

Compliance plan for Auckland International Airport Limited

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) From: 01-Sep-16 To: 31-Aug-17	44 active ICPs with missing initial energisation dates. Potential impact: None Actual impact: None Audit history: Multiple Controls: Weak Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
Low	This issue has been evident in the last 2 audits and is an issue for Vector, hence controls are weak. The audit risk rating is low as the missing information has no direct impact on settlement.	
Actions taken to resolve the issue		Completion date
See remedial actions noted in Section 4.6		31/10/17
Preventative actions taken to ensure no further issues will occur		Completion date
See preventative actions noted in Section 4.6		Ongoing
		Identified

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: 11.2(2) From: 01-Sep-16 To: 31-Aug-17	Corrections not supplied as soon as practicable. Potential impact: None Actual impact: None Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	This issue has been evident in the last 2 audits and is an issue for Vector, hence controls are weak. The audit risk rating is low as the missing information has no direct impact on settlement.	
Actions taken to resolve the issue		Completion date
See remedial actions noted in Section 4.6		31/10/17
Preventative actions taken to ensure no further issues will occur		Completion date
See preventative actions noted in Section 4.6		Ongoing
		Identified

Timeliness of Provision of Initial Energisation Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Sep-16</p> <p>To: 31-Aug-17</p>	<p>The event date populated to the registry for IED updates is not the IED date.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</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 as level of error is high and this has been evident in the AIAL audit since this requirement came into effect.</p> <p>There is no impact on settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>The identified ICPs have been investigated. The registry has been updated to align the effective date and the IED date.</p> <p>The 48 IEDs populated on 10/2/17 was a remedial action from the previous audit relating to 2014 – 2015.</p>		21/9/17
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL will monitor its activities to ensure its obligations are being met.		Ongoing
		Identified
		No further action

Monitoring of “new” & “ready” statuses		
Non-compliance	Description	
Audit Ref: 3.13 With: 15 Schedule 11.1 From: 01-Sep-16 To: 31-Aug-17	ICPs at the “New” and “Ready” for greater than 24 months are not managed Potential impact: Low Actual impact: None Audit history: Multiple Controls: None Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
Low	There is no process in place to manage ICPs at these statuses as they age. The volume of ICPs affected is low therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The 4 ICPs have been investigated. Changes are updated on the registry.		21/9/17
Preventative actions taken to ensure no further issues will occur		Completion date
A new process to monitor ICPs at “New” & “Ready” on a monthly basis has been established.		30/9/17
		Identified

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 Schedule 11.1</p> <p>From: 01-Sep-16</p> <p>To: 31-Aug-17</p>	<p>Registry not updated within three days of the event.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are weak as almost half of the pricing updates to the registry were late.</p> <p>The audit risk rating is low as the volume of ICPs affected were small and therefore the impact on settlement will be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The 18 pricing events updated more than three business days that are recorded as non-compliant are now historic.</p> <p>AIAL does not disagree that these were non-compliant</p>		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A closer AIAL inter-department focus including pricing events has been introduced recently to ensure backdating does not occur.</p> <p>AIAL will monitor its new processes closely to ensure its obligations are being met.</p>		Ongoing	

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: 2 Schedule 11.1</p> <p>From: 01-Sep-16</p> <p>To: 31-Aug-17</p>	<p>3 ICPs with duplicate addresses.</p> <p>1 ICP not readily locatable.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as there is no process in place to ensure duplicate addresses are not created.</p> <p>The audit risk rating is low as this affects four of 585 ICPs that AIAL are responsible for.</p>	
Actions taken to resolve the issue		Completion date
The 3 identified 'duplicate address' ICPs within the international and domestic terminals have been updated on the registry to include a "unit" name thereby ensuring location.		21/9/17
The registry has been updated for the 1 identified 'not readily locatable' ICP to now show the actual address		21/9/17
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL will monitor its activities to ensure population of the registry for new ICPs includes the use of readily locatable addresses.		Ongoing
		Identified

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: 7(1) Schedule 11.1</p> <p>From: 01-Sep-16</p> <p>To: 31-Aug-17</p>	<p>Initial energisation date not populated for 44 ICPs.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>This is an issue identified in the Vector report with weak controls.</p> <p>The audit risk rating is low as this has no direct impact on settlement.</p>	
Actions taken to resolve the issue		Completion date
<p>AIAL has commenced a review of the 11 and 33 earlier omitted ICPs identified to populate the IED. 5 of these have already been updated on the registry</p> <p>Regards ICP 0000021334AA349, AIAL will liaise with the retailer to determine if DG is present, or if the meter channel is recorded incorrectly as injection, and update the registry accordingly.</p>		<p>31/10/17</p> <p>31/10/17</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Third party obligations associated with timely provision of ICP information will be enforced, with AIAL ensuring this information is updated on the registry to meet its obligations.</p>		Ongoing
		Identified

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.8 With: 10.25(3) From: 01-Sep-16 To: 31-Jul-17	Meter not certified until May 2017 and not notified to the RM Potential impact: Low Actual impact: None Audit history: Once Controls: None Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls as rated as weak as no notification to the RM was provided The audit risk rating is low as the meter is certified.	
Actions taken to resolve the issue		Completion date
RM will receive notification of the recertified site including: <ul style="list-style-type: none"> the reconciliation participant for the NSP the participant identifier of the metering equipment provider for the metering installation the certification expiry date of the metering installation 		30/9/17
Preventative actions taken to ensure no further issues will occur		Completion date
AIAL will initiate a formal arrangement with the MEP to ensure that the RM does receive notification for each NSP recertification from the MEP, or AIAL.		31/11/17
		Identified