

## Compliance plan for Paua to the People RP Audit - 2021

Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 06-Nov-20 To: 08-Dec-20	Two late status updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are adequate to ensure that the registry is updated on time most of the time. One late status updated was caused by a backdated switch, and the other was a correction. The risk is low as a small number of updates were affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
HIKO uses alerts to have an operator notify the MEP for disconnections and reconnections, check for response from the MEP and update the registry.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO has strong controls to ensure that the Registry status is changed on disconnections and reconnections.		March 2021	

Inform registry of switch request for ICPs - standard switch	
Non-compliance	Description
Audit Ref: 4.1 With: Clause 2 Schedule 11.3  From: 03-Sep-20 To: 26-Nov-20	The NT files for ICPs 0000045037TR2B9 (event date 03/09/20) and 0001406533UNA1D (26/11/20) were issued three and four business days after pre-conditions were met. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are now rated as strong because the process to issue NTs has been streamlined and automated. Both late files occurred while NT files were being created manually on the registry, before HIKO was implemented.</p> <p>The impact is low because the NT files were issued one and two business days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
HIKO was implemented in March 2021 with automated switching processes.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO produces and uploads NT files automatically so will ensure that NT files are uploaded on time.		March 2021	

Losing trader response to switch request and event dates - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4</p> <p>Schedule 11.3</p> <p>From: 08-Sep-20</p> <p>To: 19-Mar-21</p>	<p>Eight AN breaches.</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		
<b>Low</b>	Controls are now rated as strong because the process is automated, and all the late files occurred before the HIKO process was fully automated. The impact is low because the files were one to two business days late.		
Actions taken to resolve the issue		Completion date	Remedial action status
HIKO was implemented in March 2021 with automated switching processes.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO produces and uploads AN files automatically so will ensure that AN files are all uploaded on time.		March 2021	

Losing trader must provide final information - standard switch			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 5 Schedule 11.3  From: 17-Sep-20 To: 02-Dec-20	Three CS breaches. One transfer CS file contained an incorrect last actual read date. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are now strong because the process to determine the last actual read date and generate CS files is now automated in HIKO. The exceptions occurred before automation of the process.  The impact is low because the late files were one or two business days late, and the switch event readings in the affected file were actual. The last actual read date field is typically used to determine the likely accuracy of estimated switch event reads.		
Actions taken to resolve the issue		Completion date	Remedial action status
HIKO was implemented in March 2021 with automated switching processes.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO produces and uploads CS files automatically so will ensure that CS files are uploaded on time. Where no actual data is available it will alert an operator before the CS is due to manually complete the CS.		March 2021	

Losing trader provides information - switch move	
Non-compliance	Description
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3  From: 14-Jan-21 To: 23-Feb-21	Three AN breaches. Ten T2 breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are now rated as strong because the process is automated, and all the late files occurred before the HIKO process was fully automated.</p> <p>The impact is low because the files were one to four business days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
HIKO was implemented in March 2021 with automated switching processes.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO produces and uploads AN files automatically so will ensure they are uploaded on time. HIKO also checks the Switch Breach report to ensure all switch events have been actioned on time.		March 2021	

Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 16-Nov-20</p> <p>To: 10-Feb-21</p>	<p>Seven switch move CS files contained incorrect last actual read dates.</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		
<b>Low</b>	<p>Controls are now strong because the process to determine the last actual read date is now automated in HIKO. The exceptions occurred before automation of the process.</p> <p>The impact is low because the switch event readings in the affected files were actual. The last actual read date field is typically used to determine the likely accuracy of estimated switch event reads.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
HIKO was implemented in March 2021 with automated switching processes.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO produces and uploads CS files automatically so will eliminate these data entry errors .		March 2021	

Meter data used to derive volume information			
Non-compliance	Description		
Audit Ref: 9.3 With: Clause 3(5) Schedule 15.2  From: Apr-20 To: Nov-20	The HHR aggregates information is truncated to two decimal places at trading period level before being summed by ICP to produce the submission information. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are now strong because the non-compliance has been cleared. The impact is low, because the aggregates are not used to calculate reconciliation results and the differences between the volumes and aggregates are less than 450 kWh per submission or (0.15%). The data is truncated to two decimal places, resulting in a potential difference of up to 0.009 kWh per ICP and trading period.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have changed the code generating our reports to now be compliant. All future submissions and revisions are compliant.		April 2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO correctly calculates, creates and loads AV140 Reports.		April 2021	

ICP days	
Non-compliance	Description
Audit Ref: 11.2 With: Clause 15.6  From: 01-Feb-21 To: 28-Feb-21	ICP days for 0000170598TR21D were double counted in error from 12/02/21 because HIKO counted one set of ICP days for each flow direction. The issue was detected and resolved prior to the audit, and I confirmed that the current ICP days values in HIKO are correct. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are currently rated as strong, because the GR100 ICP days and GR090 ICP missing reports are reviewed. The temporary issue relating to one ICP with distributed generation having ICP days double counted has been resolved.</p> <p>There is no impact, because revised ICP days have been provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This issue was picked up after a single submission and addressed in resubmissions.		March 2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
HIKO code was changed to be compliant.		March 2021	

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Oct-18</p> <p>To: 21-Apr-21</p>	<p>The HHR aggregates file does not contain electricity supplied information.</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		
<b>Low</b>	The issue relating to content of the aggregates file is an error in the code. Paua is providing submission information as expected.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
None.			

Creation of submission information			
Non-compliance	Description		
Audit Ref: 12.2 With: Clause 15.4  From: 17-Dec-20 To: 17-Dec-20	Under submission of 10 kWh for ICP 0000145867TRED0 for consumption during an inactive period. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls have been improved to strong because monitoring controls were added during the audit to identify ICPs with inactive consumption. The audit risk rating is low. All inactive ICPs were checked, and one ICP had 10 kWh of unreported inactive consumption. Revised data will be provided through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Status has been changed on the Registry and revised data will be provided through the revision process.		May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We now have an alert to pick up any ICP with 001 Status on the Registry where we have consumption greater than 0 for a period.		April 2021	

Accuracy of submission information	
Non-compliance	Description
Audit Ref: 12.7 With: Clause 15.12  From: 17-Dec-20 To: 17-Dec-20	Under submission of 10 kWh for ICP 0000145867TRED0 for consumption during an inactive period. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls have been improved to strong because monitoring controls were added during the audit to identify ICPs with inactive consumption.</p> <p>The audit risk rating is low. All inactive ICPs were checked, and one ICP had 10 kWh of unreported inactive consumption. Revised data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have changed the Status for the ICP on the Registry for the period we experienced consumption. Revised data will be provided through the revision process.		May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We now have an alert to pick up any ICP with 001 Status on the Registry where we have consumption greater than 0 for a period. Where this occurs we will change the status on the registry and contact the MEP.		April 2021	