Description		
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 16-Sep-16 To: 15-Aug-17	Some updates to network, pricing information and the “decommissioning” status in the registry for were done later than 3BD. Potential impact: Low Actual impact: Low Audit history: Twice or more Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as weak/moderate. It appears to be an ongoing catch-up job to clean data. We did not observe a structured approach to maintain the quality of data in the registry; no impact on settlement outcome therefore audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Cannot resolve as actions complete			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Data updating will continue as requested by retailers. Address updates will continue as part of compliance requirements.		ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 16-Sep-16</p> <p>To: 15-Aug-17</p>	<p>For nearly 400 ICPs the address descriptions do not allow ICPs to be readily located</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate, the addresses are corrected as an operator comes across them but it is not a structured project. No impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Manually try and resolve addresses of ICPs		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Manually try and resolve addresses of ICPs. This is a time-consuming job that can require site visits for verification.		ongoing	

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Non-compliance	Description		
Audit Ref: 4.6 With: 7 (1) of Schedule 11.1 From: 16-Sep-16 To: 15-Aug-17	Incorrect or missing information in the registry for UML, Initial Electrical Connection Date, NSPs Potential impact: Low Actual impact: Low Audit history: Twice before Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	We recorded controls as weak because there is no process in place. Audit risk rating is recorded as low because only two ICPs of metering category 2 and 3 are effected, therefore impact on settlement outcome is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
NSP data corrected, IECD data corrected,		Sept 2017, Sept 2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
UML is like address and will take time and site visits to resolve. IECD and NSP have processes in place.		ongoing	