

## Compliance plan for Vector– 2021

Non-compliance	Description		
<p>Audit Ref 2.1 With: 11.2(2)</p> <p>From: 23-Aug-20 To: 31-Jul-21</p>	<p>Inaccurate or missing information in the registry for distributed generation, UML, NSP, and Initial Electrical Connection Dates not populated in the Registry.</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>The controls are rated as moderate overall but some opportunities for further improvements are in progress which will strengthen controls once in place. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>DG – Vector will review our distributed generation process to:</p> <ul style="list-style-type: none"> <li>improve follow up with customers/installers to obtain CoCs in a timely manner;</li> <li>better identify when distributed generation has been installed at a site.</li> </ul> <p>IECD – Please see audit ref 3.5</p> <p>NSP – Please see audit ref 4.1 and 4.2</p>		Investigation by Jan 2022.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>DG – TBA. Dependent on investigation outcomes.</p> <p>IECD – Please see audit ref 3.5</p> <p>NSP – Please see audit ref 4.1 and 4.2</p>			

Non-compliance	Description		
Audit Ref 2.2 With: 11.2(2)  From: 23-Aug-20 To: 31-Jul-21	Incorrect or missing historical information in the registry across a number of areas  Potential impact: Low  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 as in most cases incorrect information is captured. The audit risk rating is low as the incorrect IECD or lack of it is not used in this reconciliation period.		
Actions taken to resolve the issue		Completion date	Remedial action status
IECD – Please see audit ref 3.5			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
IECD – Please see audit ref 3.5			

Non-compliance	Description		
Audit Ref: 3.2 With: 11.5(3)  From: 23-Aug-20 To: 31-Jul-21	No notification of delay to ICP creation for 30 ICPs requested by traders Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are assessed as moderate. They will mitigate non-compliance most of the time but there is room for improvement. Audit risk rating is assigned as low. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Not Applicable		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Vectors current process for notification of delay is to contact and notify the customer direct. Further process review needs to be completed to ensure retailer requests are identified separately and that retailers are included in the notification along with the customer.		December 2021	

Non-compliance	Description		
Audit Ref: 3.3 With: 11.7  From: 23-Aug-20 To: 31-Jul-21	8 UML ICPs did not have details recorded in the registry 3,075 ICPs with no initial electrical connection date populated  Potential impact: Low  Actual impact: Low  Audit history: Twice previously  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are assessed as moderate. Vector implemented a new connection process to address the issue of lack of IECD. The ICPs sampling confirmed that the process is working well. Audit risk rating is assigned as low. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
UML – The 8 issues identified have been corrected.		08/10/2021	Identified
IECD – Please see audit ref 3.5			
Preventative actions taken to ensure no further issues will occur		Completion date	
UML – Vector are reviewing our online ICP application form and will be requesting UML details as part of the new form.  IECD – Please see audit ref 3.5		June 2022	

Non-compliance	Description		
<p>Audit Ref: 3.4</p> <p>With: 14 of Schedule 11.1</p> <p>From: 01-Jun-20</p> <p>To: 31-Jul-21</p>	<p>34 ICPs (11 UNET, 23 VECT) not updated on the registry prior to commencement of trading</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as there can be incidents that require Vector to create backdated ICPs at the request of traders. The audit risk rating is low because energy is reconciled.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICPs were corrected and backdated at the time of identification.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>In the majority of these cases, Vector were requested to create the ICPs prior to an installation supply point being installed for the purpose of obtaining CTs. In these cases, ICPs were created in NEW status. Once the supply point is installed, Vector then change the status to READY.</p> <p>We currently have a delay in our process between the date the supply is installed and the change to READY status which is resulting in non-compliance for some of these jobs.</p> <p>Vector are currently looking at this process to determine ways to remove the delay.</p>		Jan 2022	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 23-Aug-20</p> <p>To: 31-Jul-21</p>	<p>2,858 late updates initial electrical connection dates in the registry, small number of ICPs for which Vector and trader information were different</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>The controls are rated as moderate. The process was changed on 01/06/2021, that the warranted person (livening person) will provide this information directly to Vector. Close monitoring needs to be implemented; it needs to be evaluated in the next audit. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>Missing IECD</b></p> <p>Vector continue to follow up with retailers to obtain the livening data for all historical jobs and jobs created prior to the June 2021 process change.</p>		Ongoing	Identified
<p><b>Incorrect IECD Dates</b></p> <p>Vector are checking with the retailers, meter owners and livening agents (where that information is available to us) to confirm the correct dates. Registry will be updated accordingly.</p>		Ongoing	
<p><b>IECD recorded, not yet active</b></p> <p>16 ICPs have now been updated by the retailers and the dates match with Vector</p> <p>5 ICPs have been updated by the retailer however the dates do not match. Further investigation required.</p> <p>12 ICPs still to be updated by the retailer. All have meter details populated which match Vector IECD.</p>		08/10/2021	
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><b>Missing IECD</b></p> <p>IECD – Vector implemented a new livening process on 3 June which covers:</p> <ul style="list-style-type: none"> <li>• Obtaining data direct from the warranted person</li> <li>• Monitoring of missing data</li> <li>• Reviewing date discrepancies</li> </ul> <p>We believe these changes will reduce the non-compliance in this area.</p> <p><b>Incorrect IECD Dates</b></p> <p>Further investigation is required to determine root cause. Review of discrepancies will also be increased.</p> <p>Vector have created a new role within the team which will focus on audit reviews, investigation and correction of errors.</p> <p><b>IECD recorded, not yet active</b></p> <p>Not applicable. ICPs identified had all been livened.</p>	<p>03/06/2021</p> <p>Dec 2021</p> <p>N/A</p>	
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Non-compliance	Description		
Audit Ref 4.1 With: 8 of Schedule 11.1 From: 23-Aug-20 To: 31-Jul-21	Registry event updates backdated more than three business days Potential impact: Low 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 as the checks in place will mitigate risk most of the time. New process for pricing events was introduced. Overall number of late updates significantly decreased in comparison with the last audit period. Audit risk rating is recorded as low, level of compliance is high.		
Actions taken to resolve the issue		Completion date	Remedial action status
NSP - Data analysis to identify ICP records with incorrect effective network event dates and then appropriately remediated in Gentrack.		Approx. March 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NSP - Business analysis work and a system solution implemented in order to prevent ICP incorrect network event dates going forward.		Approx. June 2022	

Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: 7(1)(b) of Schedule 11.1</p> <p>From: 23-Aug-20</p> <p>To: 31-Jul-21</p>	<p>13 out of 20 ICPs sampled were mapped to incorrect NSP</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>Controls are recorded as strong as the mapping for new ICPs is robust and historic ICPs that are potentially mis-mapped are continually being worked through. Vector uses the Audit Compliance report to correct historic incorrect mapping. The risk rating is low as Vector has one balancing area per network and therefore an incorrect NSP has no direct impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>To mitigate the number of errors, the EA “Registry Audit Comparison Report – NSP Discrepancies” report is run for VECT and UNET on a monthly basis and the remediation’s required are completed.</p> <p>There are other reports set up by Vector that show ICPs on Pending Transformers. These reports are run on a weekly basis and the remediations required are completed.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above.		Ongoing	

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 23-Aug-20 To: 31-Jul-21	1,535 ICPs with addresses that are not readily locatable Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate as Vector is still working through historic ICPs. The audit risk rating is low as this has no direct impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an ongoing piece of work. Vector continue to work on trying to identify and correct these historical address issues and are requesting help from the traders to resolve these.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			

Non-compliance	Description		
<p>Audit Ref 4.6</p> <p>With: 7(1)of Schedule 11.1</p> <p>From: 23-Aug-20</p> <p>To: 31-Jul-21</p>	<p>Distributed generation details incorrect for a small number of ICPs.</p> <p>11 UML ICPs did not have details recorded in the registry</p> <p>5 ICPs (LE) incorrectly the Dedicated NSP flag set to “N”</p> <p>7 ICPs (GN) incorrectly Dedicated NSP flag set to “Y”</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. Vector continues to improve monitoring of inaccuracies.</p> <p>The audit risk rating is assessed to be low as the discrepancies have only a minor impact to the market.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML recorded by GENE - These are sites that the meter has been historically removed, it is not that they have unmetered load connected. Likely that these are duplicated ICPS that need decommissioning. Information has been sent to Genesis to comment and confirm</p> <p>Dedicated NSP – All errors have been corrected.</p> <p>DG – Please see audit ref 2.1</p>		<p>Dec 2021</p> <p>08/10/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Dedicated NSP – This has been found to be a training error – a misunderstanding of what the dedicated NSP flag was for. Further training has been provided to staff.</p>		08/10/2021	

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: 14 of Schedule 11.1</p> <p>From: 01-Jun-20</p> <p>To: 31-Jul-21</p>	<p>Some ICPs are loaded to the registry with READY status before being accepted by trader in Siebel</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate as some small process adjustments would be beneficial. The new process has unintentionally created a timing issue for the ICP status in the registry. The audit risk rating is low because a timing issue has no direct impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>As ICPs are requested by customers in the majority of cases and not the retailer, the ICP is created in ready and then sent to the retailer for acceptance. The retailer still has the opportunity to decline. Forcing the retailer to accept the job prior to releasing the ICP would result in delays for the retailer and will extend the time it takes for customers site to be livened.</p> <p>Vector will discuss options with the retailers on the best way forward.</p>		Feb 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			