

Compliance plan for Network Tasman – 2021

Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7 From: 01-Jun-19 To: 31-May-21	One missing initial electrical connection date. 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 as they will eliminate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Initial Energisation date has been updated.	5/08/21	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
NTL has a process in place to identify missing IED's. The report wasn't run and processed within the Code timeframes due to during the absence of a core staff member. A reminder has been sent to all covering staff on required frequency of report. Discrepancy report to be run daily or at least 3 times per week which will allow NTL the opportunity to update within the Code timeframes.	28/05/21	

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: 01-Jun-19 To: 31-May-21	Three ICPs were made ready after electrical connection, and therefore trading, had occurred. 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 as they will eliminate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All corrections have been made		5/08/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Expired participant code removed from new ICP application process. NTL will withdraw approved new connection applications from Retailer and contractor once we are advised of the decommission as set up in error is advised. This should stop new connection then going ahead.		25/08/21	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Jun-19 To: 31-May-21	Late provision of Initial Electrical Connection Date for five ICPs. 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 as they will eliminate risk to an acceptable level. The audit risk rating is assessed to be low as the volume of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
All 5 corrections have been made in registry	5/08/21	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
New in-house report developed to identify rejected file updates from registry. This will give NTL the opportunity to resubmit file within timeframes	25/08/21	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 01-Jun-19 To: 31-May-21	Three ICPs were connected prior to recording of the accepting trader in the registry. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as they will eliminate risk to an acceptable level. The audit risk rating is assessed to be low as the volume of ICPs affected is small	
Actions taken to resolve the issue		Completion date
As per 3.4 above all ICPs have been updated		5/08/21
Preventative actions taken to ensure no further issues will occur		Completion date
As per 3.4 above.		28/05/21
		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-Jul-17</p> <p>To: 31-May-19</p>	<p>Updates to registry backdated greater than 3 business days of the event.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 as Network Tasman proactively work with contractors and staff to update events within the required timeframe.</p> <p>The audit risk rating is low as the volume of backdated is very small in comparison to the volume of changes made.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
All updates have been completed on the registry	5/08/21	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
NTL has a new semi-automated price category change process in place to capture EIEP8 files from registry hub. Files are processed daily and rejection files created. NTL will not backdate Price category changes going forward. Updates are as per the date of the request. Also a generic email set up for emailed requests. New auto generated Registry rejection alert email should avoid any oversites going forward. Contractors reminded of paperwork return timeframes.	25/08/21	

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1 From: 01-Jun-19 To: 31-May-21	Three ICPs with confirmed distributed generation volume, the details are not populated on the registry One ICP with the initial electrical connection date not populated. 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. Overall Network Tasman has robust controls in place. The audit risk rating is assessed to be low as the volume of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
NTL always notifies retailers and installers of requirements to lock off illegally connected distributed generation. Network Tasman updates registry fields once legal, safety inspection, COC, ROI, and authorized connection has been completed. ICP IED updated as advised above in 3.3 and 3.20.	5/8/21	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Despite developing strong controls to identify illegally connected of distributed generation, NTL is unable to prevent illegal connection distributed generation. Similarly, when illegal connection is detected, Network Tasman few options to compel the installer to disconnect the distributed generation and adhere to Network Tasman's connection processes for distributed generation. Two of the non-compliances above are what is left of a long list of illegal connections carried out by an installer on our network.	5/08/21	