

## Compliance plan for Waipa Networks Limited– 2018

| Requirement to provide complete and accurate information                                                                               |                                                                                                                                                                                                                 |                 |
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| Non-compliance                                                                                                                         | Description                                                                                                                                                                                                     |                 |
| Audit Ref: 2.1<br>With: Clauses 11.2(1) and 10.6(1)<br>From: 01-Jul-17<br>To: 30-Jun-18                                                | Registry information not complete and accurate in all instances.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                           |                 |
| Audit risk rating                                                                                                                      | Rationale for audit risk rating                                                                                                                                                                                 |                 |
| <b>Low</b>                                                                                                                             | Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.<br>The risk rating is low as the discrepancies found have no direct impact on reconciliation. |                 |
| Actions taken to resolve the issue                                                                                                     |                                                                                                                                                                                                                 | Completion date |
| Our additional checks along with additional resource we are committing to the process will result in general improvement in this area, |                                                                                                                                                                                                                 | 1/10/18         |
| Preventative actions taken to ensure no further issues will occur                                                                      |                                                                                                                                                                                                                 | Completion date |
| As above.                                                                                                                              |                                                                                                                                                                                                                 | 1/10/18         |
|                                                                                                                                        |                                                                                                                                                                                                                 | Identified      |

| Requirement to correct errors                                                                                                          |                                                                                                                                                                                                                      |                 |                        |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------|
| Non-compliance                                                                                                                         | Description                                                                                                                                                                                                          |                 |                        |
| Audit Ref: 2.2<br>With: Clauses 11.2(2) and 10.6(2)<br>From: 01-Jul-17<br>To: 30-Jun-18                                                | Errors not corrected as soon as practicable.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                                                    |                 |                        |
| Audit risk rating                                                                                                                      | Rationale for audit risk rating                                                                                                                                                                                      |                 |                        |
| <b>Low</b>                                                                                                                             | Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.<br>The risk rating is low as the corrections not actioned have no direct impact on reconciliation. |                 |                        |
| Actions taken to resolve the issue                                                                                                     |                                                                                                                                                                                                                      | Completion date | Remedial action status |
| Our additional checks along with additional resource we are committing to the process will result in general improvement in this area. |                                                                                                                                                                                                                      | 1/10/18         | Identified             |
| Preventative actions taken to ensure no further issues will occur                                                                      |                                                                                                                                                                                                                      | Completion date |                        |
| As above.                                                                                                                              |                                                                                                                                                                                                                      | 01/10/18        |                        |

| Timeliness of Provision of ICP Information to the registry manager                       |                                                                                                                                                                                                                                                     |                 |                        |
|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------|
| Non-compliance                                                                           | Description                                                                                                                                                                                                                                         |                 |                        |
| Audit Ref: 3.4<br>With: Clause 7(2) of schedule 11.1<br>From: 10-Jul-17<br>To: 30-Jun-18 | 16 ICPs not updated prior to electricity being traded.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Strong<br>Breach risk rating: 1                                                                           |                 |                        |
| Audit risk rating                                                                        | Rationale for audit risk rating                                                                                                                                                                                                                     |                 |                        |
| <b>Low</b>                                                                               | Controls are rated as strong as ICPs are being updated on the correct day. The error is occurring due to a file time processing issue.<br>The risk rating is low as the volume of ICPs affected is small and the delay is one day in all instances. |                 |                        |
| Actions taken to resolve the issue                                                       |                                                                                                                                                                                                                                                     | Completion date | Remedial action status |
| This has now been corrected.                                                             |                                                                                                                                                                                                                                                     | 25/07/18        | Cleared                |
| Preventative actions taken to ensure no further issues will occur                        |                                                                                                                                                                                                                                                     | Completion date |                        |
| As above.                                                                                |                                                                                                                                                                                                                                                     | 25/07/18        |                        |

