

Compliance plan for Buller Electricity– 2021

Non-compliance	Description		
Audit Ref 2.1 With: 11.2(2) From: 01-Mar-20 To: 31-Aug-21	Registry information incorrect for small number of ICPs. 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 processes in place will mitigate the majority of risks. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
The Registry data is correct or is unable to be corrected (with no consequence) so no action is required to resolve the issue.		10/11/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>BEL has a policy in place where Registry updates are not backdated by more than 3 Business Days (BD) except for where is allowed e.g. population of IECD date.</p> <p>The first late pricing update identified was the result of inappropriate backing dating (human error) as a replacement event (manual Registry entry). While this was immediately correctly the Registry and Distributor Audit records this as a late update.</p> <p>The functionality of the Registry does not allow replacement events to be reversed. Furthermore, prior to a previous Registry upgrade BEL requested that functionality be built into the Registry for manual updates that alerts the user to an update being backdated by more than 3 BD prior to the execution of the update, with a confirmation required to proceed. This functionality was not implemented but rather the user is now alerted that an update is backdated by more than 3 BD's. This is neither user friendly or a well-designed system.</p> <p>The second late pricing update was as a result of a Retailer request for us to reverse a previous Pricing update which was preventing them making their own update.</p> <p>While our decommissioning process has been reviewed and improved so that we will be more readily able to receive information from the field and update the Registry within the require time period, BEL is of the view that the requirement to use the physical removal data is an unnecessary and restrictive requirement. Furthermore, Distributors should have the right to reuse ICPs to re-establish connections and/or decide when an ICP is no longer required as a discretionary decision.</p> <p>IECD dates were incorrect on 3 occasions and our field staff have been made aware of the correct date to use as the IECD date on our new connection's paperwork. As the Retailer first ACTIVE event input date was delayed in the 3 cases in question BEL has unable to correct the IECD within the required time period.</p> <p>UML – BEL is of the view that it is an unnecessary requirement for distributors to populate UML details on the Registry. Furthermore, the Code states (Schedule 11.1 7(1)(m)) that this information is only required to be populated when it is known – and for the 3 ICPs in question it is considered to be unknown. Given that our UML data on the Registry is dated its accuracy is uncertain and BEL requests that we are given the permission to remove this data from the Registry.</p>	<p>1/12/2021</p>	
--	------------------	--

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Mar-20 To: 31-Aug-21	7 ICPs late updates of historically missing IECD date 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, good robust process exists to monitor compliance. The audit risk rating is low as this is no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Apr-21 To: 03-May-21	2 late pricing updates in the registry 3 late corrections of IECD Event date in the registry did not represent physical removal of electrical equipment associated with the ICP Potential impact: None 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 rated as moderate, good processes exist to monitor compliance. Decommissioning process requires a review. Audit risk rating as low due to minimal impact on reconciliation (small number of ICPs).		
Actions taken to resolve the issue		Completion date	Remedial action status
			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
See comments as per Section 2.1		1/12/2021	

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 01-Mar-20 To: 31-Aug-21	2 ICPs with identical addresses and GPS coordinates were corrected during the audit 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, good robust processes exist to monitor compliance. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 4.6 With: 7(1) of Schedule 11.1 From: 01-Mar-20 To: 31-Aug-21	3 UML ICPs do not have BUEL details in the registry 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, good robust processes exist to monitor compliance. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See comments as per Section 2.1 BUEL will use the Distributed Generation ROI date as the event data for Registry updates in the future.		1/12/2021	