

Compliance plan for KIPT Distributor – 2019

Timeliness of Provision of Initial Electrical connection Date			
Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 17-Nov-17 To: 15-Nov-18	Three late initial electrical connection updates. Potential impact: None Actual impact: None 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 there is robust reporting in place to monitor and manage the population of the initial electrical connection dates. The late updates have no direct impact on reconciliation hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
These were noted and corrected.		15/11/18	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Changing registry service from TEG to Tenco will streamline information flow. This will reduce the possibility of future non compliance as a result of; lack of information; slow information flow; or confusion arising between service providers. Tenco also have greater resources and more robust systems, further reducing the possibility that this matter to reoccur.		1/11/19	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 11-Jan-16</p> <p>To:2019-Aug-19</p>	<p>23 late updates to 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 the changes are tracked but late notification to the contractor causes events to be backdated.</p> <p>The overall volume of late updates is low and there were only three late pricing updates that had an impact on reconciliation therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
These have been identified and corrected.		As soon as the matter was identified.
Preventative actions taken to ensure no further issue will occur		Completion date
<p>Changing registry service from TEG to Tenco will streamline information flow. This will reduce the possibility of future non compliance as a result of; lack of information; slow information flow; or confusion arising between service providers.</p> <p>Tenco also have greater resources and more robust systems, further reducing the possibility that this matter to reoccur.</p>		1/11/19
		Identified

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Apr-14</p> <p>To: 19-Aug-19</p>	<p>1 missing ICP with a missing initial electrical connection date.</p> <p>1 incorrect initial electrical connection date.</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>The controls are rated as moderate as there is reporting run daily to check for such discrepancies and these don't appear to have been identified.</p> <p>Two discrepancies represent a very small level of error therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrections to be made by Tenco as part of their start up setup		1/11/19	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Changing registry service from TEG to Tenco will streamline information flow. This will reduce the possibility of future non compliance as a result of; lack of information; slow information flow; or confusion arising between service providers.</p> <p>Tenco also have greater resources and more robust systems, further reducing the possibility that this matter to reoccur.</p>		1/11/19	

Responsibility for metering information for NSP that is not a point of connection to the grid		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: 10.25(3)</p> <p>From: 29-May-18</p> <p>To: 26-Oct-18</p>	<p>Two meter recertifications notified late.</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	
Low	<p>The controls are rated as strong as TENCO are monitor NSP certification expiry dates and actively liaise with the relevant MEPs to gather this information.</p> <p>The late updates have no direct impact on reconciliation hence the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
All LE ICP's have current and correct metering cert dates, a couple of the updates as noted were put into the system late however meter recerts occurred well prior to the existing meter expiry date.		Throughout the whole period
Preventative actions taken to ensure no further issue will occur		Completion date
Tenco on behalf of all its clients including KIPT have submitted a proposed change to bring LE ICP metering details into Registry – our main constraint is getting meter recert details in from the MEP's on time as we are only aware of expiry dates and where they recert early and Tenco do not get notice at the time causes non-compliance – we are proactively looking to work with the 2 MEP's we use to improve the notices we receive.		Ongoing
		Identified

Creation of loss factors		
Non-compliance	Description	
Audit Ref: 8.1 With: 11.2 From: 01-May-08 To: 19-Aug-19	Three loss factors not created for three SB ICPs. 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 these are all historic and the controls in place when creating new NSPs are robust. The impact on reconciliation will be small therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
To be corrected by Tenco as part of their initial setup. Completion date reflect market notice periods		1/1/20
Preventative actions taken to ensure no further issue will occur		Completion date
Changing registry service from TEG to Tenco will streamline information flow. This will reduce the possibility of future non compliance as a result of; lack of information; slow information flow; or confusion arising between service providers. Tenco also have greater resources and more robust systems, further reducing the possibility that this matter to reoccur.		1/11/19
		Identified