

Compliance plan 2022 for Mercury Material Change TRUS acquisition

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2 & 15.2 From: 01-Apr-20 To: 28-Jan-21	Some inaccurate information is recorded on the registry and/or in GTV. Some submission inaccuracies. Corrections not conducted for two ICPs where meters were bridged. Investigation and correction not conducted for three ICPs with potentially inaccurate metering installations. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, as most data is recorded accurately, and validation processes are in place. The impact on settlement is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
		Remedial action status

<p>New connections: Best efforts are made to align information between GTV and the Registry via regular file transfer between the two systems and working queues that identify issues and errors within the transfers as well as discrepancy reporting.</p> <p>Revenue Assurance:</p> <p><u>Bridged meters:</u> Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p> <p><u>Investigation and correction not conducted:</u> 0000252550WT7EC – transposed reads investigation commenced – still in progress 0000460349WT61D – supply for house construction site - customer confirmed power not being used – meter since replaced – No RA issue 1000003149BP32F – meter reader alert first raised 09/09/20 – property disconnected 10/08/20 – and as we were unable to ascertain any current or historic reads, no RA case was able to be completed. However, as a result of the audit we have opened a RA case to calculate and submit the consumption for this ICP.</p> <p>We acknowledge that our current reporting capability in this area doesn't allow us to identify stopped meters in a timely manner. We will continue to look at viable options to counter this inefficiency.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Completed</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>New Connections: Exception Reporting continues to be used and enhanced to identify and resolve any discrepancies that occur between GTV and the Registry.</p> <p>A gap in knowledge was identified around temporary connections, training will take place with the New Connections team will take place to ensure this is no longer an issue.</p> <p>Revenue Assurance:</p> <p>Bridged meters: Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p> <p>Any MRS reports with instances are looked at by the team as they come in and RA investigations logged with the MEP where required.</p> <p>Between the period of September 21 to February 22, Revenue assurance were heavily resource restrained with 5 of our team leaving which has reflected on our ability to monitor reports effectively. We are now once again fully staffed to address this shortfall.</p>	<p>March 2022</p> <p>Ongoing</p> <p>Completed</p> <p>Completed</p>	

Temporary Electrical Connection of an ICP		
Non-compliance	Description	
Audit Ref: 2.10 With: Clause 10.33 From: 05-Aug-20 To: 20-May-21	11 ICPs were temporarily electrically connected without written permission from the network. 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 and will mitigate risk most of the time but there is room for improvement. The audit risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue		Completion date
Current reporting around New Connection date mismatches (IED, CO, Metering, Certification) is robust and does identify any sites temporarily connected for certification purposes. A gap in knowledge was identified and this will be filled by training within the teams.		March 2022
Preventative actions taken to ensure no further issues will occur		Completion date
A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections. Updated task documents and team training ongoing		March 2022
Identified		

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11 With: Clause 10.33A</p> <p>From: 29-Oct-20 To: 25-Nov-21</p>	<p>73 metered reconnected ICPs were not certified within five business days of becoming active.</p> <p>Three metered newly connected ICPs were not certified within five business days of becoming active.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate. Reporting is in place to identify metering certification issues, but some ICPs are not being identified as expected.</p> <p>The impact on settlement is recorded as minor because installations with expired or interim certification may be less accurate than certified metering installations.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Current reporting in place identifies sites that have been reconnected but are not recertified within 5 business days. In almost all instances reporting is working correctly identifying sites reconnected when uncertified. MEPs are notified of certification status however in most cases they do not re-certify.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We have already improved reporting around uncertified sites that have been reconnected and all ICPs identified during Audit as having not been picked up by reporting are now showing.</p> <p>We continue to engage MEPs to rectify uncertified sites as the occur.</p>		<p>Completed</p> <p>Ongoing</p>	

