

Compliance Plan Counties Power Distributor – 2021

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 01-Sep-19 To: 31-Dec-20	Registry information not complete and accurate in all instances. 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 most discrepancies are being identified. The risk rating is low as the number of discrepancies found were small in relation to the volume of ICPs.	
Actions taken to resolve the issue		Completion date
Identified and resolved any issues which were located during audit		23/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Review the BI report and make changes to display errors which are missing.		01/08/2021
		Identified

Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7 From: 30-Oct-20 To: 05-Mar-21	Two ICPs with missing initial electrical connection dates. Three ICPs with missing unmetered load information. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as Counties Power has robust reporting in place to monitor this. The risk rating is low as due to the low number of ICPs with missing information.	
Actions taken to resolve the issue		Completion date
No action taken as simply timing issue with retailer updates.		23/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
No further action taken		23/03/2021

Timeliness of Provision of ICP Information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of schedule 11.1 From: 17-Jul-20 To: 29-Oct-20	Four ICPs not updated prior to electricity being traded. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as reporting is in place to identify this and this is monitored daily. The risk rating is low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
No further action taken		23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor rejected files		23/03/2021	

Timeliness of Provision of Initial Electrical Connection Date			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of schedule 11.1 From: 01-Sep-19 To: 31-Dec-20	13 initial electrical connection dates not updated within ten business days. Potential impact: Low Actual impact: Low Audit history: multiple Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as reporting is in place to identify this and this is monitored daily. The risk rating is low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
This has been greatly reduced from last year, we shall continue to monitor this however most are due to waiting for the retailer to update the meter owner so our paperwork can be processed		23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor using the BI reporting tool		23/03/2021	

Connection of ICP that is not an NSP			
Non-compliance	Description		
Audit Ref: 3.6 With: Clause 11.17 From: 17-Jul-20 To: 29-Oct-20	Four ICPs connected before a trader was recorded on the registry as accepting responsibility. 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 reporting is in place to identify this and this is monitored daily. The risk rating is low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken		23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor the rejected files		23/03/2021	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Sep-19 To: 31-Dec-20	Some registry event updates backdated greater than three days. Potential impact: Medium 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 controls are sufficient to mitigate risk most of the time but there is room for errors to occur. The risk rating is low as these events have no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Further controls have been put in place however I feel we have mitigated this risk as much as we can		23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action taken		23/03/2021	

Notice of NSP for each ICP			
Non-compliance	Description		
Audit Ref: 4.2 With: Clause 7(1) Schedule 11.1 From: 01-Sep-19 To: 31-Dec-20	9 ICPs mapped to the incorrect NSP. Potential impact: Low Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as controls are sufficient to mitigate risk most of the time but there is room for errors to occur. The risk rating is low as Counties Power has one balancing area and therefore an incorrect NSP has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrections made during audit.		23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
BI Report has since been created to monitor ICP/TX/GXP relations, this just needs to be reviewed more regularly.		23/03/2021	

ICP location address			
Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Sep-19 To: 31-Dec-20	510 ICPs with addresses that are not readily locatable. 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 they will mitigate risk most of the time but there is room for errors to occur. The risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continue to monitor BI Report		23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per previous audit, we continue to monitor these using the BI report and updating once we have the relevant information.		23/03/2021	

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Sep-19 To: 31-Dec-20</p>	<p>Distributed generation details not recorded for one ICP.</p> <p>12 ICPs with an incorrect initial electrical connection date populated during the audit period.</p> <p>158 ICPs created prior to part 10 with an incorrect initial electrical connection date recorded.</p> <p>Three ICPs with no unmetered load details recorded.</p> <p>Two ICPs with the incorrect unmetered load recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Multiple</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 as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as the errors found will have either no or a small impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
All ICP's updated during the audit investigation		23/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to monitor the Power BI report to ensure this does not become a regular issue		23/03/2021
		Identified

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 7(3) Schedule 11.1 From: 26-Aug-19 To: 25-Nov-19	1 late price code update. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as there was only one late update. The risk rating is low as this has no impact on reconciliation.	
Actions taken to resolve the issue		Completion date
No action taken		23/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
No further changes to the process required		23/03/2021
		Identified