

Compliance plan for Trustpower RP– 2021

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. 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
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.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Exception Reporting continues to be used and enhanced to identify and resolve any discrepancies that occur between GTV and the Registry.		Ongoing
		Identified

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 01-Apr-20</p> <p>To: 28-Feb-21</p>	<p>68 reconnected ICPs were not certified within five business days of becoming active.</p> <p>One metered newly connected ICP was not certified within five business days of becoming active of the 15 ICPs sampled.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice 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. 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
Current reporting identifies ICP's that were not re-certified within 5 business days of being reconnected. MEP's are then notified by TRUS. The re-certification of the metering in most instances is not being done so this continues to make us non-compliant.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As the AMI Deployment rollout continues and completes over the next 12 months, we expect to see less reconnections being made on uncertified sites.</p> <p>We continue to monitor and engage our MEP's to ensure certification is performed within the expected timeframes for New Connections.</p>		1 January 2022	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Apr-20</p> <p>To: 28-Jan-21</p>	<p>2,964 ICPs did not have trader information updated on the registry within five business days of the event date.</p> <p>245 ICPs were not updated to inactive status on the registry within five business days of the event date.</p> <p>446 ICPs were not updated to active status on the registry within five business days of the event date.</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 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
Trustpower continues to look for opportunities to refine our reporting and processes to improve our performance in updating registry information within 5 business days. We continue to work with our MEP's to ensure timely updates of information where changes are required to existing data.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Trustpower has made process changes to ensure incorrect active status updates are being made during corrections of inactive statuses.</p> <p>Reporting will also be created to look for sites where the meter removal date and decommissioned status date differ to avoid late backdated inactive statuses being entered.</p> <p>Trustpower also continues to engage with third parties (MEPs) to reduce the number of late MEP nominations.</p> <p>Trustpower reporting has been corrected to pick up all double disconnection statuses in a row, historically was only looking at 1,4 statuses.</p> <p>A review of our Safety Disconnection Process will be done to see if gaps can be closed in late network notifications.</p> <p>Last year a historic report established for ANZSIC discrepancies was brought up to date. Now results are current we anticipate a reduction in backdated corrections being made.</p>		15 December 2021
		Identified

Trader responsibility for an ICP			
Non-compliance	Description		
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 01-Apr-20</p> <p>To: 28-Feb-21</p>	<p>24 ICPs with the incorrect MEP nominated in the first instance.</p> <p>MEP not notified for one of the ten decommissioned ICPs checked.</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 strong, as the reporting and processes have been strengthened to address the non-compliances identified. This will mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the correct MEP subsequently nominated and accepted in all cases.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Due to the sale of our own MEP new processes and procedures were needed to be set up to align with alternate MEP's. All nominations to incorrect MEP's in the first instance have now been addressed and corrected.</p> <p>The MEP has now been notified of the ICP (0000200200CT087) that had been decommissioned, asking them to collect the assets if required.</p>		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Team knowledge and training gaps have been addressed and documentation updated so that correct MEP nominations are made in the first instance.</p> <p>Automation is being enhanced so that manual selection in most instances is not required when processing a New Connection.</p> <p>New process created with IHUB so that if they are using a MTRX meter (due to Meterboard room issues) instead they are notifying TRUS early so a correction nomination can be made.</p> <p>Current Reporting will be enhanced to identify ICP's at Decommissioned or Ready for Decommissioning Statuses that do not already have a Service Order raised to alert the MEP for the collection of their assets.</p>		15 December 2021	

