

# Compliance plan for Wellington Electricity Distributor– 2020

Requirement to provide complete and accurate information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2(1) and 10.6(1)</p> <p>From: 06-Sep-19</p> <p>To: 30-Sep-20</p>	<p>A small number of discrepancies and some corrections from the last audit still to be corrected.</p> <p>Shared unmetered load has not been created to account for the shared unmetered load on the network.</p> <p>One ICP of the sample of ten ICPs checked with a mis-mapped NSP.</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		
<b>Low</b>	<p>The controls are rated as moderate as registry accuracy is managed on a daily basis and planned improvements to these processes are expected to move the controls to strong.</p> <p>The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Shared unmetered load:</p> <ul style="list-style-type: none"> <li>Billing system functionality for Shared Unmetered Load (SUML) will be deployed.</li> <li>A recommendations paper to management will be submitted for their consideration.</li> </ul> <p>Initial electrical connection dates:</p> <ul style="list-style-type: none"> <li>The ICPs mentioned above will have their incorrect IEDs removed via bulk update.</li> </ul> <p>Event dates;</p> <ul style="list-style-type: none"> <li>The ICPs mentioned above will be corrected.</li> </ul> <p>NSP Dedication:</p> <ul style="list-style-type: none"> <li>The ICPs mentioned above will be corrected.</li> </ul> <p>NSP assignment:</p> <ul style="list-style-type: none"> <li>The one incorrect ICP has been corrected.</li> </ul> <p>The remaining 77 ICPs will be reviewed.</p>		<p>28 May 2021</p> <p>28 May 2021</p> <p>26 Feb 21</p> <p>26 Feb 21</p> <p>26 Feb 21</p> <p>Complete</p> <p>26 Feb 21</p>	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
In addition to the actions documented below, adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.	29 Jan 2021	
Shared unmetered load:	28 May 2021	
<ul style="list-style-type: none"> <li>Billing system functionality for Shared Unmetered Load (SUMML) will be deployed.</li> </ul>	28 May 2021	
<ul style="list-style-type: none"> <li>A recommendations paper to management will be submitted for their consideration.</li> </ul>		
Initial electrical connection dates:	29 Jan 2021	
<ul style="list-style-type: none"> <li>Our quality assurance processes will be changed to adopt the auditor's recommendations.</li> </ul>		
Event dates;	Complete	
<ul style="list-style-type: none"> <li>Our work instructions have been amended.</li> </ul>		
NSP Dedication:	30 Apr 2021	
<ul style="list-style-type: none"> <li>Our work instructions and documentation will be amended to explain the concept and provide procedures.</li> </ul>		
NSP assignment:	29 Jan 21	
Our quality assurance processes will be amended to incorporate a review of any potential non-compliances.		

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With Clause 11.2(2)  From: 01-Nov-18 To: 30-Sep-20	Correction of some data not carried out as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate overall, but the non-compliance remains as shared unmetered load has not been resolved for a number of years. The risk is rated as low, as the impact of the shared unmetered load not being reconciled is minor.	
Actions taken to resolve the issue		Completion date
Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.		29 Jan 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.		29 Jan 2021
Shared unmetered load:		
<ul style="list-style-type: none"> <li>Billing system functionality for Shared Unmetered Load (SUML) will be deployed.</li> </ul>		28 May 2021
<ul style="list-style-type: none"> <li>A recommendations paper to management will be submitted for their consideration.</li> </ul>		28 May 2021

Distributors must create ICPs		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 11.4</p> <p>From: 31-Dec-17</p> <p>To: 30-Sep-20</p>	<p>Shared unmetered load ICPs not created to account for shared unmetered streetlights connected on the network.</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	
<b>Low</b>	<p>I rate the controls as moderate due to the lack of process to create shared unmetered load ICPs.</p> <p>The risk is rated as low, as the impact of the shared unmetered load not being reconciled is minor.</p>	
Actions taken to resolve the issue		Completion date
Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.		29 Jan 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Shared unmetered load:		
<ul style="list-style-type: none"> <li>Billing system functionality for Shared Unmetered Load (SUML) will be deployed.</li> </ul>		28 May 2021
<ul style="list-style-type: none"> <li>A recommendations paper to management will be submitted for their consideration.</li> </ul>		28 May 2021

Provision of ICP information to the registry		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7  From: 07-May-20 To: 30-Sep-20	Initial electrical connection date not populated for ICP 0000162828CK0A3. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level.  There are very few new unmetered load connections; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The Initial electrical connection date for ICP 0000162828CK0A3 has now been populated.		9 Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.		29 Jan 2021

Timeliness of provision of information to the registry		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 11-Jul-19</p> <p>To: 30-Sep-20</p>	<p>12 ICPs updated to “ready” after electrical connection.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Wellington Electricity has robust controls for new connections, and these were part of the unbundling of an existing DUMI ICP, therefore controls are rated as strong.</p> <p>The impact on settlement is to increase accuracy therefore the actual impact is none but low is the only option available.</p>	
Actions taken to resolve the issue		Completion date
No action required, as per the auditor comments.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
No action required, as per the auditor comments.		N/A
		Remedial action status
		Cleared

