

Compliance plan for KIPT Distributor – 2021

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1) From: 02-Oct-19 To: 28-Feb-21	Two ICPs identified that were not mapped to correct NSP. Two active ICPs with addresses that are not readily locatable. 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 robust and mitigate risk to an acceptable level. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICP 0000014338KPADC was updated from N063 to N065 at the request of the retailer, prior to updating this a check to ensure uniqueness was maintained should have been completed by the analyst completing this change but was not – the ICP address has been changed back to N063 whilst we await confirmation from the Centre’s Facilities Manager.		27/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Controls in this space are strong but are reliant on the analyst completing the update to ensure the required processes are followed.		Ongoing.	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 02-Oct-19 To: 28-Feb-21	Information not provided to the registry prior to electricity being traded for one ICP. 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 robust and mitigate risk to an acceptable level. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP 0000144515KP9CC was originally setup on the 03/08/2020 as READY, a later network event stripped the NSP from the ICP and it changed back to NEW, this was picked up and corrected on the 13/10/2020 when the metering paperwork came through for processing.	13/10/2020	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
This was a one-off occurrence and a result of human error during data input into Registry.	13/10/2020	

Timeliness of initial electrical connection date		
Non-compliance	Description	
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Oct-19 To: 28-Feb-21	Seven 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 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 prevent the late updates most of the time. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
All ICP's have correct IED's on them as confirmed by this audit analysis, the late updating of IED's was due to a range of factors.	During the audit period.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Controls in this space are strong and we have a daily dashboard to monitor the adherence of the population of IED's in a timely fashion, the late update by Trader or MEP can cause us to miss the timeframe however assuming that they update Registry within the required timeframes then KIPT will also remain compliant.	Ongoing	

Connection of an ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 01-Oct-19 To: 28-Feb-21	One ICP moved to "ready" late. 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 are sufficient to prevent the late updates most of the time. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP 0000144515KP9CC was originally setup on the 03/08/2020 as READY, a later network event stripped the NSP from the ICP and it changed back to NEW, this was picked up and corrected on the 13/10/2020 when the metering paperwork came through for processing.	13/10/2020	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
This was a one-off occurrence and a result of human error during data input into Registry.	13/10/2020	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 01-Oct-19 To: 28-Feb-21	Registry not updated within three days of the event for a small number of events. Potential impact: Low Actual impact: Low Audit history: Multiple 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 prevent the late updates most of the time. The audit risk rating is low as the volume of ICPs affected is relatively small and therefore the impact on settlement will be low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The late updating of decommissioning occurred when the previous Registry provider was in place, under Tenco as Registry manager there is daily monitoring of Registry to ensure that updates occur within the required timeframes to ensure compliance.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The late updating of decommissioning occurred when the previous Registry provider was in place, under Tenco as Registry manager there is daily monitoring of Registry to ensure that updates occur within the required timeframes to ensure compliance.	Ongoing	

ICP Location Address		
Non-compliance	Description	
Audit Ref: 4.4 With: 2 Schedule 11.1 From: 01-Aug-18 To: 31-Jan-21	Two active ICPs with addresses that are not readily locatable. Potential impact: None Actual impact: None Audit history: Three times 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 prevent the late updates most of the time. The audit risk rating is low as the volume of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP 0000014338KPADC was updated from N063 to N065 at the request of the retailer, prior to updating this a check to ensure uniqueness was maintained should have been completed by the analyst completing this change but was not – the ICP address has been changed back to N063 whilst we await confirmation from the Centre’s Facilities Manager.	27/04/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Controls in this space are strong but are reliant on the analyst completing the update to ensure the required processes are followed.	Ongoing.	

Updating table of Loss Category codes		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 21 of Schedule 11.1</p> <p>From: 01-Oct-19</p> <p>To: 28-Feb-21</p>	<p>New loss code KPPLV2 was created, but the required 2 months' notice was not provided.</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>Controls are rated as strong, as they are sufficient to prevent the late updates most of the time.</p> <p>The audit risk rating is deemed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
KPPLV2 was setup as a result of an SB ICP being added to The Plaza Embedded Network to enable solar to be installed on the property and appropriately reconciled back into the Embedded Network, the decision to put in with less than 2 months' notice was made purposely and in agreement with the Trader on this ICP.	09/10/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above this was a one off and the timeframes for loss factor updates are followed under normal circumstance.	09/10/2019	

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: 19-May-20</p> <p>To: 28-Feb-21</p>	<p>One NSP (SYL0113) appeared to be expired in the NSP report with an expiry date of 19/05/20. Investigation determined this was an error, the NSP was certified, and the correct expiry date was 19/05/21, this has now been corrected, this is recorded as a technical non-compliance.</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, as they are sufficient to prevent the late updates most of the time.</p> <p>The audit risk rating is deemed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
As noted this has been corrected during the audit period from 19/05/2020 to 19/05/2021 per the MEP's records.	April-2019	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We have strong controls in place for the monitoring of NSP metering expiries and are working proactively with the MEP on these meter points to ensure that we receive timely provision of new metering certs.	Ongoing	