

Compliance plan for Northpower

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>Small number of updates (about 3%) to the registry later than 3BD.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as strong. Northpower constantly review, using specially design queries, its data to check that it is accurate. Late updates to the registry are caused by special circumstances such as correction of errors, being aware that UML was removed, Gentrack's issue. No impact on traders or settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ol style="list-style-type: none"> 1. Northpower will correct any data errors discovered in the Registry and this often requires existing historical Registry entries to be replaced. 2. Decommissioning of ICPs cannot be completed in the Registry until any subsequent entries are removed and the trader moves the Registry status to Inactive Ready for Decommissioning. Unfortunately, it can take some weeks and several emails before these Registry changes are made by a trader. 3. With regard to backdating price category code changes, Northpower is happy to do this for a reasonable period (usually 1 month maximum) if agreed with the trader and the change is in the best interest of the customer. 		Not Applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Gentrack will often send a backdated entry to the Registry, often related to the Part 10 go-live, when data for an ICP is changed that affects the Registry. We have introduced checks to capture, then reverse, these old entries however this will mean both the initial update and the reversal are effectively backdated beyond 3 working days.</p>		Not Applicable	

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 16-Aug-16 To: 15-Sep-17	6 ICPs had duplicate addresses, hard to locate 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 have recorded the controls as strong.		
Actions taken to resolve the issue		Completion date	Remedial action status
The Northpower Network is predominantly a rural based network and therefore a large number of ICPs (pumps, cow sheds, etc.) do not have distinct addresses. We use the Property Name field where possible to help make addresses unique. In addition, many rural properties, and newly created urban subdivisions, do not have a "street number" issued by the local Council. The Councils will only issue "street numbers" to existing properties if the owner specifically requests this.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Northpower will continue to run the address audit reports and attempt to give any ICPs identified meaningful address information.			

Non-compliance	Description		
<p>Audit Ref: 4.5</p> <p>With: 2 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>1 ICP cannot be easily disconnected because of access issue to a main switch; the problem was created during splitting a motel into separate holiday units.</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	We have recorded the controls as weak. It is a known problem, which was "created" in 2008 during split of an existing motel into separate holiday units		
Actions taken to resolve the issue		Completion date	Remedial action status
Northpower management believe the problem was caused by the property owner splitting the existing motel into separate "holiday units" and so are not prepared to take any action.		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Northpower Network has re-iterated the requirements of the Code for ICPs created after 2002 to be able to be separately disconnected without disconnecting any other ICP.		31/8/2017	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>Less than 10 ICPs had incorrect data in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice before</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as strong. Northpower runs several queries to validate the accuracy of data. Information incorrect for a very small number of ICPs. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will continue to be proactive in our attempts to identify and correct any data errors discovered in Gentrack or the Registry. This often requires existing historical Registry entries to be replaced.</p> <p>As a consequence of correcting some Registry data we have found that additional work is involved in chasing traders to update their Registry data (notably unmetered load). It appears that many traders do not seem to be reviewing the Notification Files received from the Registry for data changes.</p>		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Northpower will continue to be proactive in our attempts to identify and correct any data errors discovered in Gentrack or the Registry. This often requires existing historical Registry entries to be replaced.</p>		On-going	

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: 14 of Schedule11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>Northpower receives a confirmation form a trader accepting responsibility for the ICP after the registry changes the ICP status to “ready” because a proposed trader specified by a customer was uploaded</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as moderate. Northpower has a good process to receive a confirmation from a trader accepting responsibility for the ICP. The problem is that it is received after the registry changes the ICP status to “ready”. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Northpower will not be changing any of the current processes around creating or livening ICPs.		Not Applicable	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Traders have varying processes for handling, in their systems, newly created ICPs. Some use the Registry status “inactive – new connection in progress” (001/12) while others do not update the Registry at all prior to the ICP being livened (connected). Northpower has to work with all these different processes in the most efficient way possible to avoid unnecessary problems for the end customer.</p> <p>Northpower expects all traders to send a service request prior to an ICP being livened (connected) as authority to liven (connect) and an indication of their taking responsibility for the electricity supplied to the ICP.</p> <p>The term “connect” used in Clause 10.31 is not a defined term under the Code. Northpower applies the commonly accepted meaning, within the industry, to this term to mean an ICP is livened and electricity may flow.</p>		Not Applicable	