

## Compliance plan for Wellington Electricity Lines Limited

Title: Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2(1) and 10.6(1)</p> <p>From: 01-Dec-17</p> <p>To: 16-Oct-18</p>	<p>Complete validation of registry information does not occur.</p> <p>Some registry discrepancies have not been resolved.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as moderate and the audit risk rating is low. The automated registry update process and daily detection of any records not sent to the registry help to ensure that GTV will be consistent with the registry, although full validation processes are not in place.</p> <p>Improvements have been made during the audit period and are expected to continue.</p>	
Actions taken to resolve the issue		Completion date
Validation on four fields identified within the 2017 Audit commenced in 2017 on a monthly basis and in December 2018 will increase in frequency to a daily reconciliation. In a staged approach we are adding a further four fields to the reconciliation data set by December 2018.		30/06/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Implementing a daily system matching report, this will improve the ability to identify and correct issues as they occur.		01/12/2018
		Identified

Title: Requirement to correct errors			
Non-compliance	Description		
Audit Ref: 2.2 With Clause 11.2(2)  From: 01-Dec-17 To: 16-Oct-18	Correction of data does not consistently occur as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as weak, some data issues have been outstanding for over two years. In most cases progress is being made.  The risk is rated as low, typically small numbers of ICPs are affected, and/or the data has a low impact.		
Actions taken to resolve the issue		Completion date	Remedial action status
Exception lists have been produced in November 2018 work has commenced on investigating and resolving historical issues.		30/06/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Implementing a daily system matching report, this will improve the ability to identify and correct issues as they occur.		01/12/2018	

Title: Timeliness of Provision of ICP Information to the registry manager	
Non-compliance	Description
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1  From: 20-Dec-17 To: 28-May-18	Ready status was not recorded on the registry prior to commencement of trading for seven ICPs.  A proposed trader was not recorded on the registry prior to the commencement of trading for seven ICPs.  Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2

<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are rated as moderate because they are sufficient to prevent late updates most of the time, and the last late update occurred in May 2018. The audit risk rating is low because a very small number of late updates occurred, and the held report process will normally promptly identify missing information so that the registry can be updated.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
The seven ICPs identified as missing Trader details are currently being investigated.		15/12/2018	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Implementing a daily system matching report, this will improve the ability to identify and correct issues as they occur.		01/12/2018	

<b>Title: Timeliness of Provision of ICP Information to the registry manager</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 16-Oct-18</p>	<p>Non-population of the initial electrical connection date.</p> <p>20 late initial electrical connection updates to registry.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Medium</b>	<p>Controls were initially weak, but have improved to moderate as new processes have been put in place to ensure initial electrical connection dates are populated more promptly.</p> <p>The potential impact is high, because Wellington Electricity is not always aware of when ICPs on its network are energised. I saw evidence of corrections to initial electrical connection dates, and processes to populate new initial electrical connection dates which should significantly reduce the impact. I also note that traders normally connect ICPs on Wellington Electricity's network and should be aware of the connection date.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We have an improved process to run the IED's for upload on a daily basis. In a staged approach, as at November 2018 we have completed in excess of 60000 IED updates. Correction of historical data is ongoing and we aim to have this completed within six months.	30/06/2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
A manual check to update this field has been included within the new connection process. Any errors will be identified by exception reporting which will be monitored daily.	01/12/2018	

<b>Title: Connection of an ICP that is not an NSP</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 20-Dec-17</p> <p>To: 28-May-18</p>	<p>A proposed trader was not recorded on the registry prior to the commencement of trading for seven ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls are rated as moderate because they are sufficient to prevent late updates most of the time, and the last late update occurred in May 2018. The audit risk rating is low because a very small number of late updates occurred, and the held report process will normally promptly identify missing information so that the registry can be updated.</p>		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
The seven ICPs identified as missing Trader details are currently being investigated.	15/12/2018	Identified	
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>		
Implementing a daily system matching report, this will improve the ability to identify and correct issues as they occur.	01/12/2018		

Title: Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 29-Mar-18 To: 12-Sep-18	Some price, network, status, and address changes were updated more than three business days after the event date. 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 rated as moderate, because processes have improved during the audit period. The risk rating is low, because most of the delayed updates were processed within 30 days. Based on the sample checked, the late updates appear to be mostly data corrections.		
Actions taken to resolve the issue		Completion date	Remedial action status
Implementing a daily system matching report that will improve the ability to identify and correct issues as they occur.		01/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Implementing a daily system matching report that will improve the ability to identify and correct issues as they occur.		01/12/2018	