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-Apr-20</p> <p>To: 28-Feb-21</p>	<p>ICP 0001113373WM8B8 unmetered load details not populated when electrically connected.</p> <p>642 late updates to active status for new connections.</p> <p>Six new ICPs had incorrect active status dates of the sample checked.</p> <p>157 late ANZSIC codes not updated within 20 days of commencing trading.</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>The non-compliances for the New Connections process have been analysed and accepted. Corrections have been made where appropriate.</p> <p>With the sale of our own MEP we have made considerable changes within our New Connections process to incorporate working with new MEP's. This has taken some time to iron out.</p>		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>An existing report giving visibility across all valid trader fields for unmetered ICP's has been enhanced and picks up all anomalies for correction.</p> <p>Weekly Reporting provides visibility across different MEP's and we continue to work actively with any MEP's that are not delivering us information to update the Registry within required timeframes.</p> <p>An existing report that compares active statuses for New Connections (IED date, Registry date, GTV date, Certification Date) has been enhanced and additional training has been given and process documentation updated so that accuracy can be delivered.</p> <p>An ANZSIC discrepancy report which picked up backdated discrepancies is now up to date so backdated corrections should no longer be necessary.</p>		15 December 2021	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 9 (1(k) Schedule 11.1</p> <p>From: 01-Apr-20</p> <p>To: 28-Jan-21</p>	<p>One ICP with a T99 series ANZSIC code.</p> <p>Nine category 2 ICPs with a residential ANZSIC code applied.</p> <p>24 ICPs of the 150 ICPs sampled with an incorrect ANZSIC code applied.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>Controls are rated as moderate and will mitigate risk most of the time but there is room for improvement.</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
All ICP's on this list have since been corrected. Some of the sites found here have appeared on our reporting. We think they were missed due to the volume on the reports and the number of different reports in different places.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
We created a new report to look into Category 2 meters with residential ANZSIC codes which we didn't have before, and after finding some issues with our logic/code for ANZSIC, we will work through with our analytics team to improve those reports. We have also moved our reporting to Power BI which provides better filtering, easier access and a better way to displaying the data.		15 July 2021.

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-Apr-20</p> <p>To: 28-Jan-21</p>	<p>19 ICPs had incorrect daily unmetered kWh recorded on the registry and were corrected during the audit.</p> <p>The unmetered load details for ICP 0001113373WM8B8 were not recorded until 9/03/21.</p> <p>ICP 0000175658WT7E2 incorrectly recorded as a 12-hour supply when it should be 24-hour supply.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 as the number of discrepancies whilst still small indicates that there is an opportunity for improvement.</p> <p>The impact on settlement and participants is minor, as the discrepancies are small.</p>	
Actions taken to resolve the issue		Completion date
<p>We continue to address discrepancies and errors to maintain accurate retailer unmetered information on the Registry.</p> <p>(ICP 0000175658WT7E2 has been updated to 24-hour supply) - Cleared</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>An existing report giving visibility across all valid trader fields for unmetered ICP's has been enhanced and picks up all anomalies for correction.</p> <p>During the previous year we had a higher than usual number of unmetered ICP's created due to a Chorus Project which has now been completed. This should mean that we see fewer unmetered ICP's being processed.</p>		Complete
		Identified

Management of “active” status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 of schedule 11</p> <p>From: 01-Apr-20</p> <p>To: 28-Feb-21</p>	<p>Six new ICPs had incorrect active status dates of the sample checked.</p> <p>ICP 1000510999PCD42 had active status recorded from 13/08/19 but should have had active status recorded from 24/07/19.</p> <p>ICP 0000519838BU421 identified in the 2020 audit not corrected during the audit period.</p> <p>Potential impact: Low</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 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
All ICP's with incorrect active status dates identified in the audit have now been corrected in both GTV and the Registry.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
An existing report that compares active statuses for New Connections (IED date, Registry date, GTV date, Certification Date) has been enhanced and additional training has been given and process documentation updated so that accuracy can be delivered.		Complete
		Cleared

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 09-Mar-20</p> <p>To: 09-Mar-20</p>	<p>ICP 0000511333WEE0E incorrectly recorded as electrically disconnected due to the being meter disconnected and reconnected on the same date of 9/03/20.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 the processes in place are robust and will mitigate risk to an acceptable level.</p> <p>The impact is none as this event was sent to the registry when it wasn't required so there is no impact on reconciliation hence the lowest rating of low has been selected.</p>	
Actions taken to resolve the issue		Completion date
The incorrectly recorded status of (1,9) for ICP 0000511333WEE0E has since been reversed from both GTV and the Registry and is now correct and accurate.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Existing Trustpower reporting has been corrected to pick up all double disconnection statuses in a row. Historically it was only looking at the 1,4 which means that ICP 0000511333WEE0E had been overlooked.		Complete
		Cleared