| Timeliness of Provision of Initial Electrical Connection Date                                 |                                                                                                                                                                                                   |                 |
|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                                                | Description                                                                                                                                                                                       |                 |
| Audit Ref: 3.5<br>With: Clause 7(2A) of schedule 11.1<br><br>From: 10-Jul-17<br>To: 30-Jun-18 | 31 initial electrical connection dates not updated within ten business days.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Once<br>Controls: Moderate<br>Breach risk rating: 2 |                 |
| Audit risk rating                                                                             | Rationale for audit risk rating                                                                                                                                                                   |                 |
| <b>Low</b>                                                                                    | Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.<br><br>The risk rating is low this has no direct impact on reconciliation.      |                 |
| Actions taken to resolve the issue                                                            |                                                                                                                                                                                                   | Completion date |
| We will add checks of the initial livening date and associated information.                   |                                                                                                                                                                                                   | 1 October 2018  |
| Preventative actions taken to ensure no further issues will occur                             |                                                                                                                                                                                                   | Completion date |
| As above                                                                                      |                                                                                                                                                                                                   | 1 October 2018  |
|                                                                                               |                                                                                                                                                                                                   | Identified      |

| Connection of an ICP that is not an NSP                                                             |                                                                                                                                                                                                                                                        |                 |                        |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------|
| Non-compliance                                                                                      | Description                                                                                                                                                                                                                                            |                 |                        |
| Audit Ref: 3.6<br>With: Clause 11.17<br><br>From: 01-Jul-17<br>To: 30-Jun-18                        | 16 ICPs connected before a trader was recorded on the registry as accepting responsibility.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                                       |                 |                        |
| Audit risk rating                                                                                   | Rationale for audit risk rating                                                                                                                                                                                                                        |                 |                        |
| <b>Low</b>                                                                                          | Controls are rated as moderate ICPs are being updated on the correct day. The error is occurring due to a file time processing issue.<br><br>The risk rating is low as the volume of ICPs affected is small and the delay is one day in all instances. |                 |                        |
| Actions taken to resolve the issue                                                                  |                                                                                                                                                                                                                                                        | Completion date | Remedial action status |
| We have modified our system so the file is submitted to the Registry on the same day as the change. |                                                                                                                                                                                                                                                        | 25/07/18        | Cleared                |
| Preventative actions taken to ensure no further issues will occur                                   |                                                                                                                                                                                                                                                        | Completion date |                        |
| As above                                                                                            |                                                                                                                                                                                                                                                        | 25/07/18        |                        |

| Changes to registry                                                                                      |                                                                                                                                                                                                          |                 |                        |
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| Non-compliance                                                                                           | Description                                                                                                                                                                                              |                 |                        |
| Audit Ref: 4.1<br>With: Clause 8<br>Schedule 11.1<br><br>From: 01-Apr-99<br>To: 30-Jun-18                | Some price, network, status, and address changes were backdated.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Multiple<br>Controls: Moderate<br>Breach risk rating: 2                |                 |                        |
| Audit risk rating                                                                                        | Rationale for audit risk rating                                                                                                                                                                          |                 |                        |
| <b>Low</b>                                                                                               | Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.<br><br>The risk rating is low as these events have no direct impact on reconciliation. |                 |                        |
| Actions taken to resolve the issue                                                                       |                                                                                                                                                                                                          | Completion date | Remedial action status |
| We will continue to backdate to fix errors but have also modified our process re decommissions as above. |                                                                                                                                                                                                          | 30/07/18        | Identified             |
| Preventative actions taken to ensure no further issues will occur                                        |                                                                                                                                                                                                          | Completion date |                        |
| As above                                                                                                 |                                                                                                                                                                                                          | 30/07/18        |                        |