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 29-Jul-19</p> <p>To: 30-Sep-20</p>	<p>297 late initial electrical connection updates.</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	
<b>Low</b>	<p>Controls are rated as moderate and will move to strong with the adoption of the recommendation in section 2.1, to use the AC020 report.</p> <p>The impact is assessed to be low as the majority of dates are populated in the required timeframe.</p>	
Actions taken to resolve the issue		Completion date
The ICPs mentioned above will have their incorrect IEDs removed via bulk update.		26 Feb 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.		29 Jan 2021
As per our response to Clause 7(2A) Schedule 11.1 we will review our connection process to determine the feasibility of using alternate information sources for IEDs.		30 Jun 2021
		Identified

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 06-Sept-19 To: 30-Sept-20</p>	<p>5 late addresses updates.</p> <p>749 late pricing updates.</p> <p>94 late status updates.</p> <p>81 late network updates.</p> <p>174 late distributed generation updates.</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.</p> <p>The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
No action required, as per the auditor comments.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
The ICPs mentioned in a previous section will have their incorrect IEDs removed via bulk update. This will prevent further occurrences if we improve the accuracy of information for any of those ICPs.		26 Feb 2021
		Investigating



Notice of NSP for each ICP		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 7(1), (4) and (5) Schedule 11.1</p> <p>From: 01-Sept-19</p> <p>To: 30-Sept-20</p>	<p>One ICP of ten ICPs checked with the incorrect NSP recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong as Wellington Electricity processes demonstrated robust controls.</p> <p>The audit risk is assessed to be low as only 77 potentially mis-mapped ICPs were identified and only one was found to be incorrect of the sample checked. .</p>	
Actions taken to resolve the issue		Completion date
<p>The one incorrect ICP has been corrected.</p> <p>The remaining 77 ICPs will be reviewed.</p>		Complete 26 Feb 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.</p> <p>A validation check to compare Gentrack to Registry address data will be added.</p>		<p>29 Jan 2021</p> <p>29 Jan 2021</p>
		Identified

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clauses 2 Schedule 11.1  From: 01-Sept-19 To: 30-Sept-20	24 active ICPs without a readily locatable address. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as Wellington Electricity processes demonstrated robust controls.  The audit risk is assessed to be low as only 54 active ICPs have addresses not readily locatable.	
Actions taken to resolve the issue		Completion date
A followup communication round with retailers for the remaining 24 ICPs will be conducted.		26 Feb 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Adoption of the audit compliance report in our quality assurance procedures will identify any potentially non compliant instances for correction.		29 Jan 2021
		Identified

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: 05-Sep-19 To: 30-Sep-20</p>	<p>15 ICPs with the NSP dedication set to Yes.</p> <p>20 ICPs with distributed generation present and the incorrect installation type of "L".</p> <p>Some incorrect initial electrical connection dates recorded (2 from the current audit period and the remaining all relate to prior to the requirement coming into effect).</p> <p>Four ICPs with the incorrect unmetered load details recorded.</p> <p>Shared metered load present but not recorded on 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 as registry accuracy is managed on a daily basis and planned improvements to these processes are expected to move the controls to strong.</p> <p>The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>15 ICPs with the NSP dedication set to Yes.</p> <ul style="list-style-type: none"> <li>These ICPs will be corrected.</li> </ul> <p>20 ICPs with distributed generation present and the incorrect installation type of "L".</p> <ul style="list-style-type: none"> <li>Any ICPs that we have verified as having DG have already been amended. The remainder require confirmation from the Traders that DG is present, as no applications for these ICPs were received. 2 of the ICPs were confirmed as having no DG present.</li> </ul> <p>Some incorrect initial electrical connection dates recorded (2 from the current audit period and the remaining all relate to prior to the requirement coming into effect).</p> <ul style="list-style-type: none"> <li>A bulk update to correct the previously mentioned ICPs will be performed.</li> </ul> <p>Four ICPs with the incorrect unmetered load details recorded.</p> <ul style="list-style-type: none"> <li>We will investigate a work-around to resolving these 4 ICPs which will address both the audit non-compliance and still generate accurate billing.</li> </ul> <p>Shared unmetered load present but not recorded on the registry.</p> <ul style="list-style-type: none"> <li>Billing system functionality for Shared Unmetered Load (SUML) will be deployed.</li> <li>A recommendations paper to management will be submitted for their consideration on how we approach this.</li> </ul>	<p>26 Feb 2021</p> <p>26 Feb 2021</p> <p>26 Feb 2021</p> <p>28 May 2021</p> <p>28 May 2021</p> <p>28 May 2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Adoption of the audit non-compliance reporting into our quality assurance processes will identify these situations occurring in the future so we can address and resolve.</p>	<p>29 Jan 2021</p>	