

Compliance plan for Mainpower Distributor – 2020

Provision of information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2(1)</p> <p>From: 01-May-19</p> <p>To: 31-Mar-20</p>	<p>All practicable steps not taken to ensure information accuracy, as recorded in sections 4.4, 4.6 and 4.8.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as overall they mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is low as the incidents identified either involved a small number of ICPs or has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
<p>When correct GPS coordinates are available this will provide readily identifiable locations. Lot numbers will be updated for new connections going forward. The older lot numbers will be replaced progressively.</p> <p>We will work with the Network team to obtain correct details when COC received. We will also work with Network team to follow up late CoCs.</p>		16/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>When correct GPS coordinates are available this will provide readily identifiable locations. Lot numbers will be updated for new connections going forward. The older lot numbers will be replaced progressively.</p> <p>We will work with the Network team to obtain correct details when COC received. We will also work with Network team to follow up late CoCs.</p> <p>It has been decided to undertake a separate project to resolve this issue rather than rely on completing the ADMS project. The issue of GPS coordinates has been added as a potential risk for any project affecting the GIS system.</p>		GPS coordinates resolved by 15 July 2020 and other changes will be ongoing
		Identified

Distributors must create ICPs		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 11.4</p> <p>From: 01-Sep-18</p> <p>To: 26-May-20</p>	<p>ICP identifier not created for streetlights connected to ASY0111 for Hurunui DC.</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 strong overall as the ICP creation process is robust but the connection of streetlights to a new GXP identified a gap in this process. This is a not a common occurrence.</p> <p>The audit risk rating is low as the lights affected are settled in the same balancing area so there is no impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
This ICP 0000700980MP704 has been created and backdated to 01/08/2018 to allow Meridian Energy as the retailer to accept it using the actual liven date on 09/08/2018. As of 08/06/2020 Meridian had accepted responsibility for the ICP, and MainPower has set the ICP up ready for Meridian to take over, although the ICP is still sitting as Ready on the registry awaiting for the next stage of action from Meridian.		8/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
We are drafting a new Streetlight Standard document and will require any connection of new Streetlights to provide confirmation from the trader that it accepts responsibility for the Streetlight. This process will also ensure that we consider the need for a new ICP identifier.		1/8/2020
		Identified

Ready updates		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 02-Apr-19</p> <p>To: 07-Feb-20</p>	<p>Late update to Ready for five ICPs electrically connected during the audit period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 strong as they will eliminate risk to an acceptable level.</p> <p>The audit risk rating is low as this affected a very small number of new connections with all being resolved within 30 days.</p>	
Actions taken to resolve the issue		Completion date
4 of the ICP's were linked to issue with the IT system picking up incorrect effective date (3) and proposed retailer not integrating (1), this has been resolved with IT. Remaining ICP was a missed update		Date 16/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
IT issued resolved		Date 30 September 2019
		Identified

Initial electrical connection date population		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-May-19 To: 31-Mar-20	60 initial electrical connection dates updated late to the registry. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
IECD's populated with correct information of livening dates		16/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
More regular/closer monitoring of results from livening agents		Date on going

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 02-Apr-19 To: 12-Feb-20	Four ICPs where the trader not recorded in the registry as having accepted responsibility prior to electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as they will eliminate risk to an acceptable level. The audit risk rating is low as the late updates were all made within five days of being electrically connected.	
Actions taken to resolve the issue		Completion date
Information has been corrected in registry		16/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
This issue was caused by an issue with the IT system and integrations these issues have been resolved.		28/2/2020

Monitoring of New and Ready		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 15 of schedule 11.1</p> <p>From: 01-May-19</p> <p>To: 31-Mar-20</p>	<p>Five ICPs not monitored during the audit period.</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is low the volume of ICPs were small.</p>	
Actions taken to resolve the issue		Completion date
The ICPs being mentioned are being checked again with the relevant Proposed Trader concerned. The network team are also reviewing these ICPs as a result of pricing changes.		16/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
We will monitor ICPs using reports from the Registry as part of our monthly checks and continue to revert to the retailer for instructions.		Ongoing
		Identified

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-May-19 To: 31-Mar-20</p>	<p>Some late registry updates.</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Correct information populated into registry to show accurate details of connection		16/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Numbers should reduce with IT issue resolved last year, and closer monitoring of ICP's through registry reporting. We will also incorporate additional checks utilizing the EIEP1 billing files monthly to see where retailers are reporting generation		On going
		Identified

Notice of NSP		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 7(1),(4) and (5) Schedule 11.1</p> <p>From: 26-Jun-18</p> <p>To: 20-May-20</p>	<p>Incorrect GXP recorded for one ICP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong as the processes in place are robust.</p> <p>The audit risk rating is low as only one incorrect NSP was identified.</p>	
Actions taken to resolve the issue		Completion date
The GXP checks are carried on 3-monthly basis and the last check carried out was based on the data as on 19/02/2020. NSP updated		28/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Moving forward, we will be monitoring the GXP information using the Non-Compliance reports produced by the registry. We have just completed the latest check as of today (11/06/2020)		Ongoing
		Identified

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 25-Feb-20 To: 31-Mar-19	1,555 ICPs with addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak due to the population of the WSG GPS co-ordinates to the registry and the subsequent effect on address accuracy was not identified as a risk in the ADMS project. This has no direct impact on reconciliation therefore the audit risk is low.	
Actions taken to resolve the issue		Completion date
This risk was not identified as part of the ADMS project. Steps are underway to resolve the issue and restore the coordinates on the Registry.		15 July 2020
Preventative actions taken to ensure no further issues will occur		Completion date
It has been decided to undertake a separate project to resolve this issue rather than rely on completing the ADMS project. The issue of GPS coordinates has been added as a potential risk for any project affecting the GIS system.		15 July 2020
		Identified

Registry accuracy			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) (o) & (p) Schedule 11.1</p> <p>From: 01-Jun-19</p> <p>To: 31-Mar-20</p>	<p>Two DG discrepancies.</p> <p>Two IECD discrepancies.</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is recorded as low because the overall number of variances is low, and the impact is negligible.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Errors corrected. Liaison with network team and livening agent to ensure all information received in a timely manner.		16/6/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
DG install information to be confirmed from CoC obtained by NSRs. IECDs populated using connection dates supplied by livening agents		On going	

Provision of information to registry after the trading of electricity at the ICP commence		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 7(3) Schedule 11.1 From: 05-Jul-19 To: 09-Mar-20	Six late pricing changes to provide the actual price category code. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is recorded as low as the number of ICPs affected is small.	
Actions taken to resolve the issue		Completion date
Registry populated with correct information back to time of installation		28/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Monitoring of changes by livening agents, and other updates to be made as at notification date		Ongoing

GPS coordinates		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 7(8) & (9)</p> <p>Schedule 11.1</p> <p>From: 25-Feb-20</p> <p>To: 31-Mar-19</p>	<p>WSG GPS coordinates populated to the registry rather than the expected NZTM format.</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>The controls are rated as weak as the population of the incorrect GPS co-ordinates to the registry and the subsequent effect on address accuracy was not identified as a risk in the ADMS project.</p> <p>This has no direct impact on reconciliation therefore the audit risk is low.</p>	
Actions taken to resolve the issue		Completion date
This risk was not identified as part of the ADMS project. Steps are underway to resolve the issue and restore the coordinates on the Registry.		15 July 2020
Preventative actions taken to ensure no further issues will occur		Completion date
It has been decided to undertake a separate project to resolve this issue rather than rely on completing the ADMS project. The issue of GPS coordinates has been added as a potential risk for any project affecting the GIS system.		15 July 2020
		Identified