

Compliance plan for AIAL Distributor – 2021

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) From: 01-Aug 18 To: 31-Jan-21	Initial electrical connection date not populated for six ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as there is room for improvement. The impact is low because of the low number of ICPs affected.	
Actions taken to resolve the issue		Completion date
There were 6 ICP's identified as not having an IED which went Active between Sept-2013 and Feb-2016 when Vector were providing the registry functions, the IED for 1 of these has since been populated, the other 5 are now all decommissioned and Registry does not allow the back population of the IED to these given they are now decommissioned.		18/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
The provision of IED's to Registry is now via Tenco as the Registry Agent on behalf of AIAL, Tenco has a reliable and robust process for ensuring that these are populated accurately and on time and there is no non-compliance in this area since Tenco took on the Registry Functions.		01/10/2018
		Cleared

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 04-Sep-18</p> <p>To: 07-Sep-18</p>	<p>Information not provided to the registry prior to electricity being traded for one ICP.</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>Controls are rated as strong, as they are robust and mitigate risk to an acceptable level.</p> <p>The audit risk rating is deemed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
This late update was a result of a delay with the previous Registry Agent, the ICP was requested to be populated to Registry on the 29/08/2018 however Vector did not populate this until the 07/09/2018 which was after the livening date of the 04/09/2018.		07/09/2018
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL has changed Registry agent from the 01/10/2018 to Tenco and population to Registry is now completed on time.		01/10/2018
		Cleared

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Aug-18</p> <p>To: 31-Jan-21</p>	<p>23 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 they are sufficient to prevent the late updates most of the time.</p> <p>The audit risk rating is deemed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
AIAL has appointed Tenco from the 01/10/2018 to manage its registry functions which will resolve the non-population of IED's to Registry in a timely fashion.		01/10/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Tenco's process/monitoring is reliant on a trigger of status change or MEP population to Registry to be aware of a new connection occurring, Tenco is however also working with the AIAL engineering services team to receive confirmation of when connections are completed on site to allow timely population of this data.		Ongoing
		Identified

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 Schedule 11.1</p> <p>From: 04-Sep-18</p> <p>To: 28-Aug-20</p>	<p>Registry not updated within three days of the event for a very small number of events.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 risk is mitigated to an acceptable level as TENCO have good reporting in place to manage registry updates.</p> <p>The audit risk rating is low as the volume of ICPs affected is relatively small and therefore the impact on settlement will be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The backdating of pricing events is a result of the delays with the prior Registry Agent, from 01/10/2018 when Tenco was appointed no backdating of pricing changes beyond 3BD occurs meaning that on a go forward compliance will be maintained. In addition, the decommissioning of ICP's is now monitored daily by Tenco ensuring that as Traders update the status of an ICP AIAL will be compliant with the timeframes required for updating the Registry status of decommissioned ICP's.		01/10/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
As above a change in Registry Agent from the 01/10/2018 will remove the risk of non-compliance in the area going forward.		01/10/2018	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: 2 Schedule 11.1 From: 01-Aug-18 To: 31-Jan-21	Six active ICPs with addresses that are not readily locatable. Potential impact: None Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated moderate as TENCO's processes are robust but they are reliant on AIAL providing address details which has been difficult in the some instances to determines. The audit risk rating is low as this only a small number of ICPs that AIAL are responsible for.	
Actions taken to resolve the issue		Completion date
3 of the ICP's identified have had updates made to Registry to make the readily locatable, the remaining 3 will have GPS co-ordinates added as recommended shortly.		March-2021
Preventative actions taken to ensure no further issues will occur		Completion date
As part of the validation of uniqueness we will also ensure that Registry address details are full and complete to ensure that they are readily locatable going forward and look to utilize GPS co-ordinates where required for new development sites.		March-2021
		Identified

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: 7(1) Schedule 11.1</p> <p>From: 01-Aug 18</p> <p>To: 31-Jan-21</p>	<p>Initial electrical connection date not populated for six ICPs.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</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 are well documented.</p> <p>The audit risk rating is low as this has no direct impact on settlement.</p>	
Actions taken to resolve the issue		Completion date
There were 6 ICP's identified as not having an IED which went Active between Sept-2013 and Feb-2016 when Vector were providing the registry functions, the IED for 1 of these has since been populated, the other 5 are now all decommissioned and Registry does not allow the back population of the IED to these given they are now decommissioned.		18/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
The provision of IED's to Registry is now via Tenco as the Registry Agent on behalf of AIAL, Tenco has a reliable and robust process for ensuring that these are populated accurately and on time and there is no non-compliance in this area since Tenco took on the Registry Functions.		01/10/2018
		Cleared

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 10.25(1)</p> <p>From: 24-Dec-19</p> <p>To: 11-Feb-20</p>	<p>One meter recertification not notified to the RM within 20 days of meter recertification.</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>Controls are rated as strong, as they are sufficient to prevent the late updates most of the time.</p> <p>The audit risk rating is deemed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
As soon as the Meter recert details were provided to Tenco by AMS these details were populated to the RM portal.		May-2020
Preventative actions taken to ensure no further issues will occur		Completion date
Tenco on behalf of AIAL is working proactively to ensure the timely provision of meter recerts to ensure compliance with this Code obligation.		Ongoing
		Identified