

# Compliance Plan 2020

## PowerNet

Non-compliance	Description		
Audit Ref: 2.1 With: <i>Clause 11.2(1) and 10.6(1)</i>  From: 01-Jul-19 To: 17-Jul-20	A relatively small quantity of information in the Registry was inaccurate, they were spread broadly across the code requirements. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate because a new ICP management system and related processes were implemented during the audit period and some improvement has been observed. The audit Risk Rating is assigned as low due to the relatively low number of ICPs involved.		
Actions taken to resolve the issue		Completion date	Remedial action status
Operation of the new data processing tool PowerNet Connect has shown discrepancies were created in application of Event Dates. Instructions have been given to operators and enhancement of the tool is noted for development.		14/08/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Development of PowerNet Connect to assist entering of correct Event Dates		07/21	

Non-compliance	Description		
<p>Audit Ref: 3.4 With:</p> <p><i>Clause 7(2) of Schedule 11.1</i></p> <p>From: 01-Jul-19 To: 17-Jul-20</p>	<p>3 ICPs (TPCO x1, LLNW x2) of 1130 ICPs (0.27%) were initially Electrically Connected to the Network prior to the ICP information being input to the Registry.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Before Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate because a new ICP connection management system and processes were implemented during the audit period. This appears to have resolved historical issues as there were no further such exceptions after December 2019. The audit Risk Rating is assigned as low due to the very low number of ICPs involved (0.27% of IECD).</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>ICPs being electrically connected prior to the ICP being loaded to the Registry have only ever occurred on ICPs with trader TrustPower. Until recently TrustPower did not issue a specific Meter and Liven instruction and their field operators could carry out this function with no intervention from TrustPower. Recent changes to MEP arrangements will see TrustPower issuing such instructions, it is expected they will need the ICP on the Registry for this to occur. This is expected to provide a safeguard which will prevent electrical connection being completed prior to an ICP being on the Registry.</p>		05/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		05/20	

Non-compliance	Description		
<p>Audit Ref: 3.5 With:</p> <p><i>Clause 7(2A) of Schedule 11.1</i></p> <p>From: 01-Jul-19 To: 17-Jul-20</p>	<p>TPCO - 7.8% of IECD input to Registry late ELIN - 2.2% of IECD input to Registry late OTPO - 18.7% of IECD input to Registry late LLNW - 4.6% of IECD input to Registry late</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate because a new ICP connection management system and processes were implemented during the audit period. It could be anticipated this area will improve in the near future. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Tools continue to be developed in the new PowerNet Connect tool to monitor and ensure correct Event Dates are being loaded to the Registry. This will highlight exceptions and facilitate improvements.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.6 With:</p> <p><i>Clause 11.17</i></p> <p>From: 01-Jul-19 To: 17-Jul-20</p>	<p>LLNW – 2 x new ICPs were connected without a Trader recorded in the Registry as taking responsibility for the ICPs</p> <p>TPCO – 1 x new ICP was connected without a Trader recorded in the Registry as taking responsibility for the ICP</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>Controls are recorded as moderate because a new processes in this area was implemented during the audit period. It is anticipated this area will improve in future. The audit Risk Rating is assigned as low due to the very low number of ICPs involved .</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Tools are being developed to monitor and identify instances of delay in loading data, which will initiate investigation into these situations with a view to applying preventative action going forward.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.14 With: <i>Clause 15 Schedule 11.1</i></p> <p>From: 01-Jul-19 To: 17-Jul-20</p>	<p>The process was not followed to ask the trader who intends to trade at the ICP whether the ICP should continue to have that status. The number of ICPs in READY status in the Registry for two years or more:</p> <p>TPCO - 6 ELIN - 2</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p><b>Low</b></p>	<p>Controls are recorded as moderate because new exception reporting and monitoring processes were implemented during the audit period. It could be anticipated this area will improve in the near future. The audit Risk Rating is assigned as low due to a small number of ICPs with minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A backlog of aged ICPs is presently being investigated to establish their status. This is carried out directly with the applicant who had initially requested the new connection. The trader for each ICP will be consulted on the outcome for decisions to be made on the future of the ICP.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Through the use of the recently developed reports, and enhanced by new dashboard already mentioned as under development, this follow-up of aged ICPs will be much improved.</p>		Ongoing	

Non-compliance	Description		
Audit Ref: 4.1 With: <i>Clause 8 Schedule 11.1</i> From: 01-Jul-19 To: 17-Jul-20	Registry information not updated within 3 business days by all PowerNet Distribution Networks ELIN, TPCO, LLNW, OTPO 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 recorded as moderate because new exception reporting and monitoring processes were implemented during the audit period. It could be anticipated this area will improve in the near future. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
For changes of Price Code of PowerNet continues to operate the timeframes policy outlined in recognition of traders requests relating to arrangements they have made with their customers. Other types of data changes in general will have Event Date on the same date as actioned, or only backdated if necessary to meet compliance for completeness of accuracy.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.6 With:</p> <p><i>Clause 7(1)</i> <i>Schedule 11.1</i></p> <p>From: 01-Jul-19 To: 17-Jul-20</p>	<p>Missing IECD information in the Registry from all PowerNet Distribution Networks ELIN (x5), TPCO (x3), LLNW (x5), OTPO (x4).</p> <p>Incorrect Installation type in the Registry for ELIN (x1), TPCO (x5), OTPO (x3)</p> <p>Missing Distributed Generation information type in the Registry capacity and fuel type for ELIN (x1), TPCO (x5), OTPO (x2)</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate because new exception reporting and monitoring processes were implemented during the audit period. It could be anticipated this area will improve in the near future. The audit Risk Rating is assigned as low due to a small number of ICPs with minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Most of ICPs with found no IECD were connected at the very end of the report period and dates have since been loaded. It has been timing of the report verses workflow which raises them in this report. 2 TPCO and 1 ELIN have had dates recorded in PowerNet data systems which are quite historic, and appear to have not uploaded to the Registry at the time, these are being corrected</p> <p>Discrepancies in DG ICP data is still under investigation</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>For IECD it is believed there are no systemic errors exist.</p> <p>For DG data quality any discovered systemic errors will be corrected</p>		Ongoing	