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 03-Jan-19</p> <p>To: 30-Oct-19</p>	<p>18 ICPs with proposed event dates greater than ten business days of the NT receipt date.</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 AN code assignment is automated based on hierarchy and the AN proposed dates process is robust.</p> <p>The impact is assessed as low as the AN dates matched those requested by the gaining trader.</p>	
Actions taken to resolve the issue		Completion date
Reporting was already in place to identify the proposed event dates in the AN file (automated) being greater than 10 business days of the NT receipt date (after the AN had been sent) and in all instances, prior to the switch being completed a NWDF was sent to the gaining trader, asking for a new switch request to be sent closer to the intended event date.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
A JIRA ticket has been raised with our Delivery Team so that the automation within GTV can be changed. If a NT is received for a TR switch and the requested event date > 10 business days into the future then the requested event date will be ignored and instead TRUS will set the switch event date based on the standard parameters set up in GTV. This proposed event date will instead be sent within the AN response file. Once this ticket has been completed there will be no further non-compliances for this.		15 December 2021
		Identified

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-Dec-20</p> <p>To: 01-Dec-20</p>	<p>CS average daily consumption of zero was invalidly recorded for 0012132394ELAA1 (1/12/20).</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
A thorough investigation has been completed on this ICP and the cause was found to be a human error/training issue. A reading had been populated manually into GTV as an actual read using an inaccurate date. This was then used by GTV to calculate the zero ADL value (correct logic) which turned out to be zero as the read entered was the same as the previous read but just a few days apart. GTV looks at the last read to read cycle for calculation. The switch for this ICP has since been withdrawn for metering issues and has now switched again correctly with an accurate ADL value		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
The training issue has been identified and addressed and procedure documents updated. We will continue to monitor zero ADL values within our outgoing CS files for any other issues. This process is now totally automated and fully tested so controls continue to be strong		Ongoing
		Identified

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: 01-Apr-20</p> <p>To: 28-Jan-21</p>	<p>One AN file had the incorrect response code applied.</p> <p>One AN file sent for ICP 0000912258TU8AA with an event date earlier than the gaining trader requested.</p> <p>50 T2 breaches (CS file not issued within five business days of the NT file).</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 the AN process is robust and has been updated to ensure that CS files are released within the required timeframe.</p> <p>The impact is assessed as low as the CS files sent were up to seven days late so impact on reconciliation will be minor.</p>	
Actions taken to resolve the issue		Completion date
<p>Following investigations as to why a MU (unmetered) AN code was auto selected for ICP 1000519760PC9AF, I have determined that the correct AN code was selected for the event date that GENE requested ICP from (01/01/2020) which was a date prior to when the current metering had been installed. The request date (01/01/2020) was a mistake and should have been 01/10/2020 so GENE sent a NWDF and when new NT request came through, accurate AN code was sent via GTV automation.</p> <p>ICP 0000912258TU8AA although an inaccurate proposed event date was sent within the AN file an accurate event date was used within the switch itself and the resulting CS file.</p> <p>We continue to monitor CS time breaches (CS file sent outside 5 business day rule) via daily and monthly reports.</p>		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

