

Compliance plan for The Power Company Limited

Non-compliance	Description		
<p>Audit Ref: 2.1 With: 11.2(1)</p> <p>From: 01-Aug-16 To: 30-Jun-17</p>	<p>Information about embedded generation is not complete and UML ICPs info is not updated following traders update</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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	Overall processes are good, weak area is embedded generation, small ICPs on wrong NSP but the same balancing area		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML – A number of ICPs with trader UML on the registry were investigated. This was generally historic UML, and most were found to have details recorded in the PowerNet ICP d/b but had not uploaded to the registry. This was corrected. A smaller number were queried with traders and found their registry data was incorrect and would be removed.</p> <p>DG – DG installers have always been very tardy in return completion notifications, despite many follow-ups. Historic records of approved applications were searched and the registry updated for those ICPs.</p>		25/8/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>DG – From the beginning of August 17 electronic processing has been introduced to automatically update the registry with DG details when an application for connection of DG is approved.</p>		11/8/17	

Non-compliance	Description		
Audit Ref: 3.6 With: 11.17 From: 01-Aug-16 To: 15-Aug-17	ICP 0001819219TPB5D, it is connected without a trader recorded in the registry Potential impact: Low Actual impact: Low Audit history: Once before Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Audit risk is assigned as low because it is related to 2 ICPs. One ICP is connected but not metered		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments against clause 3.8 below			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See comments against clause 3.8 below			

Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: 10.31</p> <p>From: 01-Aug-16</p> <p>To: 30-Jun-17</p>	<p>ICP 0001819219TPB5D, was connected without a trader requesting connection</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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	The temperature display takes only 100W, it contributes to UFE.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This ICP has been in this state for a long period. While it was being managed under the normal PowerNet new connection process it is unknown how it actually got connected.</p> <p>Ironically the situation with this ICP has been compounded by a complex issue where the connection was for the Gore District Council but The Power Company itself will actually become the customer – under a very historic contract for power supply at a penny a unit. There has been an internal failure between PowerNet and The Power Company for the account to be arranged with a trader. This is presently being taken up with The Power Company's trader and it will be resolved.</p>		In progress	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
It is believed present processes are much more robust and would prevent the connection being energized without a trader being involved.		31/8/17	

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 01-Aug-16</p> <p>To: 30-Jun-17</p>	<p>Registry information not updated within 3 business days</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three time before</p> <p>Controls: Weak</p> <p>Breach risk rating:</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Our audit risk rating is low because backdating of price codes has no financial impact. Addresses and statuses are well managed. There is no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Whenever data updates are identified the effective date is also considered, and they will be backdated if that is the most correct.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Difficulties have arisen due to back-population of IED from historic records, because PowerNet had for many years prior to 2013 (implementation of IED) been recording the initial livening date for new connections. With that field already in the data structure PowerNet began to use it for IED from 2013. Difficulty arose from the registry's handling of the historic data being sent with present day updates, i.e. pre 2013 IED dates being sent.</p> <p>It is believed this issue is now resolved to prevent these data issues with the registry.</p>		31/8/17	

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.2 From: 01-Aug-16 To: 30-Jun-17	Duplicate addresses for 4 ICPs Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Only 4 ICPs, corrected during the audit		
Actions taken to resolve the issue		Completion date	Remedial action status
The duplicate addresses were investigated and corrected immediately they were identified.		25/7/17	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
These were historic ICPs that must have been overlooked in original checks of the whole database for duplicate addresses.		25/7/17	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Aug-16</p> <p>To: 30-Jun-17</p>	<p>Incorrect or lack of information in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium			
Actions taken to resolve the issue		Completion date	Remedial action status
<p>UML – A number of ICPs with trader UML on the registry were investigated. This was generally historic UML, and most were found to have details recorded in the PowerNet ICP d/b but had not uploaded to the registry. This was corrected. For ELIN all of, and on other networks small number, were queried with traders and found their registry data was incorrect and would be removed.</p> <p>DG – DG installers have always been very tardy in return completion notifications, despite many follow-ups. Historic records of approved applications were searched and the registry updated for those ICPs.</p>		25/7/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>DG – From the beginning of August 17 electronic processing has been introduced to automatically update the registry with DG details when an application for connection of DG is approved.</p>		11/8/17	