

Compliance plan for Electricity Ashburton Limited – 2019

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 01-May-18 To: 06-Mar-19	Not all practicable steps are taken to ensure that the information provided is complete and accurate. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate overall, as most information is correct and processes are automated. Discrepancies exist in certain areas – application of event dates (which occurred due to data entry errors), the use of new status, generation capacity, and unmetered load. All of the areas listed above have a minor impact on settlement or participants, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Please see relevant section for action taken to resolve issue.		May 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Please see relevant section for Preventative actions taken.		February 2020

Requirement to correct errors	
Non-compliance	Description
Audit Ref: 2.2 With: Clause 11.2(2) and 10.6(2) From: 01-May-18 To: 06-Mar-19	Correction of data does not consistently occur as soon as practicable. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak. Although most information is corrected promptly, some issues have been outstanding for several audits. The issues relating to application of new status and ICPs not recorded on the GIS require site visits to confirm the correct data values.</p> <p>Both issues can have a minor impact on settlement or participants, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Please see relevant section for action taken to resolve issue.		May 2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Please see relevant section for Preventative actions taken.		February 2020	

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: 31-Aug-18</p> <p>To: 14-Dec-18</p>	<p>Registry not updated prior to commencement of trading for five ICPs.</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		
Low	<p>Controls are rated as strong because a small number and proportion of updates (2%) were late.</p> <p>The audit risk rating is low because a very small number of late updates occurred, and they were between one and six calendar days late. Consumption information will be revised by retailers.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are undertaking a review of our process to identify how the breaches occurred.		May 2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
It is expected that after our review has been completed there will be no additional breaches of the requirements.		February 2020	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 17-Oct-18 To: 11-Jan-19	Late population of the initial electrical connection date for seven ICPs. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong at the time of the audit. The last late update occurred in January 2019. This field is used as a source of validation for active and certification dates. There is no impact on settlement but there is a minor impact on participants who use this field in their validation processes. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We are undertaking a review of our process to identify how the breaches occurred.		May 2019
Preventative actions taken to ensure no further issues will occur		Completion date
It is expected that after our review has been completed there will be no additional breaches of the requirements.		February 2020

Connection of ICP that is not an NSP	
Non-compliance	Description
Audit Ref: 3.6 With: Clause 11.17 From: 31-Aug-18 To: 14-Dec-18	Registry not updated prior to commencement of trading for five ICPs. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because a small number and proportion of updates (2%) were late.</p> <p>The audit risk rating is low because a very small number of late updates occurred, and they were between one and six calendar days late. Consumption information will be revised by retailers.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue highlighted occurred due to key staff members involved in the process being on sick leave.		May 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will train additional staff in the process to cover the key staff member when they are on leave.		February 2020	

Management of “new” status			
Non-compliance	Description		
<p>Audit Ref: 3.13</p> <p>With: Clause 13 Schedule 11.1</p> <p>From: 01-May-18</p> <p>To: 08-Apr-19</p>	<p>326 ICPs incorrectly recorded as new.</p> <p>Potential impact: Medium</p> <p>Actual impact: None</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak, because new status is applied incorrectly.</p> <p>There is potentially an impact on settlement for the 11 ICPs which do not have an associated active ICP. The impact is expected to be low because it appears likely that the new ICPs may be disconnected or decommissioned along with the associated ICPs. The other 315 ICPs have their load settled under an active ICP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are undertaking a review of our process to identify how the breaches occurred.		May 2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
It is expected that after our review has been completed there will be no additional breaches of the requirements		February 2020	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-May-18 To: 06-Mar-19	Some price, network, and address changes were backdated. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because are sufficient to ensure that the registry is updated within three business days most of the time. The majority of the late updates occurred early in the audit period. The risk rating is low, because most of the delayed updates were processed within 30 days. Based on the sample checked, the late updates appear mostly due to incorrect application of event dates.		
Actions taken to resolve the issue		Completion date	Remedial action status
EA Networks has put ASB0331 on standby mode. Hence, no ICPs are currently been serviced by this NSP. Moving forward there are no plans to use the ASB0331 to service ICPs. Registry has been amended to reflect this.		May 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Within 12 months EA Networks will decommission ASB0331 and as a result this issue will not exist.		May 2020	

Notice of NSP for each ICP	
Non-compliance	Description
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 06-Mar-19 To: 06-Mar-19	At least four ICPs with an incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate because most ICP to NSP relationships are now managed. There are 250 active ICPs not recorded in QuickMap and there is insufficient information available to confirm the correct NSP.</p> <p>The audit risk rating is low because both relevant NSPs are in the same balancing area, thus reducing the impact on settlement. This year, EA Networks intends to decommission ASB0331 and move the remaining ICPS to ASB0661.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Tracing methodology is being rewritten to enable tracing from ICP to NSP. At completion ICPs will be allocated to the correct NSP.		May 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Extensive back office research and field audits are required to fix and update EA Networks' electrical connectivity model to capture every ICP from load to NSP.		May 2024	

Distributors to Provide ICP Information to the Registry manager	
Non-compliance	Description
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(m) & (p) Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 31-Mar-18</p>	<p>At least two ICPs with incorrect addresses.</p> <p>At least seven distributed generation records do not reflect what is physically installed.</p> <p>At least nine incorrect or missing initial electrical connection dates.</p> <p>Unmetered load type and capacity is not recorded on the registry for some ICPs where EA Networks is aware of the details.</p> <p>Some price, network (including NSP), address, and status changes had incorrect event dates applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 primarily due to the weaker controls over distributed generation and unmetered information.</p> <p>The audit risk rating is recorded as low because the overall number of variances is low and the impact is negligible.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Installation type and generation details – six of seven listed ICPs have been amended however 0000033738EAFE3 solar installation was cancelled, Registry has been amended to reflex this.</p> <p>Unmetered load – EA Network is aware of the existence of unmetered lighting connected to our network as they are shown on the streetlight geo-schematic & in a spreadsheet (although not actively maintained). What is not recorded is the ICP they relate to, Traders hold this information. We research load information on behalf of the Trader when requested.</p> <p>Initial Electrical Connection date - 0000033644EA0A4 record has been amended.</p>	May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Installation type and generation details – When ROI is provided, the registry will be amended with generation details.</p> <p>Initial Electrical Connection date – More attention will be paid in future amending the initial Electrical Connection date.</p>	May 2019	

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
<p>Audit Ref: 4.7</p> <p>With: Clause 7(3)</p> <p>Schedule 11.1</p> <p>From: 17-Oct-18</p> <p>To: 11-Jan-19</p>	<p>Six backdated price category codes for new connections.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>Controls are rated as strong because a small number and proportion of updates (3.7%) were late.</p> <p>There is no impact on settlement and a minor impact on participants; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We are undertaking a review of our process to identify how the breaches occurred.	May 2019	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
It is expected that after our review has been completed there will be no additional breaches of the requirements.	February 2020	

Management of “decommissioned” status			
Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: Clause 20 Schedule 11.1</p> <p>From: 30-Jul-18</p> <p>To: 04-Feb-19</p>	<p>Eight ICPs were not decommissioned from the requested date.</p> <p>Potential impact: Medium</p> <p>Actual impact: None</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 recorded as moderate, because the process should normally ensure that ICPs are decommissioned from the correct date.</p> <p>There is not expected to be an impact on settlement. ICPs must be at inactive ready for decommissioning status prior to being decommissioned.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
An investigation to understand this Issue was undertaken.		May 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Daily reporting will be modified to include a report that monitors ICP that have the “ready for decommissioning” status thus enable prompt decommissioning of ICPs		September 2019	