

Compliance plan for Electric Kiwi - 2021

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 & 15.2 From: 01-Jan-20 To: 31-Dec-20	Incorrect information in the registry for small number of ICPs 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	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Audit risk rating is recorded as low because the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will review sign up logic to create a follow up ticket for our CX Team in relation to "B" installation flags with subsequent actions to follow up and resolve.		31 Aug 2021	

Description	Recommendation	Audited party comment	Remedial action
The installation flag "B" recorded by distributors could be incorrect. Import/Export meter is not installed	Establishing a process to check the correctness of the installation flag during a customer sign up and also monitor changes to the installation flag uploaded by distributors when Electric Kiwi is responsible for such ICP.		

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Jan-20 To: 31-Dec-20	Some late status and trader updates 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. The Electric Kiwi customer base has grown significantly since the last audit. It is a credit to the company that their level of compliance has improved. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
Audit Compliance Reporting has been established that will be run quarterly to identify issues sooner.		31 May 2021	

Non-compliance	Description		
Audit Ref: 3.5 With: 9 of Schedule 11.1 From: 01-Jan-20 To: 31-Dec-20	Profile and type of reconciliation incorrect in the registry 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. Electric Kiwi traded UML ICPs on rare occasions. A strong process is in place. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
Electric Kiwi will re-apply for exemption status in relation to UML		1 March 2021	

Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: 9(1)(k) of Schedule 11.1</p> <p>From: 01-Jan-20</p> <p>To: 31-Dec-20</p>	<p>2 ICPs had the code "T994" recorded; ANZSIC code "T30*" was assigned to premises where construction was possibly complete</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 rated as moderate. The current process needs to be more stringent to validate the ANZSIC code during the sign up process. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
<p>Electric Kiwi already includes a step in the sign-up process to confirm with customers the ANZSIC code where indicated that construction is still underway. The process requires an additional follow up step where customers do not respond within 2 weeks of contact.</p>		31 March 2021	

Description	Recommendation	Audited party comment	Remedial action
<p>ANZSIC codes are assigned to a number of ICPs indicating that they are still under construction, which is most likely incorrect. Electric Kiwi does not trade new connections</p>	<p>During the customer sign up process, ascertain if their premises is still under construction or complete. Change ANZSIC code in the registry accordingly</p>		

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Jan-20</p> <p>To: 31-Dec-20</p>	<p>Calculation of average kWh per day does not comply with Registry Functional Specification v22.32. Incorrect switch event meter reading provided in CS files for some Arc Innovation meters</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once 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 rated as moderate. Electric Kiwi assured us that the fix for ARC meters has been developed but not yet implemented. It created unnecessary traffic of RR files. ARCS meters will be replaced by NGCM in the future but currently ELKI trades 4,500 ARCS meters. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
System improvements have already been scoped and are ready for prioritization		31 August 2021	

Non-compliance	Description		
Audit Ref: 4.10 With: 11 of Schedule 11.3 From: 01-Jan-20 To: 31-Dec-20	Calculation of average kWh per day does not comply with Registry Functional Specification v22.32. Incorrect switch event meter reading provided in Cs files for some Arc Innovation meters 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	The controls are rated as moderate. Electric Kiwi assured us that the fix for ARC meters has been developed but not yet implemented. It created unnecessary traffic of RR files. ARCS meters will be replaced by NGCM in the future but currently ELKI trades 4,500 ARCS meters. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
System improvement has been scoped and is ready for prioritisation		31 August 2021	

Non-compliance	Description		
Audit Ref: 4.15 With: 17 of Schedule 11.3 From: 01-Jan-20 To: 31-Dec-20	61 late NW files (more than 2 months) Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. They are sufficient to mitigate risk in most cases. Only 1.4% NW files were late. The audit risk rating is low, a small number of files were affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
No further actions to be taken			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Unable to implement further preventative actions.			

Non-compliance	Description		
Audit Ref: 6.1 With: 10.13 and 15.2 From: 01-Jan-20 To: 31-Dec-20	Energy is not metered and quantified according to the Code where meters are bridged Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Upon receiving advice from MEP that a site has been bridged, Electric Kiwi takes action to unbridge the meter and estimate usage for the period in question.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No preventative actions identified.			

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Jan-20 To: 31-Dec-20	HHRAGGR files do not contain electricity supplied information 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	Electric Kiwi submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No action required from Electric Kiwi			

Non-compliance	Description		
Audit Ref: 12.9 With: Clause 2 of Schedule 15.3 From: 01-Jan-20 To: 31-Dec-20	Incorrect profile used for UML submissions in Nov'20 and Dec'20 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. Reconciliation processes are well documented, many checks are in place. There was a change of personnel and the documentation did not reflect what profiles should be used for UML in NHHVOLS file. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Changes have already been implemented to enable Electric Kiwi to use the correct profile for UML submissions		January 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	