

Compliance plan for Buller Electricity Limited Distributor – 2019

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) From: 01-Oct-17 To: 15-Mar-19	Registry information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: None 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 identify most potential discrepancies but not all. The audit risk rating is low as the discrepancies identified have a minor impact on other participants.	
Actions taken to resolve the issue		Remedial action status

<p>The recommended Registry data checks have been implemented as detailed below (item number link to the list above):</p> <ol style="list-style-type: none"> 1. The query Qry_RGST_EDA_NEWCONN_IECD_Check has been created and demonstrated to capture the inconsistent IECD dates identified in the Distributor Audit e.g. when IECD date and first ACTIVE status date are not the same. This query will be run using up to date Registry EDA Event Data on a monthly basis with any identified inconsistencies being reported to Senior Management and the Board as newly created KPI's. A key aspect of this reporting is that it will provide BEL with information about this important aspect of the new connection process on a more regular basis – rather than only at the time of the Distributor Audit. 2. A check for this Registry data condition has been added to the query Qry_RSICPLIST_ICP_Not_Commissioned_Errors which is run automatically as part of the daily NED database Registry data checks each morning. 3. A check for these Registry data conditions have been included in the new query Qry_RSICPLIST_DG_Checks which is run automatically as part of the daily NED database Registry data checks each morning 4. BEL has significantly developed and improved the existing NED DECOM ICP Event so we are able to more readily identify and process the decommissioning of ICPs. The query Qry_DECOM_Process_Checks_3_B has been added to the automatic daily DECOM process checks. This query identifies ICPs which have recently been shifted to the status 1,6 (INACTIVE Ready for Decommissioning) and for which BEL does not have an existing open NED DECOM Event (ICP decommissioning). Once the NED DECOM process event is created BEL can follow through with the physical and Registry decommissioning process using the NED DECOM process. Alternatively, a NED DECOM event can be created when a decommission job request is received from a Trader. The back log of 77 ICPs with are currently in the status 1,6 will be dealt with separately and we intend to investigate and process these cases over the next 3-6 months. <p>BEL has put a pricing policy in place where all billing corrections & PCC changes will now be back dated on the Registry. Billing corrections will be back dated by more than 3 days only in complex cases which cannot possibly be resolved in less than 3 days. BEL will accept the resulting non-compliance which we have been informed is common place in the industry.</p>	<p>1/5/2019</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p>The recommended Registry data checks have been implemented as discussed above.</p> <p>BEL has put a pricing policy in place where all billing corrections & PCC changes will now be back dated on the Registry. Billing corrections will be back dated by more than 3 days only in complex cases which cannot possibly be resolved in less than 3 days. BEL will accept the resulting non-compliance which we been informed is common place in the industry.</p>	<p>1/5/2019</p>	
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Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: 11.2(2) From: 01-Oct-17 To: 15-Mar-19	Errors not corrected as soon as practicable. Potential impact: Low Actual impact: Low Audit history: None 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 identify most potential discrepancies but not all. The audit risk rating is low as the incorrect initial electrical connection dates are not used directly in the reconciliation process.	
Actions taken to resolve the issue		Completion date
The recommended Registry data checks have been implemented as discussed above (see BEL Comment 2.1).		1/5/2019
Preventative actions taken to ensure no further issues will occur		Completion date
The recommended Registry data checks have been implemented as discussed above (see BEL Comment 2.1).		1/5/2019
		Remedial action status
		Identified

Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.3 With: 11.7 From: 19-Dec-17 To: 16-Jan-19	Nominated trader not provided for 8 ICPs prior to electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the information for 20% of the ICPs electrically connected during the audit period was not provided prior to electrical connection. The audit risk rating is low as the overall volume of ICPs affected is small.	
Actions taken to resolve the issue		Completion date
BEL staff involved in the new connections process (NED NEWCONN ICP Event) have been given clear instructions to ensure that Trader acceptance is received and the Registry is updated with this information prior to electrical connection. Improved monitoring of the new connection process has been implemented.		1/5/2019
Preventative actions taken to ensure no further issues will occur		Completion date
A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.		1/5/2019
		Identified

