

Compliance plan for 318 Lambton Quay Limited (TOLQ)

Title: 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: 01-Mar-17</p> <p>To: 17-Apr-20</p>	<p>16 active ICPs which were electrically connected prior to the audit period did not have initial electrical connection dates populated. The registry was updated during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 they will mitigate risk of late or inaccurate information most of the time.</p> <p>This has no direct impact on submission hence the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As with the three ICPs in the table above, this issue was also raised by the EA at the time of the last audit. At the time we disagreed, reasoning that the connections had been live for many years within a customer network, again based on resulting correspondence our understanding was that the recommendation to populate the IECD was subject to external review. It is now been clarified that the correspondence initially received was in fact confirmation, and the external review was only relating to the audit period. This was a genuine misinterpretation of the wording of an email that resulted in no action being taken at the time (as we were expecting further correspondence) Having now received this clarification, we have updated the IECD for all ICPs.		17/04/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Our interpretation of the requirements in this situation was not correct as confirmed by the EA; as this is now confirmed we will act accordingly should the situation occur again.		17/04/2020	

Title: Requirement to correct errors		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11.2(2) and 10.6(2)</p> <p>From: 01-Mar-17</p> <p>To: 17-Apr-20</p>	<p>Missing initial electrical dates for 16 ICPs were not updated as soon as practicable. The registry was updated during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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. TOLQ initially believed that the initial electrical connection dates were not required because the ICPs were connected prior to TOLQ's start date as part of a customer network, and asked for clarification from the Authority. A response was provided by the Authority as part of the last audit review, but the update was not processed at the time because TOLQ believed the Authority was to provide some further information.</p> <p>This has no direct impact on submission hence the audit risk rating is low, and the non-compliance has been cleared because the registry has been updated.</p>	
Actions taken to resolve the issue		Completion date
Please refer Audit ref. 2.1 above		17/04/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Please refer Audit ref. 2.1 above		17/04/2020

Title: 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: 01-Mar-17</p> <p>To: 17-Apr-20</p>	<p>16 active ICPs which were electrically connected prior to the audit period did not have initial electrical connection dates populated. The registry was updated during the audit.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</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 they will mitigate risk of late or inaccurate information most of the time.</p> <p>This has no direct impact on submission hence the audit risk rating is low.</p>	

Actions taken to resolve the issue	Completion date	Remedial action status
Please refer Audit Ref. 2.1 above	17/04/2020	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Please refer Audit Ref. 2.1 above	17/04/2020	

Title: 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: 05-Nov-19</p> <p>To: 17-Feb-20</p>	<p>The meter certification details for TLQ0011 were updated 68 business days after the certification date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 will mitigate risk of late information most of the time. Certification expiry dates are monitored and paperwork is followed up, but Smartpower may not be aware of situations where certification is completed early.</p> <p>The impact was low because the meter was certified at all times.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
As per the auditors comments above we monitor NSP meter expiry dates and make enquiries as to the status of the recertification several months prior to due date. In this instance we were informed that the re-certification had been completed quite a number of months early so even if we had received paperwork promptly upon our request, we would still have been non-compliant. That being said, it is an unfortunate reality that obtaining paperwork is a slow process given the number of parties involved and the time it can take contractors to submit the paperwork in the first place, so delays in obtaining details were also a factor.	17/2/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have set our reminders for an earlier date.	17/4/2020	