

## Compliance plan for Vector

Non-compliance	Description		
Audit Ref: 2.2 With: 11.2(2) of Part 11  From: 16-Aug-16 To: 31-Aug-17	Incorrect data is proactively corrected but there are some outstanding issues identified in the last audit  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>	Audit risk rating is assessed as low because Vector proactively pursue data correction. It is just matter of time and resources. No impact on settlement outcomes. The controls we assessed as moderate, many monitoring reports have been put in place but they need to be refined		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> <li>Daily monitoring of EA files</li> <li>Comparison reports between all Vectors systems and registry to ensure data accuracy.</li> <li>Clean up of old data discrepancies</li> <li>Dedicated resource hired to clean up data</li> </ul>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
On Going			

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1  From: 16-Aug-16 To: 31-Aug-17	Initial Electrical Connection Date for around 100 ICPs is updated on the registry later than 10 business days.  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>	It is the company policy that traders are obligated to inform Vector when an installation is electrically connected. Some traders do not fulfil their obligation therefore Vector is non-compliant because Initial Electrical Connection Date is not populated or it is provided later than 10 business days. We have recorded the controls as moderate. The company monitors this area regularly but the outcomes are not as desired. The impact on participants is none, therefore audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> <li>Continual monitoring and notification of missing data.</li> <li>Escalated to retailer's multiple times for energisation data.</li> <li>Monitoring of EA Registry for when these sites are made Active with no data received.</li> <li>2 x automatic reminders sent to retailers requesting the data.</li> </ul>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As Above			

Non-compliance	Description		
Audit Ref: 3.6 With: 11.17  From: 16-Aug-16 To: 31-Aug-17	13 ICPs were connected without a trader being recorded in the registry as accepting responsibility for the ICP  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>	We have recorded the controls as Strong in this area because a very small number of ICPs did not meet compliance. There is always room for improvement, especially if on a monthly basis Vector creates close to 1,000 ICPs. Minor impact on settlement outcomes therefore audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status

<ul style="list-style-type: none"> <li>Report is being built to monitor the registry status of New.</li> </ul>	Within 6 months	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
On Going		

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1  From: 16-Aug-16 To: 31-Aug-17	Number of updated to registry information are later than 3 business days. The most backdated transactions are related to decommissioned ICPs  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>	The controls are recorded as moderate. Vector has processes and guidelines, which are followed. It is a dilemma to comply with clause 11.2 or clause 8 of Schedule 11.1. Audit risk rating in this area is recorded as low. For number of years Vector is always found non-compliant because of late updated of price code requested by traders. It is believed that overall the impact is minimal on traders. Incorrect data provided by traders caused more changes to amount paid by them		
Actions taken to resolve the issue		Completion date	Remedial action status
Currently running a decommission improvement project. <ul style="list-style-type: none"> <li>Once registry is updated to Inactive – ready for decommissioning Vector will be automatically notified so we can immediately update status.</li> <li>Automatic follow ups to retailers where they haven't updated the registry status within 5 &amp; 10 days of decommission notification.</li> </ul>		Nov 2017	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
On Going			

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 31-Aug-17</p>	<p>Addresses for 1,439 ICPs do not allow the ICP 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		
<b>Low</b>	<p>We have recorded the controls as moderate based on the project in place to address it. It has been a long term project and hopefully it will be finished within the next 12 months. The implementation of Velocity did not help but problems are expected when a new software is implemented. The impact on customers is minor, no impact on settlement outcomes. We identified audit risk rating as low because the impact on participants or settlement is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> <li>Dedicated resource continues to clean this data up and correct the addresses.</li> <li>Reports built to monitor the data between all systems</li> </ul>		Nov 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As Above			

Non-compliance	Description		
Audit Ref: 4.6 With: 7(1) of Schedule 11.1  From: 16-Aug-16 To: 31-Aug-17	Information is missing or incomplete for a relatively small number of ICPs, taking into account the total number of ICPs managed by Vector.  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>	Information is missing or incomplete for a relatively small number of ICPs. Vector is working proactively to address it but it takes time. We have recorded the controls as moderate based on the projects in place to address it. No impact on customers and minor impact on traders therefore audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> <li>Report being built to show us these customers</li> <li>Letter being drafted to send to these customers.</li> </ul>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As Above			

Non-compliance	Description		
Audit Ref: 6.7 With: 4 of Schedule 11.2  From: 29-May-17 To: 31-May-17	The Authority was notified one day later than specified, of the transfer of ICPs from Selwyn Village to the Vector's network.  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>	<p>Transfer of ICPs back to the Vector network because of an embedded network being disestablished does not happen often. There is no written process in place. In this case Vector relied on assistance from the Authority, which was very helpful. Our comment is that overall the process as such is very cumbersome and for “new comers” very confusing.</p> <p>The impact on other participants is none; the audit risk rating is low. The controls we recorded as moderate because they are not documented but working together with EA resulted in very minor non-compliance</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> <li>Ensure process is followed accurately in the future.</li> </ul>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As Above			