Meter bridging		
Non-compliance	Description	
<p>Audit Ref: 2.17</p> <p>With: Clause 10.33C and 2A of Schedule 15.2</p> <p>From: 01-Aug-21</p> <p>To: 27-Sep-21</p>	<p>Corrections not conducted for two ICPs where meters were bridged.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>0000414945TPD12 – site was bridged on reconnection 01/08/21 – bridged meter follow up logged 11/08/21 – paperwork confirming meter unbridged received 15/09/21. As the ICP had switched to an alt provider on 03/09/21 we were unable to ascertain any current or historic reads. No RA case was able to be completed.</p> <p>1000007390BPCBB – site was bridged on reconnection 11/08/21 – bridged meter follow up logged 16/08/21. This job was cancelled due to Covid Level 4 lockdown and then relogged 03/09/21. We received paperwork 27/09/21 confirming meter unbridged 08/09/21. The ICP had switched to an alt provider on 27/09/21 and as we were unable to ascertain any current or historical reads, no RA case was able to be completed.</p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads gained from the registry to estimate any unbilled consumption.	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3 With: Clause 10 Schedule 11.1</p> <p>From: 01-Mar-21 To: 26-Nov-21</p>	<p>205 ICPs were not updated to inactive status on the registry within five business days of the event date.</p> <p>377 ICPs were not updated to active status on the registry within five business days of the event date.</p> <p>2,149 ICPs did not have trader information updated on the registry within five business days of the event date.</p> <p>59 ICPs did not have ANZSIC codes populated within 20 business days of switch in or initial electrical connection.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Trustpower continues to look for opportunities to refine our reporting and processes to improve our performance in updating registry information within 5 business days.</p> <p>Reporting has been improved and created since last Audit to close gaps identified there. This will be an on-going task for us as a retailer.</p> <p>We continue to work with MEPs and Network to ensure updates are made in a timely manner on their side, so we do not experience flow on effects.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Reporting was created to look for sites where the meter removal date and decommissioned status date differ to avoid late backdated inactive statuses being entered. As it is now live issues around backdating should disappear.</p> <p>Trustpower also continues to engage with third parties (MEPs) to reduce the number of late MEP nominations, specifically IHUB as we continue to have issues around alternate MEP metering being installed without advising TRUS.</p>	Ongoing	

Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>11 ICPs with the incorrect MEP nominated in the first instance.</p> <p>MEP not notified for one of the sample of ten decommissioned ICPs checked.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong, as the reporting in place will mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the correct MEP subsequently nominated.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>All nominations to incorrect MEP's in the first instance have now been addressed and corrected. Some of these instances are caused by MEPs installing metering not requested by TRUS in the first instance, we continue to communicate with MEPs to avoid this where possible.</p> <p>Reporting in place since last audit that ensures MEPs are notified of DEC/DED sites on all occasions. The above instance of late notification was picked up after reporting was created and MEP was notified once identified in reporting.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Ongoing conversations with IHUB so that if they are using a MTRX meter instead or vice versa they are notifying TRUS early so a correction nomination can be made.</p> <p>Reporting in place since last audit that ensures MEPs are notified of DEC/DED sites on all occasions. This is monitored on a daily basis to ensure MEPs are notified in all instances.</p>	Ongoing	

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 01-Jan-21</p> <p>To: 25-Nov-21</p>	<p>13 new ICPs (11 temporarily connected and ICPs 1000599753PCDB2 and 1002108871LC5B6) had the incorrect active status dates of the samples checked.</p> <p>417 late updates to active status for new connections.</p> <p>59 late ANZSIC codes not updated within 20 days of commencing trading.</p> <p>40 late updates to 1,12 (inactive new connection in progress) status for new connections, which also resulted in late MEP nominations.</p> <p>ICP 0000702000MP807 unmetered load details not populated when electrically connected.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple 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 recorded as strong as there is robust reporting and processes in place.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Robust reporting across the New Connection process to pick up discrepancies are worked daily by the New Connections Team.</p> <p>Current reporting around New Connection date mismatches (IED, CO, Metering, Certification) is robust and does identify any sites temporarily connected for certification purposes.</p> <p>A gap in knowledge was identified and this will be filled by training within the teams.</p> <p>Reporting will be introduced to stop TRUS from switching in sites at INC.</p>	<p>Ongoing</p> <p>March 2022</p> <p>Sept 2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections.</p> <p>Reporting will be introduced to stop TRUS from switching in sites at INC that will mean we will no longer bring in sites prior to the ALT updating the status to CO.</p>	March 2022	
	Sept 2022	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 9 (1(k) Schedule 11.1</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>Seven category 2 ICPs with a residential ANZSIC code applied.</p> <p>Nine ICPs of the 120 ICPs sampled with an incorrect ANZSIC code applied.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once previously</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 the reporting has been improved during the audit period.</p> <p>The audit risk rating is low this has no direct impact on submission accuracy.</p>	
Actions taken to resolve the issue		Completion date
		Remedial action status