Title: Notice of NSP for each ICP	
Non-compliance	Description
Audit Ref: 4.2 With: Clauses 7(1), (4) and (5) Schedule 11.1  From: 01-Dec-17 To 16-Oct-18	Some existing ICPs have an incorrect NSP recorded. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as moderate, as they are sufficient to ensure that the majority of ICPs created by Wellington Electricity will have the correct NSP assigned. The incorrect NSPs appear to be largely historic, and Wellington Electricity has made progress on identifying issues and cleansing their NSP data. Further work is currently being undertaken.</p> <p>The impact is low. Most of the issues identified have been resolved. For reconciliation purposes all Wellington Electricity's NSPs are in the WELLTONUNETG balancing area. It is possible affected ICPs may not be correctly identified where there are outages or maintenance work is carried out, so the potential impact is rated as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Process reviewed and improvements made to avoid reoccurrence of ICPs with incorrect NSP recorded.		01/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process reviewed and improvements made to avoid reoccurrence of ICPs with incorrect NSP recorded.		01/12/2018	

Title: ICP location address	
Non-compliance	Description
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 16-Oct-18</p>	<p>1,820 active ICPs with duplicate addresses.</p> <p>130 active ICPs without a physical address unit number, street number or property name to allow them to be readily located.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as moderate, as they are sufficient to ensure that most ICPs will have unique and locatable addresses.</p> <p>The impact is low because in most cases address information is correct. The incomplete and duplicate addresses appear to be largely historic, and Wellington Electricity is cleansing this data.</p> <p>All duplicate addresses and 44/130 addresses that were not readily locatable were corrected prior to this report being finalised.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p>Prior to audit, we had identified and were actively correcting duplicate addresses. All 1820 ICPs with duplicate addresses have been corrected since the registry list was provided. – Cleared and evidence provided to Auditor</p> <p>97 duplicate addresses appeared as non-compliant due to a bulk update performed by Wellington Electricity. Of the 97, there was no requirement to change 13 of the addresses. The remaining 84 addresses were corrected and identified as being impacted by a bulk update. Cleared and evidence provided to Auditor.</p> <p>There have been 8 instances of non-locatable addresses since 2009, which have been corrected. 44 of the 130 non-locatable addresses have been corrected; work is underway to complete the remaining 86.</p>	30/04/2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
A manual check to the address has been added to the new connection process. If an address exists within the registry the new connection is rejected if correct address is not provided in three business days.	01/12/2018	

<b>Title: Distributors to Provide ICP Information to the Registry manager</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)</p> <p>Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 16-Oct-18</p>	<p>Some initial electrical connection dates and unmetered load details recorded on the registry are incorrect.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
Low	<p>Controls are assessed to be moderate. Controls around initial electrical connection dates have improved to moderate as new processes have been put in place to ensure initial electrical connection dates are populated more promptly. Wellington Electricity plans to improve their processes for unmetered load details and distributed generation.</p> <p>The actual impact is low, because most data provided is accurate.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We have an improved process to run the IED's for upload on a daily basis. In a staged approach, as at November 2018 we have completed in excess of 60000 IED updates. Correction of historical data is ongoing and we aim to have this completed within six months.	30/06/2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
A manual check to update this field has been included within the new connection process. Any errors will be identified by exception reporting which will be monitored daily.	01/12/2018	

<b>Title: GPS coordinates</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.8 With: Clause 7(8) and (9) Schedule 11.1 From: 01-Dec-17 To: 16-Oct-18	49 ICPs have GPS coordinates in UTM format instead of NZTM2000 format. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	49 ICPs have GPS co-ordinates. Controls are rated as moderate, because most ICPs do not have GPS populated and a relatively small number of ICPs have GPS populated in an incorrect format. The potential impact is low, because address information will assist in the location of the ICP and a small number of ICPs are affected. All GPS coordinates were removed prior to this report being finalized.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
All GPS coordinates have been removed from the Registry.	01/12/2018	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
If GPS coordinates are supplied they will be entered in NZTM2000 format. Documentation updated.	01/12/2018	