

Compliance plan for Unison Network Limited 2018

Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: 11.2(1) and 10.6(1)</p> <p>From: 01-Jan-17</p> <p>To: 29-Nov-17</p>	<p>Not all practicable steps are taken to ensure that the information provided is complete and accurate</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 registry discrepancies processes are robust except for ICP status management (monitoring of “new” and “ready” greater than 24 months and ICPs moving to “inactive -ready for decommissioning”</p> <p>The volume of ICPs is low, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Remedial action status
<p>Unison notes the Auditor’s comment that not all practicable steps are taken to ensure that the information provided is complete and accurate. Where possible, we have updated Registry information that has been identified in this audit to the correct information. Specific Registry changes we have made include:</p> <ul style="list-style-type: none"> - Monitoring of ‘new’ and ‘ready’ statuses (section 3.14) - Changes to registry information (section 4.1) - Management of ‘decommissioned’ status (section 4.11) 		<p>Completed</p> <p>Investigating</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
For ICPs that are at “new” and “ready” for greater than 24 months, Unison has implemented monthly monitoring to manage ICP status.	Immediately	
Monthly monitoring of ICPs “inactive - ready for decommissioning” has also been implemented	Immediately	
The connectivity bug in the Gentrack software is currently being reviewed by Gentrack. They have advised that the problem appears to be a base fix affecting all installations (not just Unison’s) and are looking into implementing a fix to cover all versions of the software.	TBA – with Gentrack	

Requirement to correct errors			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: 11.2(2) and 10.6(2)</p> <p>From: 01-Jan-17</p> <p>To: 29-Nov-17</p>	<p>Errors not corrected as soon as practicable.</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 registry discrepancies processes are generally robust, but the NSP change errors identified in the last audit haven’t been corrected.</p> <p>The volume of ICPs is low, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has amended these NSP event dates in the Registry to include the correct dates. However, we note that the 2017 Audit report did not ask Unison to make this change.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Following the completion of the current Distributor Audit and in future Audits, Unison will confirm in writing with the auditor whether any changes to ICP information in the Registry are needed.</p> <p>Unison is also addressing the bigger issue of recording accurate and timely NSP change event dates in the Registry by implementing a systems change. This is discussed in more detail in section 4.1 of the report.</p>		<p>April 2018</p> <p>June 2018</p>	

Provision of ICP Information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.3 With: 11.7</p> <p>From: 15-May-17 To: 30-Nov-17</p>	<p>3 new ICPs electrically connected during the audit period with unmetered load details not recorded in accordance with schedule 11.1.</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 all other details were correctly recorded</p> <p>The audit risk rating is low as only three ICPs were affected during the audit period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has updated the Registry to show the UML details relating to the three ICPs electrically connected during the audit period.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Unison acknowledges that updating the UML details was something that had been overlooked during the New Connections Process. As part of the Continual Improvement Process, the following action has been taken:</p> <ol style="list-style-type: none"> 1. Instructions have been drafted by the new connections team setting out the correct format for loading UML details into the Registry. <p>Unison is considering amending the new connections wizard to allow population of UML, when selected. This would reduce the potential for these fields to be missed.</p>		<p>Completed</p> <p>End of 2018</p>	

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: entire audit period</p>	<p>Registry not updated prior to commencement of trading for 5 ICPs.</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	
Low	<p>Controls are rated as strong because almost all registry updates occurred on time.</p> <p>The audit risk rating is low because a very small number of late updates occurred.</p>	
Actions taken to resolve the issue		Remedial action status
Unison notes the non-compliance findings; however, there is no action we can take to resolve the current issue in the Registry.		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Unison has identified a number of preventative actions in can put in place to help mitigate the likelihood of this issue occurring in the future:</p> <ol style="list-style-type: none"> 1. Implement a full Performance Management Review of third parties (livening agents) who work on our network. The review will investigate more comprehensive agreements with the agents, including agreeing and communicating expectations around timeliness for completion of paperwork and providing this to Unison. Mobile IT solutions will also be scoped to facilitate timely completion. 2. Implement EA's Energisation and Livening Guidelines, once finalised. <p>The connectivity bug in the Gentrack software is currently being reviewed by Gentrack. They have advised that the problem appears to be a base fix affecting all installations (not just Unison's) and are looking into implementing a fix to cover all versions of the software.</p>	<p>End of 2018</p> <p>TBA – EA Timeframes</p> <p>TBA – with Gentrack</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: entire audit period</p>	<p>Late population of the initial electrical connection date for 45 ICPs (4%).</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>Controls are rated as moderate, as they are sufficient to ensure that initial electrical connection dates are accurate and populated on time most of the time.</p> <p>The potential impact is low, of the 45 late updates, 31 were updated within 20 business days of the initial electrical connection date.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Unison notes the non-compliance findings; however, there is no action we can take to resolve the current issue in the Registry.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Unison has investigated this non-compliance and identified two preventative actions that will be undertaken to mitigate the risk of this issue occurring in the future:</p> <ol style="list-style-type: none"> 1. The daily discrepancy reports Unison runs will be used as a prompt to chase confirmation of IED from livening agents, where the check shows that the initial date has been populated by the trader but there is no IED. 2. Implement a full Performance Management Review of third parties (livening agents) who work on our network. The review will investigate more comprehensive agreements with the agents, including agreeing and communicating expectations around timeliness for completion of paperwork and providing this to Unison. Mobile IT solutions will also be scoped to facilitate timely completion. 	<p>Already initiated</p> <p>End of 2018</p>	