Timeliness of Provision of ICP Information to the registry manager			
Non-compliance		Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 19-Dec-17</p> <p>To: 16-Jan-19</p>		<p>Registry not updated prior to commencement of trading for eight ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating:3</p>	
Audit risk rating		Rationale for audit risk rating	
Low		<p>The controls are rated as weak as the information for 20% of the ICPs electrically connected during the audit period was not provided prior to electrical connection.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
<p>BEL staff involved in the new connections process (NED NEWCONN ICP Event) have been given clear instructions to ensure that Trader acceptance is received and the Registry is updated with this information prior to electrical connection.</p> <p>A key step taken is the re-introduction of the involvement of the BEL Network Controller in the new connection process. The electrical inspector signing off the new connection must now communicate with the Network Controller before and after electrical connection occurs.</p> <p>Electrical connection cannot proceed unless the Network Controller has a hard copy of the appropriate IECD paper work (BEL Part C Form). This paper work can only be created in the NED NEWCONN process once the Trader has accepted an ICP and a proposed electrical connection date is set.</p> <p>In addition, BEL has made improvements to the monitoring of new connection and on-going staff training.</p>		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.</p>		1/5/2019	

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: 15-Mar-18</p> <p>To: 10-Jan-19</p>	<p>Late population of the initial electrical connection date for six ICPs (15%).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 the discrepancy reporting will identify these, but it will always be reliant on staff actioning these.</p> <p>The audit risk rating is low as the volume of ICPs affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>BEL staff involved in the new connections process (NED NEWCONN ICP Event) have been given clear instructions to ensure that Trader acceptance is received and the Registry is updated with this information prior to electrical connection.</p> <p>A key step taken to ensure the IECD is populated within 10 business days is the re-introduction of the involvement of the BEL Network Controller in the new connection process. The electrical inspector signing off the new connection must now communicate with the Network Controller before and after electrical connection occurs.</p> <p>Electrical connection cannot proceed unless the Network Controller has a hard copy of the appropriate IECD paper work (BEL Part C Form). This paper work can only be created in the NED NEWCONN process once the Trader has accepted an ICP and a proposed electrical connection date is set.</p> <p>In addition, BEL has made improvements to the monitoring of new connection and on-going staff training. Inconsistencies in the first Active and IECD dates are now reported on a monthly basis to give on-going feedback on the performance of our new connections process.</p>		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.</p>		1/5/2019	

Connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 19-Dec-17</p> <p>To: 16-Jan-19</p>	<p>Eight ICPs were connected before proposed trader information was provided to the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating:3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak the information for 20% of the ICPs connected during the audit period was not provided prior to electrical connection.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date
<p>Staff involved in the new connections process (NED NEWCONN ICP Event) have been given clear instructions to ensure that Trader acceptance is received and the Registry is updated with this information prior to electrical connection.</p> <p>A key step taken is the re-introduction of the involvement of the BEL Network Controller in the new connection process. The electrical inspector signing off the new connection must now communicate with the Network Controller before and after electrical connection occurs.</p> <p>Electrical connection cannot proceed unless the Network Controller has a hard copy of the appropriate IECD paper work (BEL Part C Form). This paper work can only be created in the NED NEWCONN process once the Trader has accepted an ICP and a proposed electrical connection date is set.</p> <p>In addition, BEL has made improvements to the monitoring of new connection and on-going staff training.</p>		1/5/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.</p>		1/5/2019
		Identified

Connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 11.17</p> <p>From: 19-Dec-17</p> <p>To: 16-Jan-19</p>	<p>Eight ICPs electrically connected before proposed trader permission was provided.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak the information for 20% of the ICPs connected during the audit period was not provided prior to electrical connection.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date
<p>Staff involved in the new connections process (NED NEWCONN ICP Event) have been given clear instructions to ensure that Trader acceptance is received and the Registry is updated with this information prior to electrical connection.</p> <p>A key step taken to ensure the IECD is populated within 10 business days is the re-introduction of the involvement of the BEL Network Controller in the new connection process. The electrical inspector signing off the new connection must now communicate with the Network Controller before and after electrical connection occurs.</p> <p>Improvements to the new connection process monitoring have been made along with on-going staff training.</p> <p>Reporting of inconsistencies in the first Active and IECD dates to provide monthly performance monitoring.</p>		30/4/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.</p>		1/5/2019
		Identified

