

Compliance plan for Precinct Property Holdings Limited (PPNZ)

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1) From: 12-Aug-18 To: 23-Aug-18	Three network updates had incorrect event dates applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, as they are sufficient to ensure updates have the correct event date assigned most of the time. The risk is low as three ICPs were affected. The correct event date could be determined from the initial electrical connection date, and the applied dates were within eight days of the correct date.	
Actions taken to resolve the issue		Completion date
Corrected the Event dates in Registry		7/1/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Updated user training and documentation on Registry to ensure that Event date not input date is used when entering IED – this was just human error as opposed to a system issue		7/1/2020
Remedial action status		
Cleared		

Timeliness of Provision of Initial Electrical Connection Date	
Non-compliance	Description
Audit Ref: 3.5 With: Clause 7(2) of Schedule 11.1 From: 26-Mar-18 To: 16-Jan-19	Five ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection. 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	<p>Controls are rated as moderate as they are sufficient to ensure that initial electrical connection dates are updated on time most of the time. Paperwork is often sent to the retailer first, then passed to TENCO, which can cause delays in updating the initial electrical connection date.</p> <p>The impact is low, because there is no direct impact on settlement and all late updates were made within 16 business days of the initial electrical connection date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The IED's were updated as soon as they presented on our Compliance Dashboard		During the audit period	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We continue to work with retailers to ensure that the claiming of ICP's and setting to Active on the networks is timely to allow us to maintain compliance – where we are aware of an IED prior to a retailer setting to Active we now enter this at the time a opposed to waiting for the retailer.		Ongoing	

Connection of NSP that is not point of connection to grid			
Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 19-Dec-18</p> <p>To: 14-Jan-19</p>	<p>The MEP and meter certification expiry date for PCF0011 were provided on 14/01/2019, 14 business days after electrical connection.</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>Controls are rated as moderate as they are sufficient to ensure that MEP and meter certification information is provided on time most of the time.</p> <p>The impact is low, because the meter was certified at the time of electrical connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The meter certification details were provided on the 14/01/2019 which we acknowledge was late. This was a conversion from a customer network to an Embedded Network following redevelopment, the existing meters were therefore just recertified as opposed to be replaced or newly installed. With the Christmas/New Year the paperwork from the MEP was slightly late in reaching us which contributed to the delay.		14/01/2019	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We continue proactively work with the MEP's on ensuring timely access to meter certification data – in this case as the meters were not replaced we could have and possibly should have used the existing GN meter expiry dates given they were not changing.	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 11-Jan-18</p> <p>To: 02-Feb-18</p>	<p>19 late network updates.</p> <p>Three late pricing updates.</p> <p>Three late updates to decommissioned status.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. In most cases checked, the late update was at the request of another party, caused by another party's late provision of information to PPNZ or the registry, or was a correction.</p> <p>The risk is assessed as low as a relatively small proportion of updates were affected.</p>	
Actions taken to resolve the issue		Completion date
Registry management and updates is a daily process for Tenco on behalf of PPNZ, as soon as we see a required change in the dashboard the updates to Registry were completed, in some cases however we are reliant on other participants which causes us a consequential non-compliance		During the audit period
Preventative actions taken to ensure no further issues will occur		Completion date
Registry Management remains a key focus for Tenco and educating our staff on the impact of any late updates continues – we are confident in our systems and processes to capture changes when they are required or requested.		Ongoing

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 18-Jul-16</p> <p>To: 30-Aug-18</p>	<p>The initial electrical connection dates for 000138721PN2A5 and 0110110049PNC15 were inaccurate, and were corrected during the audit.</p> <p>Three network updates had incorrect event dates applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as the strong because most information is correctly recorded, and controls are in place to detect and correct errors.</p> <p>The number of discrepancies is minor and has no direct impact on reconciliation. All incorrect initial electrical connection dates were corrected, and the correct initial electrical date could be determined for the updates with incorrect event dates.</p>	
Actions taken to resolve the issue		Completion date
Corrected the 3 incorrect Event dates in Registry		7/1/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Updated user training and documentation on Registry to ensure that Event date not input date is used when entering IED – this was just human error as opposed to a system issue		7/1/2020
		Cleared

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 10.25(1) and 10.25(3)</p> <p>From: 05-Dec-17</p> <p>To: 15-Mar-19</p>	<p>Meter certification details were updated more than 20 business days after the certification date for PPH0011, PBS0011, PVG0011, PSI0011, PMP0011 and PTA0011.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong, because the delays were primarily caused by the MEP being unable to provide information on time.</p> <p>The impact is low. The meters with late updates were certified at all times.</p>	

Actions taken to resolve the issue	Completion date	Remedial action status
All LE ICP's have current and correct metering cert dates, a couple of the updates as noted were put into the system late however meter recerts occurred well prior to the existing meter expiry date.	Throughout the whole period	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Tenco on behalf of all its clients including PPNZ have submitted a proposed change to bring LE ICP metering details into Registry – our main constraint is getting meter recert details in from the MEP's on time as we are only aware of expiry dates and where they recert early and Tenco do not get notice at the time causes non-compliance – we are proactively looking to work with the 2 MEP's we use to improve the notices we receive.	Ongoing	