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: entire audit period</p>	<p>Two ICPs were electrically connected before proposed trader information was provided to the registry.</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
Low	<p>Controls are rated as strong because almost all registry updates occurred on time.</p> <p>The audit risk rating is low because a very small number of late updates occurred.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Unison has investigated the two ICPs in question, and these had been electrically connected prior to Unison giving approval to connect. We note that there is no further action we can take to resolve this issue.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Unison intends to implement a full Performance Management Review of third parties (livening agents) who work on our network. The review will investigate more comprehensive agreements with the agents, including agreeing and communicating expectations around timeliness for completion of paperwork and providing this to Unison. Mobile IT solutions will also be scoped to facilitate timely completion.	End of 2018	

Monitoring of “new” & “ready” statuses		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: 15 Schedule 11.1</p> <p>From: entire audit period</p>	<p>ICPs greater than 24 months not monitored.</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 moderate as the process is only carried out but only intermittently so there is room for these ICPs to be missed as they age.</p> <p>The audit risk rating is low as the volume of ICPs at greater than 24 months is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Unison has investigated the 24 ICPs identified in the Audit that had been “Ready” for greater than 24 months. Where needed, we have communicated further with relevant Traders regarding these ICPs.	Completed	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Unison acknowledges that the controls around this process have been moderate over the past 12 months. As a preventative action to mitigate the risk of this, we have implemented the running of monthly reports to check for ICPs in new or ready status for greater than 18 months.	Implemented	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8</p> <p>Schedule 11.1</p> <p>From: entire audit period</p>	<p>Some price, network, status, and address changes were backdated</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>Controls are rated as weak as they are not sufficient to ensure that the registry is updated on time most of the time for network, pricing and status events.</p> <p>The risk rating is low, because most of the delayed updates were processed within 30 days. Based on the sample checked, the later updates appear to be mostly due to late paperwork.</p>	
Actions taken to resolve the issue		Remedial action status
Unison acknowledges the non-compliances identified here. However, we note that there is no further action we can take to resolve the non-compliances identified.		N/A
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Unison has responded to each of the non-compliance areas identified by the auditor and set out the preventative actions that will be taken to address these:</p> <ol style="list-style-type: none"> 1. Address Events: <ul style="list-style-type: none"> - Address details were changed manually as a consequence of livening agents not providing the correct information. The Performance Management Review of livening agents will consider issue as part of the review. 2. Network Events (DG): <ul style="list-style-type: none"> - Unison's process to update ICPs following the installation and connection of DG (solar) requires the receipt of paperwork (Certificate of Compliance as provided for in Part 6 and/or import/export metering being installed) before making any registry changes, effectively prioritising accuracy over timeliness. The alternative would be to update the registry following approval of DG applications, however this would result in registry be updated to record DG even where installation does not go ahead which is frequently the case. We consider our current approach is appropriate; however, we will provide feedback on suggested improvements to Part 6 of the Code (Distributed Generation), when the EA commences its review in the second quarter of 2018. 3. Change of NSP <ul style="list-style-type: none"> - Unison notes the Auditor's findings. We are in the final stages of testing a system change that will allow full integration between the ADMS real time monitoring system and Gentrack, so that updates to NSPs flow through to Gentrack daily. We will be undertaking a material change audit prior to this going live. 4. Pricing Events <ul style="list-style-type: none"> - As noted by the Auditor, Unison has proposed a code change to allow backdating of pricing events, providing there is agreement between the distributor and retailer. This change was not included in the EA's latest code review, but we have been advised by the EA that it will be consulted on as part of another review sometime in 2018. 5. Status Events: <ul style="list-style-type: none"> - Unison has implemented a review of monthly ICP status reports, including ICPs that are 'inactive – 	<p>End of 2018</p> <p>July 2018 (TBC)</p> <p>June 2018</p> <p>End of 2018</p> <p>Implemented</p>	
---	--	--