| ICP address readily locatable                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                 |                 |                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------|
| Non-compliance                                                                                                                                                                                                                                                                                                                                  | Description                                                                                                                                                                                     |                 |                        |
| Audit Ref: 4.4<br>With: Clause 2<br>Schedule 11.1<br><br>From: 01-Apr-99<br>To: 30-Jun-18                                                                                                                                                                                                                                                       | 69 ICPs with addresses that are not readily locatable.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Multiple<br>Controls: Moderate<br>Breach risk rating: 2                 |                 |                        |
| Audit risk rating                                                                                                                                                                                                                                                                                                                               | Rationale for audit risk rating                                                                                                                                                                 |                 |                        |
| <b>Low</b>                                                                                                                                                                                                                                                                                                                                      | Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.<br><br>The risk rating is low as this has no direct impact on reconciliation. |                 |                        |
| Actions taken to resolve the issue                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                 | Completion date | Remedial action status |
| Our database does not allow the uniqueness of an address to be automatically checked however we have improved our manual checks and rechecks to reduce the number of duplicates. We also periodically contact Retailers for information where we don't have a readily locatable address but will do this more frequently as part of our checks. |                                                                                                                                                                                                 | 01/10/18        | Identified             |
| Preventative actions taken to ensure no further issues will occur                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                 | Completion date |                        |
| As above.                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                 | 01/10/18        |                        |

| Distributors to Provide ICP Information to the Registry manager                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                          |                 |
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| Non-compliance                                                                                                                                                                                                                                                                                                                                                               | Description                                                                                                                                                                                                                                                                                                                                                                                              |                 |
| <p>Audit Ref: 4.6</p> <p>With: Clause 7(1)<br/>Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 30-Jun-18</p>                                                                                                                                                                                                                                                                 | <p>Distributed generation details incorrect or missing</p> <p>4 ICPs with the initial electrical connection date missing.</p> <p>8 ICPs with an incorrect initial electrical connection date populated.</p> <p>5 ICPs with incorrect UML load recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> |                 |
| Audit risk rating                                                                                                                                                                                                                                                                                                                                                            | Rationale for audit risk rating                                                                                                                                                                                                                                                                                                                                                                          |                 |
| <b>Low</b>                                                                                                                                                                                                                                                                                                                                                                   | <p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as this has no direct impact on reconciliation.</p>                                                                                                                                                                                                   |                 |
| Actions taken to resolve the issue                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                          | Completion date |
| We have corrected the UNM load errors as above.                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                          | 25/07/18        |
| Preventative actions taken to ensure no further issues will occur                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                          | Completion date |
| We will have our systems person look at whether or not the output field for the UNM can be modified to the registry standard and if not then a flag generated when the UNM load price category is input alerting the user to enter the required format manually. Re the input errors – these will happen, but our improved reporting and checks should pick these up sooner. |                                                                                                                                                                                                                                                                                                                                                                                                          | 01/10/18        |
|                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                          | Identified      |



| Management of “decommissioned” status                                                                                                                      |                                                                                                                                                                                                 |                 |                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------|
| Non-compliance                                                                                                                                             | Description                                                                                                                                                                                     |                 |                        |
| Audit Ref: 4.11<br>With: Clause 20<br>Schedule 11.1<br><br>From: 28-Aug-17<br>To: 30-Jun-18                                                                | Eight ICPs decommissioned but not updated on the registry.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                 |                 |                        |
| Audit risk rating                                                                                                                                          | Rationale for audit risk rating                                                                                                                                                                 |                 |                        |
| <b>Low</b>                                                                                                                                                 | Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.<br><br>The risk rating is low as this has no direct impact on reconciliation. |                 |                        |
| Actions taken to resolve the issue                                                                                                                         |                                                                                                                                                                                                 | Completion date | Remedial action status |
| The changes to our process to update these in MagiQ at the time of physical decommissioning will ensure discrepancies are picked up in our regular checks. |                                                                                                                                                                                                 | 25/07/18        | Identified             |
| Preventative actions taken to ensure no further issues will occur                                                                                          |                                                                                                                                                                                                 | Completion date |                        |
| As above                                                                                                                                                   |                                                                                                                                                                                                 | 25/07/18        |                        |