<p><u>ANZIC codes – Cat 2 ICPs with a residential code applied:</u></p> <p>0007115757RN8B0 – Residential is correct code applied 0006004920RNDB8 – Residential is correct code applied 0000130745WE70F – Residential is correct code applied All other ICP’s on this list have since been corrected as advised.</p> <p>A report was created after last year’s audit findings that included looking at Cat 2 ICP’s with a residential ANZSIC code. We have logged a ticket asking for more enhancements for better visibility and functionality.</p> <p><u>ANZSIC codes – Incorrect code applied:</u></p> <p>Most examples are instances where we have switched a property in with the incorrect ANZSIC code. As highlighted in last year’s audit response we don’t have the capability at this time to identify where an existing commercial ANZSIC code may be incorrect, and no way of practically determining that.</p> <p>One way of mitigating part of the problem may be to monitor “House Construction” where an ICP has switched in with this code, or where this code has been in place for some time. A ticket has been logged to analyse if this is a viable option to add to our reporting capability.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>September 2022</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Our reporting has been amended to highlight CAT 2 sites better. Our training and training documents have been updated to ensure these are not missed and are completed within expected timeframes.</p> <p><u>ANZSIC codes – Incorrect code applied:</u></p> <p>Most examples occurred when we have switched a property in with the incorrect ANZSIC code. As highlighted in last year’s audit we don’t have the capability to identify where an existing commercial ANZSIC code may be incorrect.</p> <p>One way of mitigating part of the problem may be to monitor “House Construction” where an ICP has switched in with this code, or where this code has been in place for some time. A ticket has been logged to analyse if this is a viable option to add to our reporting capability.</p> <p>We believe we have taken best endeavours to help achieve compliance in this area with reporting enhancements.</p>	<p>Completed</p> <p>Ongoing</p> <p>September 2022</p>	

Changes to unmetered load			
Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>Two ICPs had incorrect daily unmetered kWh recorded on the registry.</p> <p>ICP 0000702000MP807 unmetered load details not populated when electrically connected.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate due to the change of staff, training is planned to bring the new team up to speed.</p> <p>The impact on settlement and participants is minor, as the discrepancies are very small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Shared Unmetered Load</p> <p>UML compliance has been a challenge for our team in recent times however the future looks brighter in this area. We now have Power BI discrepancy reporting in place and have recently trained two of our newer team members in the task, and with the move of the Chorus sites to Manawa Energy, the workload in this space is significantly more manageable.</p> <p>0000540598TU2BD – Logged for correction by the RA team</p> <p>0900086782PC61A – Logged for correction by the RA team</p>		<p>Completed</p> <p>June 2022</p>	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>		<p>Completion date</p>	
<p>We now have the capacity and capability to identify and correct shared unmetered load discrepancies in a timely manner.</p>		<p>Completed</p>	

Management of "active" status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 of schedule 11</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>13 new ICPs (11 temporarily connected and ICPs 1000599753PCDB2 and 1002108871LC5B6) had the incorrect active status dates of the samples checked.</p> <p>ICPs 0000931333NVFD5 and 0119010321LC5F4 incorrectly left active.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple 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 recorded as strong as there is robust reporting and processes in place.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>All ICP's with incorrect active status dates identified in the audit have now been corrected in both GTV and the Registry.</p> <p>A gap in knowledge was identified and this will be filled by training within the teams.</p>		<p>Done</p> <p>March 2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections.</p>		<p>March 2022</p>	

Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9 With: Clause 19 Schedule 11.1</p> <p>From: 01-Mar-21 To: 26-Nov-21</p>	<p>ICP 0151745161LC3F3 was incorrectly backdated to inactive on 15/04/21 for 25/06/20 due to human error resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted.</p> <p>Three ICPs recorded as ready for decommissioning in error.</p> <p>ICP 1000020907BP931 was recorded as disconnected meter removed in error.</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong as there is robust reporting and processes in place.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>New connections: ICP's with incorrect inactive status dates identified in the audit have now been corrected where possible in both GTV and the Registry.</p> <p>The New Connection team has been advised that cancelled New Connections will no longer be updated to DEC.</p> <p>Revenue Assurance: 0151745161LC3F3 – Request logged with the RA team to process a case to ensure the missed consumption is correctly submitted. Human error and one-off incident.</p>	<p>Done</p> <p>Done</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The New Connection team has been advised that cancelled New Connections will no longer be updated to DEC. The process for cancelling New Connections will be the same across the board for all Networks.</p> <p>Revenue Assurance: Highlighted the error to the team and used this as a training opportunity.</p>	<p>Done</p> <p>Done</p>	

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 08-Jul-21 To: 15-Nov-21	Five ICPs with proposed event dates greater than ten business days of the NT receipt date. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as AN code assignment is automated based on hierarchy and the AN proposed dates process is robust. The impact is assessed as low as the AN dates matched those requested by the gaining trader.	
Actions taken to resolve the issue	Completion date	Remedial action status
We acknowledge that our AN response controls are strong. In 2021 a support ticket was logged to prevent GTV from sending AN's that are more than 10 business in advance of the NT receipt.	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Following the fix being implemented in January; we have found an example that indicates the controls are not working as intended for GTV automated AN response on transfers. Another support ticket has been logged to find a more appropriate fix to ensure there will be no further issues of non-compliance.	September 2022	

Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 05-May-21 To: 15-Jul-21	One TR breach. CS average daily consumption of zero was invalidly recorded for 0001061745AL30B (15/07/21). Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong, as there are robust checks in place to mitigate risk.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TR Breach ICP 0001042680PC1A0 – A thorough investigation has found the incorrect switch type was missed in error and the site was allowed to switch out as a Move In rather than a Transfer.</p> <p>CS Average daily load 0 – This was a system issue the ICP did not have an ADL loaded in GTV. A support ticket has been logged to analyse accounts that have a 0 ADL.</p>		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TR Breach – Additional training has been delivered to ensure that the correct switch type is being identified and actioned appropriately.</p> <p>CS Average Daily Load – A ticket logged to explore installations with 0 ADL will be given urgent priority. A further support ticket has been logged to create reporting that will capture existing accounts with 0 ADL so that these can be amended.</p>		04/2022 09/2022	

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 05-Jun-21</p> <p>To: 24-Nov-21</p>	<p>Two AN files had the incorrect response code applied.</p> <p>Three ET breaches.</p> <p>Four E2 breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple 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 there are robust processes in place to manage this process.</p> <p>The impact is assessed as low the number of late files were minimal.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>Trustpower agrees to the findings in all instances:</p> <p><u>Incorrect AN code</u> – Both ICPs listed were actioned by users prior to our AN upload process being completed as part of our holds switching process.</p> <p>Learnings from these findings will be part of ongoing team training on this task and a recap will be delivered in addition to continue monitoring to emphasize the importance of updating the AN status correctly and adhering to the timing of our processes.</p> <p><u>ET Breaches</u> – All of these occurred due to human error, as per our audit findings in 2021 a support ticket was logged, and an enhancement put in place to prevent the user from entering an event date that is prior to the NT proposed event date.</p> <p>Also, in response to our audit findings in 2021 a support ticket was logged to prevent GTV from sending AN's that are more than 10 business days in advance of the NT receipt.</p>	<p>Ongoing</p> <p>11/2021</p> <p>01/2022</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>AN Files with incorrect response code</u> – Additional training will be delivered to the team to reinforce the importance of checking and amending the AN status code when working a switch from the responses.</p> <p><u>ET Breaches</u> – We have seen no further instances of an event date prior to the NT proposed event date since the enhancement was put in place in November 2021. Therefore, there should be no more instances of non-compliance.</p> <p>In 2021 a support ticket was logged to prevent GTV from sending AN's that are more than 10 business in advance of the NT receipt. However, following the fix being implemented in January; we have found an example that indicates the controls are not working as intended for GTV automated AN response on transfers. Another support ticket has been logged to find a more appropriate fix to ensure there will be no further issues of non-compliance.</p>	<p>4/2022</p> <p>11/2021</p> <p>09/2022</p>	

<p>Losing trader determines a different date - switch move</p>	
<p>Non-compliance</p>	<p>Description</p>
<p>Audit Ref: 4.9</p> <p>With: Clause 10(2) Schedule 11.3</p> <p>From: 02-Dec-20</p> <p>To: 29-Dec-20</p>	<p>Two incorrect AN codes sent.</p> <p>One CS file breach.</p> <p>Seven T2 breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 processes and reporting in place will mitigate risk.</p> <p>The impact is assessed as low as the number of late files was small in relation to the volume processed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Trustpower agrees to the findings in all instances:</p> <p>Incorrect AN code – Both ICPs listed were actioned by users prior to our AN upload process being completed as part of our holds switching process.</p> <p>CS File Breach - Human error, this ICP 0000056673TRD11 was not picked up in our reporting due to continuously sitting at low priority until the due date. Modifications have been introduced to the reporting to highlight and move up the most urgent switches.</p> <p>Seven T2 Breaches - All instances were sent 1-2 days late as Trustpower was holding the CS files until an actual read and the delay was causing a non-compliance. The process and training documents have been amended to avoid these breaches.</p>		<p>Complete</p> <p>Complete</p> <p>Complete</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>CS File Breach – We will continue to monitor CS time breaches via daily and monthly reports. Modifications have been introduced to the reporting to highlight and move up the most urgent switches. This should prevent any future instances of non-compliance.</p> <p>T2 Breaches – CS switch loss report and process is now amended and working as intended. Training documents have been amended and ongoing training provided. This will prevent any further instances of non-compliance in this area.</p>		<p>05/2021</p> <p>04/2021</p>	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 01-Jul-21</p> <p>To: 03-Oct-21</p>	<p>One incorrect negative daily consumption value sent.</p> <p>Five ICPs with the incorrect last read type of “E”.</p> <p>Two CS file sent with a read for the date of the switch event.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong, as there are robust checks in place to mitigate risk.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Trustpower agrees to the findings.</p> <p>Incorrect Negative Daily Consumption Value – The ICP 0000901347TUEDC final was billed with the incorrect data. This is human error by a call centre agent. There is a validation in GTV that picks up negative read on reads; however, this was overridden. Training docs are available for all agents in regards to billing finals and validations to help mitigate these errors.</p> <p>Five CS Files with incorrect read type of E – The invoicing was created by a system upload rather than an individual in preparation for the switch to CNIR. No further action required.</p> <p>Two CS file sent with a read for the date of the switch event.</p> <p>0001113435WM490 – User error here. New meter installed and connected for same date as requested date. Correction applied using 2/07/2021.</p> <p>5406004000CHEA0 – human error this was picked up by the administrator quickly and amended.</p> <p>No further action required as there are robust controls and systems in place.</p>		<p>4/2022</p> <p>Done</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Incorrect Negative Daily Consumption Value – Discussions with Billing team had to negate negative reads occurring. Billing to regularly review training documentation and keep available to CEA's highlighting importance of approving validations.</p> <p>Five CS files with E status - this was a unique process created for the switch of large commercial sites to CNIR and there should be no further instances of non-compliance.</p>		<p>April/2022</p> <p>Done</p>	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 of Schedule 11.3 From: 19-Aug-21 To: 11-Nov-21	Six RR breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as the processes in place mitigate risk are robust. The potential impact is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Trustpower agrees to the findings. Switching: We will continue to send late RRs only if it deems more important for our customer. GTV does display a warning box if you are about to send a RR that is over 4 months old. Billing: We have implemented some changes to our billing processes after our 2021 audit findings. <ul style="list-style-type: none"> We have increased the number of units Trustpower absorbs, before requesting a Switch Read Adjustment. Implemented an approval process where all switch read adjustments over 4 months have to be approved by the Billing TL & the Switching TL. We only request RR's outside of the 4-month mark if it is in the customer's best interest. Reporting built to identify customers who have switched in on an estimate, to capture possible issues earlier. 	Complete Completed March 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Switching: All RR requests outside of 4 months need to be reviewed and authorised by a Team Leader. Late RR's are only requested if they are of benefit to the customer. GTV has a flag that alerts the user that RR's are outside of 4 months so they can't be requested in error. Billing: We review our processes on a regular basis to ensure they are still fit for purpose and remain in everyone's best interest.	Ongoing Ongoing	

