

Compliance plan for Electricity Invercargill

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2(1)</p> <p>From: 01-Jul-17</p> <p>To: 31-Jul-18</p>	<p>The Effective Date of changing ICPs status to “decommissioned” is incorrect</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate because some refinement could still be done. PowerNet runs a few reports which monitor integrity and validity of information in the registry. Audit risk rating is assigned as low because the impact on settlement outcome is minimal.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action has been taken to correct historic data		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>PowerNet has previously believed the Decommissioning date is the date of the administrative decision to decommission an ICP. Therefore the Effective Date has been loaded as the date of this action and is the same date the Registry is updated.</p> <p>We understand now the Effective Date should be the date the ICP was actually disconnected from the network, and we will change our process to record this as the Effective Date. We note this may at times cause us breach the rules for timeframes for updates as we await the trader updating the ICP status.</p>		Ongoing	

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Jul-17 To: 31-Jul-18	Initial Energisation Date for a number of ICPs was uploaded later than 10 BD Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made to them. The number of late updates decreased in comparison with last year's findings. Audit risk rating assigned as low because the impact on settlement outcomes is low		
Actions taken to resolve the issue		Completion date	Remedial action status
Follow-up as outlined below		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
PowerNet requires the person electrically connecting an IPC to firstly have the approved Installation Connection Application form available on site. Then sign it off as completed on the day and send it to PowerNet within a day of completing the electrical connection. A weekly report is run to identify any ICPs having become Active but PowerNet has not received the completed form. Any found are followed-up with parties involved to ensure they understand these requirements.		Ongoing	

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Jul-17 To: 31-Jul-17	Registry information not updated within 3 business days by all networks (ELIN, TPCO, LLNW, OTPO) Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. Compliance in this is improved due to stricter processes. Our audit risk rating is low because backdating of price codes has no financial impact, most of them occur within the same billing month. There is no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Added to weekly System Control Report a monitor of NSP changes.		16-Jul-18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		16-Jul-18	

Non-compliance	Description		
Audit Ref: 4.6 With: 7(1) of Schedule 11.1 From: 01-Jul-17 To: 31-Jul-18	Incorrect or lack of information in the registry for a small number of ICPs Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because some refinement could still be done. PowerNet runs a number of reports which monitor integrity and validity of information in the registry. Audit risk rating is assigned as low because the impact on settlement outcome is minimal (small number of ICPs)		
Actions taken to resolve the issue		Completion date	Remedial action status
Specific ICPs are being followed-up and data corrections made where appropriate.		ASAP	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
For ICPs with DG - In PowerNet's ICP database, as data is recorded it is automatically populated to the Registry. It appears any error in that processing has occurred for a number of ICPs. This is being investigated and will be resolved.		On going	
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		16-Jul-18	

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: 20 of Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 31-Jul-18</p>	<p>Incorrect management of “decommissioned” status. The effective date of ICPs being decommissioned is the same as the date of update of 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: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as weak. There is not a robust process in place. There is concern for this area of ICP management on the LLNW network. Audit risk rating is recorded as low because the impact on settlement outcomes is small</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
See Comments in 2.1			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See Comments in 2.1			

Recommendation	Description	Audited party comment	Remedial action
We recommend investigating reasons why the UFE on Electricity Invercargill is higher than on other networks	Electricity Invercargill UFE is the highest of all networks. It is 1.5% to 2%	<p>PowerNet is aware of a need to review Loss Factor calculations, and working through updating our loadflow software to facilitate this.</p> <p>A regular comparison of UFE against Loss Factors is also to be developed, to monitor the accuracy of the calculations</p>	Complete recalculation of Load Factors and UFE reporting.