<p>Monitoring and training continue, with regards to the correct AN code being used if being manually selected. Most of AN code selection is automated eliminating the risk of incorrect codes being sent.</p> <p>A JIRA ticket has been raised with our Delivery Team so that GTV will not allow a user in the future to select an AN proposed event date earlier than what the gaining trader has proposed for move in switches, eliminating the risk of this human error being made in the future.</p> <p>A training issue has been addressed with the team who were intentionally waiting for an AMI read to come in (reads take >2 days to be delivered from MEPs) so although were warned of the CS timing breach were choosing to wait for the read. This misunderstanding has been addressed and instead the team will use an estimated final read in these scenarios to avoid the breach in timeliness.</p>	<p>15 December 2021</p>	
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Losing trader determines a different date - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: Clause 10(2) Schedule 11.3</p> <p>From: 02-Dec-20 To: 29-Dec-20</p>	<p>One AN file sent with an event date earlier than the gaining trader requested.</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 rated as strong as processes and reporting in place will mitigate risk.</p> <p>The impact is assessed as low as this was a one-off human error and the switch was completed for the requested date.</p>	
Actions taken to resolve the issue		Completion date
ICP 0000912258TU8AA - although an inaccurate proposed event date was sent within the AN file an accurate event date was used within the switch itself and the resulting CS file.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
A JIRA ticket has been raised with our Delivery Team so that GTV will not allow a user in the future to select an AN proposed event date earlier than what the gaining trader has proposed for move in switches, eliminating the risk of this human error being made in the future		15 December 2021
		Identified

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12 of Schedule 11.3</p> <p>From: 01-Apr-20</p> <p>To: 28-Jan-21</p>	<p>Six late RR files for switch moves.</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 the processes in place mitigate risk are robust.</p> <p>The potential impact is low as the number of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date
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.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
We have built a new report that shows ICPs that have had a RR accepted where the date or read has not yet been updated in GTV. This is being monitored daily.		Complete
		Identified

Non-compliance	Description		
<p>Audit Ref: 4.12</p> <p>With: Clause 14 of Schedule 11.3</p> <p>From: 01-Apr-20</p> <p>To: 28-Jan-21</p>	<p>All HH switch requests sent with the incorrect profile of GXP.</p> <p>One Category 2 AMI site requested as a HH switch.</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 as there is reporting in place to identify and get these corrected..</p> <p>The potential impact is low as the number of ICPs affected is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>HH switch requests (NTs) are sent to the Registry initially with the incorrect profile of GXP. This is an automated process inside GTV. However, there are strong controls in place that identifies these scenarios and the GXP profile is reversed and replaced both inside GTV and the Registry promptly so that it is corrected.</p> <p>ICP 0697790108LC6AF was initially requested as a HH switch in error, but subsequently the switch was withdrawn and re-requested correctly as a Switch Move In.</p>		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A JIRA ticket has been raised with our Delivery Team so that GTV will use the correct profile (HHR) when sending NT switch requests to the Registry for a HH Switch.</p> <p>Further training and process updates have been addressed within the Time of Use Team to ensure they are selecting the correct Switch Type when processing a registration (HH vs MI switch types). This error occurred only once so stronger controls not required.</p> <p>A JIRA ticket has been raised with our Delivery Team so that when a sign up is being completed for a HH or Category 2 and above ICP an alert is raised within the GTV wizard to ask the user to double check whether a HH switch or a Switch Move In Switch Type should be used.</p>		15 December 2021	

Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clause 17&18 of schedule 11.3</p> <p>From: 01-Apr-20</p> <p>To: 28-Jan-21</p>	<p>One incorrect NW code found of the sample checked.</p> <p>69 NA breaches, where the NW arrival date was more than two calendar months after the CS actual transfer date.</p> <p>14 SR breaches, where the NW was issued more than ten business days after the initial NW.</p> <p>Eight WR breaches, where the AN or CS arrival date (whichever is applicable, may be one or both) are delivered by the losing trader more than two business days after the arrival date of the AW rejecting the withdrawal and a subsequent NW is not provided before delivery of the AN or CS.</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 they mitigate risk to an acceptable level.</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>For ICP 0000474695UNFCE where the incorrect NW code was sent we accepted the AW and sent another NW with the correct code.</p> <p>We will continue to send late NW files when it is vitally important to make corrections that otherwise would impact our customer.</p>		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The training issue with regards to an incorrect NW code being manually selected has been identified and was a one of human error. The switching team have re-addressed this as a team.</p> <p>A new working report has been requested to monitor the timeframes around NW files and to ensure that no new NW's are sent if it has been > 10 business days since the initial NW was sent.</p> <p>A further working report has been requested to monitor the timeframes for AN/CS files being sent within 2 business days of an AW being rejected.</p>		15 December 2021	