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 1/10/17</p> <p>To: 15/03/19</p>	<p>Three address, one network and 16 decommission status updates were updated more than three business days after the event date.</p> <p>Potential impact: None</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 the volume is small and despite the registry being updated using the registry interface the error rate is low.</p> <p>The risk rating is low, as none of the backdated events directly affected reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>BEL has implemented an improved ICP Decommissioning process using the NED DECOM ICP Event. Clear rules/guidelines are now in place for the event dates which are to be used for Registry updates to ensure compliance. Staff training in the use of the NED DECOM process has been undertaken. BEL intends to clear & resolve the historic back log of ICPs in the 'Ready for Decommissioning' status in the coming 3-6 months.</p> <p>BEL has put a pricing policy in place where all billing corrections & PCC changes will now be back dated on the Registry. Billing corrections will be back dated by more than 3 days only in complex cases which cannot possibly be resolved in less than 3 days. BEL will accept the resulting non-compliance which we been informed is common place in the industry.</p> <p>For manual Registry updates using the web interface, human/user error in terms of inputting an appropriate event date is an on-going risk. BEL has previously raised this issue with Jade Software and this led to the Registry update process being changed to indicate if an update is back dated by more than 3 days. BEL requested that a warning be given prior to the update being processed if an update is back dated by more than 3 day, but this was not implemented.</p> <p>BEL has now created a Distributed Generation connection process in the NED database (DGCONN ICP Event) which will allow for better monitoring of this process. This will allow for more active monitoring of the Distributed Generation connection process. Daily Registry data checks are now being used to identify unknown distribution sites by cross-checking against ICPs with PV profiles.</p>		1/5/2019	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>On-going system improvements, process monitoring and staff training.</p> <p>A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.</p>	1/5/2019	

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: 8/10/13</p> <p>To: 15/03/19</p>	<p>One ICP missing distributed generation details.</p> <p>Incorrect and missing initial electrical connection dates.</p> <p>Three price category code updates not recorded with the correct effective dates.</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 the checks in place identify most potential discrepancies but not all.</p> <p>The audit risk rating is low as the discrepancies identified have a minor impact on other participants.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>BEL now has a policy in place that ICPs will no longer be reused for new connections.</p> <p>The 33 ICPs identified with missing IECD's has been rectified. BEL IECD documentation has been located and the IECD's have been entered into the Registry.</p> <p>The 6 ICPs identified with inappropriate IECD's has been rectified (the IECD's have been removed).</p> <p>BEL has put a pricing policy in place where all billing corrections & PCC changes will now be back dated on the Registry. Billing corrections will be back dated by more than 3 days only in complex cases which cannot possibly be resolved in less than 3 days. BEL will accept the resulting non-compliance which we been informed is common place in the industry.</p>		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>On-going system improvements, process monitoring and staff training.</p> <p>A key step to improve BEL's performance is the introduction of KPI's for office & field staff for the completion of paper work, internal NED process updates & associated Registry updates on a timely basis to ensure compliance. Progress against these KPI's will be reported on a monthly basis to Senior Management and the Board.</p>		31/12/2019	

Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 20 Schedule 11.1</p> <p>From: 26/10/05</p> <p>To: 15/03/19</p>	<p>Decommissioning of ICPs not managed as required by this clause.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak as the current process does not ensure that ICPs are decommissioned in a timely manner.</p> <p>The risk rating is low, as the volume of ICPs at this status is relatively small.</p>	
Actions taken to resolve the issue		Completion date
<p>BEL has improved the NED DECOM ICP Event/Process so that ICPs which have recently entered the Registry ‘Ready for Decommissioning’ status are identified. Once a NED DECOM event is created the decommissioning process can be appropriately managed.</p>		1/5/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>BEL intends to resolve & clear the historic back log of ICPs in the ‘Ready for Decommissioning’ status in the coming 3-6 months.</p>		1/12/2019
		Identified