Gaining trader informs registry of switch request - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.12 With: Clause 14 of Schedule 11.3 From: 01-Apr-20 To: 28-Jan-21	All HH switch requests sent with the incorrect profile of GXP. Potential impact: None Actual impact: None 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 HH TOU ICPs are no longer traded by TRUS. The potential impact is none but low is next best option available.		
Actions taken to resolve the issue		Completion date	Remedial action status
A ticket to fix this process was raised in 2021 however a decision was made not to proceed as Trustpower are no longer gaining, connecting, or servicing Half Hour TOU ICPs.		11/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
As we will no longer be gaining, connecting, or servicing Half Hour TOU ICP's there should be no further instances of non-compliance.		11/2021	

Losing trader provision of information - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.13 With: Clause 14 of Schedule 11.3 From: 14-Sep-21 To: 12-Oct-21	ICP0002272113ML5AB was issued incorrectly with the MU (unmetered load) due to human error. 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 HH TOU ICPs are no longer traded by TRUS. The potential impact is low as this has no material impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
We agree that the MU code was issued incorrectly due to human error.		03/2022	Cleared

Preventative actions taken to ensure no further issues will occur	Completion date	
As we will no longer be gaining, connecting, or servicing Half Hour TOU ICP's there should be no further instances of non-compliance in this area.	11/2021	

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clause 17&18 of schedule 11.3 From: 17-Mar-21 To: 05-Nov-21	Three incorrect NW codes found of the sample checked. One NW request sent in error. One WR breach. 13 SR breaches. 35 NA breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as they mitigate 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

<p>Trustpower agrees to the findings here.</p> <p>Three incorrect NW codes selected. All ICP's 1002138585LC08F, 0431963096LC44A, 0001250100TG8A8 were sent with the DF code as the customers could not move on their original move date due to COVID. Training documents have been updated, and training delivered to ensure that administrators select the CE code for these instances.</p> <p>NW request sent in error as CX. The RA team requested the incorrect account due to a data entry error. No further action required.</p> <p>WR Breach - 1002144098UNB51: PSNZ NTMI received on the 12/10/2021, TRUS NW sent and rejected by PSNZ on the 12/10. The requested switch gain date was the 16th which meant if we had sent the CS within 2 days of receiving the NW rejection, we would have breached for it being prior to the event date.</p> <p>This ICP was worked to be compliant with the CS being sent 5 days after receiving the NT. Reporting is in place to capture these so that action can be taken to prevent a breach, but this ICP did not appear on the report. A support ticket for analysis has been logged with the COBU analytics team to check the logic of report and if there are any further instances.</p> <p>13 SR Breaches – Time needed to investigate and confirm withdrawals and negotiate double withdrawals to remove TRUS time slice.</p> <p>35 NA breaches - we will continue to send late NW files when it is important to make corrections that will otherwise detrimentally impact our customer.</p>	<p>Date</p> <p>04/2022</p> <p>Completed</p> <p>10/2022</p> <p>Completed</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>1002138585LC08F, 0431963096LC44A, 0001250100TG8A8 – Training documents to be updated and training to be delivered to ensure that we are selecting the correct NW codes in all instances.</p> <p>NW request sent in error as CX 0195112865LC913 – no further action required.</p> <p>WR Breach 1002144098UNB51 – A support ticket will be logged to analyse the logic and effectiveness of the reporting we have in place. This instance was missed through the BI reporting system not working on that day.</p> <p>We will continue to send late NW files when it is vitally important to make corrections that will otherwise detrimentally impact our customer.</p>	<p>4/2022</p> <p>Completed</p> <p>10/2022</p> <p>Ongoing</p>	