<p>ready for decommissioning' and 'decommissioned'. These will be reviewed to actively reduce the timeliness of event changes.</p> <ul style="list-style-type: none"> - Unison has already commenced a thorough review of its decommissioning process to provide assurance for the safe permanent disconnection of points of supply, and to actively manage and reduce the number of 'ready for decommissioning' ICPs on the network. The review will clearly articulate responsibilities and expectations around timeframes, communications to/from traders, and ensure that business processes support this. 	June 2018	
---	-----------	--

Notice of NSP for each ICP			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clauses 7(1),(4) and (5) Schedule 11.1</p> <p>From: entire audit period</p>	<p>One existing ICP with an incorrect NSP recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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 the GIS clearly identifies transformer and therefore NSP connection point.</p> <p>The audit risk rating is low as only one ICP was found to be mis-mapped.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has investigated this ICP and we have amended the Registry to reflect the correct NSP.		Complete	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
In addition to the investigation into determining whether there are any other historic mis-mapped ICPs, Unison has also requested Gentrack to fix the connectivity issue between GIS and Gentrack. Gentrack has advised that the problem appears to be a base fix affecting all installations (not just Unison's) and are looking into implementing a fix to cover all versions of the software.		TBA – with Gentrack	

ICP location address			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 2</p> <p>Schedule 11.1</p> <p>From: entire audit period</p>	<p>One ICP does not have a physical address unit number, street number, property name or GPS coordinates to allow it to be readily located.</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		
Low	Controls are rated as strong and the risk as low, because only one ICP had an address that could not be readily located.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison has updated the location address details of this ICP.		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Unison has good controls in place to ensure that ICPs can be readily located (e.g. automatically populating GXP co-ordinates when ICPs are created). We believe our controls are sufficient to prevent this issue from occurring in the future.		N/A	

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: entire audit period</p>	<p>Known unmetered load not recorded and three incorrect initial electrical connection 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	The controls are rated as moderate as Unison mitigate risk most of the time but there is room for errors to occur, specifically in relation to the recording of unmetered load. The audit risk rating is recorded as low as the overall number of variances is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unmetered Load: where known unmetered load has been identified in the audit but not recorded, Unison has updated this in the Registry to include the unmetered load details. During this process, a couple of other instances were discovered dating back 2-3 years where this information had been missing. On the auditor’s advice, this information was updated using the creation date as the ‘effective’ date. Initial Electrical Connection Date: Unison has investigated ICP 0000039547HRBAA and it determined that the Trader had updated the Registry with the incorrect information. The Registry has subsequently been amended by the Trader to include the correct date of 21/3/2017.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Unison will implement the following preventative actions to reduce the likelihood of this non-compliance occurring again in the future: <ul style="list-style-type: none">Generation: Despite being compliant with changes to the metering status for the connection of DG, Unison intends to run a further monthly report (PR255) to identify PV profiles in the meter register details.Unmetered Load: As noted in response to section 3.3, Unison has taken the following action as part of our Continual Improvement Process:<ol style="list-style-type: none">A review of fields to be populated has been clarified with the New Connections TeamUpdates to the New Connections wizard are being investigated to determine whether this process can be automated. Initial Electrical Connection Date: The accuracy of initial electrical connection dates will be investigated fully in our Performance Management Review of third parties (livening agents) who work on our network. This work will be supported by the Electricity Authority’s Guidelines on Livening and Energisation which are due out for consultation later in 2018.		Implemented <	

Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: 20 Schedule 11.1</p> <p>From: entire audit period</p>	<p>Status mismatch between Gentrack and the Registry for four ICPs.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 breach risk rating is weak as ICPs in this status are not monitored regularly and the Gentrack bug means status mismatches are not being identified.</p> <p>The audit risk rating is low as these are decommissioned ICPs and are therefore no longer being reconciled.</p>	
Actions taken to resolve the issue		Completion date
Unison has investigated the ICP 0005001096TU797 is continuing to work with the retailer to determine the correct status for this ICP.		April 2018
		Investigating

Responsibility for metering information for NSP that is not a POC to the grid			
Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: 10.25(1)(b)</p> <p>From: 13-Apr-17</p> <p>To: 12-Jul-17</p>	<p>Site not certified between 17/4/17- 12/7/17.</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 site once certified was updated in the correct timeframe but was certified late.</p> <p>The audit risk rating is low as this affected only one gate meter and no defects were found when recertifying so there was no direct impact on reconciliation</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The reconciliation manager portal shows that certification was due on 17 April 2017 however, test house records submitted to the Authority state that the recertification did not occur until 12 July 2017. On 6 August 2017 the reconciliation manager was notified through the portal. This was inside twenty days of the actual recertification date.		Completed	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
To provide enhanced oversight and assurance of this obligation Unison will discuss with Trustpower (its delegated reconciliation participant for Atiamuri) and Mercury (the MEP) the formal inclusion of certification and notification processes and responsibilities in the arrangements between the parties for Atiamuri.		End of 2018	