

Compliance plan for The Lines Company (Dec 2020)

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2(1)</p> <p>From: 01-Dec-19</p> <p>To: 10-Nov-20</p>	<p>One pricing event and one network event had incorrect event dates, and were corrected during the audit.</p> <p>Seven ICPs had incorrect initial electrical connection dates, and were corrected during the audit.</p> <p>ICP 0001113309WMF74 had its chargeable capacity for pricing recorded in the generation capacity field due to a data entry error, and was corrected during the audit.</p> <p>Distributed generation updates for ICPs 0004050770WM132, 0001120420WM0BE, 0001062900WM45A, and 0001112481WM688 had their generation capacity rounded to the nearest kW. Backdated corrections to the capacities were processed during the audit.</p> <p>Alleged breach 2008LINE1 was recorded for incorrect dedicated NSP information. All affected ICPs have had their dedicated NSP status corrected.</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 rated as strong overall. Automation is in place for registry updates and acknowledgements, although data must be manually selected for update and exceptions are manually worked through. The discrepancy reporting process will detect and correct any instances where registry updates have not been triggered or have failed.</p> <p>The audit risk is rated as low as the inaccurate information does not have a direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All issues corrected during the audit		Complete	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Training and regular validation of Orion data against the registry		Ongoing	

Distributors must create ICPs			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 11.4 From: unknown To: 10-Nov-20	ICPs are not created for ten unmetered streetlights. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as strong as TLC have a robust ICP creation process and these lights are an historic issue. Progress with resolving the issues has been made during the audit period, and no other such instances have been identified. I have rated the audit risk rating as low. The volume associated with these lights is 342 W or an estimated 1,461 kWh per annum.		
Actions taken to resolve the issue		Completion date	Remedial action status
Complete investigation into the streetlights and create ICPs		28/02/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Historic issues, processes are robust, training and regular validation of Orion data against the registry		Ongoing	

Participants may request distributors to create ICPs			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 11.5(3) From: 07-Jan-20 To: 06-May-20	Four ICPs were not created within three business days of a request from a trader, and the reasons for the late update were not provided to the trader. 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 recorded as strong. The process has been changed to ensure that ICPs are created within three business days of a request being received, instead of waiting for trader acceptance. The impact is assessed to be low. The four late updates were one to two business days late.		

Actions taken to resolve the issue	Completion date	Remedial action status
Training and regular validation of Orion data against the registry	Complete	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training and regular validation of Orion data against the registry	Ongoing	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 03-Dec-19</p> <p>To: 31-Aug-20</p>	<p>Late population of the initial electrical connection dates for 27 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have rated the controls as strong overall because controls over the registry update process have improved over the audit period. Further training has been carried out, and the registry validation process to identify missed updates is now consistently completed weekly. The number of late updates declined later in the audit period, and a large proportion of late updates checked were backdated corrections.</p> <p>Most initial electrical connection dates were populated on time. The impact on participants is minor because this field is used to validate other fields against.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Training and regular validation of Orion data against the registry	Complete	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training and regular validation of Orion data against the registry	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 of Schedule 11.1</p> <p>From: 01-Dec-19</p> <p>To: 02-Sep-20</p>	<p>97 late address updates.</p> <p>812 late updates to dedicated NSP status.</p> <p>14 late updates to other network fields, excluding initial updates to initial electrical connection dates.</p> <p>44 late updates to decommissioned status.</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 over the registry update process have improved over the audit period. Further training has been carried out, and the registry validation process to identify missed updates is now consistently completed weekly. The number of late updates declined later in the audit period, and a large proportion of late updates checked were backdated corrections. The weaker controls over distributed generation updates result in an overall rating of moderate across all update types.</p> <p>There may be a minor impact on other participants. Processing corrections improves compliance with the completeness and accuracy requirements.</p>	
Actions taken to resolve the issue		Completion date
Training and regular validation of Orion data against the registry		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Training and regular validation of Orion data against the registry		Complete
Remedial action status		
Identified		

ICP location address	
Non-compliance	Description
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 02-Sep-20</p> <p>To: 10-Nov-20</p>	<p>88 ICPs had incomplete or duplicate address information; 85 were corrected during the audit, one relates to DUMML load, and two are under investigation.</p> <p>Nine ICPs had some incorrect address information, which was corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 ICPs created during the audit period have addresses that are readily locatable and unique.</p> <p>The audit risk rating is low based on the volume of ICPs affected. Two exceptions remain, and are currently being investigated to determine the correct address.</p> <p>Incorrect addresses can have a direct impact on the retailer's ability to read, disconnect, and reconnect these ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Have contacted customer and working with them agreed to correct details for the ICPs		28/02/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The address information is validated against LINZ street address, and training and regular validation of Orion data against the registry		Ongoing	

Distributors to Provide ICP Information to the Registry manager	
Non-compliance	Description
<p>Audit Ref: 4.6 With: 7(1) of Schedule 11.1</p> <p>From: 01-Dec-19 To: 10-Nov-20</p>	<p>The pricing update for ICP 0001113191WM880 had an incorrect event date; it was processed effective from the update date in error. The event date was corrected during the audit.</p> <p>ICP 0001113309WMF74 had its chargeable capacity for pricing recorded in the generation capacity field due to a data entry error, and was corrected during the audit.</p> <p>At least seven ICPs had incorrect initial electrical connection dates, which were corrected during the audit.</p> <p>Distributed generation updates for ICPs 0004050770WM132, 0001120420WMOBE, 0001062900WM45A, and 0001112481WM688 had their generation capacity rounded to the nearest kW. Backdated corrections to the capacities were processed during the audit.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>I have rated the controls as strong, because there were generally small numbers of discrepancies and most were identified and corrected through TLC's discrepancy reporting processes prior to the audit.</p> <p>The audit risk rating is low because all of the data accuracy issues have been resolved.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
All issues corrected during the audit	Corrected	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Historic issues, processes are robust, training and regular validation of Orion data against the registry	Ongoing	