Switch saving protection		
Non-compliance	Description	
<p>Audit Ref: 4.17</p> <p>With: Clause 11.15 AA-11.15 AC</p> <p>From: 01-Apr-20</p> <p>To: 21-Jan-21</p>	<p>Saves and win-back activity undertaken within 180 days of the ICP being requested to switch.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating:6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as weak as the process in place does not mitigate risk and there is room for improvement.</p> <p>The impact is assessed to be medium because it is likely that the number of issues found are an indication of the number of switches that have been withdrawn incorrectly.</p>	
Actions taken to resolve the issue		Completion date
<p>At the time that this code change was introduced, there was industry confusion regarding what could and couldn't be said. To help retailers, in July 2020, the EA produce some helpful Guidelines to ensure best practice.</p> <p>Subsequent to these Guidelines being publish (July/August 2020), further training was undertaken.</p> <p>ICP 00004010431WM74, this was an individual training issue and our review of a much larger sample of calls indicated that this does not appear to be common practice. The customer states "so it might be best for us to wait until then?" Agent agrees. Rather than saying – it's entirely up to you. The Agent thought they were just answering the customer's question and not trying to entice them to stay. This highlights that the highly complex nature of this rule, which can be open to subjectivity.</p> <p>We intend to carry out an end to end review of our processes and training to further strengthen our knowledge and practices.</p>		30 May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

<p>A complete change in approach has been taken to ensure our commissioned Agents were not taking a sales approach to these calls. In Feb/March 2021, the team managing this process are now all non-commissioned based paid and focused on the customer offboarding.</p> <p>Of the 429 CX withdrawals, a further check was done on 30 calls, to ascertain if there were any further failings or potential breaches in relation to (Clause 11.15AA to 11.15AB), Switch Save Protect. None were identified; however, it was noted that the use of the CX code potentially may be incorrect for 10% of the calls listened to. This was due to where a customer has advised they had no knowledge of a switch or no intent to switch but were seeking pricing only. My understanding of the Electricity Registry NW Advisory Codes would indicate, we should have used UA (unauthorised) in these instances not CX. We will review our switch withdrawal process to determine if there is an issue.</p>	Complete	
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Unmetered threshold		
Non-compliance	Description	
<p>Audit Ref: 5.2</p> <p>With: Clause 10.14 (2)(b)</p> <p>From: 01-May-20</p> <p>To: 21-Jan-21</p>	<p>Unmetered load threshold exceeded for eight ICPs.</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 rated as strong, as unmetered thresholds are monitored and managed with robust controls.</p> <p>The impact is assessed to be low as these are historic ICPs and the load is known and is being reconciled correctly.</p>	
Actions taken to resolve the issue		Completion date
The Auditor suggested applying for an exemption again for those ICP's. This is currently waiting on the outcome of a meeting with Chorus that is taking place in May 2021.		30 May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
The outcome of the meeting noted above will decide whether they will do the exemption application again or push for meters to be installed.		30 September 2021

Unmetered threshold exceeded		
Non-compliance	Description	
<p>Audit Ref: 5.3</p> <p>With: Clause 10.14 (5)</p> <p>From: 01-May-20</p> <p>To: 21-Jan-21</p>	<p>Eight ICPs with an unmetered load greater than 6,000kWh per annum not resolved within 20 business days of the exemption expiring.</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 rated as strong, as unmetered thresholds are monitored and managed with robust controls.</p> <p>The impact is assessed to be low as these are historic ICPs and the load is known and is being reconciled correctly.</p>	
Actions taken to resolve the issue		Completion date
The Auditor suggested applying for an exemption again for those ICP's. This is currently waiting on the outcome of a meeting with Chorus that is taking place in May 2021.		30 May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
The outcome of the meeting noted above will decide whether they will do the exemption application again or push for meters to be installed.		30 September 2021
		Identified