Metering information			
Non-compliance	Description		
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 01-Oct-21 To: 03-Oct-21	Five ICPs with the incorrect last read type of "E". Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, as the processes in place mitigate risk are robust. 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
Trustpower agrees with the findings. Five CS Files with incorrect read type of E – the invoices are showing as calculated which means that the E status is correct in the switch file however the AMI reads were available at the time of invoicing. This was done as a bulk upload process in preparation for the switch to CNIR. No further action required.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Five CS files with E status – no further action required. This was a unique process created for the switch of large commercial sites in bulk to CNIR and there should be no further instances of non-compliance.		Complete	

Maintaining shared unmetered load	
Non-compliance	Description
Audit Ref: 5.1 With: Clause 11.14 From: 01-Mar-21 To: 26-Nov-21	Two ICPs with the incorrect shared unmetered load recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	<p>The controls are recorded as moderate due to the change of staff, training is planned to bring the new team up to speed.</p> <p>The impact on settlement and participants is minor, as the discrepancies are very small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Shared Unmetered Load</p> <p>UML compliance has been a challenge for our team in recent times however the future looks brighter in this area. We now have Power BI discrepancy reporting in place (screenshot attached), have recently trained two of our newer team members in the task, and with the move of the Chorus sites to Manawa Energy, the workload in this space is significantly more manageable.</p> <p>0000540598TU2BD – Logged for correction by the RA team</p> <p>0900086782PC61A – Logged for correction by the RA team</p>	<p>Completed</p> <p>June 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We now have the capacity and capability to identify and correct shared unmetered load discrepancies in a timely manner.</p>	<p>Completed</p>	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24</p> <p>From: 06-Jan-21</p> <p>To: 08-Dec-21</p>	<p>Some ICPs with distributed generation not quantified.</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 40 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement in relation to distributed generation.</p> <p>Submission information is estimated for the bridged period in most cases, so the impact on submission accuracy is considered low and the volume of unaccounted for distributed generation is expected to be low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>Location management: ICP# 0011002947PCD94 has been corrected by the Network since audit.</p> <p>Data will be pulled to identify sites that do not have IMP/EXP metering installed with no open meter change service order and these will be worked through with customers/Networks to have IMP/EXP metering installed.</p> <p>Revenue Assurance: Bridged meters</p> <p>0000414945TPD12 – site was bridged on reconnection 01/08/21 – bridged meter follow up logged 11/08/21 – paperwork confirming meter unbridged received 15/09/21. As the ICP had switched to an alt provider on 03/09/21 we were unable to ascertain any current or historic reads. No RA case was able to be completed.</p> <p>1000007390BPCBB – site was bridged on reconnection 11/08/21 – bridged meter follow up logged 16/08/21. This job was cancelled due to Covid Level 4 lockdown and then relogged 03/09/21. We received paperwork 27/09/21 confirming meter unbridged 08/09/21. The ICP had switched to an alt provider on 27/09/21 and as we were unable to ascertain any current or historical reads, no RA case was able to be completed.</p>	<p>Done</p> <p>April 2022 and ongoing</p> <p>Completed</p> <p>Completed</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Along with data being pulled to rectify historical sites without IMP/EXP metering our process will also change so that all sites with generation will have an IMP/EXP meter installed regardless of gifting etc.</p> <p>Revenue Assurance: Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p>	<p>April 2022 and ongoing</p> <p>Ongoing</p>	

