

Precinct Property Holdings Limited (PPNZ)

Distributor Compliance Plan 2021

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-Dec-19 To: 31-May-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
All but 1 of the ICP's that were set to ready post the ready date was for known reasons and updated as soon as we were either able to do so due to system limitations on the next business day following the weekend when the go live fell. The issue with ICP 024000000PN2F4 was a result of human error and corrected as soon as we became aware.		During the audit period	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Controls in this space are strong already however we are working with our system provide to forward date registry changes in their system to then populate within registry on the actual date where this falls on a weekend to thus ensure that this non-compliance when it does occur is removed.		On going	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Dec-19</p> <p>To: 31-May-21</p>	<p>105 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.</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
As noted by Veritek over 50% of these late entries were due to an internal comms issue, the others were the result of late paperwork during Covid lockdown #1 who backdated entries that were not required and a result of human error.	Throughout the audit period as identified	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As noted we have modified our process to populate IED's upon receipt of the meter install paperwork as opposed to relying on the retailer and MEP updates to occur in Registry – we do however monitor registry updates via Salesforce to ensure that none slip through here.	Ongoing	

Connection of NSP that is not point of connection to grid		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 10.30 From: 01- Dec-19 To: 31-May-21	Meter certification details were updated more than 20 business days after the certification date for PBS0011. 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 moderate as they are sufficient to ensure that MEP and meter certification information is provided on time most of the time. The impact is low. The meter with the late update was certified at all times.	
Actions taken to resolve the issue	Completion date	Remedial action status
The late update of PSB0011 was a result of delays caused by NZ Defence and Precinct working through their leasing agreement as to whether an Embedded Network was permitted within their tenancy space – whilst the meter was certified on the 19/07/2019 the actual Embedded Network go live date was the 01/06/2020 with metering details added in the RM portal on the 30/06/2020 and therefore just outside the 20-business day requirement.	30/06/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Controls in this space are strong however we would note that we are reliant on timely provision of data from the MEP which is at time a challenge for us.	N/A	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Dec-19</p> <p>To: 31-May-21</p>	<p>One late address update.</p> <p>One late network update.</p> <p>Two late pricing updates.</p> <p>Five late updates to decommissioned status.</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>Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. In most cases checked, the late update was at the request of another party, caused by another party's late provision of information to PPNZ or the registry, or was a correction.</p> <p>The risk is assessed as low as a relatively small proportion of updates were affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
As noted by the auditors most updates were completed on time and those that were not were only fractionally outside of the required timeframes and likely a result of human error in not following the Compliance Dashboard process.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Controls in the space remain strong and have been tightened as we have had some staff turnover and improved the process documentation and administration of registry updates.	N/A	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 1-Dec-19 To: 31-May-21	Two duplicated addresses were identified. 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 sufficient to ensure addresses are unique most of the time. The risk is assessed as low as the volume of ICPs affected is relatively small.	
Actions taken to resolve the issue	Completion date	Remedial action status
The was a one-off error caused by incorrect information from site – upon notice by Veritek during this audit process the ICP was updated upon confirmation from site on the correct labeling of 1 ICP.	26/07/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Our controls in this space are strong – we are currently working with our system provider on an enhancement that will prevent duplicate addresses occurring in the future.	Ongoing	

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 10.25(1) and 10.25(3) From: 1-Dec-19 To: 31-May-21	Meter certification details were updated more than 20 business days after the certification date for PMH0011 and PPW0011. 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 strong, because the delays were primarily caused by the MEP being unable to provide information on time. The impact is low. The meters with late updates were certified at all times.	
Actions taken to resolve the issue	Completion date	Remedial action status
Metering certification details were populated to the RM portal within 2 business days of receipt from the MEP and the noncompliance is a result of late paperwork from the MEP.	Throughout the audit period.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We continue to work with the MEP to ensure we receive meter certificates in a more timely manner.	Ongoing	

Responsibility for metering information when creating an NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 10.25(2) From: 1-Dec-19 To: 31-May-21	Meter certification details were updated more than 20 business days after the certification date for PBS0011. 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 strong, because the delays were primarily caused by the MEP being unable to provide information on time. The impact is low. The meters with late updates were certified at all times.	
Actions taken to resolve the issue	Completion date	Remedial action status
The late update of PSB0011 was a result of delays caused by NZ Defence and Precinct working through their leasing agreement as to whether an Embedded Network was permitted within their tenancy space – whilst the meter was certified on the 19/07/2019 the actual Embedded Network go live date was the 01/06/2020 with metering details added in the RM portal on the 30/06/2020 and therefore just outside the 20-business day requirement.	30/06/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Controls in this space are strong however we would note that we are reliant on timely provision of data from the MEP which is at time a challenge for us.	N/A	

