

## Compliance Plan for Network Waitaki Distributor – May 2020

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1)  From: 01-Sep-17 To: 28-Apr-20	Some event dates, IECDs and registry information not complete and accurate. 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>	I have recorded the controls as strong in this area as Network Waitaki has checks in place to identify and resolve discrepancies and the number of inaccuracies is low.  There is a minor impact on participants due to inaccuracies. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
NWL undertook to have a discrepancy report built to check for inaccuracies. This was undertaken halfway through the last audit period to resolve this problem.		5/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Reports are run both daily & weekly to pick up any errors. This approach has shown to be successful.		5/5/2020
		Identified

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1 With: Clause 8 Schedule 11.1</p> <p>From: 01-Jan-18 To: 29-Feb-20</p>	<p>Records updated on the registry later than 3 business days after event. Six NSP changes updated later than 8 business days. Some incorrect event dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as strong in this area as Network Waitaki has checks in place to identify and resolve discrepancies and the number of late updates was low.</p> <p>There is a minor impact on participants with late updates. The Audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
NWL's Discrepancy Report built halfway through the audit period will pick up all future data discrepancies		5/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Run Discrepancy Report daily and weekly to enable mistakes to be picked up and corrected in a timely manner.		5/5/2020
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 20-Aug-19 To: 28-Apr-20	Two ICPs with incorrect NSPs. Potential impact: Low Actual impact: Low Audit history: Once 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. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
<a href="#">NWL's Discrepancy Report built halfway through the audit period will pick up all future data discrepancies</a>		5/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<a href="#">Run Discrepancy Report daily and weekly to ensure any mistakes are caught and corrected.</a>		5/5/2020
		Identified

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1  From: 01-Jan-19 To: 15-Apr-20	One ICP with insufficient address information. 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.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
NWL's Discrepancy Report built halfway through the audit period will pick up all future data discrepancies. Although, the addresses in both cases were localized iconic destinations, easily recognizable and no further details were required, NWL did undertake to formalize the addresses to meet the audits requirements.		5/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Run Discrepancy Report daily and weekly to ensure any mistakes are caught and corrected.		5/5/2020
		Cleared

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(o) of Schedule 11.1</p> <p>From: 22-Jan-19</p> <p>To: 28-Apr-20</p>	<p>Incorrect registry information for two DG ICPs.</p> <p>1 missing IECD.</p> <p>1 incorrect IECD.</p> <p>3 ICPs with unmetered load discrepancies.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as strong in this area as Network Waitaki has checks in place to identify and resolve discrepancies and the number of discrepancies was low.</p> <p>There is a minor impact on participants with late updates. The Audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Not sure why previous Audits have not picked this issue up before - as they have been in the Registry for several audits.</p> <p>Since the last audit NWL has only had 1 unmetered load to populate in the Registry.</p> <p>In the future, NWL will contact the Retailer for the outstanding UML details to mitigate this circumstance occurring.</p>		30/6/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Check with the Retailer to ensure that the formula the Retailer has loaded into the Registry, matches the formula that NWL have been advised of on the application.</p>		30/6/2020	

Notice of balancing areas			
Non-compliance	Description		
Audit Ref: 6.3 With: Clause 24(1) and Clause 26(3) Schedule 11.1 From: 01-Jan-19 To: 28-Apr-20	ICPs are moved between two balancing areas. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as Network Waitaki has updated the dedicated/non-dedicated fields correctly but not addressed the balancing areas. The impact on settlement and participants is minor because of the small number of ICPs affected; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will apply to get Oam0331 GXP added to Balancing Area		31/7/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will apply to get Oam0331 GXP added to Balancing Area and ensure controls are tighter around this area going forward.		31/7/2020	