## Compliance plan for Trustpower MC- 2021

Meter data used to derive volume information					
Non-compliance	Description				
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2	Raw meter data is rounded upon receipt and not when volume information is created.  Potential impact: Low Actual impact: None Audit history: Twice				
From: 01-Apr-21	Controls: Moderate				
To: 15-Sep-21	Breach risk rating: 2				
Audit risk rating	Rationale for audit risk rating				
Low	I have considered the controls for HHR and NHH data. The controls for HHR data are strong but there are no controls to prevent rounding of NHH raw meter data, the system is designed to round as soon as the data arrives. Overall, the controls are rated as moderate.  There is no impact because no metered consumption information is "missing", therefore the audit risk rating is low.				
Actions taken to resolve the issue		Completion date	Remedial action status		
No action currently as technology change required long term		n/a	Identified		
Preventative actions taken to ensure no further issues will occur		Completion date			
Will resolve with integration of MDM data to GTV. Strategic priorities have pushed this piece of work out from May 21 to November 22.		30 Nov 2022			

Electronic meter readings and estimated readings					
Non-compliance	Description				
Audit Ref: 9.6 With: Clause 17	Event information is not analysed and acted upon for all MEPs.  Potential impact: Low				
Schedule 15.2	Actual impact: Low				
From: 01-Apr-21	Audit history: Once				
To: 15-Sep-21	Controls: Moderate				
·	Breach risk rating: 2				
Audit risk rating	Rationale for audit risk rating				
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.				
	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		
We are reviewing our processes in partnership with the MEPs to ensure we are getting the data we need sent to us and then actioned on our side. This work has been put on hold pending the sale of Trustpower's retail business to Mercury. Work will recommence post Feb 2022		Late 2022	Identified		
Preventative actions taken to ensure no further issues will occur		Completion date			
We are following the Auditor's suggestion of understanding events we need to look at and will set up the appropriate technology and reporting processes to manage the data. This work has been put on hold pending the sale of Trustpower's retail business to Mercury. Work will recommence post Feb 2022		Late 2022			

HHR aggregates information provision to the reconciliation manager					
Non-compliance	Description				
Audit Ref: 11.4	HHR aggregates file does not contain electricity supplied information.				
With: Clause 15.8	Potential impact: None				
	Actual impact: None				
	Audit history: Multiple times				
From: 01-Apr-21	Controls: Strong				
To: 15-Sep-21	Breach risk rating: 1				
Audit risk rating	Rationale for audit risk rating				
Low	Controls are rated as strong as the issue relating to content of the aggregates file is an error in the code, Trustpower are providing submission information as expected.  The HHR aggregates file cannot contain electricity supplied information, or other reports relying on the aggregates file will not be accurate, therefore I consider this matter does not have a risk rating.				
Actions taken to resolve the issue		Completion date	Remedial action status		
Due to code contradictions, we are unable to comply		n/a	Unknown		
Preventative actions taken to ensure no further issues will occur		Completion date			
We were under the impression that this contradiction was being addressed by the EA. We have yet to see any updates.		n/a			