Distributed unmetered load			
Non-compliance	Description		
<p>Audit Ref: 5.4</p> <p>With: Clause 11 Schedule 15.3</p> <p>From: 01-Jun-18 To: 26-Mar-20</p>	<p>Errors found in 13 databases, one database still to be audited and three audits are overdue.</p> <p>For those completed the specific findings are detailed in the DUML database audit reports.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The effectiveness of the controls is recorded as moderate as Trustpower actively works with its DUML customers to provide complete and accurate information.</p> <p>The impact on settlement is major because the incorrect submission figures are major when considered across all databases.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The vast majority of DUMLS that we have issues with are those related to NZTA. The EA is aware of the ongoing issues that all retailers are having with NZTA. We have committed a lot of resource to try and resolve these issues and welcome the EA's further intervention with NZTA to resolve this issue for all retailers.</p> <p>Speaking specifically to the audits that are overdue/incomplete.</p> <p><u>NZTA West Waikato</u></p> <p>The Principal Network Manager has engaged a consultant to produce the monthly load report for the Waikato area and a second contractor to help with data management through McKays (head contractor). Trustpower is working with NZTA to engage a contractor to complete a full field audit with the expectation that a compliant database will be established and that the improved data management practises will meet the future requirements.</p> <p><u>NZTA Otago</u></p> <p>NZTA lights in the Clutha District Council (CDC) have been included in the CDC RAMM database as confirmed in their recent audit (except for a small number of individual fittings). Trustpower is in the process of confirming those fitting details and establishing individual UML ICP's for each.</p> <p>With the NZTA lights removed, the existing ICP will now include only those lights in the Waitaki District Council (WDC) jurisdiction for which Trustpower understands WDC hold a</p>		Complete	Identified

compliant database. Trustpower is in the process of scheduling an audit for that database.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Overall, Trustpower believe we have good governance in place, we know what audits are required, when and what the issues are, and we monitor this via a monthly governance meeting.</p> <p>We successfully manage a number of council, contractor and other 3rd party relationships – there have been material corrections made in a number of areas.</p> <p>We have strong internal capability in terms of understanding requirements, and effective DUML management process.</p> <p>While we have ongoing challenges with NZTA in particular – these are well known to the EA. As outlined above, plans are in place for corrections to continue to occur.</p> <p>Trustpower retails across 18 DUML databases with ~60 ICPS. The volume submitted to market for all DUML volume in March 2021 was ~700,000 kWh (between 8.5 GWh and 9 GWh annually). While we do not dispute that we continue to manage exceptions and errors under many of these databases, some database are in fact being managed well and have no of very minor errors (as reflected in a recent 24 month audit renewal period for Western BOP NZTA). Often errors are corrected quickly and do not affect submissions in an ongoing way.</p> <p>A view that the market submission impact arising from errors across all databases is major, is subjective. Errors often only amount to a few lights and minimal volume. Given this context, the low number and relatively low volume of overall submission in total (compared to the scale of our total energy purchase submission), Trustpower's view is that the impact is no more than low to moderate.</p>	Ongoing	

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: 19-Jul-18</p> <p>To: 28-Feb-21</p>	<p>ICP 0002211488TGB0D has wind generation and PV1 profile is recorded, instead of EG1.</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 36 ICPs.</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>Controls are rated as strong with as there are robust processes in place.</p> <p>Submission information is estimated for the bridged period so the impact on submission accuracy is considered low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The profile for ICP 0002211488TGB0D has now been corrected to EG1.</p> <p>Our controls to find Bridged meters are sufficient, sites are identified, and energy is calculated and reconciled using estimates as accurately as possible using historical consumption is available, or consumption post bridged period if historical data is not available. We will continue to monitor our reports and reconcile energy as required for bridged meters.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>An existing report has now been enhanced that picks up generation ICPs with a fuel type of wind to ensure that the correct profile (EG1) is populated.</p>		Complete	

Interrogate meters once			
Non-compliance	Description		
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Apr-20 To: 28-Jan-21	Exceptional circumstances not proven for two of a sample of ten ICPs not read during the period of supply. 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, 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
This is a rare occurrence and we do not currently have technology to resolve this issue short term but will implement a long-term preventative approach.		n/a	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will implement new technology to be able to gain access information and communicate with customer using email and text. New technology would be scalable and efficient ensuring we reach more customers.		September 2021	

