

## Compliance plan for Auckland International Airport – 2018

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1)  From: 01-Sep-17 To: 24-Aug-18	Registry information not complete and accurate in all instances. Potential impact: None Actual impact: None Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as the majority of information is complete and accurate, but the population of the initial electrical connection date using the correct effective date is an opportunity for improvement.  The audit risk rating is low as the missing information has no direct impact on settlement.	
Actions taken to resolve the issue		Completion date
Update the Registry with IED dates for the 4 ICPs mentioned above		1/10/18
Preventative actions taken to ensure no further issues will occur		Completion date
A memo will be sent to all contractors and Electricity Retailers to highlight the importance of correct and accurate information  More stringent sanity checks will be taken prior to populating the information in the Registry, this includes requirement for photos of the meter certification, site visits, checks with the nominated Electrical Inspector and or the nominated Registry Agent		1/10/18  On-going
		Identified

Requirement to correct errors			
Non-compliance	Description		
Audit Ref: 2.2 With: 11.2(2)  From: 01-Sep-17 To: 24-Aug-18	Corrections not made as soon as practicable. Potential impact: None Actual impact: None Audit history: Multiple Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as corrections were evident, but the duplicated addresses expected to be corrected post the last audit have not been updated.  The audit risk rating is low as the missing information has no direct impact on settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status
The address for the 3 ICPs with the same address will be corrected		17/09/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AIAL will have contract in place with a nominated Registry Agent with agreed level of service to minimise errors		1/10/18	

Timeliness of Provision of Initial Electrical Connection Date			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 24-Aug-18</p>	<p>The event date population of the registry was performed more than 10 business days after the actual date of initial electrical connection for 68 (89%) ICPs.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak as timeliness of updates to the registry is longer than required (even allowing for the population of the missing initial electrical connection dates for historic ICPs) and this has been evident in the AIAL audit since this requirement came into effect.</p> <p>There is no impact on settlement, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The majority of the IED updates longer than 10 working days were due to historical non-compliances and cannot be corrected, however the new process with Sel electrical will see this issue disappear in the next audit			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication with nominated electrical inspector as well as AIAL internal staff			

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: 8 Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 24-Aug-18</p>	<p>Registry not updated within three days of the event.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are weak as 88% of the pricing updates and 73% of the status updates to the registry were late.</p> <p>The audit risk rating is low as the volume of ICPs affected is relatively small and therefore the impact on settlement will be low.</p>	
Actions taken to resolve the issue		Completion date
Regulatory rules Refresher course was taken in March 2018 for the staff involved in this process,		
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL is looking into a new Registry Agent which will be more proactive in ensuring the events are captured within the specified period.		
		Investigating

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: 2 Schedule 11.1  From: 01-Sep-17 To: 24-Aug-18	Three ICPs with duplicate addresses. Potential impact: None Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated moderate as Gentrack now has a built-in business rule to check for non-unique addresses. The audit risk rating is low as this affects three of the 547 ICPs that AIAL are responsible for.	
Actions taken to resolve the issue		Completion date
Unit numbers will be updated for the 3 ICPs above		17/09/18
Preventative actions taken to ensure no further issues will occur		Completion date
No future ICPs will be issued without unit numbers. This is evident in addition of ICPs in the audit period		On-going
		Identified

Distributors to Provide ICP Information to the Registry manager			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 24-Aug-18</p>	<p>Initial electrical connection date not populated for four ICPs and an incorrect date used for six ICPs.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 all information is provided to the registry as required with the exception of the initial electrical connection date, where there is room for errors to occur with the current process.</p> <p>The audit risk rating is low as this has no direct impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The IED dates for the ICPs above will be corrected		1/10/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Photo evidence will be sought prior to update of IEDs in the Registry			

Management of “decommissioned” status		
Non-compliance	Description	
Audit Ref: 4.11 With: 20 Schedule 11.1 From: 01-Sep-17 To: 24-Aug-18	Decommissioned status not managed. Potential impact: None Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as weak as the registry updates to “inactive - ready for decommissioning” were not managed. The audit risk rating is low as this has no direct impact on settlement.	
Actions taken to resolve the issue		Completion date
A memo will be sent to all contractors and Electricity Retailers to highlight the importance of correct and accurate information		1/10/18
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL will have contract in place with a nominated Registry Agent with agreed level of service to minimise errors		1/10/18
		Identified

Creation of loss factors		
Non-compliance	Description	
<p>Audit Ref: 8.1 With: 11.2</p> <p>From: 01-Apr-18 To: 24-Aug-18</p>	<p>Incorrect loss factors recorded since 1/4/18 when Vector changed the parent network loss factors.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are none as Vector's loss factor changes were not picked up and AIAL's loss factors adjusted.</p> <p>The audit risk rating is low as UFE is allocated to participants; therefore there is no adverse impact on settlement but traders may use published losses in pricing decisions. The variance found was minor.</p>	
Actions taken to resolve the issue		Completion date
A review of AIAL loss factors has been undertaken with new levels (H.V. - 1.0152, & L.V. - 1.0265).		17/9/18
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL will monitor Vector's published loss factors for variance.		Ongoing
		Identified