

Compliance plan for Wellington Electricity Lines Limited

Title: Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2(1) From: entire audit period	Complete validation of registry information does not occur. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate and the audit risk rating is low. The automated registry update process and daily detection of any records not sent to the registry help to ensure that GTV will be consistent with the registry, although full validation processes are not in place.		
Actions taken to resolve the issue		Completion date	Remedial action status
Data matching is currently performed by We*. This process will be enhanced by including additional fields to meet the auditor's recommendation.		31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Actively reviewing these lists and correcting any exceptions		15/1/2018	

Title: Requirement to correct errors	
Non-compliance	Description
Audit Ref: 2.2 With Clause 11.2(2) From: entire audit period	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, some data issues have been outstanding for over a year. In most cases some progress has been made.</p> <p>The risk is rated as low, typically small numbers of ICPs are affected, and/or the data has a low impact.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Exception lists produced by the data reconciliation process will be actioned on a monthly basis.		31/12/2017	Identified
Priority completion timeframes will be assigned for specific work types to ensure compliance with regulated timeframes.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Actively reviewing these lists and correcting exceptions		15/1/2018	

Title: 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: entire audit period</p>	<p>Registry not updated prior to commencement of trading.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because they are sufficient to prevent late updates most of the time. The audit risk rating is low because a very small number of late updates occurred.		
Actions taken to resolve the issue		Completion date	Remedial action status
A weekly exception report is being developed in GTV that will identify any ICP's assigned as New or that does not have a Trader.		30/04/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We* will then update any new ICP's from New to Ready and add Trader details where required.	1/5/2018	

Title: Timeliness of Provision of Initial Energisation 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>Non-population and late population of the initial energisation date.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as weak, as they are unlikely to ensure that initial energisation dates are accurate and populated on time.</p> <p>The potential impact is high, because Wellington Electricity is not always aware of when ICPs on its network are energised. Traders relying on the initial energisation date to determine when the ICP becomes active may make inaccurate reconciliation submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Weekly extraction of data from registry and matching with GTV to identify status changes. Manual update of GTV, which will update the registry overnight.		28/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Actively reviewing these lists and correcting exceptions		14/3/2018	

Title: Connection of ICPs			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: entire audit period</p>	<p>Five ICPs were energised before proposed trader information was provided to the registry, and 18 ICPs were energised before the trader could accept responsibility for the ICP on the 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>Controls are rated as moderate as they are sufficient to mitigate the risk of an ICP being energised before a trader is proposed on the registry, but there is room for improvement.</p> <p>The risk rating is rated as low because a relatively small number of ICPs are affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Document a procedure to ensure that consistent and accurate processes are followed for this process.		31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Actively reviewing to ensure compliance.		15/1/2018	

Title: Management of "new" status			
Non-compliance	Description		
<p>Audit Ref: 3.12</p> <p>With: Clause 13</p> <p>Schedule 11.1</p> <p>From: entire audit period</p>	<p>ICP 0001436704UNB04 is incorrectly recorded with new status, it should be decommissioned.</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 under normal circumstances; the new status is rarely applied and there are controls to ensure it is applied correctly for new ICPs. The issue occurred due to a data migration issue when changing from Gentrack to GTV, and has not been updated.</p> <p>The audit risk rating is low, because only one ICP is affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Already actioned		10/11/2017	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Already actioned		23/11/2017	

Title: Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: entire audit period</p>	<p>Some price, network, status, and address changes were backdated more than three business days.</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>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 data corrections.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Update the existing procedure to check for any requests which would breach the compliance and communicate these as rejected orders to the Trader.		31/12/2017	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Activity reviewing these lists and correcting	15/1/2018	

Title: 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>Some existing ICPs have an incorrect NSP recorded.</p> <p>Potential impact: Medium</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>Controls are rated as strong, as they are sufficient to ensure that ICPs created by Wellington Electricity will have the correct NSP assigned most of the time. The incorrect NSPs appear to be largely historic, and Wellington Electricity intends to cleanse this data.</p> <p>The impact is low. For reconciliation purposes all Wellington Electricity's NSPs are in the WELLTONUNETG balancing area. It is possible affected ICPs may not be correctly identified where there are outages or maintenance work is carried out, so the potential impact is rated as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As identified by the auditor these are historical. These have been identified and will be corrected.		31/03/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
These have been identified and will be corrected.		31/3/2018	

Title: ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: entire audit period</p>	<p>There are 2257 active ICPs with duplicate addresses, and 229 active ICPs without a physical address unit number, street number or property name to allow them to be readily located.</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>Controls are rated as moderate, as they are sufficient to ensure that new ICPs created by Wellington Electricity will not have incomplete or duplicate addresses most of the time, but there is some room for improvement.</p> <p>The impact is low because in most cases address information is correct. The incomplete and duplicate addresses appear to be largely historic, and Wellington Electricity intends to cleanse this data.</p>	
Actions taken to resolve the issue		Completion date
<p>Data will be extracted from both the registry and GTV to identify those ICPs which need to be resolved.</p> <p>Due to the large volume of data, we will target the first 200 ICP's to be updated by 31/01/2018 with the balance to follow in the coming months.</p>		31/06/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>A manual check and system exception highlighting occurs to identify potential duplicate records. We will then reject the application and request clarifying details from the Trader.</p> <p>Missing data from New ICP applications causes these to be rejected by us.</p> <p>Both scenarios are included within our procedural instructions.</p>		Process already used.
		Identified

Title: Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: entire audit period</p>	<p>Some unmetered load and energisation information provided to the registry is incorrect.</p> <p>Potential impact: High</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>Controls are rated as weak, because controls are insufficient to ensure that initial energisation dates are populated correctly and unmetered load is recorded.</p> <p>The potential impact is high, because Wellington Electricity is not always aware of when ICPs on its network are connected. Traders relying on the initial energisation date to determine when the ICP becomes active may make inaccurate reconciliation submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Liaison with district councils to be conducted to investigate options to address historical issues.		31/3/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Investigation to commence to identify options for how to address any new applications for the connection of private lights.		1/6/2018	