

WFNZ Distributor Compliance Plan 2021

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-May-19 To: 30- April- 21	24 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as TENCO are reliant on third parties to advise them of this information, but this was slow in being provided for the embedded network indicating an opportunity for improvement. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
During this audit period there was a large number of new connections off the back of the Westfield Newmarket development – all IED's were populated as we waited for data from the MEP or Trader to populate to Registry.		During the audit period
Preventative actions taken to ensure no further issues will occur		Completion date
The process for the population of IED's on WFNZ networks has been modified whereby we are non-populating based on data directly from the MEP which comes through 2-3BD post the actual install and livening thus improving our compliance levels.		During the audit period
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 01-Jun-20 To: 19-Jun-20	Registry not updated within three days of the event for one pricing event. 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 they are sufficient to prevent the late updates most of the time. The audit risk rating is low only one event was updated late during the audit period.	
Actions taken to resolve the issue		Completion date
This was a one-off issue on 1 ICP during the audit period and corrected as soon as the issue was identified.		At the time the error was found.
Preventative actions taken to ensure no further issues will occur		Completion date
Controls in this space are strong and demonstrated by only 1 of 104 updates during the audit period occurring later than Code requirements.		N/A
		Identified

Distributors to provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: 7(1)(p) of Schedule 11.1</p> <p>From: 17-Oct-19</p> <p>To: 13-Nov- 19</p>	<p>Two ICPs with the incorrect initial electrical connection date recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 there is reporting in place to identify such errors.</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
The IEDs were corrected at the time the error was identified on them, this was caused by human error via a manual entry to registry.		At the time the error was identified.
Preventative actions taken to ensure no further issues will occur		Completion date
As above this was a result of human error across ~250 new connections during this audit period, we have improved the training and controls in this space to ensure that compliance is maintained going forward.		During the audit period.
		Identified

Updating table of loss category codes			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 21 of Schedule 11.1</p> <p>From: 01-May-19</p> <p>To: 30-April-21</p>	<p>New loss codes WFR1, WFR6, WFR7 were created, but the required 2 months' notice was not provided.</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 affected only a small number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This is a one off error as a result of a loss code tidy op completed across all TENC managed networks, the Criteria should have been using EN and SB ICP's however only EN ICP's were reviewed and the loss code was incorrectly closed in Registry – as soon as we were made aware of the issue we backdated the start date for the loss code.		05/06/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Loss Code updates and changes to Registry are now only via our Market Operations and Compliance Manager and are no longer completed just via an Analyst.		September-2020	

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) and 10.25(3)</p> <p>From: 01-May-19</p> <p>To: 30-April-21</p>	<p>The Reconciliation Manager was notified 153 days after recertification for WAB0011.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice 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 rated as strong, as they are sufficient to prevent the late updates most of the time.</p> <p>The audit risk rating is low, as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
This was notified late due to an incorrect email address held by AMCI and therefore the notification was missed. AMCI now hold the correct email address. As soon as we were made aware of the mis-match between our records on the MEP's we updated the RM NSP Metering table with the updated records.		23/09/2020
Preventative actions taken to ensure no further issues will occur		Completion date
We have added a step to our process whereby on BD1 each month we send the MEP a record of all LE metering cert details with have in Tenco's CRM to allow them to review and provide updated meter paperwork to us where the steps introduced in November-2017 as referenced above have not been completed.		September-2020
		Identified