

Compliance plan for Waipa Distributor – 2021

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 01-Jun-20 To: 31-May-21	Registry information not complete and accurate in all instances. Potential impact: High Actual impact: Medium Audit history: Twice Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as moderate because validation steps are now in place, but improvements are required. The risk rating is medium as the corrections not actioned may have a direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
We will increase discrepancy reporting including increased scrutiny of unmetered load and initial electrical connection details.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We will increase discrepancy reporting including increased scrutiny of unmetered load and initial electrical connection details.		Ongoing
		Remedial action status
		Identified

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: Clauses 11.2(2) and 10.6(2) From: 01-Jun-20 To: 31-May-21	Errors not corrected as soon as practicable. Potential impact: High Actual impact: Medium Audit history: Three times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as moderate because validation steps are now in place, but improvements are required. The risk rating is medium as the corrections not actioned may have a direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
We will increase frequency of discrepancy reporting and ensure any identified are dealt with sooner.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We will increase frequency of discrepancy reporting and ensure any identified are dealt with sooner.		Ongoing
		Identified

Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.3 With: Clauses 7(2) of Schedule 11.1 From: 31-Mar-15 To: 31-May-21	14 ICPs electrically connected but the initial electrical connection date had not been populated. The incorrect event date was used for 13 ICPs when the IECD was populated prior to the on-site audit. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
These have now been corrected.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will increase frequency of discrepancy reporting and ensure any identified are dealt with sooner.	Ongoing	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clauses 7(2) of Schedule 11.1 From: 18-Sep-20 To: 29-Apr-21	Ten ICPs not updated to “ready” prior to electricity being traded. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
There was a one off issue however it has highlighted issues with our existing system so we are investigating alternatives.	August 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have scheduled a new ICP Management system as part of our ICT systems project.	August 2022	

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-20 To: 31-May-21	94 initial electrical connection dates not updated within ten business days. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
IECD dates have now been updated.	Completed.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have scheduled a new ICP Management system as part of our ICT systems project but will increase discrepancy reporting in the meantime.	August 2022	

Connection of an ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 07-Sep-20 To: 08-Sep-20	No trader recorded as accepting responsibility on the registry prior to electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
This was a process issue which was practically compliant (ie the Retailer had accepted responsibility) but not technically.	Completed.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are investigating a new ICP Management system and will look at the possibility of live updates.	August 2022	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Jun-20</p> <p>To: 31-May-21</p>	<p>Five address events, three network events, 386 pricing updates, 51 decommission status updates and 167 distributed generation updates were updated more than three business days after the event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as the volume of ICPs affected are small.</p>	
Actions taken to resolve the issue		Completion date
The instances of late updates had practical reasons behind them and we do not believe require any changes to procedures or resourcing levels.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
The instances of late updates had practical reasons behind them and we do not believe require any changes to procedures or resourcing levels.		N/A
		Identified

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Jun-20 To: 31-May-21	657 ICPs with addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will continue to work through these to update them.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have scheduled a new ICP Management system as part of our ICT systems project but will increase discrepancy reporting in the meantime.	August 2022	

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-20 To: 31-May-21	Chargeable capacity incorrectly recorded on the registry when it is being derived from the retailer billing files. 24 ICPs with distributed generation details incorrect or missing. 13 ICPs with the initial electrical connection date missing. 2 ICPs with an incorrect initial electrical connection date populated. 9 ICPs with unmetered load discrepancies. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as there is now regular discrepancy reporting in place, but there is room for improvement. The risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have corrected unmetered load details and followed up with Retailers.	Completed.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Increased reporting will address these sooner.	Ongoing	

Updating loss factors		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 21 of schedule 11.1 From: 01-Feb-21 To: 12-Feb-21	One changed loss factor not notified two months in advance of coming into effect. 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 processes are well mapped. The audit risk rating is low as the number of ICPs affected was small.	
Actions taken to resolve the issue		Completion date
This was a one-off incident.		Completed.
Preventative actions taken to ensure no further issues will occur		Completion date
The LAKE network is being disestablished as of 31/08/21.		31 August 2021
		Identified