

## Compliance plan for Paua to the People RP Audit - 2022

Provision of information			
Non-compliance	Description		
Audit Ref: 2.2 With: Clause 15.35  From: 01-Mar-21 To: 30-Sep-22	Three occurrences of failing to deliver submission files on time. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are strong as the is a schedule inbuilt within the system to alert users when submission files are due however key personnel availability resulted in delayed file delivery.		
Actions taken to resolve the issue		Completion date	Remedial action status
All reports are submitted to match the required submission schedule		Cleared	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We have introduced reminders to email us on days that reports are due. We have also added visible reminders on our Action and Reconciliation hubs. We now have automated the entire process so that AV reports can be produced within minutes of being happy with the data. All reports are checked prior to dispatch		Implemented	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Mar-21</p> <p>To: 30-Sep-22</p>	<p>Three late status updates.</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	
<b>Low</b>	The controls are adequate to ensure that the registry is updated on time most of the time. One late status update was caused by a backdated switch, and the other was a correction. The risk is low as a small number of updates were affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
We identified the ICP and resolved them as soon as they were located and prior to the audit	Cleared	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We recently implemented identification of consumption from ICP which the registry reports as disconnected. Alerts are prominently displayed on our Action and ICP Management Hubs for the operator to identify and fix. Our disconnection & reconnection process now has reminders built in to add to our to do list where we are unable to change the status because the ICP is in the switch process.	Implemented	

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1(k) of Schedule 11.1 From: 01-Mar-21 To: 30-Sep-22	ICP 0000157936TR838 was populated with an incorrect ANZSIC code. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong to ensure that the ANZSIC code is reviewed as part of the sign-up process. The risk is low as only one ICP was affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
The ANZSIC code has been changed	October 2022	Cleared
We have added a step to our onboarding process to check the ANZSIC code.	Implemented	

Management of "active" status		
Non-compliance	Description	
Audit Ref: 3.8 With: 17 Schedule 11.1 From: 01-Mar-21 To: 30-Sep-22	ICP 0000010333TR4E4 was populated with an incorrect inactive status. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong as Paua only complete disconnections remotely by AMI meter. The risk is low as only one ICP was involved.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have changed our processes to only use the disconnected by AMI Meter code.	Cleared	Cleared
We have changed our processes to only use the disconnected by AMI Meter code.	Implemented	

<b>Management of “inactive” status</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.9 With: Clause 19 Schedule 11.1  From: 01-Mar-21 To: 30-Sep-22	Three ICPs had consumption during inactive periods, indicating that their status was incorrect. Estimated under submission of 36 kWh has occurred.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Strong  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are rated as strong as there are system checks in place to capture this exception, however the system was offline for a period of time for a system upgrade.  The impact is low, because the impact on settlement and participants is four ICPs and 36 kWh.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The ICPs have been included in future submissions.	Completed	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We have now implemented identification of consumption of ICP which the registry reports as disconnected. Alerts are prominently displayed on our Home and ICP Management Hubs for the operator to identify and fix. Our disconnection & reconnection process now has reminders built in to add to our to do list.	Implemented	

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: 01-Mar-21 To: 30-Sep-22	Ten AN timing breaches. Four Transfer ANs applied the incorrect response code. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are assessed as strong because the process is automated, and all the late files occurred during the period the switching automation within the HHR data management system was offline to enable a system upgrade to be implemented. The impact is low because most of the late files were only a day or two late and the longest delay was no more than 10 business days late.	
Actions taken to resolve the issue	Completion date	Remedial action status
The automated switching system is now up, and we do not expect to operate without it going forward.	Implemented	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
With the upgrade to our system completed we should now be compliant. Future upgrades will not have to take this part of the system down.	Implemented	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 01-Mar-21</p> <p>To: 30-Sep-22</p>	<p>16 CS breaches due to the late delivery of a CS file.</p> <p>One transfer CS file contained an incorrect switch event read.</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	
<b>Low</b>	<p>Controls are assessed as strong because the process is automated, and all the late files occurred during the period the switching automation within the HHR data management system was offline to enable a system upgrade to be implemented.</p> <p>The impact is low because most of the late files were only a day or two late and the longest delay was no more than 10 business days late. The incorrect switch event reading was less than 200 kWh different, and the gaining trader was not settling the ICP as HHR.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The automated switching system is now up, and we do not expect to operate without it going forward.	Implemented	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
With the upgrade to our system completed we should now be compliant. Future upgrades will not have to take this part of the system down.	Implemented	

<b>Losing trader provides information - switch move</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3  From: 01-Mar-21 To: 30-Sep-22	Three AN breaches. Ten T2 breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are assessed as strong because the process is automated, and all the late files occurred during the period the switching automation within the HHR data management system was offline to enable a system upgrade to be implemented.  The impact is low because most of the late files were only a day or two late and the longest delay was no more than six business days late.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The automated switching system is now up, and we do not expect to operate without it going forward.	Implemented	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
With the upgrade to our system completed we should now be compliant. Future upgrades will not have to take this part of the system down.	Implemented	



