

## Compliance plan for Network Waitaki – 2019

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Sep-17 To: 31-Dec-18	Some event dates and IECDs not complete and accurate Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We have Included IED Dates to our Data comparison Report which checks for IEDs after ICPs become Active in Registry. In the event of any differences the report will highlight it as an exception for us to fix. This control will assist in Keeping IEDs to correct dates.		Proposed Finish Date 30/3/2019
Preventative actions taken to ensure no further issues will occur		Completion date
As Above		Proposed or actual date
		Identified

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 10-Apr-18</p> <p>To: 12-Apr-18</p>	<p>Ready status updated after trading for ICP 0000460513WTA82.</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	
<b>Low</b>	<p>The controls are recorded as strong because the new connections process is well designed and managed. There was only one exception out of all new connections during the audit period.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Not sure how this happened ( I was in Hospital ) but we received a Wells SR No 2224547 on the 28/3/2018 asking us to fit meter and liven. The Wells job came from AMS SR No 2721149, to get this SR they would have had instructions from the Retailer Genesis prior to 28/3/2018. We failed to update the Registry with the retailer and to put the ICP into the Ready Status. The Retailer had agreed to trade on this ICP before livening date as they wouldn't have issued a Metering SR dated 28/3/2018.</p>		Identified
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We now insist on a Customer nominating a retailer before we will accept a New Connection application and by putting the retailer in the Registry it alters the ICP Status to Ready.</p>		<p>Proposed or actual date</p> <p>1/3/2019</p>

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: 07-Mar-18</p> <p>To: 12-Sep-18</p>	<p>15 late initial electrical connection date updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Network Waitaki has reporting in place to ensure initial energisation dates are provided by contractors in a timely manner. I consider the controls are moderate because there are improvements that can be made to reporting and the level of automation to improve compliance.</p> <p>There is no impact on settlement. The only potential impact is where a trader may wish to compare their Active date to the IED, so the impact is considered minor, leading to an audit risk rating of low.</p>	
Actions taken to resolve the issue		Completion date
<p>We are in the process of adding the IEDs to our Data Comparison report and should have it complete before March end this year.</p> <p>This will provide us with a check that we have loaded our database and the registry with the correct IED and on the correct date.</p>		<p>Proposed or actual date</p> <p>30/3/2019</p>
Preventative actions taken to ensure no further issues will occur		Completion date
AS Above		
		Identified

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 01-Sep-17 To: 31-Dec-18	Updates to registry backdated greater than 3 business days of the event. Some incorrect event dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	I have recorded the controls as moderate because there is room to improve the accuracy of event dates and additional reporting can improve the identification of events where updates are required.  There is a minor impact on participants with late updates. The Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pricing changes have been a cause of our non-compliance forgetting to put in the odd Event date, we are now peer reviewing all changes to help improve our percentage of mistakes.		Proposed or actual date 28/2/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above this will be in place until we update Our Database in a couple of years where we will look at automated the upload.			

Non-compliance	Description		
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 01-Sep-17 To: 22-Feb-19	Two ICPs with incorrect NSPs. 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	Remedial action status
Ran Report to check for discrepancies.		30/3/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Make it Part of our Data Comparison Report			

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1)(o) of Schedule 11.1 From: 02-Oct-17 To: 15-Feb-19	Incorrect registry information for one DG ICP. 80 missing IECDs. 15 incorrect IECDs. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are moderate and have room for improvement There is an impact on other participants because they may rely on these fields as part of their validation. The impact is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Found that one of our bulk Registry updates removed some IEDs. These have been checked and put back in the registry.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our IT Dept commits to check any Bulk uploads before finalising them.			