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-20 To: 29-Mar-21	Raw meter data is rounded upon receipt and not when volume information is created. Potential impact: Low Actual impact: None Audit history: Once 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 no impact because no metered consumption information is “missing”, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
No action currently as technology change required long term		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
Will resolve with integration of MDM data to GTV. Strategic priorities have pushed this piece of work out from May 21 to November 22.		30 November 2022
		Identified

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Apr-20 To: 29-Mar-21	Event information is not analysed and acted upon for all MEPs. Potential impact: Low Actual impact: Low Audit history: None 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
We are reviewing our processes in partnership with the MEPs to ensure we are getting the data we need sent to us and then actioned on our side.		30 August 2021
Preventative actions taken to ensure no further issues will occur		Completion date
We are following Steve's suggestion of understanding events we need to look at and will set up the appropriate technology and reporting processes to manage the data.		30 November 2021
		Identified

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Aug-19 To: 30-Mar-21	Incorrect ICP days for four ICPs. 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 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
The existing revision cycle will replace with updated ICP days files		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
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

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Apr-20</p> <p>To: 29-Mar-21</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>Controls are rated as strong as the issue relating to content of the aggregates file is an error in the code, Trustpower are providing submission information as expected.</p> <p>The HHR aggregates file cannot contain electricity supplied information, or other reports relying on the aggregates file will not be accurate, therefore I consider this matter does not have a risk rating.</p>	
Actions taken to resolve the issue		Completion date
Due to code contradictions, we are unable to comply		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
We were under the impression that this contradiction was being addressed by the EA. We have yet to see any updates.		n/a
		Identified

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Mar-20 To: 31/4/2020	ICP 0000880323NVEBD was not submitted in March and April 2020 for Day 4 but was in the Day 13 files for both months. 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 strong, only one ICP had a discrepancy. The impact on settlement is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Natural revision cycle has ensured that the volumes have been included.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Additional checks taken during file creation process		Complete

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 03-Oct-19</p> <p>To: 08-Nov-19</p>	<p>One ICP from the previous audit with an accepted RR read that was not used, resulting in under submission of 450 kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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. Although the RR reads are not visible to the user in some cases, they are present in GTV.</p> <p>The potential impact is low based on the kWh difference. This ICP did not have the reading changed because it switched out.</p>	
Actions taken to resolve the issue		Completion date
The amended SWG read was not passed from switching form billing to be applied before the site switched out. Due to the site no longer being retailed by TRUS this cannot be cleared.		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
Additional reporting implemented to capture scenarios for an amended switch read has been received and not applied.		Complete
		Cleared

Permanence of meter readings for reconciliation			
Non-compliance	Description		
Audit Ref: 12.8 With: Clause 4 of Schedule 15.2 From: 01-Mar-19 To: 30-Apr-19	Forward estimates were not replaced by revision 14 for March and April 2019. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as the reporting has since been modified to capture all ICPs with FE remaining. The impact is low. Total forward estimate for the ICP was 577 to 580 kWh.		
Actions taken to resolve the issue		Completion date	Remedial action status
Report updated to account for anomaly.		Complete	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional peer review checks to be undertaken to identify any FE remaining at 14-month revision.		Complete	

Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Jun-19 To: 31-Aug-20	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
The non-compliances span a period encompassing our meter reading outsourcing project as well as the COVID-19 lockdown period. Due to the large number of legacy meters installed during these periods read attainment was impacted and accuracy reduced. We implemented an end-of-month read for the AMI sites we did have reliable data for at the time (~95k) and this increased our read percentage & accuracy markedly		Complete
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
		Identified

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-20</p> <p>To: 31-Aug-20</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 as the move from inhouse meter reading resulted in a drop in meter reading attainment resulting in more FE and lower HE attainment. Significant improvements have been made and it is likely the results will continue to improve over the next audit period.</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 HR percentages have increased markedly since last audit 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. We continue to monitor the FE volumes.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We proposed a change for this part of the code suggest a different approach including a materiality portion but are yet to receive a response from the EA.</p> <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>		Ongoing	