Reporting of defective metering installations	
Non-compliance	Description
<p>Audit Ref: 6.4</p> <p>With: Clause 10.43(2) and (3)</p> <p>From: 26-Jun-19</p> <p>To: 21-Feb-22</p>	<p>MEP not notified for three ICPs where metering installations could be inaccurate, defective, or not fit for purpose</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Defective meter detection</p> <p>0000252550WT7EC – transposed reads investigation commenced – still in progress</p> <p>0000460349WT61D – supply for house construction site - customer confirmed power not being used – meter since replaced – No RA issue</p> <p>1000003149BP32F – meter reader alert first raised 09/09/20 – property disconnected 10/08/20 – and as we were unable to ascertain any current or historic reads, no RA case was able to be completed. However as a result of the audit we have opened a RA case to calculate and submit the consumption for this ICP.</p>		<p>Ongoing</p> <p>Completed</p> <p>Ongoing</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We acknowledge that our current reporting capability in this area doesn't allow us to identify stopped meters in a timely manner. We will continue to look at viable options to counter this inefficiency.</p>		Ongoing	

NHH meter reading application	
Non-compliance	Description
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Oct-21</p> <p>To: 03-Oct-21</p>	<p>Five ICPs with the incorrect last read type of "E".</p> <p>Disconnection reads applied to the day before the disconnection.</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 recorded as strong, as there are robust checks in place to mitigate risk.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Trustpower agrees with the findings. Five CS Files with incorrect read type of E – the invoices are showing as calculated which means that the E status is correct in the switch file however the AMI reads were available at the time of invoicing. This was done as a bulk upload process in preparation for the switch to CNIR. No further action required.	Complete	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Five CS files with E status – no further action required. This was a unique process created for the switch of large commercial sites to CNIR and there should be no further instances of non-compliance.	Complete	

Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Mar-21 To: 31-Dec-21	Exceptional circumstances not proven for two of a sample of five ICPs not read during the period of supply. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong, as Trustpower have robust processes in place including attempting to get reads as customers switch away. The audit risk rating is low as the number of ICPs not read during the period of supply is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We agree this is non-compliant. However, this remains a rare occurrence and we do not currently have the current resource/ability to monitor these sites where a customer moves out prior to our meter readers accessing the site.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Ticket logged to investigate the viability of sending automated SMS/Email messages when a customer's property is skipped by the meter reader.	September 2022	
Ticket logged to review changes we could make to our bills, to better highlight when a customer has been estimated.	September 2022	

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 01-Oct-21 To: 03-Oct-21	Five ICPs with the incorrect last read type of "E". 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 there are robust checks in place to mitigate risk. 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
Trustpower agrees with the findings. Five CS Files with incorrect read type of E – the invoices are showing as calculated which means that the E status is correct in the switch file however the AMI reads were available at the time of invoicing. This was done as a bulk upload process in preparation for the switch to CNIR. No further action required	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Five CS files with E status – no further action required. This was a unique process created for the switch of large commercial sites to CNIR and there should be no further instances of non-compliance.	Completed	

Meter data used to derive volume information			
Non-compliance	Description		
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Apr-21 To: 22-Feb-22	Raw meter data is rounded upon receipt and not when volume information is created. Potential impact: Low Actual impact: None Audit history: Twice Controls: Moderate 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 little impact because no metered consumption information is "missing". In some cases, the lack of decimals can trigger the switching RR process where the other trader is using decimals, but most of these traders are now filtering out differences less than 1 kWh. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Trustpower accepts these finding. We have recently scaled our MDM solution to include all AMI networks. We agree that AMI decimal data is now available, but not yet integrated.		18/03/2022 Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are scoping the integration of MDM to GTV, this has been delayed from NOV 2022 due to the sale to Mercury being rescheduled by 6 months.		April 2023	

Electronic meter readings and estimated readings			
Non-compliance	Description		
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Apr-21 To: 21-Feb-22	Event information is not analysed and acted upon for all MEPS. Voltage on the load side of the meter should be obtained and evaluated. Potential impact: Low Actual impact: Low Audit history: Once 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
Trustpower agrees with the findings. Our Analytics team have built a report in PowerBI to make this process a more manageable task, this has been handed to our Revenue Assurance team with recommendations to check that the report is fit for purpose on a regular basis. IHUB now monitor AMI events from their end, sending us service request orders to raise for all critical events and then following up with a monthly summary report, with all AMI events requiring a service request.		March 2022 Dec 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Revenue Assurance will be monitoring the Power BI report for its success and will be making any amendments identified over the coming months.		Ongoing	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Jan-21 To: 31-Mar-21	ICP days submitted for generation only ICPs. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate 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
The existing revision cycle will replace with updated ICP days files. File creation code has been enhanced to eliminate the need for a load meter to be onsite in order for inclusion in the ICP days file	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
A step in the submission file check process detects any consumption loaded against generation only profile in AV-080 file. This enables identifying affected Transmission point(s) and ICP(s). Investigation of the cause and correction will be carried out prior to the file submission.	Complete	

