

## Compliance plan for OtagoNet Joint Venture

Non-compliance	Description		
<p>Audit Ref: 2.1 With: 11.2(1)</p> <p>From: 01-Aug-16 To: 30-Jun-17</p>	<p>Information about embedded generation is not complete and UML ICPs info is not updated following traders update</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Overall processes are good, weak area is embedded generation		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML – A number of ICPs with trader UML on the registry were investigated. This was generally historic UML, and most were found to have details recorded in the PowerNet ICP d/b but had not uploaded to the registry. This was corrected. A smaller number were queried with traders and found their registry data was incorrect and would be removed.</p> <p>DG – DG installers have always been very tardy in return completion notifications, despite many follow-ups. Historic records of approved applications were searched and the registry updated for those ICPs.</p>		25/8/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>DG – From the beginning of August 17 electronic processing has been introduced to automatically update the registry with DG details when an application for connection of DG is approved.</p>		11/8/17	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 19-Aug-16</p> <p>To: 19-Aug-16</p>	<p>Initial Energisation Date for small number of ICPs was uploaded later than 10 BD. It was data correction after the last audit</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Audit risk rating is low because non-compliance was caused by data correction after the last audit and it was a very small number of ICPs		
Actions taken to resolve the issue		Completion date	Remedial action status
The PowerNet process is for livening agents to return documentation at the end of the day initial energisation has taken place. Close monitoring now takes place where weekly a report to identify any ICPs becoming Active with no IED recorded.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Any instances found are investigated so contact can be made to the party involved and timeliness reinforced, under the threat of revoking their PowerNet authorisation to carry out this distributor function.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 01-Aug-16</p> <p>To: 30-Jun-17</p>	<p>Registry information not updated within 3 business days</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three time before</p> <p>Controls: Weak</p> <p>Breach risk rating:</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Our audit risk rating is low because backdating of price codes has no financial impact. Addresses and statuses are well managed. There is no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Whenever data updates are identified the effective date is also considered, and they will be backdated if that is the most correct.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Difficulties have arisen due to back-population of IED from historic records, because PowerNet had for many years prior to 2013 (implementation of IED) been recording the initial livening date for new connections. With that field already in the data structure PowerNet began to use it for IED from 2013. Difficulty arose from the registry's handling of the historic data being sent with present day updates, i.e. pre 2013 IED dates being sent.</p> <p>It is believed this issue is now resolved to prevent these data issues with the registry.</p>		31/8/17	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Aug-16</p> <p>To: 30-Jun-17</p>	<p>Incorrect or lack of information in the registry</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			
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML – A number of ICPs with trader UML on the registry were investigated. This was generally historic UML, and most were found to have details recorded in the PowerNet ICP d/b but had not uploaded to the registry. This was corrected. For ELIN all of, and on other networks small number, were queried with traders and found their registry data was incorrect and would be removed.</p> <p>DG – DG installers have always been very tardy in return completion notifications, despite many follow-ups. Historic records of approved applications were searched and the registry updated for those ICPs.</p>		25/7/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>DG – From the beginning of August 17 electronic processing has been introduced to automatically update the registry with DG details when an application for connection of DG is approved.</p>		11/8/17	