

Compliance Plan WEL Networks Distributor – 2021

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) & 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 they will mitigate risk most of the time but there is room for errors to occur. 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
WEL notes that that the number of registry updates and actions completed has greatly increased since the last audit, but the number of variances or perceived inaccuracies has remained low or even decreased. WEL reviews discrepancies on a daily basis but are reliant often on other parties such as retailers and livening agents in giving us correct information in a timely manner. We have evidence where we have pushed parties for information or to recheck information provided. This is predominant in section 4.1. Through the audit it is noted that we have updated information as soon as we have been given it, or corrected information once being made aware of any incorrect information.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
WEL will continue to work with necessary parties to remind them of their obligations to provide information required for registry updates in a timely manner. This pertains mainly to section 4.1. We have corrected the two ICPs in question in 4.2. We have and corrected one of the three ICPs identified in section 4.6 for unmetered load with the remaining two under current investigation.		March 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-Sep-19 To: 31-Dec-20	95 initial electrical connection dates updated greater than ten days from the event 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 audit risk rating is strong as WELs has robust controls in place. The audit risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
The audit notes that of the 96 late updates identified, 87 were due to late notifications from livening agents, and eight were due to corrections being made. Livening agents were pushed for weekly livening details to be given to us and these were actioned upon receipt. Information in the registry that was conflicting was followed up on and corrections made as soon as identified and correct information gained.		March 2021
Preventative actions taken to ensure no further issues will occur		Completion date
WEL continues to follow up with the livening agents when a livening date is not provided and our reporting indicates we should have one. Email evidence of this occurring is held. If we do not get the information requested we will use the retailer date as a placeholder to ensure field is populated. Note that this is also reliant on the retailer updating the ICP status to active in a timely manner to alert us to an update being required. Once the correct livening date has been provided this information is updated. WEL will continue to work with livening agents to remind them of the importance of providing accurate livening information in a timely manner.		March 2021
		Identified

Connection of NSP that is not point of connection to grid			
Non-compliance	Description		
Audit Ref: 3.9 With: Clause 10.30 From: 08-Nov-19 To: 02-Apr-20	Late notification of metering installation certification for new NSP (TPH0111). 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 rated as strong, as they are sufficient to ensure updates are on time most of the time. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is the first that has occurred so there was no formal process for this situation.		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
WEL to make a documented process for this.		March 2021	

Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 4.1</p> <p>With: clause 8 schedule 11.1</p> <p>From: 01-Sep-19</p> <p>To: 31-Dec-20</p>	<p>A small number of registry event updates backdated greater than three days.</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>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 volume of ICPs affected are small.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>WEL notes that Address, Network and Pricing changes and updates to the electricity registry required have increased since the last audit but lateness is extremely low.</p> <p>For the events deemed late, almost all have been outside of our control and due to information required not provided to us as noted in audit findings</p>	March 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>WEL will continue to chase parties for information where we know work has been done and registry updates are required.</p> <p>We have worked hard in the Distributed Generation area since the last audit and have implemented all noted process changes given in the 2019 audit response.</p> <p>We will be reviewing our internal Distributed Generation process and looking to potentially reduce the time given for paperwork to be returned to us upon work completion by solar installers. We note that this may not necessarily improve the instances of late updates as it is still reliant on paperwork being returned in a timely manner. This area is difficult to police as we do not have any indication of when a solar installer has completed work. We rely on them advising us in a timely manner, but there are no consequences for them if they do not do this. While we have an option to physically disconnect a property, this is not a desirable outcome for any parties.</p>	March 2021	

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 01-Sep-19 To: 31-Dec-20	Two ICPs with incorrect NSP. 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 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
Incorrect information populated into our GIS mapping system flowed through to the registry. This occurred with same street names located within multiple towns in the Waikato. The two ICPs with incorrect information have now been corrected.		March 2021
Preventative actions taken to ensure no further issues will occur		Completion date
We have now added pole numbers for ICPs to lessen the chance of incorrect NSP allocations occurring. Any errors will be corrected as soon as we are made aware of them		March 2021
		Cleared

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</p> <p>To: 31-Dec-20</p>	<p>Distributed generation details missing.</p> <p>Three ICPs with an incorrect initial electrical connection date populated.</p> <p>Two ICPs with unmetered load discrepancies.</p> <p>Unmetered load not recorded for 39 private lights.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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 have no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Distributed Generation details will continued to be chased up where required. We note that if a retailer has updated their profile incorrectly to reflect DG on site that isn't, this reflects against WEL as having missing details.</p> <p>The two ICPs with unmetered load discrepancies are currently being worked on with traders.</p> <p>The 39 private unmetered lights are currently being worked on.</p>		March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
WEL will work to obtain missing registry information or correct registry information as soon as we are aware of it.		March 2021	

Responsibility for metering information when creating an NSP that is not a POC to the grid			
Non-compliance	Description		
Audit Ref: 6.9 With: Clause 10.25(2) From: 08-Nov-19 To: 02-Apr-20	Late notification of metering installation certification for new NSP (TPH0111). 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 rated as strong, as they are sufficient to ensure updates are on time most of the time. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Action has been taken prior to audit.		March 2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The creation of a new Interconnection point is a very rare occurrence. This was the first time that WEL has had to do this in the last decade and as such we had no documented process. We will be creating a new process with relevant time frames for future use if we create any more interconnection points.		March 2021	