Grid connected generation	
Non-compliance	Description
Audit Ref: 12.6 With: Clause 15.11 From: 01-Oct-21 To: 07-Oct-21	Both TRUS and CNIR codes in the NSP vols file for the period October 1 st to 7 th . Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level and were improved immediately after this issue.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Upon being advised of the error we investigated immediately. We identified where the issue had occurred, corrected the offending file, and resubmitted within 3 hours. This was done prior to the publication of October 2021 3-month reconciliation reports.</p>	Done	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We identified that the zero-out portion of our market submission process omitted volumes included in our AV-130 submission. We have since included AV-130 volumes to our zero-out process. In addition, where possible we intend to make future NSP changes effective from the beginning of a month to avoid part-month submissions. Process notes have also been updated to note that where this cannot be achieved AV-130 files are to remain separate.</p>	Ongoing	

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 25-May-18</p> <p>To: 22-Nov-21</p>	<p>Corrections not conducted for two ICPs where meters were bridged.</p> <p>13 new ICPs had the incorrect active status dates of the samples checked:</p> <ul style="list-style-type: none"> • 11 ICPs temporarily electrically connected but not made active resulting in the volumes being reconciled for the incorrect period, • ICP 1002108871LC5B6 made active to replace an incorrectly decommissioned ICP for 25/5/19 on 4/05/21 resulting in an estimated 1,310 kWh under submission as the volumes from May 19-February 2020 have not been recoiled as they are beyond the 14-month revision cycle, and • ICP 1000599753PCDB2 made active to on 16/04/21 was found to have an existing electrically connected meter on site and is likely to have been consuming since mid-2018 resulting in under submission. <p>ICP 0151745161LC3F3 was incorrectly backdated to “inactive” on 15 April 2021 for 25 June 2020 due to human error and reversed to “active” during the audit resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted.</p> <p>Two ICPs not active for the correct date as the NT request date was after the reconnection date resulting in consumption being reconciled to the incorrect period.</p> <p>One example of a disconnection read not being entered resulting 10kWh of under submission.</p> <p>Potential impact: Medium</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 because they ensure risks are mitigated to an acceptable level.</p> <p>The potential impact is low based on the kWh impact</p>	
Actions taken to resolve the issue		Completion date
		Remedial action status

Accuracy of submission information			
Non-compliance	Description		
	<p>Reconciliation: Reconciliation has no visibility over these ICP level of errors unless they result in significant discrepancy in consumption compared with previously submitted consumption. In that case, we investigate it and work with teams responsible to rectify prior to the submission.</p> <p>New Connections: A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections.</p> <p>Human error – provided as a training opp. Logged ticket.</p> <p>ICP 0151745161LC3F3 was incorrectly backdated to “inactive” on 15 April 2021 for 25 June 2020 due to human error and reversed to “active” during the audit resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted.</p>	<p>Ongoing</p> <p>March 2022</p>	Identified
	<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
	<p>New Connections: A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections so that the correct CO date is added even if only CO for certification.</p> <p><u>Revenue Assurance:</u></p> <p>Bridged meters: Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p>	<p>March 2022</p> <p>Ongoing</p>	

Forward estimate process			
Non-compliance	Description		
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Apr-20 To: 31-May-21	Some FE thresholds not met in some instances. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as they mitigate risk to an acceptable level. The audit risk rating is low as the Initial data is replaced with revised data and washed up.		
Actions taken to resolve the issue		Completion date	Remedial action status
Read attainment was impacted by COVID-19 restrictions and accuracy reduced. The implemented end-of-month read for the AMI sites we did have reliable data and easing back into normality will increase our read percentage & accuracy markedly."		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AMI rollouts have increased, with more than 200k sites now possessing AMI meters. Combined with the ongoing use of the EOM read process has resulted in a more robust process should similar events happen in the future.		Ongoing	

Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: 01-Feb-21</p> <p>To: 31-Aug-21</p>	<p>Historic estimate thresholds were not met for some revisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate because Covid-19 restrictions have had a negative impact on reading attainment and these issues are outside Trustpower's control.</p> <p>The audit risk rating is low as overall the meter reading attainment levels are high, but not as high as they have been previously.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Our R3 HE percentages have increased markedly largely as a result of the AMI rollout.</p> <p>The scenario that causes the non-compliance (embedded networks with a mix of high & low consumption sites and the high consumption site has restricted access) is still present. COVID-19 restrictions had notable impact on obtaining reads from these sites.</p> <p>We continue to monitor the FE volumes.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Our metering services team continue to progress on unread / restricted access sites that flow through to rectifying these scenarios. Also, the AMI rollout is continuing to have a positive impact on these volumes.</p> <p>Monthly reports that contain list of ICPs which have high consumption but low HE will be provided to Bill Data team post each R3 and R7 submission from April 2022. This will help the team prioritise read attainment from the ICPs that would make meaningful impact on improving HE proportion in submission data.</p>	<p>Ongoing</p> <p>Ongoing</p>	