<b>Gaining trader changes to switch meter reading - switch move</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.11 With: 12 Schedule 11.3  From: 01-Mar-21 To: 30-Sep-22	Switch event reading not used for ICP (0000047860TR436). Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are assessed as strong because the process is automated, and the failure to issue RR files occurred during the period the switching automation within the HHR data management system was offline to enable a system upgrade to be implemented.  The impact is low as the volumes are small.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The opening read for 0000047860TR436 has been adjusted to match the supplied estimate.	Cleared	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
With the upgrade to our system completed we should now be compliant. Future upgrades will not have to take this part of the system down.	Implemented	

<b>Withdrawal of switch requests</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 4.15</p> <p>With: Clause17 and 18 Schedule 11.3</p> <p>From: 01-Mar-21</p> <p>To: 30-Sep-22</p>	<p>Two AW files were delivered late.</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>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are assessed as strong because the process is automated, and the failure to issue AW files on time occurred during the period the switching automation within the HHR data management system was offline to enable a system upgrade to be implemented.</p> <p>The impact is low because the delay in providing the AW files was no more than six business days.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The automated switching system is now up, and we do not expect to operate without it going forward.	Implemented	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
With the upgrade to our system completed we should now be compliant. Future upgrades will not have to take this system down.	Implemented	

<b>Correction of HHR metering information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 8.2 With: Clause 19(2) Schedule 15.2  From: 01-Mar-21 To: 30-Sep-22	Some HHR consumption volume not accounted for during a HHR meter change for ICP 0000121079TR333.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are strong because the estimation process is robust for most scenarios. The impact is low because the volume affected is small.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Adjusted volume included in future volumes	Oct 2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
The SUM Check we conduct daily will pick up meter changes and each is individually accessed	Implemented	

<b>Meter data used to derive volume information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 9.3 With: Clause 3(5) Schedule 15.2  From: 01-Mar-21 To: 30-Sep-22	The HHR aggregates information is not aligned with HHR submission volumes for September R1 and R3.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are strong as the process to generate these files simultaneously ensures data alignment.  The impact is low, because the aggregates are not used to calculate reconciliation results and the differences between the volumes and aggregates are less than 1%.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Cycle 14 Reports matched	Cleared	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
FOXworks presents the operator with a checksum to enable the volumes of the two reports to match.		

Half hour estimates		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 15 Schedule 15.2  From: 01-Mar-21 To: 30-Sep-22	The estimation performed for ICP 0000126746TR077 did not match the consumption calculated from the supplied midnight reads by 11 kWh.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong because the estimation process is robust for most scenarios. The impact is low because the volume affected is 11 kWh.	
Actions taken to resolve the issue	Completion date	Remedial action status
Volume included in future volumes	Oct 2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The SUM Check we conduct daily will pick up meter changes and each is individually accessed	Implemented	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 01-Mar-21 To: 30-Sep-22</p>	<p>Three ICPs where consumption occurred during an inactive period resulting in under submission of HHR volumes.</p> <p>The estimation performed for ICP 0000126746TR077 did not match the consumption calculated from the supplied midnight reads by 11 kWh.</p> <p>Some HHR consumption volume not accounted for during a HHR meter change for ICP 0000121079TR333.</p> <p>Submission files delivered late on two occasions.</p> <p>AV-090 Submission file for December 2020 R14 included corrupt data for one trading period.</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	
<b>Low</b>	<p>Controls are assessed as strong as:</p> <ul style="list-style-type: none"> <li>there is an automated process to alert users where inactive consumption occurs and the exceptions occurred during the period the action hub within the HHR data management system was offline to enable a system upgrade to be implemented,</li> <li>the estimation process has a check in place to ensure volumes align with midnight reads where these are available, and</li> <li>late delivery of submission files was due to key personnel availability.</li> </ul> <p>The impact is low because the volume affected is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Correct HHR volume for the corrupted period was reloaded	Cleared	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our system has several checks and balances to ensure that the reports are accurate including comparisons against days expected, last month's submission, previous submissions, and that the AV140 and AV090 sum matches.	Implemented	

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 01-Mar-21 To: 30-Sep-22</p>	<p>Three ICPs where consumption occurred during an inactive period resulting in under submission of HHR volumes.</p> <p>The estimation performed for ICP 0000126746TR077 did not match the consumption calculated from the supplied midnight reads by 11 kWh.</p> <p>Some HHR consumption volume not accounted for during a HHR meter change for ICP 0000121079TR333.</p> <p>AV-090 Submission file for December 2020 R14 included corrupt data for one trading period</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	
<b>Low</b>	<p>Controls are assessed as strong as:</p> <ul style="list-style-type: none"> <li>there is an automated process to alert users where inactive consumption occurs and the exceptions occurred during the period the action hub within the HHR data management system was offline to enable a system upgrade to be implemented, and</li> <li>the estimation process has a check in place to ensure volumes align with midnight reads where these are available.</li> </ul> <p>The impact is low because the volume affected is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
See previous commentary.	Cleared	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our system has many checks to identify potential issues and alert an operator for a fix.	Implemented	